

RCRA Inspection Report

1) **Inspector and Author of Report**

Robert S. Nakamoto, P.E., CHMM
Environmental Engineer
Phone: 404-562-9341
nakamoto.robert@epa.gov

U.S. Environmental Protection Agency, Region 4
Enforcement and Compliance Assurance Division
Chemical Safety and Land Enforcement Branch
RCRA Enforcement Section
61 Forsyth Street, S.W.
Atlanta, Georgia 30303

2) **Facility Information**

Georgia Pacific Wood Products LLC
8250 Sumter Highway
Alcolu, South Carolina 29001

EPA ID: SCR000772178
NAICS: 321219 – Reconstituted Wood Product
Manufacturing

3) **Responsible Official**

Ross Reed
Environmental Manager
Georgia Pacific Wood Products LLC
8250 Sumter Highway
Alcolu, South Carolina 29001
ross.reed@gapac.com

4) **Inspection Participants**

Jim Motes, Georgia Pacific Wood Products LLC
Ross Reed, Georgia Pacific Wood Products LLC
Tom Richmond, South Carolina Department of Environmental Services (SCDES)
Earle Watson, SCDES
Doug Nunnally, SCDES
Robert S. Nakamoto, U.S. Environmental Protection Agency (EPA), Region 4

5) **Date and Time of Inspection**

June 25, 2024, at 9:30 a.m. EDT

6) **Applicable Regulations¹**

South Carolina Hazardous Waste Management Act (SCHWMA), S.C. Code Ann. Section 44-56-30, as amended; [Resource Conservation and Recovery Act (RCRA) Sections 3002-3005 (42 U.S. Code – Annotated U.S.C.A. 6925 and 6927)], South Carolina Hazardous Waste Management Regulations (SCHWMR), S.C. Code Ann. Regs. 61-79.260-270, 61-79.273, 61-79.279 [40 Code of

¹ As the State's authorized hazardous waste program operates in lieu of the federal RCRA program, the citations of those authorized provisions will be to the authorized State program. However, for ease of reference, the federal citations will follow in brackets.

Federal Regulation (C.F.R.), Parts 260 - 270, 273, 278, & 279], and Hazardous Waste Permit Number SC8170022620, pursuant to Section 44-56-10 et seq. S.C. Code Ann. Regs. 61-79 of the 1976, as amended.

As the State's authorized hazardous waste program operates in lieu of the federal RCRA program, the citations of those authorized provisions alleged herein will be to the authorized State program; however, for ease of reference, the federal citations will follow in brackets. Resource Conservation and Recovery Act (RCRA) Sections 3002, 3005 and 3007 (42 U.S.C. §§ 6922, 6925 and 6927), and the regulations promulgated pursuant thereto at 40 Code of Federal Regulations (C.F.R.) Parts 260-270, 273 and 279.

Pursuant to S.C. Code Ann. Regs. 61-79.262.17(a) [40 C.F.R. § 262.17(a)], a large quantity generator (LQG) may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status, as required by Section 44-56-60(a)(2) and (b) of the SCHWMA, S.C. Code Ann. § 44-56-60(a)(2) and (b) [Section 3005 of RCRA, 42 U.S.C. § 6925], provided that the generator complies with the conditions listed in S.C. Code Ann. Regs. 61-79.262.17(a) [40 C.F.R. § 262.17(a)] (hereinafter referred to as the "LQG Permit Exemption").

Pursuant to S.C. Code Ann. Regs. 61-79.262.15(a) [40 C.F.R. § 262.15(a)], a generator may accumulate as much as 55 gallons of non-acute hazardous waste and/or either one quart of liquid acute hazardous waste at or near the point of generation where wastes initially accumulate, which is under the control of the operator of the process generating the waste, without a permit or without having interim status, as required by Section 44-56-60(a)(2) and (b) of the SCHWMA, S.C. Code Ann. § 44-56-60(a)(2) and (b) [Section 3005 of RCRA, 42 U.S.C. § 6925], provided that the generator complies with the satellite accumulation area conditions listed in S.C. Code Ann. Regs. 61-79.262.15(a) [40 C.F.R. § 262.15(a)] (hereinafter referred to as the "SAA Permit Exemption").

