

RCRA Inspection Report

1) Inspector and Author of Report

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U.S. Environmental Protection Agency, Region 4
61 Forsyth Street, S.W.
Atlanta, Georgia 30303

2) Facility Information

Greenwood Fabricating and Plating Inc.
215 Mill Avenue
Greenwood, South Carolina 29646
Greenwood County

EPA ID: SCD981920374
NAICS: 332813 Electroplating, Plating, Polishing,
Anodizing, and Coloring

3) Responsible Official

John Tucker
Plating Manager
Greenwood Fabricating and Plating Inc.
215 Mill Avenue
Greenwood, South Carolina 29646
jtucker@gpfi.com

4) Inspection Participants

John Tucker	Greenwood Fabricating and Plating Inc
Brad Rinehart	Greenwood Fabricating and Plating Inc
Justin Turner	Greenwood Fabricating and Plating Inc
Mike Coursey	Greenwood Fabricating and Plating Inc
Samuel Madden	SCDHEC
Tom Richmond	SCDHEC
Paula Whiting	US EPA, Region 4 Atlanta

5) Date and Time of Inspection

April 2, 2024, at 9:05 a.m. EDT

6) Applicable Regulations¹

Resource Conservation and Recovery Act (RCRA) Sections 3002, 3005 and 3007 (42 U.S.C. §§ 6922, 6925 and 6927), and the regulations promulgated pursuant thereto at 40 Code of Federal Regulations (C.F.R.) Parts 260-270, 273 and 279.

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.

South Carolina Hazardous Waste Management Act, S.C. Code Ann. § 44-56-10 et seq., and South Carolina Hazardous Waste Management Regulations (SCHWMR), S.C. Code Ann. Regs. 61-79.260-270, 61-79.273 and 61-79.279

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

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

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

7) Purpose of Inspection

The purpose of the inspection was to conduct an unannounced RCRA compliance evaluation inspection (CEI) to determine the compliance of Greenwood Fabricating and Plating Inc., EPA ID Number: SCD981920374 with the applicable regulations. This was an EPA lead inspection.

8) Facility Description

Greenwood Fabricating and Plating Inc. (GFPI) is a full-service fabrication, machining, and electroplating job shop that provides finished components to a wide classification of manufacturers. GFPI has two large, automated lines with one for copper and aluminum and one for aluminum, and a small, automated line for zinc (Picture 1). The facility also has manual job shop lines that are operator controlled. The electroplating services include silver on tin on copper plating or aluminum on busbar (which hold the electrical wiring for large buildings) system plating. The fabrication job shop makes break box stick outs.

The GFPI facility is approximately 100,000 square feet under roof and operates 24 hours per day, 5 days per week in three shifts. GFPI employs approximately 120 full time employees with 2-5 employees handling hazardous waste. The wastewater treatment plant is operated by a

third party, Operators Unlimited, with three operators onsite.

Greenwood Fabricating and Plating Inc.'s most recent Hazardous Waste Generator Notification (EPA Form 8700-12) dated January 1, 2023, characterized the facility as a Large Quantity Generator (LQG) of hazardous waste. Greenwood Fabricating and Plating Inc. may generate hazardous waste streams, spent aerosol cans, used solvent, used oil, universal lamps and batteries, paint waste and other wastes. The hazardous waste may be designated the following EPA Waste Codes D002, D003, D006, D007, D008, D011, F006, F007, and F008.

9) Previous Inspection History

This facility was last inspected on February 23, 2022, by South Carolina Department of Health and Environmental Control (SCDHEC). Deficiencies of universal waste regulatory requirements were noted.

10) Findings

On April 2, 2024, EPA inspector Paula Whiting, accompanied by South Carolina Department of Health and Environmental Control (SCDHEC) inspectors Samuel Madden and Tom Richmond arrived at Greenwood Fabricating and Plating Inc. at approximately 9:05 a.m. EDT. The inspectors signed in at the front desk and were escorted to a conference room. Mr. John Tucker, Plating Manager and Mr. Brad Rinehart, Safety Coordinator received the inspectors. The inspectors introduced themselves, showed their credentials to the representatives, 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 EPA inspector explained that the Small Business Regulatory Enforcement Fairness Act's classification of a "small business" is generally set by the Small Business Administration using the business' SIC/NAICS code and annual receipts or number of employees. A copy of the EPA's information sheet for small businesses can be found at <https://www.epa.gov/sites/production/files/2017-06/documents/smallbusinessinfo.pdf>. The EPA inspector also discussed the company's ability, pursuant to 40 C.F.R. § 2.203, to assert a business confidentiality claim for information submitted to the EPA. The company did not assert a business confidentiality claim.

