RCRA Inspection Report

1) Inspector and Author of Report

Alan Newman
Environmental Engineer
RCRA Enforcement Section
Phone: (404) 562-8589
Newman.alan@epa.gov

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

2) Facility Information

MKC Enterprises, Inc.
5856 New Peachtree Road
Doraville, Georgia 30340
Dekalb County

EPA ID# GAD000616367

3) Responsible Officials

Timothy Lehmann
Facility Manager
(678) 453-3890
tlehmann@harsco.com

4) Inspection Participants

Timothy Lehmann, MKC Enterprises
Patricia Tinnemeier, MKC Enterprises
Bryan Jones, Clean Earth
Celia Mayben, Clean Earth

Samantha Luo, GAEPD
Alan Newman, EPA

5) Date of Inspection

February 15, 2023; 9:00 a.m. – 4:00 p.m.

6) Applicable Regulations[1]

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; Georgia Hazardous Waste Management Act, Ga. Code Ann. § 12-8-60 *et seq.*, and Georgia Hazardous Waste Management Rules, Ga. Comp. R. and Regs. 391-3-11.01 to 391-3-11.18 (2016 and 2018); and RCRA Hazardous Waste Facility Operating Permit HW-005 (S&T)-2 issued by the State of Georgia.

[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.

Pursuant to O.C.G.A. §12-8-62(15) [40 C.F.R. § 260.10], a large quantity generator of hazardous waste (LQG) is 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 Ga. Comp. R. and Regs. 391-3-11-.18 [40 C.F.R. § 273.9], a large quantity handler of universal waste (LQHUW) is a universal waste handler who does accumulate 5,000 kilograms or more of universal waste (batteries, pesticides, mercury-containing equipment, lamps, or aerosol cans, calculated collectively) at any time.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(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 Section 12-8-66 of the GHWMA, Ga. Code Ann. § 12-8-66 [Section 3005 of RCRA, 42 U.S.C. § 6925], and without complying with Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.16(b) or § 262.17(a)], except as required in Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.15(a)(7) and (8)], provided that the generator complies with the satellite accumulation area conditions listed in Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.15(a)] (hereinafter referred to as the "SAA Permit Exemption").

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [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 12-8-66 of the GHWMA, Ga. Code Ann. § 12-8-66 [Section 3005 of RCRA, 42 U.S.C. § 6925], provided that the generator complies with the conditions listed in Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.17] (hereinafter referred to as the "LQG Permit Exemption").

7) Purpose of Inspection

The purpose of this inspection was to conduct an unannounced compliance evaluation inspection to determine MKC Enterprises, Inc. compliance with the conditions of its RCRA Hazardous Waste Facility Operating Permit HW-005(S&T)-2 the applicable requirements of RCRA and the corresponding Georgia regulations. This was an EPA lead inspection.

8) Facility Description

MKC Enterprises Inc. has operated at the current site in Doraville, Georgia since 1980. MKC Enterprises Inc., a private company, was acquired by Clean Earth, Inc. on March 18, 2018, and continues operations as MKC Enterprises, A Clean Earth Company (MKC). Clean Earth is a national disposal and recycling company and consists of 27 permitted facilities. Harsco Corporation acquired Clean Earth Inc. on May 9, 2019. Harsco is a worldwide corporation with approximately 11,000 employees and has four primary businesses including Clean Earth, Harsco Environmental, Harsco Rail, and Harsco Industrial. Harsco continues to expand by acquiring Environmental Solutions business (ESOL) from Stericycle, Inc in April 2020.

MKC provides treatment, storage, and transfer of hazardous and non-hazardous wastes. MKC receives waste via trucks from a variety of hazardous waste generators. Permitted waste management activities that are conducted on-site include: reclamation, treatment, consolidation, and transfer of waste to approved off-site incineration, landfill, or treatment facility for final disposal. No disposal occurs at the facility. On-site processes include lab pack handling, consolidation, stabilization, pH adjustments, and bulking of compatible containerized waste into various sized containers i.e., drums, roll-off containers, and tanker trucks.