Pursuant to S.C. Code Ann. Regs. 61-79.273.9 [40 C.F.R. § 273.9], a "Small Quantity Handler of Universal Waste" (SQHUW) is a Universal Waste handler who does not accumulate 5,000 kilograms or more of Universal Waste (batteries, pesticides, mercury-containing equipment, or lamps, calculated collectively) at any time.

Pursuant to S.C. Code Ann. Regs. 61-79.273.14(a) [40 C.F.R. § 273.14(a)], an SQHUW must label or mark the universal waste to identify the type of universal waste.

Pursuant to S.C. Code Ann. Regs. 61-79.273.15(c) [40 C.F.R. § 273.15(c)], an SQHUW who accumulates universal waste must be able to demonstrate the length of time that universal waste has been accumulated from the date it became a waste or is received.

7) Purpose of Inspection

The purpose of the inspection was to conduct an unannounced RCRA compliance evaluation inspection (CEI) to determine the compliance of Georgia Pacific Wood Products LLC with the applicable regulations. This was an EPA lead inspection supported by SCDES.

8) Facility Description

Georgia Pacific Wood Products LLC is a subsidiary of Georgia-Pacific (GP). GP is a subsidiary of Koch Industries. GP has approximately 30,000 employees and Koch Industries has approximately 130,000 employees. Georgia-Pacific (GP) was founded in 1927 in Augusta, Georgia, and presently has over 150 GP locations in different nations. GP has locations in thirty states in the U.S. GP's products include, but are not limited to, building products (lumber, plywood, Orientated Strand Board, gypsum products, etc.), cellulose, paper consumer products (paper towels, paper plates, etc.), dispensers, and recycling equipment.

The Georgia-Pacific Wood Products LLC (Georgia Pacific) Clarendon facility produces Oriented Strand Board (OSB). The process starts with harvested trees that are transported to the facility where their bark is removed. The logs are cut into strands, thin flakes of wood, that are dried in two dryers. The dryers are heated with the exhaust of two 334 million BTU/hour wood fired furnaces. Once the strands are dry, they are coated with resin, formed into large mats, that are then compressed to the desired thickness in a high temperature press to create a structural panel. The large panels of OSB are then trimmed, and cut to size, normally 4' X 8' sheets. Trimmed material is either recoated with resin to be put back into the board or is used as furnace fuel.

The facility is on 947 acres with a roofed area of 451,000 square feet. Georgia Pacific employs approximately 160 employees. The facility is in constant production seven days per week excepting periodic maintenance shutdowns.

Georgia Pacific's most recent Hazardous Waste Generator Notification, dated 1/01/2023, characterized the facility as a Large Quantity Generator (LQG) of hazardous waste. Over the past twenty years the facility has fluctuated between being a Very Small Quantity Generator (VSQG) and an LQG. Georgia Pacific may generate hazardous waste streams, spent aerosol cans, used oil, universal lamps and batteries, and other wastes. The hazardous waste may be designated with one or more of the following EPA Waste Codes: D001, D002, D008, D035, and F003.

9) Previous Inspection History

This was Georgia Pacific Wood Products LLC's first CEI. SCDES conducted a Compliance Assistance Visit on 10/01/2010.

10) Opening Conference

On June 25, 2024, EPA inspector Robert Nakamoto, accompanied by South Carolina Department of Environmental Services (SCDES) inspectors Tom Richmond, Earle Watson, and Doug Nunnally arrived at Georgia Pacific at approximately 9:30 a.m., and registered at the security gate. Ross Reed, the facility's Environmental Manager, came to the security area escorted the inspection team to the parking area, and then to a conference area. The inspectors introduced themselves, showed their credentials to the representatives, and

explained the purpose of the inspection. Jim Motes, the Plant Manager, joined the opening conference.