Mr. Tucker and Mr. Rinehart 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 the facility representatives led the inspectors on a tour of the facility operations. Below is a description of the observations made during the inspection.

11) Inspection Observations

10.1 Line 7

Electroplating Line 7 has a cyanide equilibrium tank that generates two pits of cyanide waste and a non-cyanide equilibrium tank that generates one pit of non-cyanide waste. Each pit has

two pumps that pump directly to the on-site wastewater treatment plant. The inspectors walked through the Line 7 and observed the plating process. A blue plastic 55-gallon container of hazardous waste caustic cleaner and debris was observed in a satellite accumulation area (SAA) at the end of the line (Pictures 2-3). The container was observed closed and labeled. In addition, the air around the container was very caustic due to the process and difficult to breathe.

10.2 Line 8

Electroplating Line 8 plates tin onto aluminum metal parts. At the time of the inspection, the inspectors observed the following:

- A black 55-gallon container of hazardous waste cyanide contaminated debris on a secondary containment pallet (Pictures 4-5) in an SAA. This waste is expected to exhibit the hazardous waste characteristics of toxicity and corrosivity, in addition to the hazardous waste characteristic of reactivity. The label had a written hazard indicator of Reactive, but not Toxic or Corrosive.

Pursuant to S.C. Code Ann. Regs. 61-79.262.15(a)(5)(ii) [40 C.F.R. § 262.15(a)(5)(ii)], which is a condition of the SAA Permit Exemption, a generator is required to mark or label its containers with an indication of the hazards of the contents.

- Solids were noted in a non-cyanide concrete secondary containment area; this area needed a cleanout (Picture 6). Mr. Tucker stated that the solid material built up over time and that corrosive spillover periodically occurred in the past. The inspectors stated that the contents of the secondary containment area required a hazardous waste determination prior to disposal.

Pursuant to S.C. Code Ann. Regs. 61-79.262.11 [40 C.F.R. § 262.11], a person who generates a solid waste, as defined in S.C. Code Ann. Regs. 61-79.262.2 [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 S.C. Code Ann. Regs. 61-79.262.11 [40 C.F.R. § 262.11].

10.3 Less Than 90-Day Central Accumulation Area

The central accumulation area (CAA) was located between the plating lines and the wastewater treatment plant. A blast media booth with an SAA for accumulating hazardous waste generated in the booth was observed in this area. A blue 55-gallon container of hazardous waste spent copper/silver sand blast sat on a wooden pallet (Pictures 7-8) in this SAA. Spent copper/silver sand blast is expected to exhibit the hazardous waste characteristic of toxicity. The container, which was closed, was marked with an indication that the contents are Reactive, but not with an indication that the contents are Toxic. The inspectors observed the spent blast media was released to the ground underneath the sand blaster outlet (Pictures 9-10). In addition, clean, unused sand blast media was spilled on the ground near the sand blaster inlet (Pictures 11-12). To minimize the possibility of a release, both the clean and spent media needed to be swept up and disposed of.

Pursuant to S.C. Code Ann. Regs. 61-79.262.15(a)(5)(ii) [40 C.F.R. § 262.15(a)(5)(ii)], which is a condition of the SAA Permit Exemption, a generator is required to mark or label its containers with an indication of the hazards of the contents.

Pursuant to S.C. Code Ann. Regs. 61-79.262.17(a)(6) [40 C.F.R. § 262.17(a)(6)], which incorporates S.C. Code Ann. Regs. 61-79.262.251 [40 C.F.R. § 262.251], and is a condition of the LQG Permit Exemption, a generator is required to maintain and operate its facility to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment.

The inspectors observed nine 25 cubic yard supersacks of hazardous waste wastewater treatment plant sludge (Pictures 13-14). Each supersack was labeled Wastewater Treatment Sludge, Toxic and marked with an accumulation start date. The oldest date was January 28, 2024. Two of the supersacks were closed, however, the remaining six were not closed. The EPA inspector recommended taping or zip tying the supersacks closed.

Pursuant to S.C. Code Ann. Regs. 61-79.262.17(a)(1)(iv) [40 C.F.R. § 262.17(a)(1)(iv)], which is a condition of the LQG Permit Exemption, (A) a container holding hazardous waste must always be closed during accumulation, except when it is necessary to add or remove waste; and (B) A container holding hazardous waste must not be opened, handled, or stored in a manner that may rupture the container or cause it to leak.