MKC is comprised of two buildings on 0.63 acres of owned land and 1.22 acres of leased land. MKC employs eight workers who work one eight-hour shift, 5 days a week; hours are from 8 a.m. to 5:30 p.m., Monday through Friday. The facility is in DeKalb County. MKC is partially surrounded by a chain-link fence; a combination of fencing and the walls of the two operations buildings makes up the facility perimeter. The site security utilizes locked doors of the operational buildings and intact locked fence gates.

MKC's most recent Hazardous Waste Generator Notification (EPA Form 8700-12) dated February 18, 2022, characterized the facility as a large quantity generator (LQG), a large quantity handler of universal waste (LQHUW) for batteries, lamps, aerosol cans, and mercury continuing equipment, a hazardous waste transporter, and a used oil transporter.

MKC was re-issued a RCRA Hazardous Waste operation Permit, # HW-005 (S & T), that became effective on March 22, 2019, for storage and treatment of hazardous waste which expires on March 21, 2029.

The table below lists the permitted units at MKC:

Unit name	Permitted Amount (Gallons)	Status
Storage A and C	52,085	Operational
Treatment	8,250	Operational
RU-3	36,520	Proposed - Unbuilt
RU-4	17,710	Proposed - Unbuilt
RU-5	5,500	Proposed - Unbuilt
RU-6	8,078	Proposed - Unbuilt

MKC operates under the NAICS codes 562211 - Hazardous waste treatment and disposal and 562112 – Hazardous waste collection.

9) Previous Inspection History

GAEPD has conducted two RCRA CEIs at the subject facility between 2018 and 2023 and found no violations during those inspections. The most recent RCRA CEI at the subject facility was on July 28, 2021.

10) Opening Conference

On February 15, 2023, EPA inspector Alan Newman, accompanied by GAEPD inspector Samantha Luo, arrived at MKC Enterprises Inc. (MKC) at approximately 9:00 a.m. Tim Lehmann, Facility Manger, immediately received the inspectors. Tim Lehmann and the inspectors were joined by Patricia Tinnemeier for the opening conference. The inspectors introduced themselves, showed their credentials to Tim Lehmann and Patricia Tinnemeier and explained the purpose of the visit.

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

Tim Lehmann provided an overview of the facility's history and current operations during the opening conference. The inspection participants also discussed health and safety protocols and required personal protective equipment before Facility representative led the inspectors on a tour of the Facility operations.

11) Inspection Observations

MKC is a permitted treatment, storage, and disposal facility that stores and generates hazardous waste by combining waste from small containers into larger containers. MKC also generates universal waste lamps and universal waste aerosol cans (Photograph 1). Facility personnel stated that MKC receives anywhere from 50 to 150 manifests each month.

- Warehouse – Universal Waste Storage

There were six 30-gallon and four 5-gallon containers of used batteries in storage in the warehouse on the day of the inspection (Photographs 2-6). Four of the 30-gallon containers and one of the 5-gallon containers stored alkaline batteries. One 30-gallon and two 5-gallon containers stored Lithium batteries. One 30-gallon container stored Nickel-Cadmium (Ni Cad) batteries. One 5-gallon container stored lead acid batteries. None of the containers of Lithium batteries, lead acid batteries, or Ni Cad batteries were labeled with one of the following phrases: "Universal Waste - Battery(ies)," or "Waste Battery(ies)," or "Used Battery(ies)." Facility personnel labeled each container during the inspection.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.18 [40 C.F.R. § 273.34(a)], a LQHUW must label or mark each Universal Waste battery or container or tank in which the batteries are contained clearly with one of the following phrases: "Universal Waste - Battery(ies)," or "Waste Battery(ies)," or "Used Battery(ies)."

There were ten (10) 4-foot cylindrical cardboard containers and three long cardboard boxes used to store universal waste lamps (Photographs 7-8). There was one 4-foot cylinder and three long boxes that were not dated. Facility personnel stated that all lamps were shipped off site on January 16, 2023, and that all batteries were shipped off site on January 19, 2023. The recent pick up on February 8, 2023 was unable to accommodate the volume of universal waste present at that time. A follow-up shipment on February 20, 2023 was able to accommodate the remaining volume.

