

RCRA Inspection Report

1) Inspector and Author of Report

Alan Newman
Environmental Engineer
Phone: 404-562-8589
newman.alan@epa.gov

Sarah Rowell
Environmental Engineer
Phone: 404-562-9418
rowell.sarah@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, SW
Atlanta, Georgia 30303

2) Facility Information

Excel TSD of Tennessee, LLC
552 Rivergate Road
Memphis, Tennessee 38109

EPA ID#: TND980847024
NAICS #: 562211 - Hazardous Waste
Treatment and Disposal

3) Responsible Officials

Stephen B. Neal, President
Excel TSD of Tennessee, LLC
Phone: 901-774-8146
sneal@exceltsd.com

4) Inspection Participants

Nathan Jenkins, Excel TSD
Stephen Neal, Excel TSD
Kurt Bodensedt, Excel TSD
Kim Williamson, Excel TSD
Dwight Hinch, Environmental Consultant

Beverly Philpot, TDEC Nashville
Cliff Caudle, TDEC Memphis
Donya Sharafoddinzadeh, TDEC Memphis
Jason Simpson, TDEC Memphis
Sarah Rowell, USEPA
Alan Newman, USEPA

5) Date of Inspection

September 4, 2024; 8:03 a.m. – 6:15 p.m.

6) Applicable Regulations¹

Resource Conservation and Recovery Act (RCRA) Sections 3002 (42 U.S. Code – Annotated U.S.C.A. 6925 and 6927), and 40 Code of Federal Regulation (C.F.R.) Parts 260 - 270, 273, 278, & 279; Tennessee Hazardous Waste Management Act of 1977, Tennessee Code Annotated (Tenn. Code Ann.) § 68-212-101 et seq., Chapter 0400-12-01 of the Rules and Regulations of the State of Tennessee (Tenn. Comp. R. & Regs), and Hazardous Waste Permit TNHW-138.

Pursuant to Tenn. Comp. R. & Regs. 0400-12-01-.03(1)(f)1. [40 C.F.R. § 262.15(a)], a generator may accumulate as much as 55 gallons of non-acute hazardous waste in containers at or near any 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 Tenn. Comp. R. & Regs. 0400-12-01-.03(1)(f)1. [Section 3005 of RCRA, 42 U.S.C. § 6925], and without complying with Tenn. Comp. R. & Regs. 0400-12-01-.03(1)(g)2. or 0400-12-01-.03(1)(h)1. [40 C.F.R. § 262.16(b) or § 262.17(a)], except as required in Tenn. Comp. R. & Regs. 0400-12-01-.03(1)(f)1.(vii) and (viii) [40 C.F.R. § 262.15(a)(7) and (8)], provided that the generator complies with the satellite accumulation area (SAA) conditions listed in Tenn. Comp. R. & Regs. 0400-12-01-.03(1)(f)1. [40 C.F.R. § 262.15(a)] (hereinafter referred to as the “SAA Permit Exemption”).

Pursuant to Tenn. Comp. R. & Regs. 0400-12-01-.01(2)(a) [40 C.F.R. § 260.10], a large quantity generator (LQG) of hazardous waste includes a generator who generates greater than or equal to 1,000 kilograms (2,200 pounds) of non-acute hazardous waste in a calendar month.

Pursuant to Tenn. Comp. R. & Regs. 0400-12-01-.03(1)(h) [40 C.F.R. § 262.17], an LQG may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status, as required by Section 68-212-108 of the THWMA, Tenn. Code Ann. § 68-212-108 [Section 3005 of RCRA, 42 U.S.C. § 6925], provided that the generator complies with the conditions listed in Tenn. Comp. R. & Regs. 0400-12-01-.03(1)(h) [40 C.F.R. § 262.17] (hereinafter referred to as the “LQG Permit Exemption”).

Pursuant to Tenn. Comp. R. & Regs. 0400-12-01-.12(1)(i) [40 C.F.R. § 273.9], a large quantity handler of universal waste (LQHUW) is a universal waste handler (as defined in this subparagraph) who accumulates 5,000 kilograms or more total of universal waste (batteries, pesticides, mercury-containing equipment, lamps, or aerosol cans, calculated collectively) at any time. This designation as a large quantity handler of universal waste is retained through the end of the calendar year in which the 5,000- kilogram limit is met or exceeded.

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. Additionally, Tennessee reorganized its regulations and the permit references 1200-12-01. The new reference is 0400-12-01.

7) Purpose of Inspection

The purpose of this inspection was to conduct an unannounced compliance evaluation inspection (CEI) to determine Excel TSD of Tennessee, LLC's (Excel TSD) compliance with the conditions of its RCRA Hazardous Waste Facility Operating Permit TNHW-138, the applicable requirements of RCRA, and the corresponding Tennessee regulations. This was an EPA lead inspection.

8) Facility Description

Excel TSD is a permitted hazardous waste treatment and storage facility that operates under Hazardous Waste Permit Number TNHW-138 (the Permit). The facility is currently undergoing a permit modification and renewal process. The Permit, which was issued on September 30, 2008, was to remain in effect until September 30, 2018, unless continued, revoked and reissued, or terminated under applicable regulations. Excel TSD submitted a permit renewal application, which continued the existing permit while the renewed permit is negotiated with TDEC. At the time of the inspection, Excel TSD was employing 11 site workers, five office workers, and two drivers.

Excel TSD is situated on approximately 7.3 acres in southwest Shelby County, Tennessee. The Permit authorizes Excel TSD to store hazardous waste on-site in containers and in above ground storage tanks (ASTs). The Permit also authorizes Excel TSD to treat hazardous waste in containers by fuel blending, neutralization and stabilization, separation/consolidation, and emptying of pressurized containers. Excel TSD manages and stores non-hazardous wastes, used oil, and universal wastes at the facility. Hazardous waste or solid waste disposal is not permitted at the facility.

In October 2011, Excel TSD moved its administrative and sales offices into a building located next door to the facility. The address of the office building is 550 Rivergate Road. This leased office space is situated immediately southwest of the facility in the building formerly occupied by Best-Wade Petroleum, Inc. According to facility personnel, Excel TSD's current permit application includes the move of the administration office to the former Best-Wade Petroleum building. Excel TSD is in the process of purchasing this property; the former underground storage tanks and associated potentially contaminated soils were actively being removed on the day of the inspection.

The operating portion of the site is enclosed by a perimeter fence which encompasses approximately 1.75 acres. All access to the site is monitored and controlled. A security fence separates the Staging/Support Area from the Active Area of the facility. The Active Area, which is approximately 1.0 acre in size, is divided into the Non-Hazardous Staging Area and the Containment Area and it also includes a Personnel Decon Room. The Non-Hazardous Staging Area also includes a Laboratory Building and a Personnel Support (Operations) Trailer. The Containment Area, where all waste storage, treatment, and processing takes place, includes a

Maintenance Building, a Hazardous Waste Management Building, a Hazardous Waste Tank Farm, and a Fuel Blending Area.

The Contained Area of the facility consists of concrete pavement which encompasses approximately 0.6 acres. This area is bounded by containment curbing and raised concrete edging. Incoming waste material is evaluated in accordance with the facility's waste analysis plan and is either accepted or rejected. For wastes that are accepted, Excel TSD is permitted to decant, separate, consolidate, bulk, blend, neutralize, stabilize, and store hazardous and non-hazardous waste in the Contained Area of the Facility. Excel TSD manages, stores, and treats containerized hazardous and non-hazardous waste in three "units" in the Contained Area. Two units are housed in the Hazardous Waste Management Building, which is comprised of two separate, secondarily contained areas: Building A (Area 5) and Building B (Area 6). The third unit, the Outside Hazardous Waste Container Management Area (OHWCM), is divided into four distinct areas (Areas 1-4). Excel TSD also has a total of 15 aboveground storage tanks (ASTs) in the Contained Area.

Building A and Building B may each be used for container storage of hazardous, non-hazardous, and universal waste. Building A has a permitted capacity of 16,720 gallons. Building B has a permitted capacity of 11,000 gallons. The Permit states that ignitable and reactive wastes (D001 and D003) must be stored at least 50 feet from the facility's property line. In Building B, this prohibited area for storing D001 and D003 wastes is designated by a painted line maintained on the floor of that building. Equipment for neutralizing waste corrosives and emptying pressurized containers is located in Building B. The Hazardous Waste Management Building has secondary containment walls around the perimeter and between the two sections of the building. Access points to the buildings are ramped as part of the containment design. The total combined permitted capacity for the OHWCMA and for Building A and Building B of the Hazardous Waste Management Building is 52,620 gallons of hazardous waste.

The OHWCMA, which lies west of the Hazardous Waste Management Building and west of the Tank Farm, has a total permitted capacity of 30,060 gallons of hazardous waste. The OHWCMA is used for receiving/shipping hazardous and non-hazardous waste containers, for sampling waste, and for storing containerized waste. The Permit states that ignitable and reactive wastes (D001 and D003) must be stored at least 50 feet from the facility's property line. The prohibited area for storage of D001 and D003 wastes is designated by a painted line maintained along the southern side of the OHWCMA.

The facility operates two permitted ASTs (Tanks F1 and F2) for hazardous waste storage within the Tank Farm. Each of the permitted ASTs has a storage capacity of approximately 6,000 gallons. In addition to Tanks F1 and F2, seven other ASTs are located in the Tank Farm. Two of these ASTs (Tanks T1 and T2) are active and have a liquid capacity of approximately 10,000 gallons each. According to the Permit, Tank T1 is used to store used oil and Tank T2 is used to store non-hazardous wastewater. Tanks P1 through P5 in the Tank Farm are not in service.

Six additional ASTs in the Contained Area are located northeast of the Tank Farm. Tanks T3 and T4 have a capacity of approximately 10,000 gallons each and are used to store non-hazardous

wastewater. Tanks SW1 through SW4 are 10,000-gallon ASTs that are used to store storm water that collects on-site in the Contained Area. Three collection sumps are located in the Contained Area to facilitate the removal of storm water following rain events.

Wastes suitable for fuel blending are received at the facility in various sizes of containers, including cargo tankers. The covered portion of the OHWCMA encompasses approximately 2,530 square feet and is referred to as the Fuel Blending Area (Area 4). This area is located on the north side of the Hazardous Waste Management Building. In the Fuel Blending Area, selected hazardous and non-hazardous wastes are consolidated and mixed to meet customer burner specifications. This hazardous waste-derived fuel is shipped off-site for energy recovery at other permitted facilities. Fuel blending at Excel TSD is typically a batch process and is performed in containers known as process vessels. The process can be performed manually or by using a Disperser, which is a bladed, motorized, high shear mixing apparatus used to break apart and uniformly distribute thicker materials into a receiving liquid.

Tanks F1 and F2 can be used to store hazardous waste material suitable for fuel blending. These tanks may also be used to store fuels after blending and prior to shipment off-site. Frequently, the entire contents are removed from incoming containers during the blending process. However, the facility may encounter both suitable and non-suitable fuel blending material in the same container. Waste material of various viscosities may be added or removed to achieve fuel specifications. According to the Permit, a batch of no more than 20 containers of hazardous waste may be open at any time during processing. Material that is not suitable for fuel blending may be moved to hazardous waste container storage areas until shipped off-site for disposal.

Excel TSD's most recent Hazardous Waste Generator Notification (EPA Form 8700-12) dated March 1, 2024, characterized the facility as a large quantity generator (LQG) of hazardous waste; a hazardous waste Treatment, Storage and Disposal Facility (TSDF); and a Used Oil Transfer Facility. Excel TSD accepts hazardous waste with the EPA waste codes: D001-D043, F001 – F012, F019 – F028, F032, F034, F035, F037-F039, K001-K011, and K013–K016 and also accepts nonhazardous waste. Excel TSD is a large quantity handler of universal waste and accepts used oil.

According to the Waste Activity Audit Section (WAAS), Excel TSD has 6 hazardous waste (HW) streams (WSs) reported as active in the 2023 annual report. Information regarding these WSs is summarized in the table below:

Waste Stream Information			
WS #	Description	EPA Waste Codes	2023 Reported Monthly Maximum (pounds)
5	HW for Offsite Shipping; Consolidation/Bulking of waste received from	D001, D002, D003, D004, D005, D006, D007, D008, D009, D010, D011, D012, D013, D014, D015,	50,000

	offsite for transfer offsite for treatment or disposal	D016, D017, D018, D019, D020, D021, D022, D023, D024, D025, D026, D027, D028, D029, D030, D031, D032, D033, D034, D035, D036, D037, D038, D039, D040, D041, D042, D043, F001, F002, F003, F004, F005, F006, F007, F008, F009, F010, F011, F012, F019, F020, F021, F022, F023, F024, F025, F026, F027, F028, F032, F034, F035, F037, F038, F039, K001, K002, K003, K004, K005, K006, K007, K008, K009, K010, K011, K013, K014, K015, K016	
13	Waste flammable liquid	D001, F003	4,409
14	Lab waste	D001, F003, F005	220
16	Hazardous waste solids ORM-E: plant cleanup (leaks & spills, contaminated PPE, etc.)	D008, F001, F003	4,409
23	Waste flammable liquid: hazardous waste derived fuel for shipment off-site to cement kilns.	D001, D018, D035, F003, F005	500,000
33	Hazardous waste solids: contaminated PPE	D004, D005, D006, D007, D008, D018, D021, D022, D023	4,400

9) **Previous Inspection History**

Over the past thirty years, the Tennessee Department of Environment and Conservation (TDEC) has conducted one or more annual RCRA CEIs at the subject facility and found multiple violations during most of those inspections.

On September 12, 2023, TDEC conducted the most recent RCRA CEI at the subject facility and found multiple apparent violations of RCRA's requirements. As a result, TDEC issued a Commissioner's Order to Excel TSD on April 30, 2024, and later verified that the facility had not returned to compliance during multiple follow ups in December, February, and June 2024. Excel TSD paid the penalty associated with the Commissioner's Order.

10) Opening Conference

On September 4, 2024, EPA inspectors Alan Newman and Sarah Rowell, accompanied by TDEC inspectors Cliff Caudle, Beverly Philpot, Jason Simpson, and Donya Sharafoddinzadeh, arrived at the subject Excel TSD facility at approximately 8:00 a.m. Nathan Jenkins, Facility Manager, immediately received the inspectors. Nathan Jenkins conducted the opening conference. The inspectors introduced themselves, showed their credentials to Nathan Jenkins, and explained the purpose of the visit.

The inspectors described the anticipated use of a digital camera during the inspection and provided a request for records. 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. The EPA inspector explained that the EPA has an information sheet for small businesses, which 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.

Nathan Jenkins 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 Nathan Jenkins led the inspectors on a tour of the Facility operations.

11) Inspection Observations

Facility personnel stated that waste arrives at the facility in container shipments, which are delivered via box-vans or trailers, and in bulk shipments, which are delivered via tanker trucks. The contents of each container are fingerprinted to ensure that they meet the anticipated waste profile for that container. Based on the fingerprint analysis, Excel TSD personnel sign the manifest to either accept or reject each waste container. TDEC's recent Commissioner's Order requires Excel TSD personnel to place waste containers into specific storage areas based on the physical state of the contents. Containers of liquid hazardous waste are stored in Areas 4, 5, or 6; and containers of solid hazardous waste are stored in Areas 1, 2, or 3. Excel TSD personnel decant liquids from containers and either treat or store those liquids elsewhere at the facility, as determined by the physical properties of the waste. In most cases, Excel TSD personnel de-head (open) containers of solids and empty the contents into one of eight 330-gallon metal totes. Certain waste that is received in tankers, totes, or 55-gallon containers is offloaded into one of the two hazardous waste storage tanks. Liquid hazardous wastes from the tanks are combined with the solids in the totes. The combination is agitated to suspend the solids. The

resulting slurry waste is added to the outbound tanker bound for shipment off site to be burned at a RCRA permitted TSD facility. Some wastes are unable to be processed in this process and are sent off site to another RCRA TSD for processing.