The CAA contained a black 55-gallon container of spent silver stripper from Greenwood Fabricating and Plating Inc.'s Hodges Plant (Picture 15). The wastewater treatment plant staff were not aware when the container arrived or what it would be used for. The inspectors requested the manifest, bill of lading and/or the shipping papers for this container. On April 15, 2024, Mr. Tucker stated via email that the facility did not have transportation paperwork for the drum of silver strip from Hodges, and that the drum was being treated in house. Because the container could not be tracked and the use of the contents could not be ascertained, a hazardous waste determination is required to prior to any processing or shipment.

Pursuant to S.C. Code Ann. Regs. 61-79.262.11 [40 C.F.R. § 262.11], a person who generates a solid waste, as defined in S.C. Code Ann. Regs. 61-79.262.2 [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 S.C. Code Ann. Regs. 61-79.262.11 [40 C.F.R. § 262.11].

Also, in the rear of the CAA was an SAA for accumulating hazardous nitric waste (Picture 16). The inspectors observed a blue 55-gallon container, which was closed and labeled Hazardous Waste, Nitric Acid, Corrosive, in this SAA. The inspectors also observed a single 25-cubic yard supersack of hazardous waste wastewater treatment plant sludge closed, labeled, and dated March 20, 2024 (Picture 17).

10.4 Wastewater Treatment Plant

The wastewater treatment plant (WWTP) is managed by Operators Unlimited. The rinsewater, which contains acids and cyanide, is sent to batch tanks that are pH adjusted to drop out the metals. The water is fed back to the front of the waste stream for additional treatment. The hazardous waste solids are filter pressed and discharged into 25-cubic yard supersacks for shipment and disposal to US Ecology. At the time of the inspection, the inspectors observed three 25-cubic yard supersacks under the hoppers (Pictures 18-21). The supersacks were labeled Hazardous Waste, Wastewater Treatment Sludge, Toxic, dated but not closed and not actively being filled. Mr. Turner explained that the bags take one to two days to fill. The inspectors stated that supersacks must be covered/closed when not actively filling. The inspectors recommended covering the supersacks with a board or plank until ready to fill. A floor press that is used once a week was observed beside the WWTP (Picture 22).

Pursuant to S.C. Code Ann. Regs. 61-79.262.17(a)(1)(iv) [40 C.F.R. § 262.17(a)(1)(iv)], which is a condition of the LQG Permit Exemption, (A) a container holding hazardous waste must always be closed during accumulation, except when it is necessary to add or remove waste; and (B) A container holding hazardous waste must not be opened, handled, or stored in a manner that may rupture the container or cause it to leak.

A 55-gallon container of hazardous waste was observed in an SAA for accumulating the contents of used aerosol cans at the WWTP (Picture 23). The container, which was not closed or labeled, was equipped with an aerosol can puncture system.

Pursuant to S.C. Code Ann. Regs. 61-79.262.15(a)(4) [40 C.F.R. § 262.15(a)(4)], which is a condition of the SAA Permit Exemption, a generator is required to keep containers of hazardous waste closed at all times during accumulation, except when adding, removing, or consolidating waste; or when temporary venting of a container is necessary for the proper operation of equipment, or to prevent dangerous situations, such as build-up of extreme pressure.

Pursuant to S.C. Code Ann. Regs. 61-79.262.15(a)(5) [40 C.F.R. § 262.15(a)(5)], which is a condition of the SAA Permit Exemption, a generator is required to mark or label its containers (i) with the words “Hazardous Waste” and (ii) with an indication of the hazards of the contents.

Two 15,000-gallon wastewater treatment process tanks were observed near the WWTP. The tanks were labeled Cyanide Waste and Non-Cyanide Waste (Pictures 24-25).

10.5 Shipping

The universal waste lamps were stored in the shipping attic. The inspectors observed four cardboard boxes that were closed, labeled “Waste Lamps”, and dated (Pictures 27-28). The oldest date was April 24, 2023. A box with two spent high intensity discharge lamps was observed not closed, not labeled, and the facility was not able to demonstrate the waste was accumulated less than one year (Picture 26). Mr. Forest Dove removed the box and took it with him to be properly managed.

Pursuant S.C. Code Ann. Regs. 61-79.273.13(d) [40 C.F.R. § 273.13(d)], a SQHUW must manage universal waste lamps in a way that prevents releases of any universal waste or component of a universal waste to the environment.

Pursuant to S.C. Code Ann. Regs. 61-79.273.14(e) [40 C.F.R. § 273.14(e)], a SQHUW must label or mark each lamp or container of lamps clearly with one of the following phrases: "Universal Waste-Lamp(s)," or "Waste Lamp(s)," or "Used Lamps."