- Consolidation Room

Facility personnel use the consolidation room to combine like chemicals into larger containers (Photographs 9-11). Facility personnel stated that combined containers are labeled with the oldest accumulation start date. At the time of the inspection there were four 5-gallon containers of hazardous waste and thirteen 5-gallon containers of non-hazardous waste. Each container was labeled, closed, and in good condition.

Once MKC consolidates waste from multiple containers into one, the standard operating procedure is to label the accumulation start date on the combined containers with the oldest date of accumulation. The inspection team noted the accumulation start dates on some of the consolidation containers were incorrect, however the database that tracked the containers was correct. MKC stated they would rectify this inconsistency with training.

- Building 1 - Permitted Container Storage Area C

Containers of waste are stored in Bays 4, 5, and 6 in this area (Photographs 12-19). On the day of the inspection, there were 456 containers totaling 9,927 gallons. The inspection team requested information on the ten containers in storage with the oldest accumulation start dates. Each of the oldest containers were in Building 1 Area C. The inspection team was able to locate nine of the ten containers during the inspection. The tenth container identified with container number 6576106 was described as a 30-gallon fiber drum in Bay 6 Row #2. This container was not located in this area. Neither the facility personnel nor the inspection team were able to locate this during the inspection. On March 6, 2023, MKC personnel documented that this container was consolidated with other lab packs into container number 7111387C and shipped to the Clean Earth of Alabama Facility in Glencoe, Alabama on January 3, 2023. The inspection team noted multiple pallets of universal waste lamp containers that were shrink-wrapped together. There was one label on the shrink-wrap. MKC had not labeled each container when it arrived. MKC personnel documented that each container of waste was labeled in an email dated March 6, 2023.

Pursuant to Permit Condition 1.F.2.l [40 C.F.R. § 264.73(b)], the owner or operator must keep a written operating record at this facility. (b) The following information must be recorded, as it becomes available, and maintained in the operating record for three years unless noted as follows: (2) the location of each hazardous waste within the facility and the quantity at each location. For disposal facilities, the location and quantity of each hazardous waste must be recorded on a map or diagram that shows each cell or disposal area. For all facilities, this information must include cross-references to 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.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.18 [40 C.F.R. § 273.34(e)], a LQHUW must label or mark clearly each lamp or a container or package in which such lamps are contained with any one of the following phrases: "Universal Waste - Lamp(s)," or "Waste Lamp(s)," or "Used Lamp(s)".

- Truck Parking Area.

MKC parks transport trucks in a fenced area beside Building 2. There were two trucks located in this parking area on the day of the inspection. One truck was empty and the other was storing approximately eleven 4-foot cylindrical cardboard containers of universal waste lamps (Photographs 20-21). Three of the containers were covered with black plastic. The inspection team considered these to be open containers. Facility personnel closed these containers during the inspection.

Pursuant Ga. Comp. R. and Regs. 391-3-11-.18 [40 C.F.R. § 273.33(d)(1)], a LQHUW must manage universal waste lamps in a way that prevents releases of any universal waste or component of a universal waste to the environment. (1) A large quantity handler of universal waste must contain any lamp in containers or packages that are structurally sound, adequate to prevent breakage, and compatible with the contents of the lamps. Such containers and packages must remain closed and must lack evidence of leakage, spillage or damage that could cause leakage under reasonably foreseeable conditions.

- Building 2 - Permitted Container Storage Area A

The inspection team noted multiple containers in Building 2 (Photographs 22-23). On the day of the inspection, there were 116 containers totaling 5,655 gallons. Each container was labeled, in good condition, and closed. Spill kits and fire control equipment were present.

- Sitewide issues

The inspection team noted an area of concern due to the signs posted around the facility which had, over time, faded and recommended that they be replaced. MKC representatives documented that new signs had been posted at the site on March 29, 2023, by submitting photographs via email.

Pursuant to Permit Condition I.F.2.b [40 C.F.R. § 264.14(c)], the owner or operator must prevent the unknowing entry, and minimize the possibility for the unauthorized entry, of persons or livestock onto the active portion of his facility. A sign with the legend, "Danger - Unauthorized Personnel Keep Out", must be posted at each entrance to the active portion of a facility, and at other locations, in sufficient numbers to be seen from any approach to this active portion. The legend must be written in English and in any other language predominant in the area surrounding the facility and must be legible from a distance of at least 25 feet. Existing signs with a legend other than "Danger - Unauthorized Personnel

Keep Out" may be used if the legend on the sign indicates that only authorized personnel are allowed to enter the active portion, and that entry onto the active portion can be dangerous.