After the opening conference in the administration building, the inspection team started the tour of the facility at the gate where initial access is granted for incoming shipments via tractor trailers and tanker trucks (Photographs 1-3). The inspection team noted signage on the exterior fence. There were work crews onsite just inside the exterior fence removing underground storage tanks (USTs) from the facility. USTs were loaded on trailers for off-site transfer (Photographs 3-6).

OHCMA 1-4 Permitted Container Storage Areas and Sections A and B of the Hazardous Waste Management Building

The inspection team proceeded through one of three interior fence gates to the permitted hazardous waste management portions of the site (Photographs 7-9). The inspection team noted that the volume of waste observed in the permitted areas was within the permitted limits on the day of the inspection:

Unit	Location Area	Total Volume of Hazardous Waste Inventoried by Inspection Team (gal)	Permitted Limit of Unit (gal)
OHCMA	1	0	
OHCMA	2	6,542	
OHCMA	3	4,039	
OHCMA	4	16,092	
Total	1-4	26,673	30,060
Building A	5	7,222	16,720
Building B	6	4,589	11,000
All Areas		38,484	52,620

The inspection team observed the secondary containment pad and inventoried the containers of hazardous waste stored in the OHCMA. On January 26, 2016, the EPA and TDEC conducted a joint RCRA CEI of Excel TSD. The EPA inspection report dated May 4, 2016, and the TDEC inspection report dated March 11, 2016, both stated that the inspectors observed bare patches of concrete, cracks, and gaps in the surface of the secondary containment pad for the permitted areas. In response to the EPA issued Compliance Agreement and Final Order dated September 29, 2017, Excel TSD certified that the secondary containment structure at the Facility was in compliance with the regulatory standards of Tenn. Comp. R. & Regs. 0400-12-01-

.06(9)(f) [40 C.F.R. § 264.175] based on a letter from Fisher Arnold Engineering Integration dated October 17, 2017. However, prior to and following the certification of compliance by Excel TSD, specifically on June 27, 2017, June 27, 2018, May 22, 2019, September 11, 2020, July 29-30, 2021, September 14, 2022, and September 12, 2023, TDEC conducted annual RCRA CEIs of the facility. Each TDEC CEI inspection report noted observations where the condition of the secondary containment pad did not appear to meet the permit condition. None of the reports included observations that an impervious coating had been applied to the secondary containment.

During the inspection, the inspection team observed that the surface of the secondary containment pad for Areas 1, 2, and 3 continued to have bare patches of concrete, cracks, and gaps (Photographs 10-15, 40-44, and 47). The inspection team noted red crack filler sealant had been recently placed in various areas (Photographs 12 and 14). The secondary containment pad was not free of cracks or gaps and sufficiently impervious to contain leaks, spills, and accumulated precipitation. This appears to be an ongoing unresolved issue. This issue has apparently persisted for at least nine years without full resolution.

Pursuant to Permit Condition III.F.2(a), Specific Conditions for Storage in Containers; Containment, Detection, and Management of Leaks or Spills: a containment system shall be designed, operated, and maintained as follows: (a) a base shall underlie the containers which is free of cracks or gaps and is sufficiently impervious to contain leaks, spills, and accumulated precipitation until the collected material is detected and removed.

OHWCMA Area 1

The inspection team did not observe any containers in OHWCMA Area 1 on the day of the inspection (Photographs 10-14).

OHWCMA Area 2

The inspection team observed 114 containers in four rows in OHWCMA Area 2 (Photographs 15-45) and noted that 53 of these containers were not labeled with an indication of the hazard of their contents. Although some were labeled with a DOT Class 9 miscellaneous hazard label (Photographs 16-39), the EPA has determined that the DOT Class 9 label is not appropriate to meet the RCRA indication of hazard labeling standard because it does not indicate any specific hazard associated with the waste. The inspection team noted one container that was labeled with a storage accumulation start date of 8/31/2023, which indicates that the container had been in storage for over one year (Photograph 23-25). The inspection team observed one open container that was labeled as Corrosive and Toxic hazardous waste, dated 12/21/2023, and was marked with Excel TSD internal codes 425, 2231-099, and 77922 (Photograph 45-46). Facility personnel closed the open container and began marking each container with an indication of the hazard of its contents, as necessary, during the inspection.

Pursuant to Permit Condition II.O.3, Land Disposal Restrictions: the storage of hazardous waste restricted from land disposal under Rule 1200-1-11-.10 is prohibited unless the requirements of Rule 1200-1-11-.10(4) are met (however, Rule 1200-1-11-.10(4) was repealed and renumbered 0400-12-01-.10). Pursuant to Tenn. Comp. R. & Regs. 0400-12-01-.10(4)(a)1.(ii)(I)III. [40 C.F.R. § 268.50(a)(2)(i)(C)], each container of hazardous wastes restricted from land disposal must be clearly marked to identify its contents and with an indication of the hazards of the contents.

Pursuant to Permit Condition II.O.3, Land Disposal Restrictions: the storage of hazardous waste restricted from land disposal under Rule 1200-1-11-.10 is prohibited unless the requirements of Rule 1200-1-11-.10(4) are met (however, Rule 1200-1-11-.10(4) was repealed and renumbered 0400-12-01-.10). Pursuant to Tenn. Comp. R. & Regs. 0400-12-01-.10(4)(a)3. [40 C.F.R. § 268.50(c)], an owner/operator of a treatment, storage or disposal facility may store hazardous wastes restricted from land disposal beyond one year if they prove that such storage was solely for the purpose of accumulation of such quantities of hazardous waste as are necessary to facilitate proper recovery, treatment, or disposal.

Pursuant to Permit Condition III.D.2, Management of Containers: the permittee shall assure that containers holding hazardous waste are always closed during storage, except when it is necessary to add or remove waste.

OHWCMA Area 3

The inspection team noted one roll off box of hazardous waste, a number of empty containers of various sizes, and one blue, roll off box for common trash in this area (Photographs 47-51). Additionally, stormwater was pooled between OHWCMA 3 and the maintenance building (Photograph 52). Facility personnel stated that the pump to move this stormwater to the stormwater tanks had been out for repair but that it had recently returned. The only container storing hazardous waste in this area was the roll off container. Even though the tarp on this roll off container was in contact with the top of the container, the inspection team observed a strong smell of solvent surrounding the roll off. This was an area of concern. This container was labeled as hazardous waste and dated within the year, but it was not marked with an indication of the hazards of its contents.

Pursuant to Permit Condition II.O.3, Land Disposal Restrictions: the storage of hazardous waste restricted from land disposal under Rule 1200-1-11-.10 is prohibited unless the requirements of Rule 1200-1-11-.10(4) are met (however, Rule 1200-1-11-.10(4) was repealed and renumbered 0400-12-01-.10). Pursuant to Tenn. Comp. R. & Regs. 0400-12-01-.10(4)(a)1.(ii)(I)III. [40 C.F.R. § 268.50(a)(2)(i)(C)], each container of hazardous waste restricted from land disposal must be clearly marked to identify its contents and with an indication of the hazards of the contents.

Area 4

The permitted hazardous waste container storage Area 4 consists of a concrete base with curbed sides and a metal roof (Photograph 53-55). The inspection team observed six rows of waste with adequate aisle space. Generally, the inspection team noted all containers (both hazardous and non-hazardous waste) in each row in Area 4. Area 4 is utilized to receive and manage containers of waste pending waste characterization and verification of waste determination and to store containers of liquid hazardous waste and dangerous-when-wet reactive hazardous waste. The inspection team observed cracks and worn coating of the secondary containment in this area. Although the inspection team observed evidence that Excel TSD had conducted repairs on some cracks in the secondary containment system, they did not observe evidence of repairs to the worn coating in this area (Photograph 56).

The inspection team noted 367 containers ranging from 1-gallon to 275-gallon totes in Area 4 on the day of the inspection. The inspection team observed four containers that were labeled with accumulation start dates of greater than one year in storage in Area 4:

- one 5-gallon black plastic container, dated 6/21/2023 (Photograph 57);
- one 5-gallon white plastic container, dated 11/18/2022 (Photographs 58-59);
- one 55-gallon blue plastic container, dated 12/6/2022 (Photographs 60-62); and
- one 5-gallon white plastic container, dated 7/18/2023 (Photographs 63-64).

The inspection team identified six rows of containers in Area 4, and sequentially numbered them from left to right (Row 1 through Row 6). In Row 1, the inspection team observed one 5-gallon blue poly container that was labeled as an oxidizer but not labeled with an accumulation start date or with Excel TSD markings of either the material profile form number or the container number. The inspection team noted a total of 58 containers that were not marked with an indication of the hazards of their contents (Photographs 65-82). The inspection team noted multiple containers that were labeled as both hazardous waste and non-hazardous waste (Photographs 83-92). The inspection team noted hazardous waste in at least three containers that were severely dented. The dented containers had not been overpacked, and their contents had not been transferred into containers that were in good condition (Photographs 93-98). The inspection team noted multiple stainless steel mixing containers and a mixing unit (Photographs 99-106), and Facility personnel stated that these were empty and not in use on the day of the inspection.

Pursuant to Permit Condition III.F.2(a), Specific Conditions for Storage in Containers; Containment, Detection, and Management of Leaks or Spills: a containment system shall be designed, operated, and maintained as follows: (a) a base shall underlie the containers which is free of cracks or gaps and is sufficiently impervious to contain leaks, spills, and accumulated precipitation until the collected material is detected and removed.

Pursuant to Permit Condition II.O.3, Land Disposal Restrictions: the storage of hazardous waste restricted from land disposal under Rule 1200-1-11-.10 is prohibited unless the requirements of Rule 1200-1-11-.10(4) are met (however, Rule 1200-1-11-.10(4) was repealed and renumbered 0400-12-01-.10). Pursuant to Tenn. Comp. R. & Regs. 0400-12-01-.10(4)(a)3. [40 C.F.R. § 268.50(c)], an owner/operator of a treatment, storage or disposal facility may

store hazardous wastes restricted from land disposal beyond one year if they prove that such storage was solely for the purpose of accumulation of such quantities of hazardous waste as are necessary to facilitate proper recovery, treatment, or disposal.

Pursuant to Permit Condition II.H.7(b), Preparedness and Prevention, the permittee shall prevent hazards at the container unloading (storage) areas by several means such that containers of hazardous waste shall be checked for proper container type, proper container closure, and proper labeling and errors will be corrected as described in Attachment 2.

Pursuant to Attachment 2.1, page 2.1-4 and 5, each such received container is promptly, clearly, and durably marked (using markers or grease pencils) or labeled (using adhesive labels) by Excel TSD receiving personnel with the date the container was received. The approved MPF [Material Profile Form] Number that matches the manifest description of the waste is also written on each container (if it has not already been entered on a label), along with a container number.

Pursuant to Permit Condition II.O.3, Land Disposal Restrictions: the storage of hazardous waste restricted from land disposal under Rule 1200-1-11-.10 is prohibited unless the requirements of Rule 1200-1-11-.10(4) are met (however, Rule 1200-1-11-.10(4) was repealed and renumbered 0400-12-01-.10). Pursuant to Tenn. Comp. R. & Regs. 0400-12-01-.10(4)(a)1.(ii)(I)I. [40 C.F.R. § 268.50(a)(2)(i)(A)], each container of hazardous waste restricted from land disposal must be clearly marked with the words “Hazardous Waste”.

Pursuant to Permit Condition II.O.3, Land Disposal Restrictions: the storage of hazardous waste restricted from land disposal under Rule 1200-1-11-.10 is prohibited unless the requirements of Rule 1200-1-11-.10(4) are met (however, Rule 1200-1-11-.10(4) was repealed and renumbered 0400-12-01-.10). Pursuant to Tenn. Comp. R. & Regs. 0400-12-01-.10(4)(a)1.(ii)(I)IV. [40 C.F.R. § 268.50(a)(2)(i)(D)], each container of hazardous waste restricted from land disposal must be clearly marked with the accumulations start date.

Pursuant to Permit Condition II.O.3, Land Disposal Restrictions: the storage of hazardous waste restricted from land disposal under Rule 1200-1-11-.10 is prohibited unless the requirements of Rule 1200-1-11-.10(4) are met (however, Rule 1200-1-11-.10(4) was repealed and renumbered 0400-12-01-.10). Pursuant to Tenn. Comp. R. & Regs. 0400-12-01-.10(4)(a)1.(ii)(I)III. [40 C.F.R. § 268.50(a)(2)(i)(C)], each container of hazardous waste restricted from land disposal must be clearly marked to identify its contents and with an indication of the hazards of the contents.

Pursuant to Permit Condition III.B, Condition of Containers, if a container holding hazardous waste is not in good condition (e.g., severe rusting, apparent structural defects) or if it begins to leak, the permittee shall transfer the hazardous waste from this container to a container that is in good condition or otherwise manage the waste in some other way that complies with the conditions of this permit.

Area 5 (Building A)

The permitted hazardous waste container storage Area 5 (Building A) consists of a concrete base with curbed sides and a metal building (Photographs 107-126). The inspection team observed cracks and worn coating of the secondary containment in this area; some repairs had been conducted but the worn coating had not been addressed by the repairs (Photographs 112-117). The inspection team noted that the floor sumps covered with metal grates were full of debris. Facility representatives stated that waste is removed from the sumps twice a month. This is an area of concern. The inspection team inspected 121 containers in Area 5. The inspection team noted twelve containers that were not marked with an indication of the hazards of their contents (Photograph 118-121). The inspection team noted at least four open boxes of laboratory samples on a table in Area 5 that were not labeled with accumulation start dates and were not at the point of generation (Photograph 122). The inspection team noted that the aisle space between Rows 1 and 2 and between Rows 2 and 3 appeared too narrow to pass easily (Photographs 123-126). The inspection team measured the spaces between these two rows at their narrowest and recorded the distances to be 29.4 inches and 27.5 inches (less than 2.5 feet).

Pursuant to Permit Condition III.F.2(a), Containment, Detection, and Management of Leaks or Spills: a containment system shall be designed, operated, and maintained as follows: (a) a base shall underlie the containers which is free of cracks or gaps and is sufficiently impervious to contain leaks, spills, and accumulated precipitation until the collected material is detected and removed.

Pursuant to Permit Condition II.O.3, Land Disposal Restrictions: the storage of hazardous waste restricted from land disposal under Rule 1200-1-11-.10 is prohibited unless the requirements of Rule 1200-1-11-.10(4) are met (however, Rule 1200-1-11-.10(4) was repealed and renumbered 0400-12-01-.10). Pursuant to Tenn. Comp. R. & Regs. 0400-12-01-.10(4)(a)1.(ii)(I)III. [40 C.F.R. § 268.50(a)(2)(i)(C)], each container of hazardous waste restricted from land disposal must be clearly marked to identify its contents and with an indication of the hazards of the contents.

Pursuant to Permit Condition III.D.2, Management of Containers: the permittee shall assure that container holding hazardous waste are always closed during storage, except when it is necessary to add or remove waste.

Pursuant to Permit Condition II.O.3, Land Disposal Restrictions: the storage of hazardous waste restricted from land disposal under Rule 1200-1-11-.10 is prohibited unless the requirements of Rule 1200-1-11-.10(4) are met (however, Rule 1200-1-11-.10(4) was repealed and renumbered 0400-12-01-.10). Pursuant to Tenn. Comp. R. & Regs. 0400-12-01-.10(4)(a)1.(ii)(I)I. and IV. [40 C.F.R. § 268.50(a)(2)(i)(D)], each container of hazardous waste restricted from land disposal must be clearly marked with the accumulations start date.

Pursuant to Permit Condition III.D.1, Management of Containers, which incorporates Attachment 7.1: Container Management: General Container Management Procedures: 4.

Containers will be managed in rows no more than two containers wide (e.g., one four-drum pallet), with a minimum aisle space of 2.5 feet between rows. This allows for personnel access so that each drum can be readily inspected for label information, condition, and leaks.

Pursuant to Permit Condition II.H.5: Preparedness and Prevention: 2. Required Aisle Space Required: The permittee shall maintain aisle space to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment to any area of the facility operation in an emergency.