The inspectors described the anticipated use of a digital camera during the inspection and discussed the request for records. The EPA inspector explained that the Small Business Regulatory Enforcement Fairness Act's classification of a "small business" is generally set by the Small Business Administration using the business' SIC/NAICS code and annual receipts or number of employees. A copy of the EPA's information sheet for small businesses can be found at <https://www.epa.gov/sites/production/files/2017-06/documents/smallbusinessinfo.pdf>. The EPA inspector also discussed the company's ability, pursuant to 40 C.F.R. § 2.203, to assert a business confidentiality claim for information submitted to the EPA. The company did not assert a business confidentiality claim. The facility did not appear to qualify as a small business.

Mr. Reed and Mr. Motes provided an overview of the facility's history and current operations during the opening conference. The inspection participants also discussed health and safety protocols and required personal protective equipment before Facility representatives led the inspectors on a tour of the Facility operations. It was briefed that the primary waste stream was wastewater from cleaning the facility's Regenerative Thermal Oxidizer (RTO). Many of the materials (such as wood dust) that would otherwise be a waste, are recycled on site. Mr. Reed stated that the RTO wash water was presently being recycled as make up water and was no longer managed as a hazardous waste. He also stated that the lead (D008) in the wash water is from naturally occurring lead that is in the wood.

Mr. Motes drew a sketch and gave an overview of the production process. The plant receives logs, debarks them, and then sends the smooth logs into the process. The logs are cut into wafers, go to wet bins and are screened, and sorted by size. The wafers are then sent to blenders where glue is added and the material is formed and pressed and then cut into market dimensions. The product is then packed for shipment.

11) Inspection Observations

Wood Reception Area

The inspection team began the walk-through portion of the inspection near the log reception area of the facility. Approximately 200 trucks per day transport wood logs from sustainably managed forests to the plant site each day. Each truck carries approximately 20 tons of logs. Two cranes, capable of unloading the entire load of a truck, are utilized to unload the trucks and to stack the logs. Approximately 50,000 tons of logs are in the staging area and this amount of logs is processed on roughly a monthly basis (Photograph 1).

Debarking Rotary Drums

Logs are loaded into rotary drums that are 135 feet long. Inside these rotary drums bark is removed from the logs. The removed bark is utilized for fuel for the on-site furnaces which provide heat for the production process. Smooth logs exit the debarking rotary drums. Wood scrap is also collected (Photograph 2). Discarded wood materials can either be reinserted into the production process or used as fuel in the facility's furnaces. The Air Pollution Control

equipment (baghouses) in this area were observed. That system collects dust. The facility's former main hazardous waste stream (Wash Water) was generated from maintenance activities for the air pollution control system. Dust from the baghouse is collected and transported via a conveyor. Dust from the process is collected and used on-site for fuel (Photograph 3).

Stranders

The logs are then fed into stranding machinery. This machinery converts the logs into wood wafers. The stranding device has a rotating device that is made up of 48 blades. The device rotates at approximately 350 revolutions per minute (rpm). The operators clean and replace blades several times per day.

Wet Bins & Screeners

The wafers next go to wet bins where the wood wafers are moistened and then screened to separate the wafers by size. Larger strands will be utilized for the outside of the OSB while smaller and medium size strands will be utilized for the interior of the OSB.

Dryers

The strands are fed into rotary drum dryers that are 130 feet long. The dryers operate at approximately 800 °F. Heat for the dryers is provided by the facility's on-site furnaces. The air stream from the dryers is fed to Wet Electrostatic Precipitators. The dried wafers exit into temporary storage in dry bins before being fed into the Blenders.

Blending and Forming

In the blending area the wood wafers are sprayed with adhesives and wax. The forming line is approximately 550 feet long and is four stories. This part of the production line takes a mat of wafers that are over a foot thick and then presses it into OSB sheets with approximately a 95% reduction in width. This is accomplished by presses that operate at 7,500 pounds per square inch (psi) in an environment that is maintained at 400 °F.