The inspection team asked about management of aerosol cans generated at the site. MKC personnel initiated a new universal waste accumulation container for spent aerosol cans.

- Record Review

Contingency Plan:

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 July 18, 2018. 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 local police department, fire department, other emergency response teams, emergency response contractors, equipment suppliers, local hospitals, or the Local Emergency Planning Committee. The plan lists the names and emergency telephone numbers for persons identified as emergency coordinators. Tim Lehmann 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 list is not up to date. One of the persons on this list recently left the company. MKC submitted an updated emergency contact list on March 6, 2023. This is an area of concern for the inspection team.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.17(a)(6)], which incorporates Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.263(d)], and is a condition of the LQG Permit Exemption, a generator is required to review and immediately amend its contingency plan, if necessary, whenever the list of emergency coordinator changes.

The plan does include 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 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 Doraville Police Department, Fire Station #15 Dekalb County, and Northside Hospital on September 24, 2021.

The quick reference guide includes 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; the identification of on-site notification systems; and the name of the emergency coordinator(s) and emergency telephone number(s).

Training Records:

The inspectors reviewed facility job descriptions and employee names that were provided for Chemist, Administrative Assistant, Customer Care Manager, Driver-Tech, Facility Manager, and Lead Chemist. Each description included the requisite skill, education, or other qualifications, and duties of facility personnel assigned to that position. However, none of the job descriptions specifically address or describe hazardous waste management duties of the position or included the names of employees filling the position.

MKC 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 2022. Two persons were not up to date on their training, Patricia Hardin and Patricia Tinnemeier. After the inspection, MKC documented that these two individuals completed their required training for RCRA by March 24, 2023.

Pursuant to Permit Condition I.F.2.d [40 C.F.R. § 264.16(c)], Annual Review of Training - facility personnel must take part in an annual review of the initial training required in paragraph (a) of this section.

Waste Manifest Records:

The inspectors reviewed available hazardous waste manifest records and land disposal restriction forms for shipments of hazardous waste sent since July 28, 2021.

The facility's records did not include a signed return copies of the hazardous waste manifests in the table below:

Manifest Number	Waste Codes	Waste Description	Waste Destination	Date of Shipment/ Receipt
018001664 FLE	D001/F003	Eight containers of Waste Flammable Liquids (Photograph 24)	Clean Harbors – El Dorado (ARD069748192)	12/2/2022 2/27/2023
018001585 FLE	D001/D002/D003 P023	Sixteen containers of various waste (Photograph 25)	Clean Harbors – El Dorado (ARD069748192)	10/21/2022 10/31/2022
016699438 FLE	D001/D002/D003/ D004/D005/D006/ D007/D008/D011 /P039/P087/P105	Seventeen containers of various wastes (Photograph 26)	Clean Harbors – El Dorado (ARD069748192)	9/8/2022 9/25/2022

Manifest Number	Waste Codes	Waste Description	Waste Destination	Date of Shipment/ Receipt
016680880 FLE	D001/D002	Two containers of Waste Sodium Hydroxide and two containers of Waste Organic Peroxide (Photograph 27)	Clean Harbors – El Dorado (ARD069748192)	2/25/2022 3/11/2022
016680890 FLE	D001/D002/D003/ D005/D007/D011/ D038/U134/P022/ P098/P099/P105	Twelve Containers of various wastes	Clean Harbors – El Dorado (ARD069748192)	2/18/2022 3/6/2022
016680879 FLE	D001/D005/D007/ D008/D010/D022 and D001/D002	Three containers of Waste Flammable Liquids and one container of Waste Organic Peroxide	Clean Harbors – El Dorado (ARD069748192)	2/11/2022 2/26/2022