Area 6 (Building B)

The permitted hazardous waste container storage Area 6 (Building B) consists of a concrete base with curbed sides and a metal building (Photographs 127-139). This area was utilized to store hazardous waste and universal waste. The inspection team observed worn coating of the secondary containment in this area; some repairs had been conducted but the worn coating had not been addressed by the repairs (Photographs 138-139). The inspection team inspected 90 containers of varying sizes up to 250-gallon totes in Area 6. The inspection team noted one overpack container of hazardous waste in the second row that was not marked with an indication of the hazards of its contents. All accumulation start dates were examined and determined to be less than one year. The permit prohibits the storage of ignitable waste within 50 feet of the Facility boundary, and the inspectors observed a red line in Area 6, which is used to demark the 50-foot line to the facility boundary. However, the inspectors observed one gaylord box which was marked with an indication that its contents are ignitable, that was partially over the red line (Photographs 127-129, 135-139). The red line on the floor of this area has faded over time and the inspection team recommends that this line be repainted and that personnel be re-trained to ensure no ignitable wastes are stored within 50 feet of the facility boundary. The inspection team also observed a pool of water in this area, which did not appear to be sloped to gravity drain water away from the waste containers. The presence of water and the absence of adequate slope is an area of concern for the inspection team.

Pursuant to Permit Condition III.F.2(a), Containment, Detection, and Management of Leaks or Spills: a containment system shall be designed, operated, and maintained as follows: (a) a base shall underlie the containers which is free of cracks or gaps and is sufficiently impervious to contain leaks, spills, and accumulated precipitation until the collected material is detected and removed.

Pursuant to Permit Condition III.G, Special Requirements for Ignitable or Reactive Waste: The permittee shall not locate containers holding ignitable or reactive waste within 15 meters (50 feet) of the facility's property line.

Pursuant to Permit Condition II.O.3, Land Disposal Restrictions: the storage of hazardous waste restricted from land disposal under Rule 1200-1-11-.10 is prohibited unless the requirements of Rule 1200-1-11-.10(4) are met (however, Rule 1200-1-11-.10(4) was repealed and renumbered 0400-12-01-.10). Pursuant to Tenn. Comp. R. & Regs. 0400-12-01-.10(4)(a)1.(ii)(I)III. [40 C.F.R. § 268.50(a)(2)(i)(C)], each container of hazardous waste

restricted from land disposal must be clearly marked to identify its contents and with an indication of the hazards of the contents.

Hazardous Waste Permitted Tanks

Excel TSD operates two permitted hazardous waste tanks, Tanks F1 and F2. These tanks are the only tanks in the Tank Farm or elsewhere at the facility that are used to store hazardous wastes. Both Tanks F1 and F2 are cylindrical steel tanks with rounded ends, 16 feet long and 8 feet in diameter, and mounted vertically on steel legs with concrete supports. The design capacity of each tank is 6,000 gallons. Piping exits both tanks at the bottom and the top, but the piping and all other ancillary equipment (e.g., valves) is fully contained within the Tank Farm. Excel TSD has determined that these tanks are Level 1 Tanks for organic air emission controls. Tank F2 is equipped with an electric-powered top-mounted agitator. Facility personnel stated that this agitator has not been in operation for multiple years. A pipe at the top of the tanks connects the two tanks together and it is equipped with a conservation vent, which allows vapor pressure equalization between the two tanks and then with the atmosphere. These tanks appear to have been manufactured in 1988.

The tanks are labeled as F1 and F2. Other tanks co-located with these tanks were either out of service and empty or they were storing non-hazardous waste on the day of the inspection. Each permitted tank was labeled as with the words “Hazardous Waste”, with an indication of the hazards of its contents, and with an accumulation start date of 8/6/2024 (Photographs 140-167). The inspection team noted no debris in the secondary containment; however, the secondary containment berms were chipped and peeling. The impervious coating in this area appears to be compromised (Photograph 152-154). The inspection team was unable to view the tops of the tanks, because neither one was equipped with an operational ladder to scale the tank. Inspection personnel climbed a nearby tank to observe the tops of Tanks F1 and F2 from that vantage point. Facility personnel stated that they had not been on top of the adjacent hazardous waste tanks in many years. The exterior surface of the two tanks appeared to be newly painted. Both tanks showed signs of significant rusting and flaking.

The inspectors observed a conservation vent at the middle of a pipe connecting the tops of Tanks F1 and F2 (Photograph 163). This equipment appears to be a pressure relief device in gas/vapor service, which should be operated with no detectable emissions. Facility personnel stated that they had not conducted any monitoring on this equipment in many years. Without monitoring, Excel TSD has no records to demonstrate that the equipment is operating with no detectable emissions. The inspection team observed signs of a tank overflow through the line and out through the conservation vent and onto the pipe on either side of the conservation vent. The presence of waste observed on and around the conservation vent also indicates that this closure device is not secured in the closed position as designed. The inspection team noted one bolt missing from the pipe/port connector flange on a fill pipe connected to the top of Tank F1 (Photograph 158). The missing bolt indicates that this closure device is not secured in the closed position as designed. The inspection team observed some air emission monitoring tags

on the valves, flanged connections, and pipe and tank fittings for both Tanks F1 and F2. The inspection team recommends that an updated tank integrity testing be conducted.

Pursuant to Permit Condition IV.C.1, Containment, Detection, and Management of Releases to the Secondary Containment Systems, the permittee shall ensure that secondary containment systems are constructed and maintained as shown and described in Attachment 7.3, and the documentation approved by the Division Director pursuant to Subsection II.B of this permit, and operated to prevent any migration of wastes or accumulated liquid out of the system to the soil, groundwater, or surface water at any time during the use of the tank system.

Pursuant to Permit Condition II.B: Maintenance of the Facility: the permittee shall construct or maintain the facility to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment.

Pursuant to Permit Condition II.H.1: Preparedness and Prevention, Operation/Maintenance of the Facility: the facility shall be designed, constructed, maintained, and operated to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous constituents to air, soil, or surface water which could threaten human health or the environment.

Pursuant to Permit Condition II.R.3: Organic Air Emission Standards, General Standards, which incorporates Tenn. Comp. R. & Regs. 1200-1-11-.06(32) [40 C.F.R. § 264 Subpart CC] (however, Rule 1200-1-11-.06 was repealed and renumbered 0400-12-01-.06). Pursuant to Tenn. Comp. R. & Regs. 0400-12-01-.06(32)(e)3.(iii) [40 C.F.R. § 264.1084(c)(3)], whenever a hazardous waste is in the tank, the fixed roof shall be installed with each closure device secured in the closed position.

Laboratory and Decontamination Shed SAAs

Excel TSD manages one SAA in the laboratory, and the inspection team observed seven containers of hazardous waste in this SAA: one red 8-gallon container dated 8/1/23, three 5-gallon empty transfer containers, a 5-gallon black plastic bucket labeled as "Oxidizer 5.1", three open boxes of laboratory samples, one 1-liter accumulating waste from an analyzer, and one 5-gallon white container (Photographs 169-182). These containers were in good condition and closed. Each container was labeled with the words hazardous waste, but most were not marked with an indication of the hazards of their contents.

Excel TSD manages a second SAA for accumulating used PPE in the decontamination shed. The inspection team observed one 55-gallon container in this SAA (Photograph 183-185). This container was closed and labeled with the words hazardous waste, but it was not marked with an indication of the hazards of its contents.

Pursuant to Tenn. Comp. R. & Regs. 0400-12-01-.03(1)(f)1.(v)(I) [40 C.F.R. § 262.15(a)(5)(ii)], which is a condition of the SAA Permit Exemption, a generator is required to mark or label its containers with an indication of the hazards of the contents.

Used Oil Storage and Non-Hazardous Waste Storage Areas

The inspection team noted hundreds of containers stored in the used oil storage area and the non-hazardous waste storage area (Photographs 186-197). Although these containers were in good condition and labeled, some containers were labeled as both non-hazardous waste and Hazardous Waste (Photograph 191-193, and 195). The inspection team was unable to determine if these were hazardous waste stored outside of permitted areas, because the hazardous waste determinations reflected by the container labels were inadequate and conflicting.

Pursuant to Tenn. Comp. R. & Regs. 0400-12-01-.03(1)(b) [40 C.F.R. § 262.11], a person who generates a solid waste, as defined in Tenn. Comp. R. & Regs. 0400-12-01-.02(1)(b) [40 C.F.R. § 261.2], must make an accurate determination as to whether that waste is a hazardous waste in order to ensure wastes are properly managed according to applicable RCRA regulations articulated in Tenn. Comp. R. & Regs. 0400-12-01-.03(1)(b) [40 C.F.R. § 262.11].

12) Records Review

While the rest of the inspection team conducted the Facility tour, TDEC representative Beverly Philpot conducted a review of available records created since the last RCRA CEI, which was conducted in September 2023. The observations below are also documented in the TDEC inspection report dated November 13, 2024. TDEC reviewed the following records: the contingency plan, the hazardous waste permit, the closure plan, the corrective action plan, spill prevention, Control and Countermeasures inspections, manifests, annual reports, transporter records, waste reduction plan and annual review, air emission monitoring for Subparts BB and CC, the waste analysis plan, hazardous waste determinations, training documentation, hazardous waste storage area inspections for permitted tanks and containers storage areas, daily inspection check lists, weekly inspections for discharge confinement structures, and daily inventory reports among other records.

Daily Inventory Reports

The inspection team requested inventory records from October 2023 through the date of the inspection. Below is a chart of the permitted capacity exceedances and missing records as documented by submittals dated September 18, 2024:

Permitted Container Storage Capacity versus Daily Inventory		
	Outside Hazardous Waste Container Management Area 30,060 Gallons	Combined Maximum Hazardous Waste Container Capacity 52,620 Gallons

Date	Inventory	Exceedance	Inventory	Exceedance
10-31-2023	50,817	20,757	65,288	12,688
12-20-2023	31,655	1,595	<52,620	None
12-21-2023	31,655	1,595	<52,620	None
12-22-2023	31,655	1,595	<52,620	None
12-23-2023	No	Inventory	Sheets	Submitted
12-24-2023	No	Inventory	Sheets	Submitted
12-25-2023	No	Inventory	Sheets	Submitted
12-26-2023	No	Inventory	Sheets	Submitted
12-27-2023	31,655	1,595	<52,620	None
12-28-2023	31,655	1,595	<52,620	None
12-29-2023	31,655	1,595	<52,620	None
03-22-2024	39,841	9,781	<52,620	None
03-23-2024	39,841	9,781	<52,620	None
03-25-2024	40,721	10,661	<52,620	None
03-26-2024	40,331	10,271	<52,620	None
03-27-2024	40,331	10,271	<52,620	None
03-28-2024	43,438	13,378	53,151	531
03-29-2024	43,438	13,378	53,151	531
May 2024	No	Inventory	Sheets	Submitted
June 2024	No	Inventory	Sheets	Submitted
July 2024	No	Inventory	Sheets	Submitted
August 2024	No	Inventory	Sheets	Submitted
September 1-3, 2024	No	Inventory	Sheets	Submitted

No permitted storage capacity exceedances were noted for November 2023, or for January, February, or April 2024. Exceedances of permitted storage capacities were noted for one day in October 2023 (October 31, 2023), for six days in December 2023 (December 20-22 and 27-29, 2023), and for seven days in March 2024 (March 22-23, 25-29, 2024). No records were submitted for December 23-27, 2023, or for May, June, July, August, and September 1-3, 2024, which equates to a total of approximately 130 days.

Pursuant to Permit Condition III.A.2: Specific Conditions for Storage in Containers/Waste identification: The permittee may store hazardous wastes in containers in the unit(s), described in Attachment 7, subject to the terms of this permit: 2. The total combined, maximum hazardous waste container capacity is 52,620 gallons. The maximum waste storage capacities for each unit are:

- (a) Container Storage Building A (Area 5) = 16,720 gallons
- (b) Container Storage Building B (Area 6) = 11,000 gallons
- (c) Outside Hazardous Waste Container Management Area (Areas 1-4) = 30,060 gallons

Pursuant to Permit Condition I.F.7: Documents to be Maintained at the Facility: the permittee shall maintain at the facility, until closure is completed and certified by a qualified Professional Engineer, the following documents and amendments, revisions and

modifications to these documents: (7) operating and other applicable administrative records as required by this permit and Chapter 1200-1-11.

Pursuant to Permit Condition II.K.1., the permittee shall keep a written operating record at the facility. The following information shall be recorded by the permittee, as it becomes available, and maintained in the operating record for five (5) years unless noted as follows:

(b) The location of each hazardous waste within the facility and the quantity at each location. This information shall include cross-references to specific manifest document numbers if the waste was accompanied by a manifest. This information must be maintained in the operating record until closure of the facility.

(i) The permittee will complete at the end of each operating day (or at the beginning of the next operating day) a Daily Container Inventory Location Report identifying, for each operational area at the facility, the hazardous waste containers that are in that area at that time. The completed Daily Container Inventory Location Reports will be maintained, as paper or electronic files, as part of the operating record until closure of the facility.

Contingency Plan and Quick Reference Guide (QRG):

Excel TSD uses one Contingency Plan that addresses requirements of both the permit and the LQG regulations. The actions that facility personnel should take in response to an emergency are described in the facility's Contingency Plan, which was last updated on February 26, 2024.

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 describes arrangements agreed to with the Shelby County Emergency Management Agency, appropriate first responder entities, and the local hospital.

The plan lists the names and emergency telephone numbers for persons identified as emergency coordinators. Nathan Jenkins is listed as the primary emergency coordinator, and the other individuals are listed in the order in which they will assume responsibility as alternates.

The plan includes a list of all emergency equipment at the facility. The list includes fire extinguishing systems, spill control equipment, communications and alarm systems, and decontamination equipment. The list is not up to date. The Plan lists radios as the communication equipment, but facility personnel currently use cell phones. 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 signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes.

A copy of the Contingency Plan (and its quick reference guide) was most recently submitted to the Shelby County Emergency Management Agency, appropriate first responder entities, and a local hospital on February 26, 2024. However, there was no QRG available for review during the inspection.

Excel TSD submitted a QRG to the EPA and the TDEC on September 18, 2024. The QRG included the types/names of hazardous waste in layman's terms and the associated hazard associated with each hazardous waste present at any one time; the estimated maximum amount of each hazardous waste that may be present at any one time; the identification of any hazardous wastes where exposure would require unique or special treatment by medical or hospital staff; a map of the facility showing where hazardous wastes are generated, accumulated and treated and routes for accessing these wastes; a street map of the facility in relation to surrounding businesses, schools and residential areas; the locations of water supply; and the identification of on-site notification systems. The QRG did not include updated names of the emergency coordinator(s) and emergency telephone number(s). The QRG did not meet the minimum requirements as listed above.