Trimming, Sealing, Painting, Stacking and Packing

The large mats can then be trimmed down into OSB sheets of approximately 4' by 8'. The edges are sealed to provide water and moisture resistance. The OSB sheets are then painted with Georgia Pacific manufacturing and product markings and then stacked. The stacked OSB sheets can then be painted on the side and again marked with Georgia Pacific information.

Blend Building Area

In this area wax can be added to the product. The furnaces were observed. These furnaces provide heat for drying the wood and for processing the wood during the pressing and shaping process. The dryers are heated with the exhaust of two 334 million btu/hour wood fired furnaces. Wet electrostatic precipitators were observed. The primary source of water for this area is well water but the water formerly managed as a hazardous waste is now used as makeup water.

Layer Area

The components of the wood strands are pressed into large sheets that undergo a high temperature shaping and pressing process to create OSB that is at the specified width and composition. The production line takes the inputs and joins them together to produce sheets of OSB.

Recycling Review and Waste Management Areas

Following a lunch break the inspection resumed concentrating on waste management areas. The Air Pollution Control equipment (baghouses) in this area were observed. That system collects dust. The facility's main hazardous waste stream is generated from the air pollution control system. Dust from the baghouse is collected and transported via a conveyor. The area where the former frac tanks were located for storing wastewater was observed. Mr. Reed reviewed the process where the former wastewater was now being utilized as make-up water to replace well water. To control air pollutant emissions and comply with the applicable requirements, the site operates five Wet Electrostatic Precipitators (WESPs) and four Regenerative Thermal Oxidizers (RTOs). Mr. Reed briefed that no treatment of the water is occurring prior to reintroducing the water back into the system. The wash water is inserted back into the water feed to the Wet Electrostatic Precipitators (Photographs 6 and 7).

Wood ash generated from the combustion of wood residuals in facility's two furnaces is sent to Southeastern Organics for use as a soil amendment. This material had the appearance of a grey ash material. Material from the WESP centrifuges, which is primarily made up of smoke, pitches, and tars, and had an appearance similar to a black sludge like material, is also sent to Southeastern Organics for use as a soil amendment. It ranges from a black cold tar like consistency to light brown that breaks apart easily. The facility analyzed these materials and both were determined to be non-hazardous (Photograph 4).

Central Accumulation Area (CAA) and Universal Waste Storage

The facility had a processing unit on top of a metal 55-gallon container for processing aerosol cans. Aerosol cans are then managed as scrap metal. Four 55-gallon metal containers were in the CAA. One 55-gallon container of waste acetone (D001/F003) was dated 12/5/2023. A second 55-gallon container of waste acetone (D001/F003) was dated 10/11/2023 and "Full 5/2/2024". A third container of waste acetone (D001/F003) was dated 6/22/2023 but was found to be empty (Photographs 9-11).

A fourth metal 55-gallon container (waste xylene and toluene, waste codes D001 and D035) was dated 3/7/2022. This container was being used to collect the aerosol can contents from the aerosol can puncturing device (Photograph 12). The 3/7/2022 dated container was determined to be a case of the erroneous marking of the date. The container was missing the hazard marking for the D035 waste code.

Pursuant to S.C. Code Ann. Regs. 61-79.262.17(a) [40 C.F.R. § 262.17(a)] which is a condition of the LQG Permit Exemption, a large quantity generator may accumulate hazardous waste on site for no more than 90 days.

Pursuant to S.C. Code Ann. Regs. 61-79.262.15(a)(5)(ii) [40 C.F.R. § 262.15(a)(5)(ii)], which is a condition of the LQG permit exemption, a generator must mark or label its container with the following: (ii) An indication of the hazards of the contents (examples include, but are not limited to, the applicable hazardous waste characteristic(s) (*i.e.*, ignitable, corrosive, reactive, toxic); hazard communication consistent with the Department of Transportation requirements at 49 CFR part 172 subpart E (labeling) or subpart F (placarding); a hazard statement or pictogram consistent with the Occupational Safety and Health Administration Hazard Communication Standard at 29 CF 1910.1200; or a chemical hazard label consistent with the National Fire Protection Association code 704).