No records were provided to show that MKC contacted the transporter or the owner or operator of the designated facility to determine the status of this waste, and MKC did not submit exception reports for these missing manifests. MKC documented that they had obtained final copies of each of the manifest above on March 6, 2023, and March 24, 2023.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. 262.42(a)(1-2)], (a) (1) A generator of 1,000 kilograms or greater of hazardous waste in a calendar month, or greater than 1 kg of acute hazardous waste listed in § 261.31 or § 261.33(e) in a calendar month, who does not receive a copy of the manifest with the handwritten signature of the owner or operator of the designated facility within 35 days of the date the waste was accepted by the initial transporter must contact the transporter and/or the owner or operator of the designated facility to determine the status of the hazardous waste and (2) A generator of 1,000 kilograms or greater of hazardous waste in a calendar month, or greater than 1 kg of acute hazardous waste listed in § 261.31or § 261.33(e) in a calendar month, must submit an Exception Report to the EPA Regional Administrator for the Region in which the generator is located if he has not received a copy of the manifest with the handwritten signature of the owner or operator of the designated 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 generator does not have confirmation of delivery; (ii) A cover letter signed by the generator or his authorized representative explaining the efforts taken to locate the hazardous waste and the results of those efforts.

Inspection Records:

The inspectors reviewed MKC's available records of daily, weekly, and monthly inspections of the hazardous waste permitted container storage areas since 2021. 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 about Emergency shower and eyewash, fire blankets, first aid equipment and supplies protective clothing doors and locks outdoor area lighting, warning signs, container

labeling, drum moving equipment, storage area ramps, warning signs (indoor), entrance road and transport parking, loading/unloading dock spill containment, aisle space, condition of containers, segregation of incompatible waste , housekeeping, Telephone and PA system, cell phones, spill equipment, and fences and gates for both Buildings 1 and 2. The records include the date and time of the inspection and the name, signature and initials of the employee conducting the inspection. Each week, the employee records notations of observations and necessary follow-up actions for the inspected areas.

12) Closing Conference

The inspectors conducted the exit meeting at approximately 4:00 pm with Tim Lehmann, Patricia Tinnemeier, Celia Mayben, and Bryan Jones. During this meeting, the inspectors stated their preliminary conclusions of the inspection. MKC agreed to provide closure cost estimate and revised current inventories totals by March 1, 2023. On February 15 and 16, 2023, Tim Lehmann provided the closure cost estimate and revised current inventories in an email to Alan Newman. Several other items for clarification were requested and provided in emails dated March 6 and 29, 2023.

13) List of Appendices

Appendix 1 – Photo Log:
27 Photos taken on: February 15, 2023
Photographs taken by: Alan Newman
Photographs taken with: Lumix Digital
EPA Property Tag: S75870

14) Signed

ALAN NEWMAN Digitally signed by ALAN NEWMAN
Date: 2023.04.12 17:26:03 -04'00'

Alan Newman
Environmental Engineer

Concurrence

Araceli B. Chavez
RCRA Enforcement Section

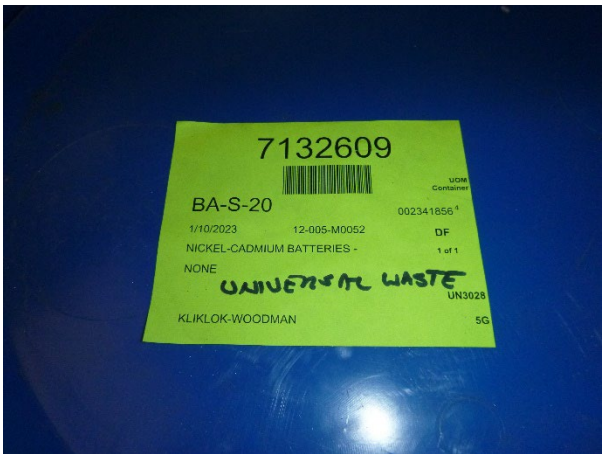
Appendix 1
Photograph Log:

Photographs taken by Alan Newman
Photographs taken with Lumix Digital
EPA Property Tag: S75870

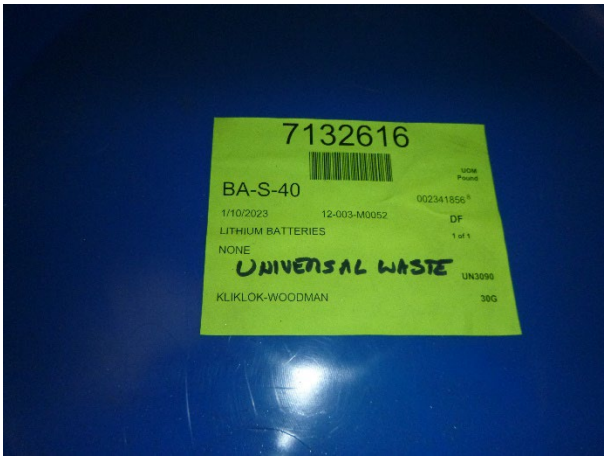
Photograph 1: Exterior of Building 1.