Pursuant to Tenn. Comp. R. & Regs. 0400-12-01-.03(1)(vi))2. [40 C.F.R. § 262.17(a)(6)] which references Tenn. Comp. R. & Regs. 0400-12-01-.03(12)(j)2 [40 C.F.R. § 262.262], an LQG complies with the standards in paragraph (12) of this Rule, Preparedness, Prevention, and Emergency Procedures for Large Quantity Generators. A copy of the contingency plan and all revisions to the plan must be maintained at the large quantity generator, and:

- 2. A large quantity generator that first becomes subject to these provisions after the effective date of these rules, or a large quantity generator that is otherwise amending its contingency plan, must at that time submit a quick reference guide of the contingency plan to the local emergency responders identified in part 1 of this subparagraph or, as appropriate, the Local Emergency Planning Committee. The quick reference guide must include the following elements:**
 - (i) The types/names of hazardous wastes in layman's terms and the associated hazard associated with each hazardous waste present at any one time (e.g., toxic paint wastes, spent ignitable solvent, corrosive acid);**
 - (ii) The estimated maximum amount of each hazardous waste that may be present at any one time;**
 - (iii) The identification of any hazardous wastes where exposure would require unique or special treatment by medical or hospital staff;**
 - (iv) A map of the facility showing where hazardous wastes are generated, accumulated, and treated, and routes for accessing these wastes;**
 - (v) A street map of the facility in relation to surrounding businesses, schools, and residential areas to understand how best to get to the facility and also evacuate citizens and workers;**
 - (vi) The locations of water supply (e.g., fire hydrant and its flow rate);**
 - (vii) The identification of on-site notification systems (e.g., a fire alarm that rings off site, smoke alarms); and**

- (viii) **The name of the emergency coordinator(s) and 7/24-hour emergency telephone number(s) or, in the case of a facility where an emergency coordinator is continuously on duty, the emergency telephone number for the emergency coordinator.**

Weekly Inspection Records

The inspectors reviewed Excel TSD's available records of inspections of the hazardous waste central accumulation area (CAA) since September 2023. The inspection log includes a checklist to record observations about leaking containers and for deterioration of containers caused by corrosion or other factors. The inspection log includes a checklist to record observations including: Containers: improperly closed, signs of leaks, corrosion, bulging, properly labeled damaged, not on pallets outside, pallets/PCUs in good condition, stacked improperly, and aisle space; Aisle Space: adequate unobstructed access by emergency equipment or personnel; Secondary Containment including Sumps: accumulated liquids, cracks, deterioration, debris, sealant not in good condition; Concrete Surfaces including Ramps and Curbs: cracks, deterioration, spills, debris, sealant not in good condition, and uneven settlement; and Incompatible Waste Storage: segregated and stored properly, and not on PCU among other requirements.

Tank Inspections

Facility personnel stated that each and every operating day a man lift was utilized in conjunction with a forklift truck to view the top of the Tanks F1 and F2 as part of the daily inspections (Photograph 168). However, it did not appear that the tops of tanks were visible using this method due to the berm between Area 4 and the permitted Tank area. The daily inspections did not record any of the following conditions observed during the inspection: the rusting tanks, the release of hazardous waste through the open conservation vent, or the missing bolt from the opening on top of the tank. Additionally, the daily inspection checklists stated that the concrete surface in the load/unloading area was "acceptable" and did not include a notation concerning the secondary containment deficiencies or repairs under the space labeled "Observation". However, the associated column for "Date and Name of Repairs/Remedial Action" was marked as "ongoing repairs." TDEC personnel noted that "pages 4.3-7, 4.3-8, and 4.3-9 were dated 2-28-24, 2-29-24, 2-30-24, and 3-1-24." February had only 29 days in 2024; however, there was a record for an inspection on February 30, 2024.

Pursuant to Permit Condition II.E.1 General Inspection Requirements, Inspections: the permittee shall inspect the facility for malfunctions and deterioration, operator errors, and discharges which may be causing or may lead to (1) a release of hazardous waste or hazardous constituents to the environment or (2) a threat to human health. The permittee shall inspect each listed item on the inspection form(s) in Attachment 4. The inspection type and frequency shall be in accordance with Attachment 4.

Pursuant to Permit Condition II.E.2, General Inspection Requirements, Remedies: the permittee shall remedy any deterioration or malfunction of equipment or structures which

the inspection reveals on a schedule which ensures that the problem does not lead to an environmental or human health hazard. Where a hazard is imminent or has already occurred, remedial action shall be taken immediately.

Pursuant to Permit Condition II.E.3, General Inspection Requirements, Inspection Records: the permittee shall record inspections in an inspection log or summary. The permittee shall keep these records for at least five years from the date of inspection. At a minimum, these records shall include the date and time of the inspection, the name of the inspector, a notation of the observations made, and the date and nature of any repairs or other remedial actions.

Pursuant to Attachment 4.1-2: Hazardous Waste Tank Systems: Each hazardous waste tank is visually inspected daily for signs of damage or leakage. This inspection also includes the piping, valves, and other equipment ancillary to the tanks. During this inspection, the secondary containment area is visually inspected for collected liquids and signs of deterioration, including concrete cracks or gaps.

Pursuant to Attachment 8.1: General Tank System Operation Procedures: 2. As more fully described in Attachment 4 (Inspections), Excel TSD personnel will formally inspect each tank system every operating day (i.e., each day that there is hazardous waste in the tank system), checking the tanks, their ancillary equipment, and the secondary containment system to detect corrosion or releases of wastes.

Pursuant to Permit Condition II.E.1 General Inspection Requirements, Inspections, which incorporates Attachment 4.1-2: Hazardous Waste Tank Systems: Each hazardous waste tank is visually inspected daily for signs of damage or leakage. This inspection also includes the piping, valves, and other equipment ancillary to the tanks. During this inspection, the secondary containment area is visually inspected for collected liquids and signs of deterioration, including concrete cracks or gaps.

Pursuant to Permit Condition IV.C, Containment, Detection, and Management of Releases to the Secondary Containment Systems, which incorporates Attachment 4 (Inspections), Excel TSD personnel will formally inspect each tank system every operating day (i.e., each day that there is hazardous waste in the tank system), checking the tanks, their ancillary equipment, and the secondary containment system to detect corrosion or releases of wastes.

Pursuant to Permit Condition IV.F, Inspection of the Tank Systems:

2. The permittee shall inspect at least once each operating day:
 - (a) Aboveground portions of the tank system, to detect corrosion or releases of waste;
 - (b) Data gathered from monitoring and leak detection equipment (e.g., pressure or temperature gauges, monitoring ells) to ensure that the tank system is being operated according to its design; and
 - (c) The construction materials and the area immediately surrounding the

externally accessible portion of the tank system, including the secondary containment system (e.g., dikes) to detect erosion or signs of releases of hazardous waste (e.g. wet spots, dead vegetation).

Subpart CC Inspections:

Excel TSD did not provide the requested records of annual inspections for Subpart CC organic air emissions that were conducted for Tanks F1 and F2 over the last 5 years.

Pursuant to Permit Condition II.R.3.: General Standards, which incorporates Rule 1200-1-11-.06(32) (however, Rule 1200-1-11-.06 was repealed and renumbered 0400-12-01-.06).

Pursuant to Tenn. Comp. R. & Regs. 0400-12-01-.06(32)(c)2., Air Emission Standards for Tanks, Surface Impoundments, and Containers [40 CFR 264 Subpart CC]; Standards: General [40 CFR 264.1082], 2. The owner or operator shall control air pollutant emissions from each hazardous waste management unit in accordance with standards specified in subparagraphs (e) through (h) of this paragraph, as applicable to the hazardous waste management unit, except as provided for in part 3 of this subparagraph.

Pursuant to Tenn. Comp. R. & Regs. 0400-12-01-.06(32)(e)3.(iii-iv): Standards: Tanks [40 CFR 264.1084],

- 3. Owners and operators controlling air pollutant emissions from a tank using Tank Level 1 controls shall meet the requirements specified in subparts 3(i) through 3(iv) of this subparagraph:**

(iii) Whenever a hazardous waste is in the tank, the fixed roof shall be installed with each closure device secured in the closed position except as follows:

(iv) The owner or operator shall inspect the air emission control equipment in accordance with the following requirements.

(I) The fixed roof and its closure devices shall be visually inspected by the owner or operator to check for defects that could result in air pollutant emissions. Defects include, but are not limited to, visible cracks, holes, or gaps in the roof sections or between the roof and the tank wall; broken, cracked, or otherwise damaged seals or gaskets on closure devices; and broken or missing hatches, access covers, caps, or other closure devices.

(II) The owner or operator shall perform an initial inspection of the fixed roof and its closure devices on or before the date that the tank becomes subject to this subparagraph. Thereafter, the owner or operator shall perform the inspections at least once every year except under the special conditions provided for in part 12 of this subparagraph.

(III) In the event that a defect is detected, the owner or operator shall repair the defect in accordance with the requirements of part 11 of this subparagraph.

(IV) The owner or operator shall maintain a record of the inspection in accordance with the requirements specified in part (j)2 of this paragraph.

Pursuant to Permit Condition IV.A. Waste Identification, which incorporates Attachment 8.1-4: Control of Organic Air Emissions from Tank Systems: At least once each year, Excel TSD personnel visually inspect the fixed roofs and closure devices of Tanks F1 and F2 to check for defects that could result in air pollutant emissions. Such defects include, but are not limited to, visible cracks, holes, or gaps in the roof of the tank or between the closure devices and the tank roof; broken, cracked, or otherwise damaged seals or gaskets on closure devices; and broken or missing hatches, access covers, caps, or other closure devices. Such inspections are performed using an inspection checklist as described in Attachment 4, (Inspections), and the completed checklist will be maintained for a period of at least 5 years as part of the facility's Operating Record.

If a defect is detected, Excel TSD will make first efforts at repair of the defect no later than 5 calendar days after detection, and repair shall be completed as soon as possible but no later than 45 calendar days after detection. Records will be kept documenting the corrective action(s) taken to repair the defect.

Training Records:

The inspectors reviewed facility job descriptions and employee names that were provided for Technician, office manager, operations manager, general manager, and lab manager. Each description included the requisite skill, education, or other qualifications, and duties of facility personnel assigned to that position.

Excel TSD provided a written description of the type and amount of both introductory and continuing training to be given to each person filling the positions listed above. The inspectors reviewed records of employee hazardous waste training completed in 2023 and 2024. The inspection team noted that Jenice Garrett had not received RCRA training or DOT training. This employee signed one manifest certifying all items on an outgoing generator manifest on August 16, 2024. Additionally, Excel TSD failed to provide documentation that the training program has been audited as required in the permit. The inspection team reviewed the current training documentation from 2019 which did not include regulatory amendments for the Hazardous Waste Generator Improvement Rule (GIR). Tennessee adopted the GIR on May 13, 2021, and was authorized for GIR on September 12, 2022. There have also been additional rules adopted and authorized by EPA which should be folded into the current training program.

Pursuant to Permit condition II.F, Personnel Training: the permittee shall ensure that facility personnel successfully complete a program of classroom instruction and/or on-the-job training that teaches them to perform their duties in a way that ensures the permittee's compliance with this permit and the Tennessee Hazardous Waste Management Regulations. The permittee shall ensure that the training program is directed by a person(s) trained in hazardous waste management procedures and shall include instruction which teaches facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to the positions in which they are employed.

Pursuant to Permit Condition II.F.1, Personnel Training: Training Program: the training program shall at least conform to the personnel training included in this subsection and Attachment 5.

Pursuant to Attachment 5.2: Training Program Review and Audit: The Safety Director will review and audit training activities annually to attempt to ensure that the training program is being properly and effectively implemented. At a minimum, this audit will review the following areas:

- Overall program effectiveness,
- Identification of personnel requiring training,
- Identification of specific classroom and job site training requirements (including introductory training and training updates) for various personnel,
- Conformance of training provided to employees with their training needs,
- Qualification and training of instructors, and
- Procedures to prevent unsupervised work by employees who have not completed the required training.

As part of this annual audit, the training program is to be reviewed at least annually and updated as deemed necessary. When problems are identified, more frequent review may be conducted until the Safety Director is satisfied that the issue has been resolved.

Subpart BB Monitoring

Excel TSD utilizes a mini-Rae photoionization gas detector (PID) to monitor equipment in contact with hazardous waste with organic concentration of at least 10 percent by weight. This includes valves, threaded piping connections, end caps, and bolted flanges associated with the piping systems utilized to transfer wastes into and out of Tanks F1 and F2, and portable pumps among other equipment used for treatment in totes.

The inspection team requested that the individual who conducts the Method 21 monitoring activity at the facility demonstrate the monitoring procedure he would use to look for emissions from the cap on a water bottle. Using his index finger to represent the PID probe, the individual made a quick circle five inches above the bottle cap. Method 21 specifically requires the inlet probe to be placed at the surface of the component interface where leakage could occur, and to be moved along the interface periphery. Movement of the instrument probe should be done slowly, so that meter readings can be recorded after leaving the probe inlet at the maximum reading location for approximately two times the instrument response time. Additionally, Excel TSD's PID calibration record did not list calibration gas readings to confirm proper calibration. The PID calibration records indicated that facility personnel were calibrating the PID monthly rather than on each day of use. Facility personnel were unable to describe their procedure for PID calibration.

Pursuant to Permit Condition II.Q: General Facility Conditions; Air Emission Standards for Equipment Leaks, which incorporates Tenn. Comp. R. & Regs. 0400-12-01-.06(31)(n)2., for all equipment that contains or contacts hazardous waste with organic concentrations of at least 10 percent by weight that are managed in units that are subject to this permit or in any on-site hazardous waste recycling unit, the permittee shall conduct leak detection monitoring, as required in subparagraph (c) through (m) of this paragraph, in compliance with the following requirements:

- (i) Monitoring shall comply with Reference Method 21 in 40 CFR part 60.**
- (ii) The detection instrument shall meet the performance criteria of Reference Method 21.**
- (iii) The instrument shall be calibrated before use on each day of its use by the procedures specified in Reference Method 21.**
- (iv) Calibration gases shall be:**
 - (I) Zero air (less than 10 ppm of hydrocarbon in air).**
 - (II) A mixture of methane or n-hexane and air at a concentration of approximately, but less than, 10,000 ppm methane or n-hexane.**
- (v) The instrument probe shall be traversed around all potential leak interfaces as close to the interface as possible as described in Reference Method 21.**

Annual Reports

The DSWM's Waste Activity Audit Section (WAAS) conducted a review of Excel TSD's reporting year 2022 annual report, which was received on March 13, 2023, and reporting year 2023 annual report, which was received on March 3, 2024. Deficiencies were identified during the review of the annual reports and a Notice of Deficiency (NOD) was issued on May 2, 2024. The NOD required Excel TSD to submit corrected Annual Reports for the 2022 and 2023 Reporting Years by June 3, 2024. As of the writing of this report, the NOD is still outstanding according to WAAS. The TDEC requested that this issue be addressed immediately. The TDEC will continue to lead in the resolution of this issue.

Manifests

The inspection team reviewed available hazardous waste manifest records and land disposal restriction forms for shipments of hazardous waste sent since September 2023. The inspection team recorded approximately ten container numbers during the initial walk through the permitted container storage areas, and were not able to match two of those containers with incoming manifest records:

Date	Container Number	Profile Number
8/31/2023	6707-015	81651
9/3/2023	4498-071	83938

Pursuant to Permit Condition II.J.1.(b)(v): Manifest System; Use of Manifest System: (b) if a facility receives a hazardous waste shipment accompanied by a manifest the permittee or his agent must: (v) retain at the facility a copy of each manifest for at least three years from the date of delivery.

The facility's records did not include a signed return copy of hazardous waste manifest number 019229688FLE for a truck tanker shipment of hazardous waste flammable liquid that was sent to Lone Star Industries (MOD981127319) on May 24, 2024, or hazardous waste manifest number 019229710FLE for a truck tanker shipment of hazardous waste flammable liquid that was sent to Lone Star Industries (MOD981127319) on May 30, 2024. During the review of e-manifest records, the inspection team noted that the May 24th shipment was rejected by the receiving facility. No records were provided to show that Excel TSD contacted the transporter or the owner or operator of the designated facility to determine the status of this waste, and Excel TSD did not submit exception reports for these missing manifests. Excel TSD personnel stated that they had not submitted a manifest exception report in the last year.

Pursuant to Permit Condition II.J.3: Manifest System; Initiating a Shipment, which incorporates Tenn. Comp. R. & Regs. 0400-12-01-.03(5)(c)1.(ii) and (iii) [40 C.F.R. § 262.42], Recordkeeping and Reporting; Exception Reporting;

- (ii) the permittee must submit an Exception Report to the Commissioner if he has not received a copy of the manifest with the handwritten signature of the owner or operator of the designed facility within 45 days of the date the waste was accepted by the initial transporter. The Exception Report must include:**
 - (I) A legible copy of the manifest for which the permittee does not have confirmation of delivery.**
 - (II) A cover letter signed by the permittee or his authorized representative explaining the efforts taken to locate the hazardous waste and the results of those efforts.**
- (iii) The Exception Report required by subpart (ii) of this part must be submitted to the Commissioner within five days after the 45-day period expires.**

13) Closing Conference

Due to the lateness of the day on September 4, 2024, the TDEC/EPA inspection team did not hold a closing conference or complete the document review at the facility.