A pallet of approximately 23 lead-acid forklift batteries was on a pallet near the hazardous waste drums. Four smaller batteries were on top of the larger batteries. The batteries were not labeled as universal waste nor were they dated. Mr. Reed briefed that normally the forklift vendor will take spent batteries with them as they are exchanged for new batteries. The circumstances that had led to the accumulation of these batteries was not known. The batteries were not marked as a universal waste and were also missing the accumulation start date (Photograph 13). A 4-foot container of universal waste lamps was closed, labeled, and dated (Photograph 8).

Pursuant to S.C. Code Ann. Regs. 61-79.273.14(a) [40 C.F.R. § 262.14(a)] a small quantity handler of universal waste must label or mark the universal waste to identify the type of universal waste.

Pursuant to S.C. Code Ann. Regs. 61-79.273.15(c) [40 C.F.R. § 262.17(a)] a small quantity handler of universal waste who accumulates universal waste must be able to demonstrate the length of time that the universal waste has been accumulated from the date it becomes a waste or is received.

One Satellite Accumulation Area (SAA) is maintained on the production line for the printing system. A single metal 55-gallon container was being used to accumulate the spent acetone, D001/F003, waste. This single SAA container was dated 6/24/2024 and was properly marked and labeled (Photograph 14).

12) Records Review

Shipment of Wastes

A concern before the inspection was that the Biennial Report for 2021 showed approximately 150 tons of RTO hazardous waste that was generated but had no record of shipment. Reviewing the facility records, it was determined that this waste had been generated during a clean-out event on 12/15/2021. Following the inspection the facility emailed copies of its hazardous waste manifests for 2022. This was the year when LQG levels of hazardous waste were last shipped (some of the waste was generated in December 2021). The manifests were reviewed and found to be complete. The facility had shipped all of its RTO wastewater to Chemical Waste Management in Emelle, Alabama.

For the later 2021 and early 2022 period, the hazardous waste manifests demonstrated that the hazardous waste was shipped to a permitted TSDF in early 2022 within the 90-day time frame allowed for an LQG. This information was also noted in the facility's 1st Quarter 2022, Quarterly Hazardous Waste Report to SCDES, that noted that 150 tons had been shipped. This information was in the state records but had not yet been entered into RCRAInfo (the federal database).

Another concern was that the amount of hazardous waste generated in 2022, in the 3rd Quarter 2022, Quarterly Hazardous Waste Report to SCDES, did not match the amount of waste shipped on the hazardous waste manifests in 2022. Approximately 250,000 pounds of RTO wastewater was reported as generated on 9/12/2022. In the 4th Quarter 2022, Quarterly Hazardous Waste Report to SCDES, it was reported that 129,520 pounds was shipped for a discrepancy of approximately 120,420 pounds. Mr. Reed investigated this issue and determined that it was due to overestimating the amount of RTO in the tanks when the waste was initially generated due to mistakenly believing that one frac tank had RTO wastewater in it, when it was empty.

Contingency Plan

The actions that facility personnel should take in response to an emergency are described in the facility's Hazardous Waste Contingency Plan, which was not dated but was transmitted to local agencies on 12/9/2022. The plan describes actions facility personnel must take in response to fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water at the facility. The plan includes a list of all primary emergency equipment at the facility. The list includes fire extinguishing systems, spill control equipment, communications and alarm systems, and decontamination equipment. The plan includes the location and a physical description of each item on the list, and a brief outline of its capabilities. The plan includes an evacuation plan for personnel. This plan describes signals to be used to begin evacuation, evacuation routes, and alternate evacuation routes. A copy of the Hazardous Waste Contingency Plan was most recently submitted to the emergency services December 2022. The plan listed the positions and emergency telephone numbers for the persons identified as Emergency Coordinators but three of the Emergency Coordinators in the plan are no longer working at the facility. The Quick Reference Guide was also determined to require an update on the names listed in the plan due to personnel changes and the removal of the Frac Tanks formerly used to accumulate the RTO hazardous waste. The list of the emergency coordinators in the Contingency Plan did not designate the primary emergency coordinator nor the order in which the other emergency coordinators would assume the primary position. After the inspection, the facility notified as a VSQG.