Photograph 2: Universal Waste Batteries.


Photograph 3: Universal Waste Batteries.



Photograph 4: Universal Waste Batteries.



Photograph 5: Universal Waste Batteries.

Photograph 6: Universal Waste Batteries.

Photograph 7: Universal Waste Lamps.

Photograph 10: Containment Room in Building 1.

Photograph 8: Universal Waste Lamps.

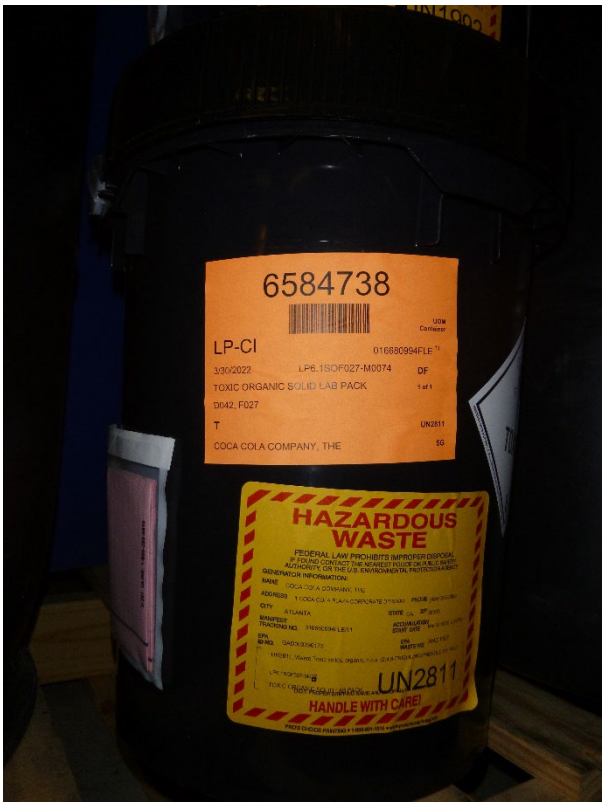
Photograph 11: Containment Room in Building 1.

Photograph 9: Containment Room in Building 1.

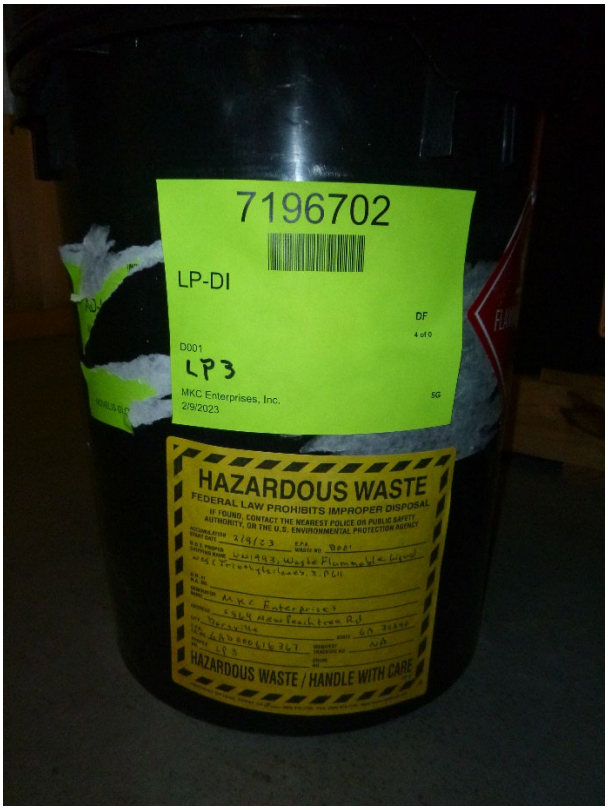
Photograph 12: Universal Waste Lamps.