On September 13, 2024, Cliff Caudle requested the following records via email: unmanifested waste report, inspections – construction material sand the area immediately surrounding, discharge confinement structures – weekly, annual training program audit, quick reference guide for Contingency plan and documentation that is has been sent to LEPC and first responder entities, records an results of waste analysis and waste determinations performed, and daily inventory sheets from eight specific days. Additionally, TDEC requested information regarding ten manifests.

Excel TSD responded via email on September 18, 2024, to the information request with the following records: the quick reference guide, inspection checklists, daily inventory sheets, and manifests.

The inspectors conducted the closing conference on October 22, 2024, at 4:00 pm with Nathan Jenkins, Steve Neal of Excel TSD, and Dwight Hinch, an environmental consultant via MS Teams. TDEC was represented by Beverly Philpot, Jim Holt, and Jason Simpson. The EPA was represented by Alan Newman, Sarah Rowell, George McBroom, Alexis Wilson, and Devon Robinson. During this meeting, the inspectors stated their preliminary conclusions of the inspection. Excel TSD agreed to provide updated records for waste inventories once the CEI report was finalized.

TDEC completed and mailed its Notice of Violation (NOV) on November 13, 2024. Excel TSD responded to the NOV on December 13, 2024.

14) Summary of Observations

Below is a summary of the observations described above:

A) Pursuant to Permit Condition I.F.7: Documents to be Maintained at the Facility: the permittee shall maintain at the facility, until closure is completed and certified by a qualified Professional Engineer, the following documents and amendments, revisions and modifications to these documents: (7) operating and other applicable administrative records as required by this permit and Chapter 1200-1-11.

Pursuant to Permit Condition II.K.1., the permittee shall keep a written operating record at the facility. The following information shall be recorded by the permittee, as it becomes available, and maintained in the operating record for five (5) years unless noted as follows:

(b) The location of each hazardous waste within the facility and the quantity at each location. This information shall include cross-references to specific manifest document numbers if the waste was accompanied by a manifest. This information must be maintained in the operating record until closure of the facility.

(i) The permittee will complete at the end of each operating day (or at the beginning of the next operating day) a Daily Container Inventory Location Report identifying, for each operational area at the facility, the hazardous waste containers that are in that area at that time. The completed Daily Container Inventory Location Reports will be maintained, as paper or electronic files, as part of the operating record until closure of the facility.

Excel TSD did not provide documentation for hazardous waste inventory for approximately 130 days in 2023 and 2024.

- B) Pursuant to Permit Condition II.B: Maintenance of the Facility: the permittee shall construct or maintain the facility to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment.**

The impervious coating and secondary containment berms around hazardous waste Tanks F1 and F2 were chipping and peeling; Tanks F1 and F2 both showed signs of significant rusting and flaking; Excel TSD had not conducted any monitoring of ancillary equipment associated with Tanks F1 and F2; and hazardous waste had been released through the open conservation vent associated with Tanks F1 and F2.

- C) Pursuant to Permit Condition II.E.1 GENERAL INSPECTION REQUIREMENTS: Inspections: The permittee shall inspect the facility for malfunctions and deterioration, operator errors, and discharges which may be causing or may lead to (1) a release of hazardous waste or hazardous constituents to the environment or (2) a threat to human health. The permittee shall inspect each listed item on the inspection form(s) in Attachment 4. The inspection type and frequency shall be in accordance with Attachment 4.**

Pursuant to Permit Condition II.E.2 GENERAL INSPECTION REQUIREMENTS: Remedies: The permittee shall remedy any deterioration or malfunction of equipment or structures which the inspection reveals on a schedule which ensures that the problem does not lead to an environmental or human health hazard. Where a hazard is imminent or has already occurred, remedial action shall be taken immediately.

Pursuant to Permit Condition II.E.3 GENERAL INSPECTION REQUIREMENTS: Inspection Records: The permittee shall record inspections in an inspection log or summary. The permittee shall keep these records for at least five years from the date of inspection. At a minimum, these records shall include the date and time of the inspection, the name of the inspector, a notation of the observations made, and the date and nature of any repairs or other remedial actions.

Pursuant to Attachment 4.1-2: Hazardous Waste Tank Systems: Each hazardous waste tank is visually inspected daily for signs of damage or leakage. This inspection also includes the piping, valves, and other equipment ancillary to the tanks. During this inspection, the secondary containment area is visually inspected for collected liquids and signs of deterioration, including concrete cracks or gaps.

Pursuant to Attachment 8.1: General Tank System Operation Procedures: 2. As more fully described in Attachment 4 (Inspections), ETSD personnel will formally inspect each tank system every operating day (i.e., each day that there is hazardous waste in the tank system), checking the tanks, their ancillary equipment, and the secondary containment system to detect corrosion or releases of wastes.

Pursuant to Permit Condition II.E.1 General Inspection Requirements, Inspections, which incorporates Attachment 4.1-2: Hazardous Waste Tank Systems: Each hazardous waste

tank is visually inspected daily for signs of damage or leakage. This inspection also includes the piping, valves, and other equipment ancillary to the tanks. During this inspection, the secondary containment area is visually inspected for collected liquids and signs of deterioration, including concrete cracks or gaps.

Pursuant to Permit Condition IV.C, Containment, Detection, and Management of Releases to the Secondary Containment Systems, which incorporates Attachment 4 (Inspections), ETSD personnel will formally inspect each tank system every operating day (i.e., each day that there is hazardous waste in the tank system), checking the tanks, their ancillary equipment, and the secondary containment system to detect corrosion or releases of wastes.

Pursuant to Permit Condition IV.F, Inspection of the Tank Systems:

2. The permittee shall inspect at least once each operating day:
 - (a) Aboveground portions of the tank system, to detect corrosion or releases of waste;
 - (b) Data gathered from monitoring and leak detection equipment (e.g., pressure or temperature gauges, monitoring ells) to ensure that the tank system is being operated according to its design; and
 - (c) The construction materials and the area immediately surrounding the externally accessible portion of the tank system, including the secondary containment system (e.g., dikes) to detect erosion or signs of releases of hazardous waste (e.g. wet spots, dead vegetation).

Excel TSD did not appear to be conducting adequate permitted hazardous waste tank inspections.

- D) Pursuant to Permit condition II.F, Personnel Training: the permittee shall ensure that facility personnel successfully complete a program of classroom instruction and/or on-the-job training that teaches them to perform their duties in a way that ensures the permittee's compliance with this permit and the Tennessee Hazardous Waste Management Regulations. The permittee shall ensure that the training program is directed by a person(s) trained in hazardous waste management procedures and shall include instruction which teaches facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to the positions in which they are employed.

Excel TSD failed to train one employee.

- E) Pursuant to Permit Condition II.F.1, Personnel Training: Training Program: the training program shall at least conform to the personnel training included in this subsection and Attachment 5.

Pursuant to Attachment 5.2: Training Program Review and Audit: The Safety Director will review and audit training activities annually to attempt to ensure that the training program is being properly and effectively implemented. At a minimum, this audit will review the following areas:

- **Overall program effectiveness;**
- **Identification of personnel requiring training;**
- **Identification of specific classroom and job site training requirements (including introductory training and training updates) for various personnel;**
- **Conformance of training provided to employees with their training needs;**
- **Qualification and training of instructors; and**
- **Procedures to prevent unsupervised work by employees who have not completed the required training.**

As part of this annual audit, the training program is to be reviewed at least annually and updated as deemed necessary. When problems are identified, more frequent review may be conducted until the Safety Director is satisfied that the issue has been resolved.

Excel TSD failed to provide records of an audit of its training program to ensure that it was up to date.

- F) Pursuant to Permit Condition II.H.1: Preparedness and Prevention, Operation/Maintenance of the Facility: the facility shall be designed, constructed, maintained, and operated to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous constituents to air, soil, or surface water which could threaten human health or the environment.**

Excel TSD failed to maintain the permitted tanks by failing to repair the rusting tanks.

- G) Pursuant to Permit Condition II.H.5: Preparedness and Prevention: 2. Required Aisle Space Required: The permittee shall maintain aisle space to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment to any area of the facility operation in an emergency.**

The inspection team noted two locations where aisle space was insufficient in Area 5.

- H) Pursuant to Permit Condition II.H.7(b), Preparedness and Prevention, the permittee shall prevent hazards at the container unloading (storage) areas by several means such that containers of hazardous waste shall be checked for proper container type, proper container closure, and proper labeling and errors will be corrected as described in Attachment 2.**

Pursuant to Attachment 2.1, page 2.1-4 and 5, each such received container is promptly, clearly, and durably marked (using markers or grease pencils) or labeled (using adhesive labels) by ETSD receiving personnel with the date the container was received. The approved MPF [Material Profile Form] Number that matches the manifest description of

the waste is also written on each container (if it has not already been entered on a label), along with a container number.

The inspectors observed one container in Area 4 that was not labeled with the accumulation start date, the MPF number, or the container number.

- I) Pursuant to Permit Condition II.J.1.(b)(v): Manifest System; Use of Manifest System: (b) if a facility receives a hazardous waste shipment accompanied by a manifest the permittee or his agent must: (v) retain at the facility a copy of each manifest for at least three years from the date of delivery.**

Excel TSD did not provide manifests associated with two containers on site.

- J) Pursuant to Permit Condition II.J.3: Manifest System; Initiating a Shipment, which incorporates Tenn. Comp. R. & Regs. 0400-12-01-.03(5)(c)1.(ii) and (iii) [40 C.F.R. § 262.42], Recordkeeping and Reporting; Exception Reporting;**
- (ii) the permittee must submit an Exception Report to the Commissioner if he has not received a copy of the manifest with the handwritten signature of the owner or operator of the designed facility within 45 days of the date the waste was accepted by the initial transporter. The Exception Report must include:**
 - (I) A legible copy of the manifest for which the permittee does not have confirmation of delivery.**
 - (II) A cover letter signed by the permittee or his authorized representative explaining the efforts taken to locate the hazardous waste and the results of those efforts.**
 - (iii) The Exception Report required by subpart (ii) of this part must be submitted to the Commissioner within five days after the 45-day period expires.**

The facility's records did not include a signed return copy of hazardous waste manifest number 019229688FLE or hazardous waste manifest number 019229710FLE. Excel TSD personnel stated that they had not submitted a manifest exception report in the last year.

- K) Pursuant to Permit Condition II.O.3, Land Disposal Restrictions: the storage of hazardous waste restricted from land disposal under Rule 1200-1-11-.10 is prohibited unless the requirements of Rule 1200-1-11-.10(4) are met (however, Rule 1200-1-11-.10(4) was repealed and renumbered 0400-12-01-.10). Pursuant to Tenn. Comp. R. & Regs. 0400-12-01-.10(4)(a)1.(ii)(I)I. [40 C.F.R. § 268.50(a)(2)(i)(A)], each container must be clearly marked with the words Hazardous waste.**

The inspectors observed one container in Area 4 that was not labeled with the words "Hazardous Waste."

- L) Pursuant to Permit Condition II.O.3, Land Disposal Restrictions: the storage of hazardous waste restricted from land disposal under Rule 1200-1-11-.10 is prohibited unless the requirements of Rule 1200-1-11-.10(4) are met (however, Rule 1200-1-11-.10(4) was**

repealed and renumbered 0400-12-01-.10). Pursuant to Tenn. Comp. R. & Regs. 0400-12-01-.10(4)(a)1.(ii)(I)III. [40 C.F.R. § 268.50(a)(2)(i)(C)], each container of hazardous wastes restricted from land disposal must be clearly marked to identify its contents and with an indication of the hazards of the contents.

The inspectors observed that the following containers, which were not marked with an indication of the hazards of their contents, stored by Excel TSD: 53 containers in Area 2, one roll off in Area 3, 58 containers in Area 4, 12 containers in Area 5, and one container in Area 6.

M) Pursuant to Permit Condition II.O.3, Land Disposal Restrictions: the storage of hazardous waste restricted from land disposal under Rule 1200-1-11-.10 is prohibited unless the requirements of Rule 1200-1-11-.10(4) are met (however, Rule 1200-1-11-.10(4) was repealed and renumbered 0400-12-01-.10). Pursuant to Tenn. Comp. R. & Regs. 0400-12-01-.10(4)(a)1.(ii)(I)IV. [40 C.F.R. § 268.50(a)(2)(i)(D)], each container must be clearly marked with the accumulations start date.

The inspectors observed one container in Area 4 and four containers in Area 5 that were not labeled with the accumulation start date.

N) Pursuant to Permit Condition II.O.3, Land Disposal Restrictions: the storage of hazardous waste restricted from land disposal under Rule 1200-1-11-.10 is prohibited unless the requirements of Rule 1200-1-11-.10(4) are met (however, Rule 1200-1-11-.10(4) was repealed and renumbered 0400-12-01-.10). Pursuant to Tenn. Comp. R. & Regs. 0400-12-01-.10(4)(a)3. [40 C.F.R. § 268.50(c)], an owner/operator of a treatment, storage or disposal facility may store hazardous wastes restricted from land disposal beyond one year if they prove that such storage was solely for the purpose of accumulation of such quantities of hazardous waste as are necessary to facilitate proper recovery, treatment, or disposal.

The inspectors observed one container in Area 2 and four containers in Area 4 with an accumulation start date over one year old.

O) Pursuant to Permit Condition II.Q: General Facility Conditions; Air Emission Standards for Equipment Leaks, which incorporates Tenn. Comp. R. & Regs. 0400-12-01-.06(31)(n)2., for all equipment that contains or contacts hazardous waste with organic concentrations of at least 10 percent by weight that are managed in units that are subject to this permit or in any on-site hazardous waste recycling unit, the permittee shall conduct leak detection monitoring, as required in subparagraph (c) through (m) of this paragraph, in compliance with the following requirements:

(i) Monitoring shall comply with Reference Method 21 in 40 CFR part 60.

(ii) The detection instrument shall meet the performance criteria of Reference Method 21.

(iii) The instrument shall be calibrated before use on each day of its use by the procedures specified in Reference Method 21.

- (iv) Calibration gases shall be:**
 - (I) Zero air (less than 10 ppm of hydrocarbon in air).**
 - (II) A mixture of methane or n-hexane and air at a concentration of approximately, but less than, 10,000 ppm methane or n-hexane.**
- (v) The instrument probe shall be traversed around all potential leak interfaces as close to the interface as possible as described in Reference Method 21.**

Excel TSD did not provide calibration records for conducting monitoring under RCRA Subpart BB.

- P) Pursuant to Permit Condition II.R.3.: General Standards, which incorporates Rule 1200-1-11-.06(32) (however, Rule 1200-1-11-.06 was repealed and renumbered 0400-12-01-.06).**

Pursuant to Tenn. Comp. R. & Regs. 0400-12-01-.06(32)(c)2., Air Emission Standards for Tanks, Surface Impoundments, and Containers [40 CFR 264 Subpart CC]; Standards: General [40 CFR 264.1082], 2. The owner or operator shall control air pollutant emissions from each hazardous waste management unit in accordance with standards specified in subparagraphs (e) through (h) of this paragraph, as applicable to the hazardous waste management unit, except as provided for in part 3 of this subparagraph.

Pursuant to Tenn. Comp. R. & Regs. 0400-12-01-.06(32)(e)3.(iii-iv): Standards: Tanks [40 CFR 264.1084], (3) Owners and operators controlling air pollutant emissions from a tank using Tank Level 1 controls shall meet the requirements specified in subparts 3(i) through 3(iv) of this subparagraph:

(iii) Whenever a hazardous waste is in the tank, the fixed roof shall be installed with each closure device secured in the closed position except as follows.

(iv) The owner or operator shall inspect the air emission control equipment in accordance with the following requirements.