Pursuant to S.C. Code Ann. Regs. 61-79.262.17(a)(6) [40 C.F.R. § 262.17(a)(6)] which incorporates S.C. Code Ann. Regs. 61-79.262.261(d) [40 C.F.R. § 261(d)], and is a condition of the LQG Permit Exemption, the contingency plan must list names and emergency telephone numbers of all persons qualified to act as emergency coordinator and this list must be kept up to date. Where more than one person is listed, one must be named as primary emergency coordinator, and others must be listed in the order in which they will assume responsibility as alternates.

Inspection Records

The weekly inspection records of the CAA were reviewed. The weekly hazardous waste CAA inspection records were found to be missing for the periods of March through August of 2022 and April 2023 through December 2023. The facility later clarified that during the period of March through August 2022 that they were a VSQG. During the period of April 2023 through December 2023 the facility was on record as being an LQG. A subsequent review of RCRAInfo showed that the facility had notified as a VSQG on 3/25/2022 and then as an LQG on 9/15/2022. Following the inspection, the facility notified as a VSQG.

Pursuant to S.C. Code Ann. Regs. 61-79.262.17(a)(1)(v) [40 C.F.R. § 262.17(a)(1)(v)] which is a condition of the LQG Permit Exemption, at least weekly, the large quantity generator must inspect central accumulation areas.

Training

The training records for 2022 and 2023 were emailed to the inspection team after the inspection. The training records for the primary staff handling hazardous waste accumulation in the CAA and shipments were reviewed. The hazardous waste training for secondary plant staff managing hazardous waste in the SAAs was also reviewed.

Recycling Review

The facility provided additional information on the recycling of wash down water from RTO periodic cleaning. The OSB manufacturing process generates air pollutants regulated under the Clean Air Act and the facility is considered a major source and operates under a Title V permit (TV-0680-0046). To control air pollutant emissions and comply with the applicable requirements, the site operates five Wet Electrostatic Precipitators (WESPs) and four Regenerative Thermal Oxidizers (RTOs). These systems work together to control emissions from the furnaces, dryers, and press. Although no water is discharged from the system, each WESP requires 10,000 – 40,000 gallons of “makeup water” daily to sustain its operation due to evaporation loss through the RTO stacks.

The facility evaluated the RTO wash water to determine the appropriate storage and disposal requirements. Their initial review only evaluated it based on its characteristics, which resulted in a determination that it was hazardous based on its lead content (slightly over the 5 ppm limit) and needed to be disposed of. The facility recently re-evaluated the process and alternatives were re-evaluated. Georgia Pacific determined that the RTO wash water could be beneficially reused in the dryer pollution control systems and qualified under S.C. Code Ann. Regs. 61-79.261.2(e)(1)(iii) [40 C.F. R. § 261.2(e)(1)(iii)]. This finding by Georgia Pacific was based on the RTO wash water being returned to the pollution control process from which it was generated, that the wash water is not altered, treated, or reclaimed, before reinsertion into the facility’s system, and that it is a suitable substitute, avoiding the use of an equal amount of additional ground water. The inspection team reviewed the facility’s regulatory analysis of the reuse of the RTO wash water including the site observations during the inspection, the review of the analytical data, and the review of the applicable regulations.

13) Closing Conference and Follow-up

The inspectors conducted the exit meeting with Mr. Reed and Mr. Motes. During this exit briefing Mr. Johnny Temples (Georgia Pacific Regional Operations Manager) and Brandon Grissom (Corporate Environmental Manager) joined via telephone. During this meeting, the EPA and SCDES presented the preliminary results of the inspection. Georgia Pacific Wood Products LLC was inspected as a LQG of hazardous waste.