Photograph 13: Universal Waste Lamps.

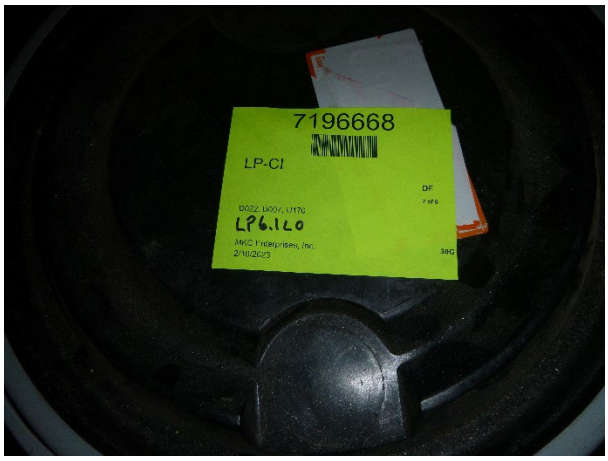
Photograph 14: Building 1 Container dated 3/30/2022.



Photograph 15: Building 1 Container dated 3/30/2022.



Photograph 16: Building 1 Container dated incorrectly as 2/9/2023.



Photograph 17: Building 1 permitted storage containers.


Photograph 18: Building 1 Area C.

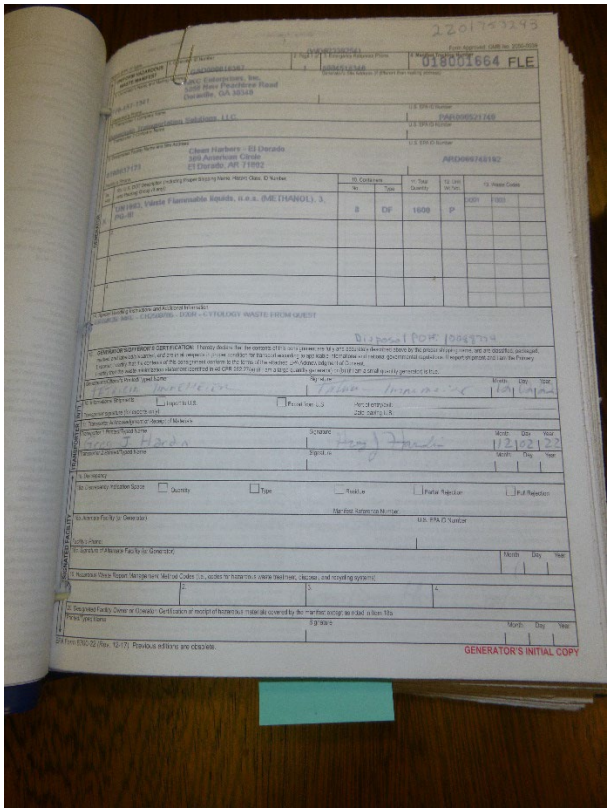

Photograph 19: Building 1 Area C.


Photograph 20: Trailer storing universal waste lamps in open containers.