(I) The fixed roof and its closure devices shall be visually inspected by the owner or operator to check for defects that could result in air pollutant emissions. Defects include, but are not limited to, visible cracks, holes, or gaps in the roof sections or between the roof and the tank wall; broken, cracked, or otherwise damaged seals or gaskets on closure devices; and broken or missing hatches, access covers, caps, or other closure devices.

(II) The owner or operator shall perform an initial inspection of the fixed roof and its closure devices on or before the date that the tank becomes subject to this subparagraph. Thereafter, the owner or operator shall perform the inspections at least once every year except under the special conditions provided for in part 12 of this subparagraph.

(III) In the event that a defect is detected, the owner or operator shall repair the defect in accordance with the requirements of part 11 of this subparagraph.

(IV) The owner or operator shall maintain a record of the inspection in accordance with the requirements specified in part (j)2 of this paragraph.

Pursuant to Permit Condition IV.A. Waste Identification, which incorporates Attachment 8.1-3: Control of Organic Air Emissions from Tank Systems: At least once each year, ETSD personnel visually inspect the fixed roofs and closure devices of Tanks F1 and F2 to check for defects that could result in air pollutant emissions. Such defects include, but are not limited to, visible cracks, holes, or gaps in the roof of the tank or between the closure devices and the tank roof; broken, cracked, or otherwise damaged seals or gaskets on closure devices; and broken or missing hatches, access covers, caps, or other closure devices. Such inspections are performed using an inspection checklist as described in Attachment 4, (Inspections), and the completed checklist will be maintained for a period of at least 5 years as part of the facility's Operating Record.

If a defect is detected, ETSD will make first efforts at repair of the defect no later than 5 calendar days after detection, and repair shall be completed as soon as possible but no later than 45 calendar days after detection. Records will be kept documenting the corrective action(s) taken to repair the defect.

Excel TSD did not provide records regarding annual inspections for Subpart CC organic air emissions for Tanks F1 and F2 for the last 5 years.

Q) Pursuant to Permit Condition II.R.3: Organic Air Emission Standards: General Standards The permittee shall comply with the applicable requirements of Rule 1200-1-11-.06(32). Pursuant to Tenn. Comp. R. & Regs. 0400-12-01-.06(32)(e)3.(iii) [40 C.F.R. § 264.1084(c)(3)], whenever a hazardous waste is in the tank, the fixed roof shall be installed with each closure device secured in the closed position.

Excel TSD was storing hazardous waste in Tank F1, which was equipped with a closure device not secured in the closed position due to a missing bolt from a closure device.

R) Pursuant to Permit Condition III.A.2: Specific Conditions for Storage in Containers/Waste identification: The permittee may store hazardous wastes in containers in the unit(s), described in Attachment 7, subject to the terms of this permit: 2. The total combined, maximum hazardous waste container capacity is 52,620 gallons. The maximum waste storage capacities for each unit are:
(a) Container Storage Building A (Area 5) = 16, 720 gallons
(b) Container Storage Building B (Area 6) = 11,000 gallons
(c) Outside Hazardous Waste Container Management Area (Areas 1-4) = 30,060 gallons

Excel TSD exceeded its permitted capacity for 130 days in 2023 and 2024.

S) Pursuant to Permit Condition III.B, Condition of Containers, if a container holding hazardous waste is not in good condition (e.g., severe rusting, apparent structural defects) or if it begins to leak, the permittee shall transfer the hazardous waste from this

container to a container that is in good condition or otherwise manage the waste in some other way that complies with the conditions of this permit.

Excel was storing three severely dented containers in Area 4 that had not been overpacked.

- **Pursuant to Permit Condition III.D.1, Management of Containers, which incorporates Attachment 7.1: Container Management: General Container Management Procedures: 4. Containers will be managed in rows no more than two containers wide (e.g., one four-drum pallet), with a minimum aisle space of 2.5 feet between rows. This allows for personnel access so that each drum can be readily inspected for label information, condition, and leaks.**

The inspection team noted two locations where aisle space was less than 2.5 feet in Area 5.

- T) Pursuant to Permit Condition III.D.2, Management of Containers: the permittee shall assure that containers holding hazardous waste are always closed during storage, except when it is necessary to add or remove waste.**

Excel TSD was storing one container in Area 2 and four containers in Area 5 that were open.

- U) Pursuant to Permit Condition III.F.2(a), Specific Conditions for Storage in Containers; Containment, Detection, and Management of Leaks or Spills: a containment system shall be designed, operated, and maintained as follows: (a) a base shall underlie the containers which is free of cracks or gaps and is sufficiently impervious to contain leaks, spills, and accumulated precipitation until the collected material is detected and removed.**

The inspection team noted cracks or gaps and lack of sufficiently impervious surface in the secondary containment in Areas 1, 2, 3, 4 and the Hazardous Waste Building (Areas 5 and 6).

- V) Pursuant to Permit Condition III.G, Special Requirements for Ignitable or Reactive Waste: The permittee shall not locate containers holding ignitable or reactive waste within 15 meters (50 feet) of the facility's property line.**

Excel TSD was storing one container within 15 meters of the property line that was labeled as ignitable waste in Area 6.

- W) Pursuant to Permit Condition IV.C.1, Containment, Detection, and Management of Releases to the Secondary Containment Systems, the permittee shall ensure that secondary containment systems are constructed and maintained as shown and described in Attachment 7.3, and the documentation approved by the Division Director pursuant to Subsection II.B of this permit, and operated to prevent any migration of wastes or accumulated liquid out of the system to the soil, groundwater, or surface water at any time during the use of the tank system.**

The inspection team noted cracks or gaps and lack of sufficiently impervious surface in the secondary containment in the tank farm.

- X) Pursuant to Tenn. Comp. R. & Regs. 0400-12-01-.03(1)(b) [40 C.F.R. § 262.11], a person who generates a solid waste, as defined in Tenn. Comp. R. & Regs. 0400-12-01-.02(1)(b) [40 C.F.R. § 261.2], must make an accurate determination as to whether that waste is a hazardous waste in order to ensure wastes are properly managed according to applicable RCRA regulations articulated in Tenn. Comp. R. & Regs. 0400-12-01-.03(1)(b) [40 C.F.R. § 262.11].**

Excel TSD was storing waste containers labeled as non-hazardous waste and as Hazardous Waste outside of the permitted hazardous waste container storage area.

- Y) Pursuant to Tenn. Comp. R. & Regs. 0400-12-01-.03(1)(f)1.(v)(I) [40 C.F.R. § 262.15(a)(5)(ii)], which is a condition of the SAA Permit Exemption, a generator is required to mark or label its containers with an indication of the hazards of the contents.**

The inspectors observed eight SAA containers that were not marked with the indication of the hazard(s) of their contents in the laboratory and decontamination shed.

- Z) Pursuant to Tenn. Comp. R. & Regs. 0400-12-01-.03(1)(vi))2. [40 C.F.R. § 262.17(a)(6)] which references Tenn. Comp. R. & Regs. 0400-12-01-.03(12)(j)2 [40 C.F.R. § 262.262], an LQG complies with the standards in paragraph (12) of this Rule, Preparedness, Prevention, and Emergency Procedures for Large Quantity Generators. A copy of the contingency plan and all revisions to the plan must be maintained at the large quantity generator, and:**

- 2. A large quantity generator that first becomes subject to these provisions after the effective date of these rules, or a large quantity generator that is otherwise amending its contingency plan, must at that time submit a quick reference guide of the contingency plan to the local emergency responders identified in part 1 of this subparagraph or, as appropriate, the Local Emergency Planning Committee. The quick reference guide must include the following elements:**

- (i) The types/names of hazardous wastes in layman's terms and the associated hazard associated with each hazardous waste present at any one time (e.g., toxic paint wastes, spent ignitable solvent, corrosive acid);**
- (ii) The estimated maximum amount of each hazardous waste that may be present at any one time;**
- (iii) The identification of any hazardous wastes where exposure would require unique or special treatment by medical or hospital staff;**
- (iv) A map of the facility showing where hazardous wastes are generated, accumulated, and treated, and routes for accessing these wastes;**
- (v) A street map of the facility in relation to surrounding businesses,**

- schools, and residential areas to understand how best to get to the facility and also evacuate citizens and workers;
- (vi) The locations of water supply (e.g., fire hydrant and its flow rate);
 - (vii) The identification of on-site notification systems (e.g., a fire alarm that rings off site, smoke alarms); and
 - (viii) The name of the emergency coordinator(s) and 7/24-hour emergency telephone number(s) or, in the case of a facility where an emergency coordinator is continuously on duty, the emergency telephone number for the emergency coordinator.

Excel TSD's QRG did not include updated names of the emergency coordinator(s) and emergency telephone number(s).

15) List of Attachments

Attachment 1 – Photo Log

Attachment 2 – Aerial Photograph of Site dated April 5, 2018

Attachment 3 – Schematic of site with locations of permitted areas depicted dated October 1, 2007

16) Signed

ALAN NEWMAN

Digitally signed by ALAN NEWMAN

Date: 2025.05.23 08:01:22 -04'00'

Alan Newman

Environmental Engineer

17) Concurrence

ARACELI CHAVEZ

Digitally signed by ARACELI CHAVEZ

Date: 2025.05.23 08:04:26 -04'00'

Araceli B. Chavez

RCRA Enforcement Section

Attachment 1

Photograph Log:

Photos taken September 4, 2024

Photos taken by Sarah Rowell

Photos taken with: Lumix Digital

EPA Property Tag: S75870



Photograph 1: Administration Building.



Photograph 4: Tanks removed from Best-Wade Petroleum, Inc. the former owners.



Photograph 2: Front gate.



Photograph 5: Tanks removed from Best-Wade Petroleum, Inc. the former owners.



Photograph 3: Front Gate.



Photograph 6: Tanks removal from Best-Wade Petroleum, Inc. the former owners.



Photograph 7: Gate to TSD Permitted Storage Area near Area 1.



Photograph 10: Permitted area 1 - looking across Area 2, 3 and at 4 under the Shed.



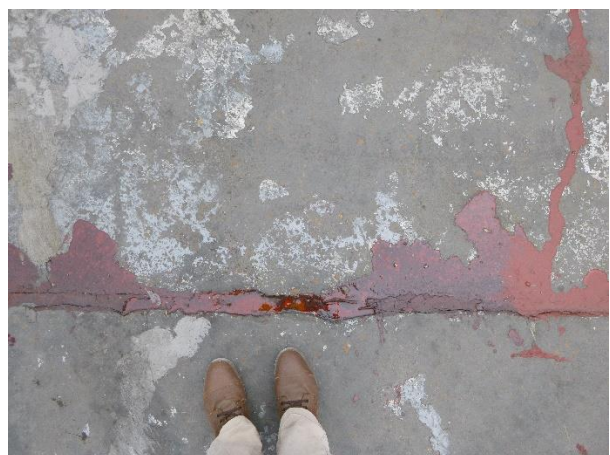
Photograph 8: Second Gate to TSD permitted Storage Area near maintenance area.



Photograph 11: Permitted Area 1- looking across Areas 2, 3 and 4 under the Shed.



Photograph 9: Loading dock gate near Area 1.



Photograph 12: Permitted Area 1 secondary containment.



Photograph 13: Permitted Area 1 secondary containment.



Photograph 16: Permitted Area 2.



Photograph 14: Permitted Area 1 secondary containment.



Photograph 17: Permitted Area 2.



Photograph 15: Permitted Area 2.



Photograph 18: Permitted Area 2.



Photograph 19: Permitted Area 2.



Photograph 22: Permitted Area 2.



Photograph 20: Permitted Area 2.



Photograph 23: Permitted Area 2.



Photograph 21: Permitted Area 2.



Photograph 24: Permitted Area 2.



Photograph 25: Permitted Area 2.



Photograph 28: Permitted Area 2.



Photograph 26: Permitted Area 2.



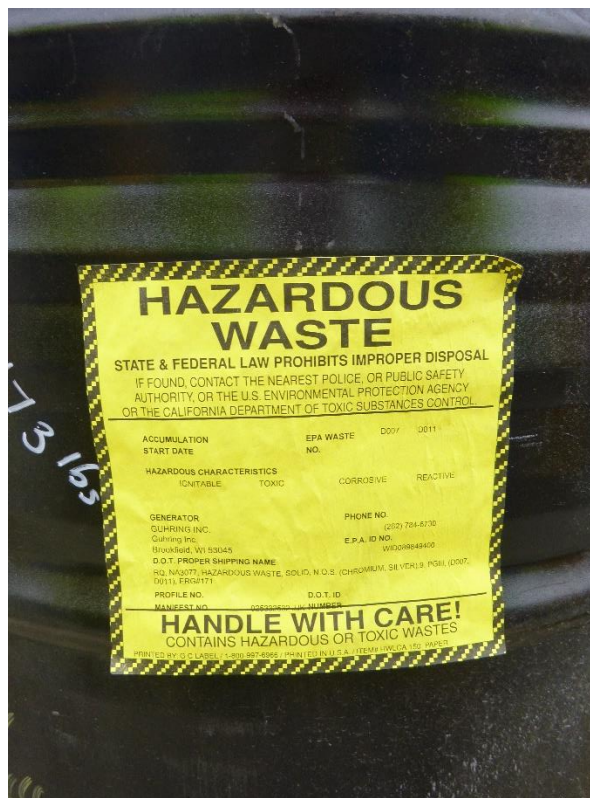
Photograph 29: Permitted Area 2.



Photograph 27: Permitted Area 2.



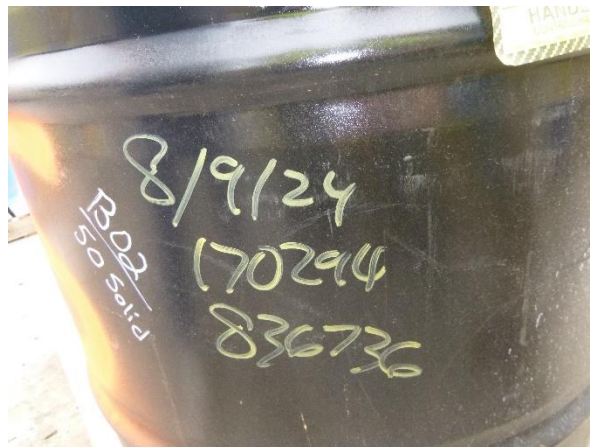
Photograph 30: Permitted Area 2.



Photograph 32: Permitted Area 2.



Photograph 31: Permitted Area 2.



Photograph 33: Permitted Area 2.



Photograph 34: Permitted Area 2.



Photograph 35: Permitted Area 2.



Photograph 36: Permitted Area 2.



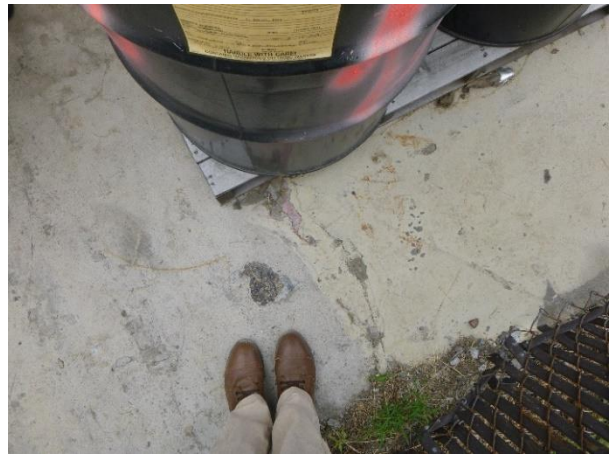
Photograph 37: Permitted Area 2.



Photograph 38: Permitted Area 2.