14) List of Attachments

Attachment A – Photo Log

15) Signed

ROBERT NAKAMOTO Digitally signed by ROBERT NAKAMOTO
Date: 2024.08.26 10:38:58 -04'00'

Robert S. Nakamoto
Environmental Engineer
RCRA Enforcement Section

16) Concurrence

ARACELI CHAVEZ Digitally signed by ARACELI
CHAVEZ
Date: 2024.08.29 14:55:10 -04'00'

Araceli B. Chavez
Chief
RCRA Enforcement Section

Attachment 1 – Photo Log

Photos taken on: 6/25/2024

Photos taken by: Robert S. Nakamoto

Photos taken with: Kodak PixPro FZ53

EPA Property Tag: SX9091

Serial Number: M037489049



Photograph 1: Stack of Logs for Input into the production process.



Photograph 2: Wood scrap that will be utilized for fuel.



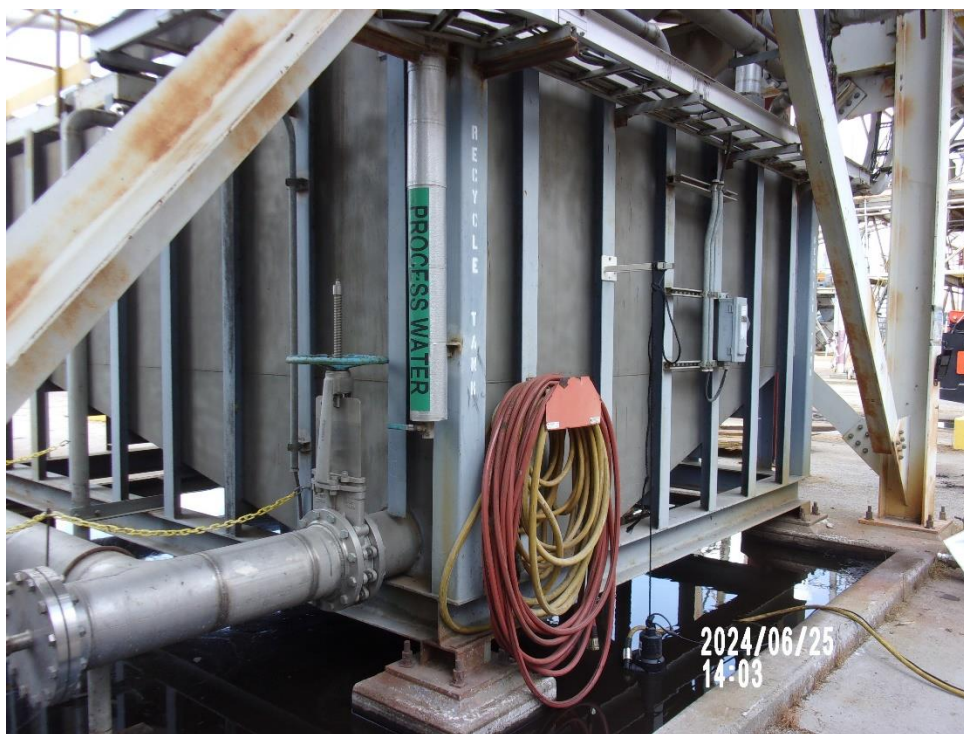
Photograph 3: Baghouses where the dust will be utilized for fuel.



Photograph 4: Wood ash material that will be recycled as a soil amendment.



Photograph 5: Picture of the area where hazardous waste frac tanks were formerly stored.



Photograph 6: Picture of tank where recycled RTO wash water will be inserted for the Air Pollution Control System.



Photograph 7: Second view of tank where recycled RTO water is inputted into the Air Pollution Control System.



Photograph 8: Universal waste container for universal waste lamps.



Photograph 9: Hazardous waste containers in the CAA.



Photograph 10: Label on hazardous waste container dated 12/5/2023.



Photograph 11: Label on HW container in the CAA dated 10/11/2023 and also 5/2/2024.



Photograph 12: Aerosol can puncturing device over a HW SAA container.



Photograph 13: Pallet of unlabeled and undated universal waste batteries.



Photograph 14: Hazardous Waste SAA container for paint waste.