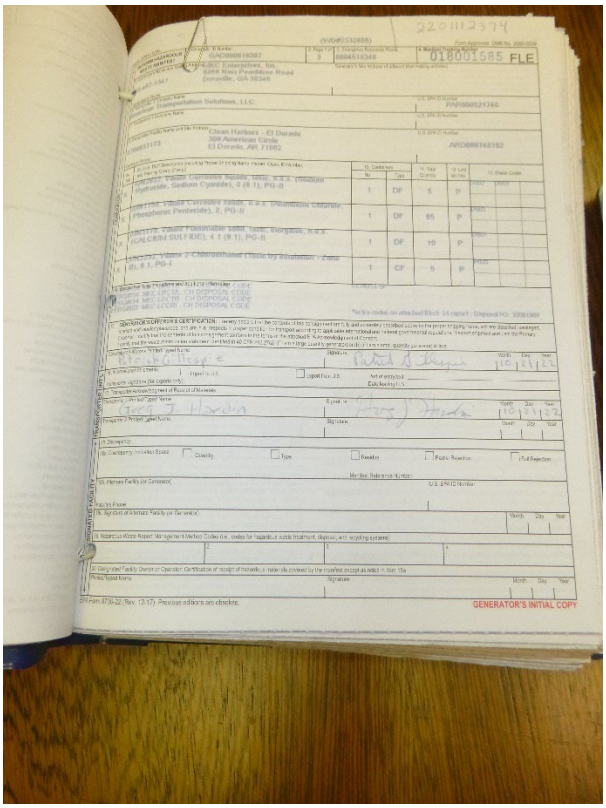

Photograph 21: Trailer storing universal waste lamps in open containers.


Photograph 22: Building 2 Area A.

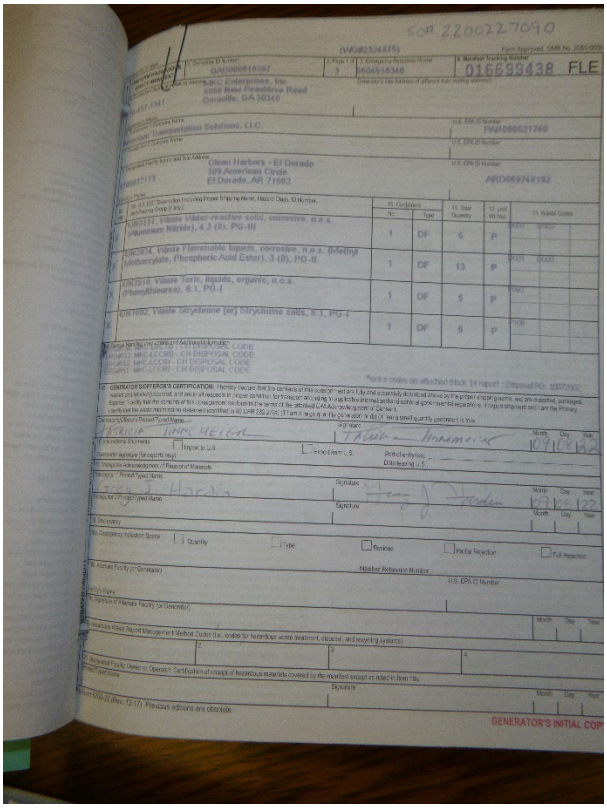
Photograph 23: Building 2 Area A.



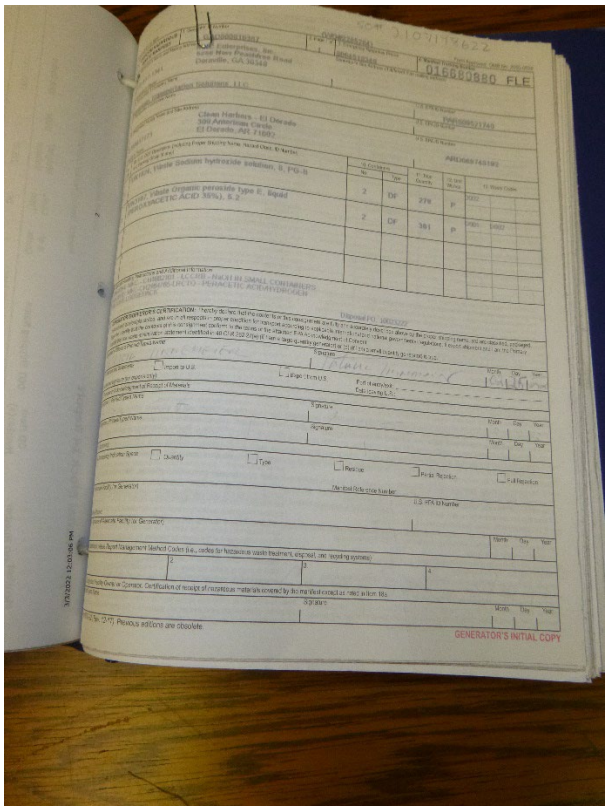
Photograph 24: Manifest 018001664 FLE.



Photograph 25: Manifest 018001585 FLE.



Photograph 26: Manifest 016699438 FLE.



Photograph 27: Manifest 016680880 FLE.