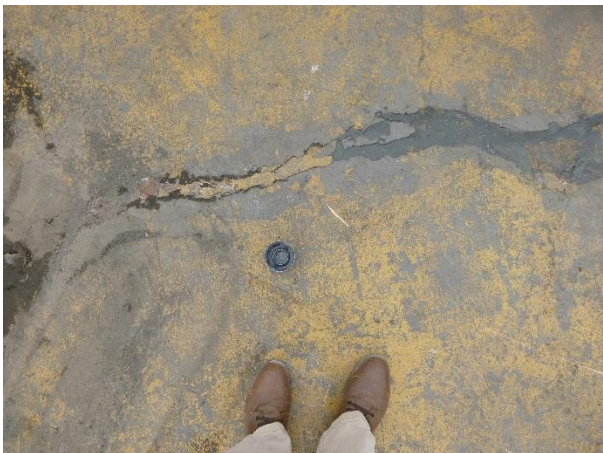
Photograph 39: Permitted Area 2.



Photograph 41: Permitted Area 2.



Photograph 42: Permitted Area 2.



Photograph 40: Permitted Area 2.



Photograph 43: Permitted Area 2.



Photograph 44: Permitted Area 2.



Photograph 46: Permitted Area 2.



Photograph 45: Permitted Area 2.



Photograph 47: Permitted Area 3.



Photograph 48: Permitted Area 3.



Photograph 49: Permitted Area 3.



Photograph 52: Permitted Area 3.



Photograph 50: Permitted Area 3.



Photograph 53: Permitted Area 4.



Photograph 51: Permitted Area 3.



Photograph 54: Permitted Area 4.



Photograph 55: Permitted Area 4.



Photograph 56: Worn coating in Area 4 Secondary Containment.



Photograph 57: Container stored over a year Area 4.



Photograph 58: Container stored over a year
Area 4.



Photograph 60: Container stored over a year
Area 4.



Photograph 59: Container stored over a year
Area 4.



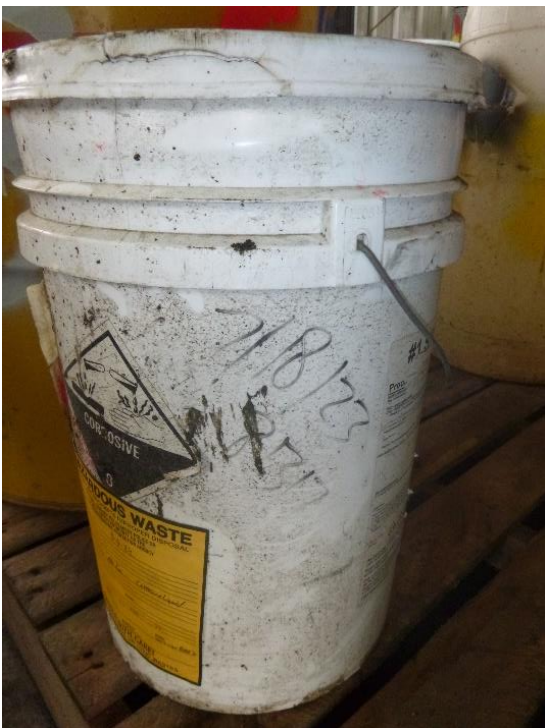
Photograph 61: Container stored over a year
Area 4.



Photograph 62: Container stored over a year
Area 4.



Photograph 64: Container stored over a year
Area 4.



Photograph 63: Container stored over a year
Area 4.



Photograph 65: Permitted Area 4.



Photograph 66: Permitted Area 4.



Photograph 68: Permitted Area 4.



Photograph 67: Permitted Area 4.



Photograph 69: Permitted Area 4.



Photograph 70: Permitted Area 4.



Photograph 71: Permitted Area 4.



Photograph 72: Permitted Area 4.



Photograph 73: Permitted Area 4.



Photograph 74: Permitted Area 4.



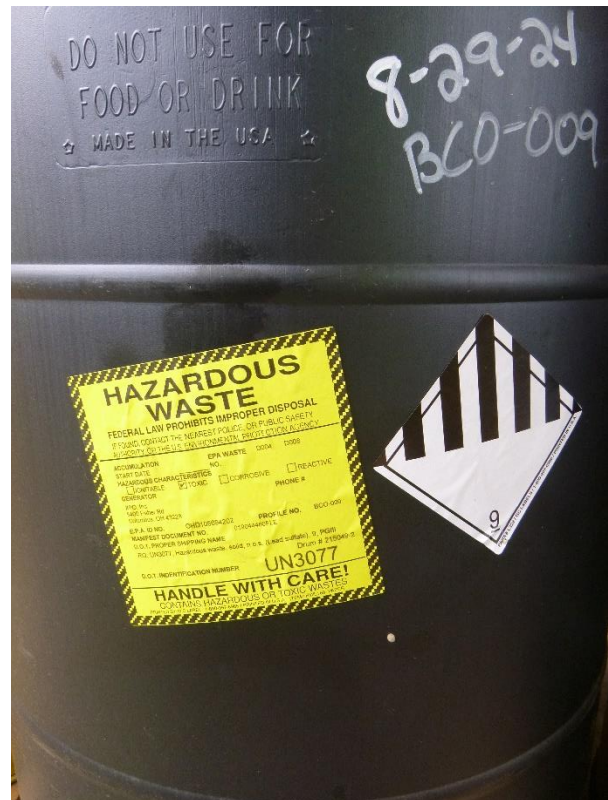
Photograph 75: Permitted Area 4.



Photograph 76: Permitted Area 4.



Photograph 77: Permitted Area 4.



Photograph 79: Permitted Area 4.



Photograph 78: Permitted Area 4.



Photograph 80: Permitted Area 4.



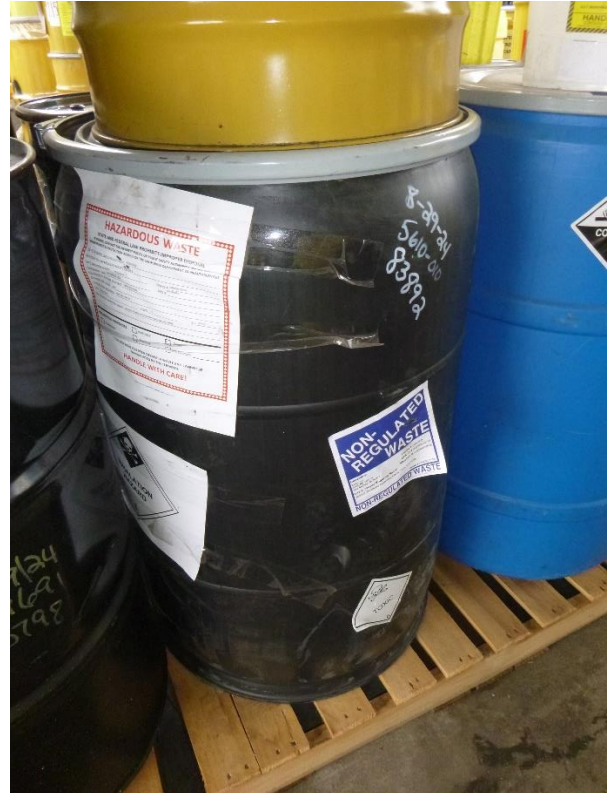
Photograph 81: Permitted Area 4.



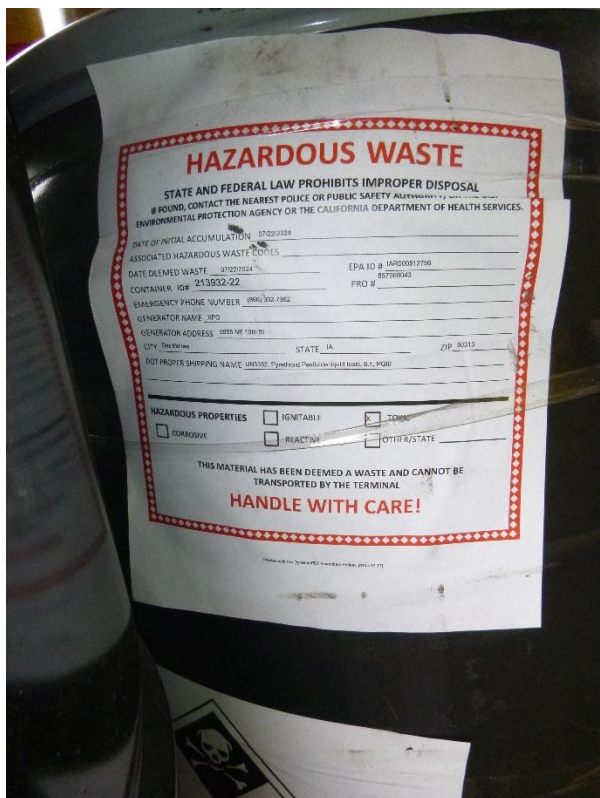
Photograph 83: Permitted Area 4.



Photograph 82: Permitted Area 4



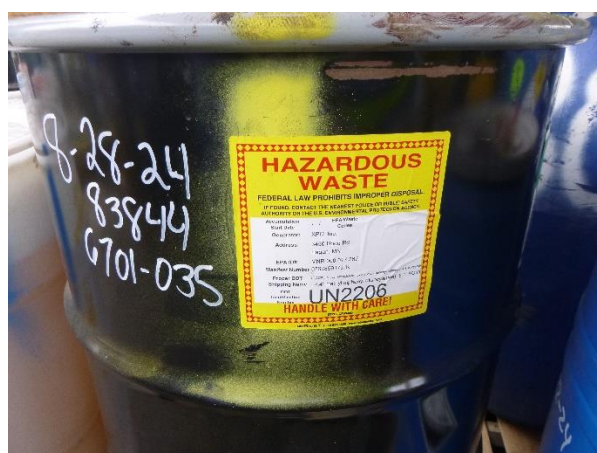
Photograph 84: Permitted Area 4.



Photograph 85: Permitted Area 4.



Photograph 87: Permitted Area 4.



Photograph 88: Permitted Area 4.



Photograph 86: Permitted Area 4.



Photograph 89: Permitted Area 4.



Photograph 90: Permitted Area 4.



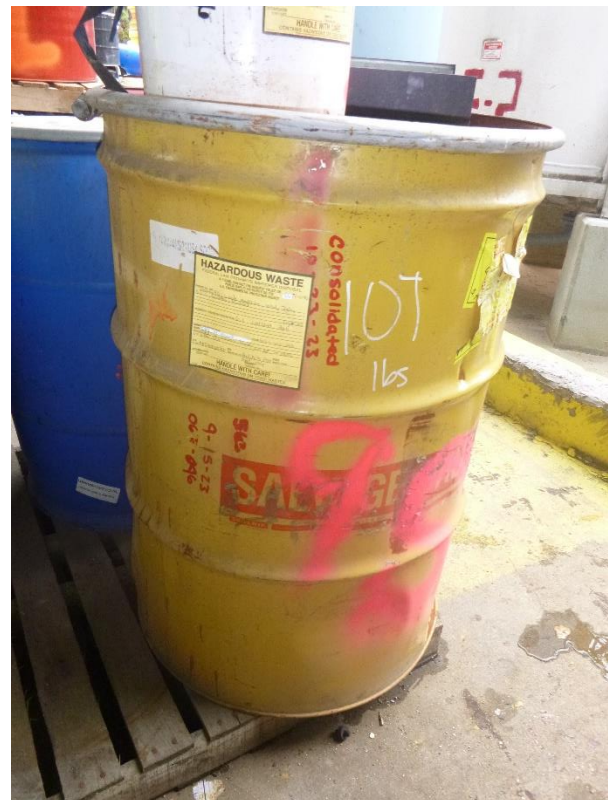
Photograph 93: Permitted Area 4.



Photograph 91: Permitted Area 4.



Photograph 92: Permitted Area 4.



Photograph 94: Permitted Area 4.



Photograph 95: Permitted Area 4.



Photograph 97: Permitted Area 4.



Photograph 96: Permitted Area 4.



Photograph 98: Permitted Area 4.



Photograph 99: Permitted Area 4.



Photograph 101: Permitted Area 4.



Photograph 100: Permitted Area 4.



Photograph 102: Permitted Area 4.



Photograph 103: Permitted Area 4.



Photograph 105: Permitted Area 4.



Photograph 104: Permitted Area 4.



Photograph 106: Permitted Area 4.



Photograph 107: Permitted Area 5.



Photograph 110: Permitted Area 5.



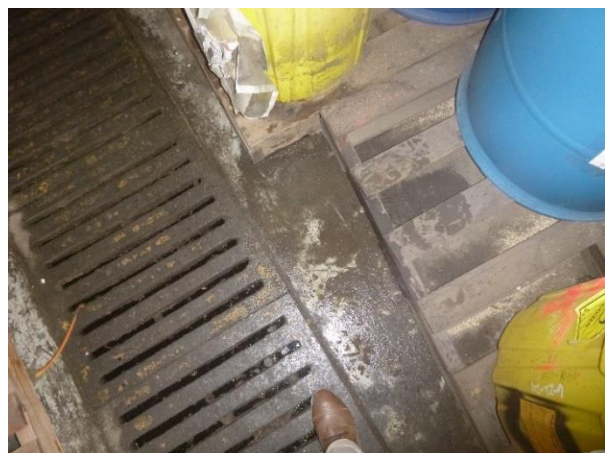
Photograph 108: Permitted Area 5.



Photograph 111: Permitted Area 5.



Photograph 109: Permitted Area 5.



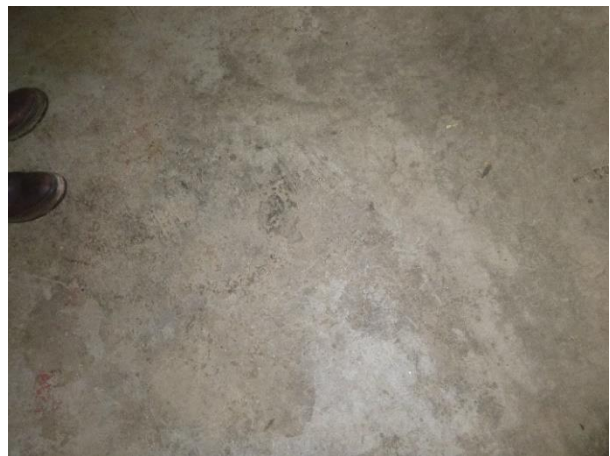
Photograph 112: Permitted Area 5.



Photograph 113: Permitted Area 5.



Photograph 115: Permitted Area 5.



Photograph 116: Permitted Area 5.



Photograph 114: Permitted Area 5.



Photograph 117: Permitted Area 5.



Photograph 119: Permitted Area 5.



Photograph 118: Permitted Area 5.



Photograph 120: Permitted Area 5.



Photograph 121: Permitted Area 5.



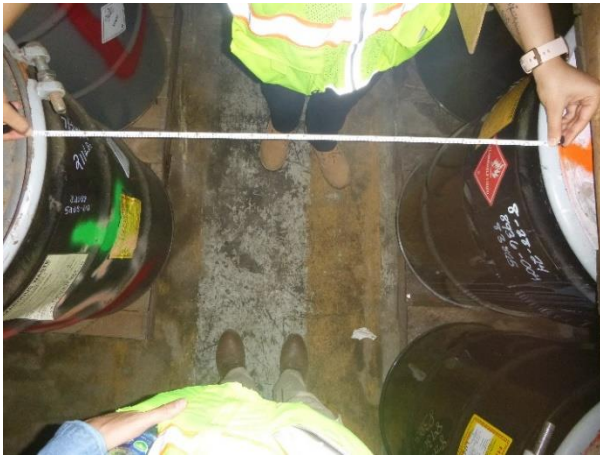
Photograph 123: Permitted Area 5.



Photograph 122: Permitted Area 5.



Photograph 124: Permitted Area 5.



Photograph 125: Permitted Area 5.



Photograph 128: Permitted Area 6.



Photograph 126: Permitted Area 5.



Photograph 129: Permitted Area 6.



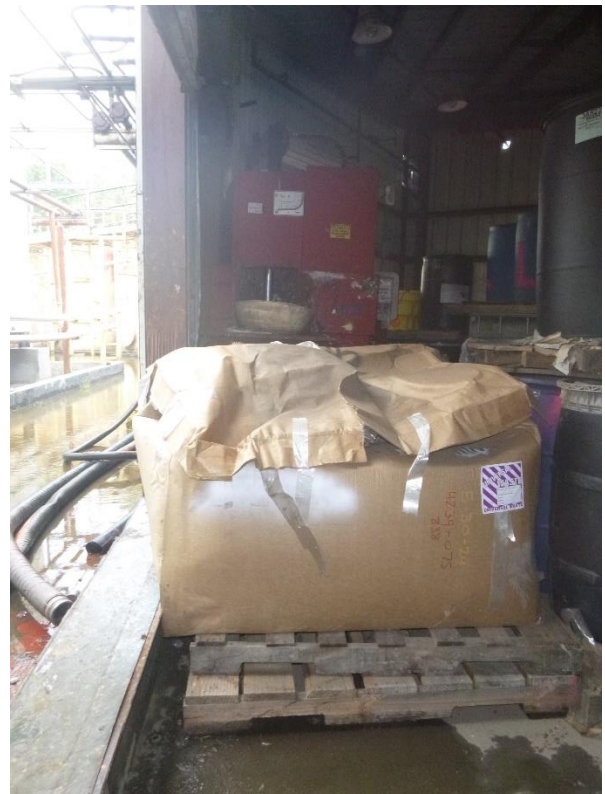
Photograph 127: Permitted Area 6.



Photograph 130: Permitted Area 6.



Photograph 131: Permitted Area 6.



Photograph 133: Permitted Area 6.



Photograph 132: Permitted Area 6.



Photograph 134: Permitted Area 6.



Photograph 135: Permitted Area 6.



Photograph 138: Permitted Area 6.



Photograph 136: Permitted Area 6.



Photograph 139: Permitted Area 6.



Photograph 137: Permitted Area 6.



Photograph 140: Permitted Tanks.



Photograph 141: Permitted Tanks.



Photograph 143: Permitted Tanks.



Photograph 144: Permitted Tanks.



Photograph 142: Permitted Tanks.



Photograph 145: Permitted Tanks.



Photograph 147: Permitted Tanks.



Photograph 146: Permitted Tanks.



Photograph 148: Permitted Tanks.



Photograph 149: Permitted Tanks.



Photograph 150: Permitted Tanks.



Photograph 151: Permitted Tanks.



Photograph 152: Permitted Tanks.



Photograph 153: Permitted Tanks.



Photograph 155: Permitted Tanks.



Photograph 154: Permitted Tanks.



Photograph 156: Permitted Tanks.



Photograph 157: Permitted Tanks.



Photograph 158: Permitted Tanks.



Photograph 159: Permitted Tanks.



Photograph 160: Permitted Tanks.



Photograph 161: Permitted Tanks.



Photograph 162: Permitted Tanks.



Photograph 163: Permitted Tanks.



Photograph 164: Permitted Tanks.



Photograph 165: Permitted Tanks.



Photograph 166: Permitted Tanks.



Photograph 167: Permitted Tanks.



Photograph 168: Permitted Tanks.



Photograph 171: Laboratory.



Photograph 169: Laboratory.



Photograph 172: Laboratory.



Photograph 170: Laboratory.



Photograph 173: Laboratory.



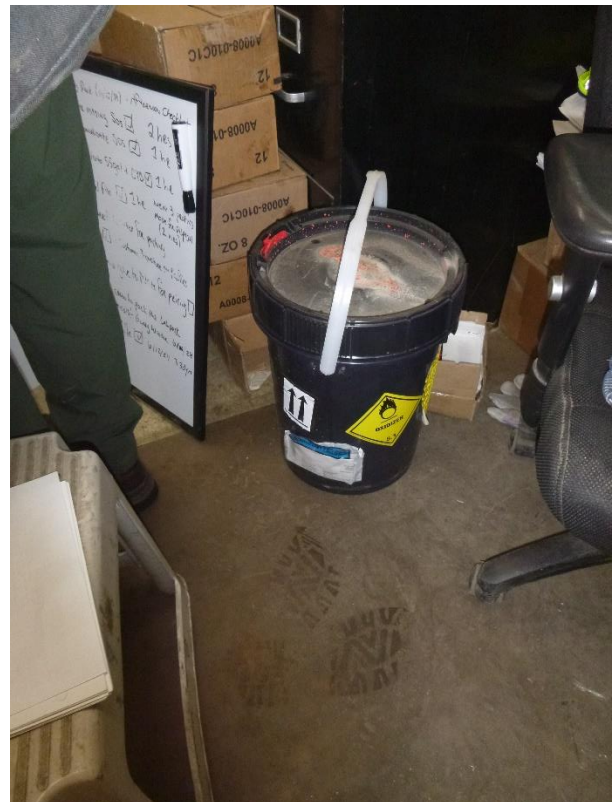
Photograph 174: Laboratory.



Photograph 175: Laboratory.



Photograph 176: Laboratory.



Photograph 177: Laboratory.



Photograph 178: Laboratory.



Photograph 180: Laboratory.



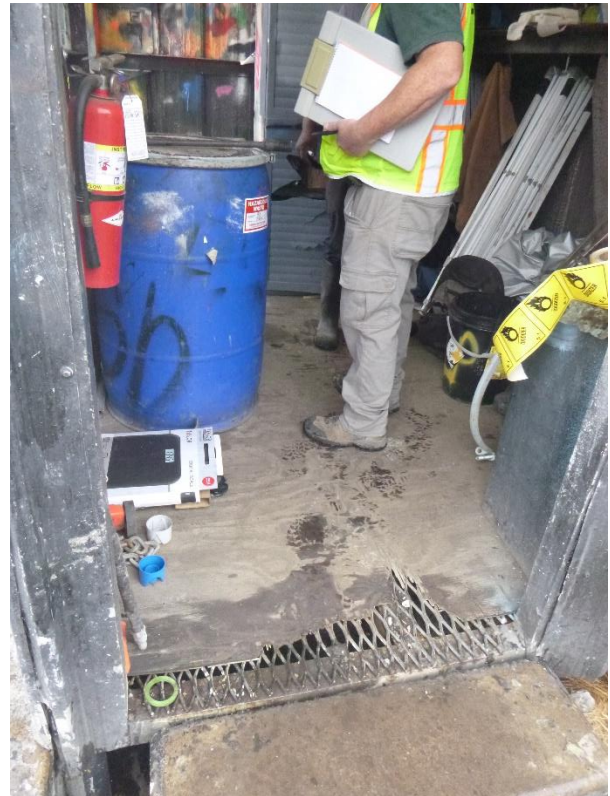
Photograph 179: Laboratory.



Photograph 181: Laboratory.



Photograph 182: Laboratory.



Photograph 184: Shed on Pad.



Photograph 183: Laboratory.



Photograph 185: Shed on Pad.



Photograph 186: Non-hazardous waste storage.



Photograph 187: Non-hazardous waste storage.



Photograph 188: Non-hazardous waste storage.



Photograph 189: Non-hazardous waste storage.



Photograph 190: Non-hazardous waste storage.



Photograph 191: Non-hazardous waste storage.



Photograph 192: Non-hazardous waste storage.



Photograph 193: Non-hazardous waste storage.



Photograph 194: Non-hazardous waste storage.



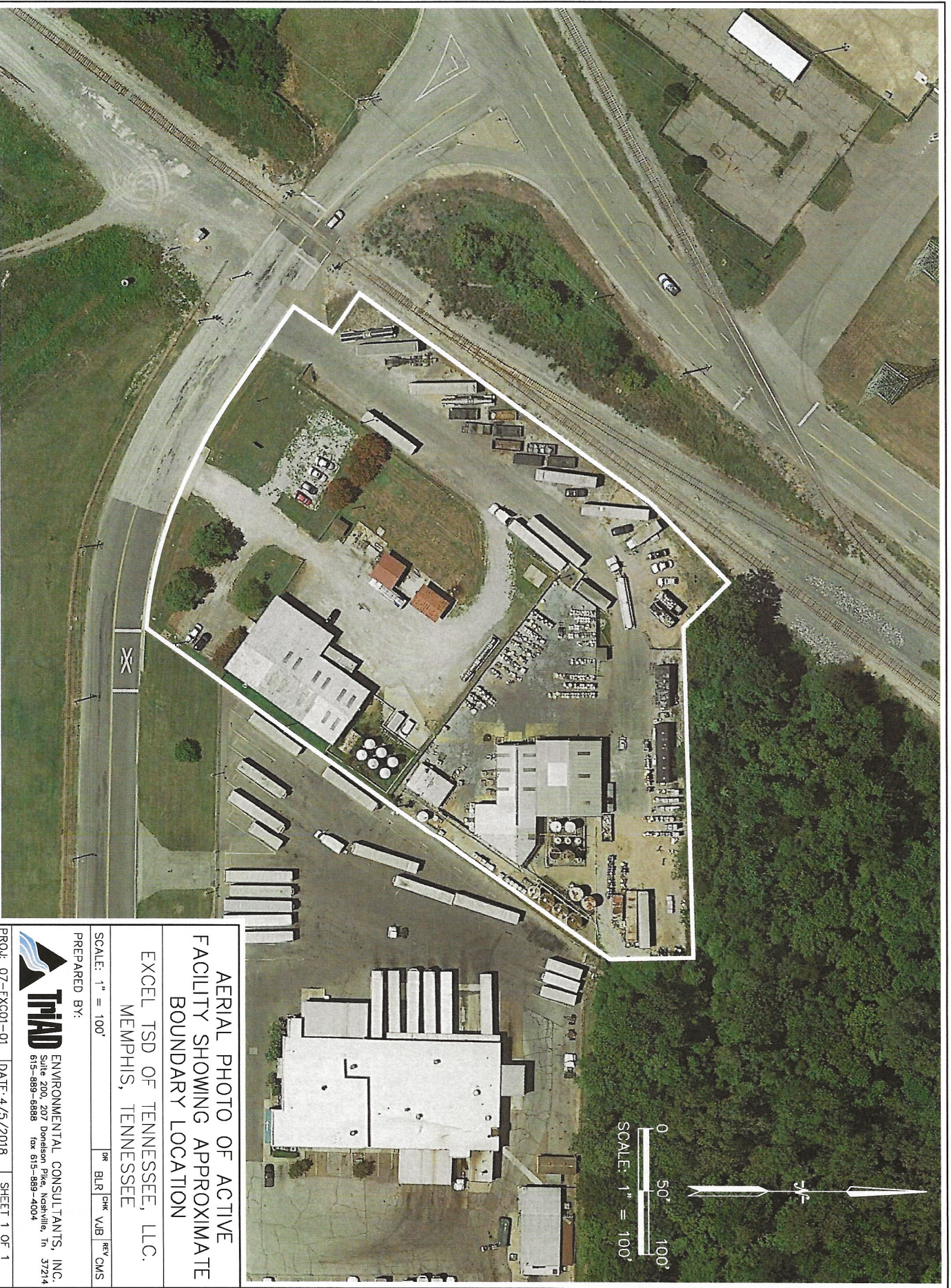
Photograph 195: Non-hazardous waste storage.



Photograph 196: Non-hazardous waste storage.



Photograph 197: Non-hazardous waste storage.



AERIAL PHOTO OF ACTIVE
FACILITY SHOWING APPROXIMATE
BOUNDARY LOCATION

EXCEL TSD OF TENNESSEE, LLC.
MEMPHIS, TENNESSEE

SCALE: 1" = 100'

DR	BLR	CHK	VJB	REV	CMS
----	-----	-----	-----	-----	-----

PREPARED BY:



ENVIRONMENTAL CONSULTANTS, INC.
Suite 200, 2207 Davidson Pike, Nashville, TN 37214
615-889-5888 fax 615-889-4004

PROJ: 07-EXC01-01 | DATE: 4/5/2018 | SHEET 1 OF 1

MEMPHIS FIELD OFFICE

MAR 30 2011

CONTAINER INVENTORY AREAS

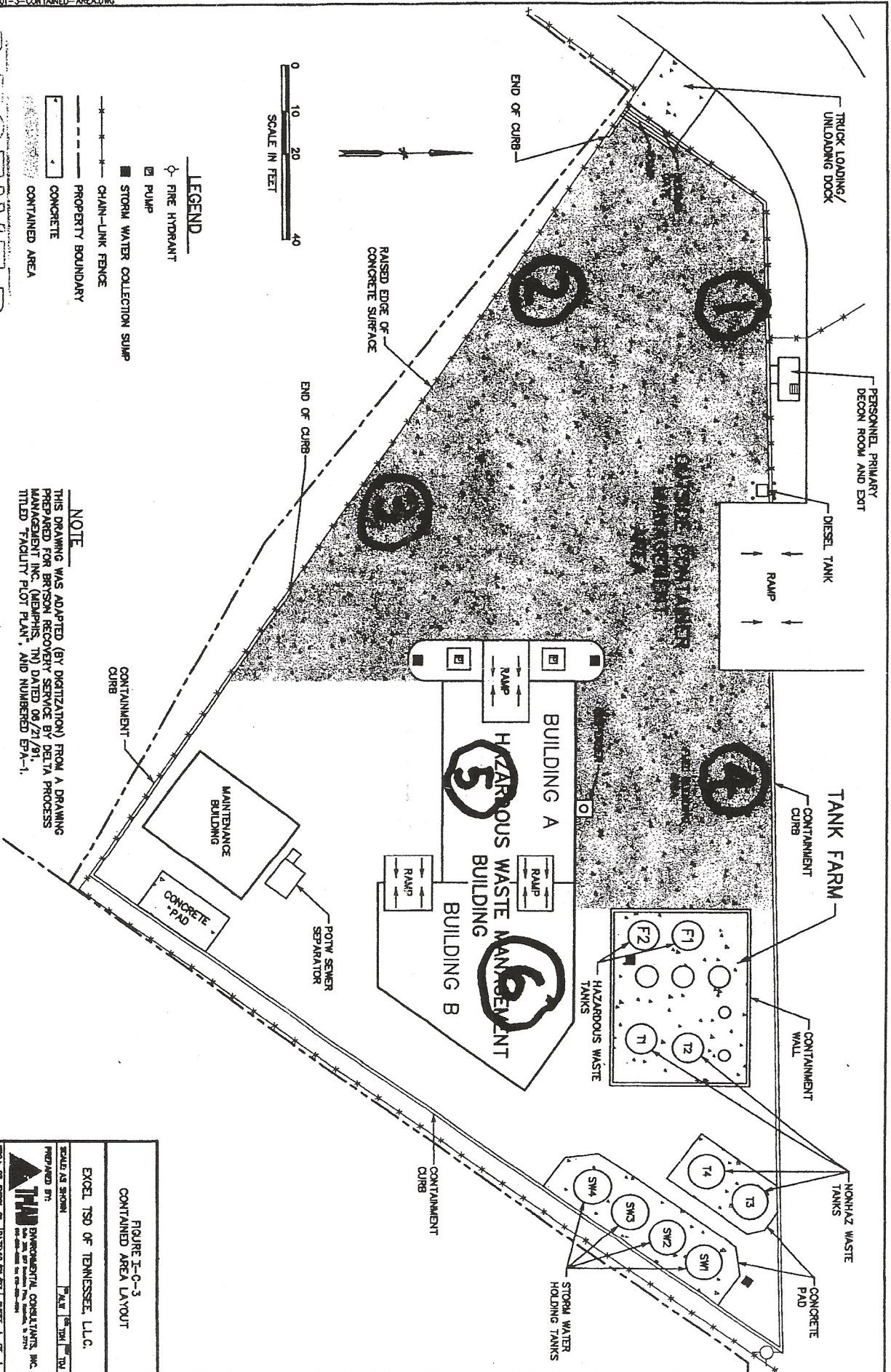


FIGURE I-C-3 CONTAINED AREA LAYOUT	
EXCEL TSD OF TENNESSEE, L.L.C.	
PREPARED BY:	THM
SCALE AS SHOWN	1" = 10' 1" = 10'
DATE: 07-03-06	DATE: 10/07/07
SHEET 1 OF 1	