Pursuant to S.C. Code Ann. Regs. 61-79.273.15(a) and (c) [40 C.F.R. § 273.15(a) and (c)], a SQHUW may accumulate universal waste no longer than one year and must to be able to demonstrate the length of time that the universal waste has accumulated from the date that it became a waste or was received.

10.6 Air Compressor Room

Seven 55-gallon used oil containers and four 55-gallon used coolant containers were stored in the Air Compressor Room (Picture 29). The inspectors observed only one of the used oil containers was labeled and an oil release to ground was spreading across the floor (Pictures 30-31). The inspectors identified that the release was compressor oil blow off from an adjoining building.

Pursuant to S.C. Code Ann. Regs. 61-79.279.22(c)(1) [40 C.F.R. § 279.22(c)(1)], containers and aboveground tanks used to store used oil at generator facilities must be labeled or marked clearly with the words "Used Oil."

Pursuant to S.C. Code Ann. Regs. 61-79.279.22(d) [40 C.F.R. § 279.22(d)], upon detection of a release of used oil to the environment, the facility must clean up and manage properly the released used oil and other materials.

12) Records Review

The inspectors requested the training records, the contingency plan, the weekly inspection records, the waste minimization plan, waste profiles, the 2021-2024 hazardous, non-hazardous, and used oil manifests. The generator status notification (EPA Form 8700-12) was last updated January 1, 2023.

The inspectors requested the training records for the employees handling hazardous waste. Training records for Brad Rinehart, Mike Coursey, Courtney Anderson, Justin Turner, and David Eiseweid were provided. Mr. Rinehart and Mr. Turner received DOT Hazmat/RCRA Hazardous Waste Course from Safety Compliance Management, Inc. on May 25, 2023. The remaining employees received hazardous waste training from Mr. Rinehart on October 23, 2023. Job titles and descriptions were requested and reviewed. However, Mr. Turner's job description did not list hazardous waste management as a job duty. In addition, Mr. Rinehart's records did not have any train-the-trainer certifications, even though he was training the facility staff in waste management.

Pursuant to S.C. Code Ann. Regs. 61-79.262.17(a)(7)(i)(B) [40 C.F.R. § 262.17(a)(7)(i)(B)], which is a condition of the LQG Permit Exemption, this program must be directed by a person trained in hazardous waste management procedures and must 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 S.C. Code Ann. Regs. 61-79.262.17(a)(7)(iv) [40 C.F.R. § 262.17(a)(7)(iv)], which is a condition of the LQG Permit Exemption, the generator must maintain training records that include, among others: the job title for each position at the facility related to hazardous waste management, and the name of the employee filling each job; a written job description for each position; a written description of the type and amount of both introductory and continuing training that will be given to each person filling a position; and records documenting that the training required has been given to and completed by Facility personnel.

Dominique Ware and Joseph Williams are employees of Operators Unlimited, and their training records were not available during the review.

Pursuant to S.C. Code Ann. Regs. 61-79.262.17(a)(7) (iv) [40 C.F.R. § 262.17(a)(7) (iv)], which is a condition of the LQG Permit Exemption, the generator must maintain training records that include, among others: the job title for each position at the facility related to hazardous waste management, and the name of the employee filling each job; a written job description for each position; a written description of the type and amount of both introductory and continuing training that will be given to each person filling a position; and records documenting that the training required has been given to and completed by Facility personnel.

The inspectors requested the Contingency Plan revised January 20, 2023, for review. The plan included an emergency contact list, an evacuation map, a fire extinguisher inspection list, a list of emergency response equipment, the Quick Reference Guide, and documentation (i.e., green return receipt cards, emails) that copies of the current contingency plan were provided to the local emergency response agencies (i.e., fire, police, hospital). The inspectors observed that the Quick Reference Guide did not identify the SAA for accumulating hazardous waste nitric acid, identified an incorrect hazard for the hazardous waste sand blast media, and did not identify the filter press sludge CAA on the map.

Pursuant to S.C. Code Ann. Regs. 61-79.262.17(a)(6) [40 C.F.R. § 262.17(a)(6)], which incorporates S.C. Code Ann. Regs. 61-79.262.262(b)(1) [40 C.F.R. § 262.262(b)(1)] and is a condition of the LQG Permit Exemption, generators must include 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).

The weekly inspection records for 2021-2024 were reviewed. The inspections were documented on paper and then transcribed into Microsoft Excel. The inspectors observed that the sand blast media releases were not documented on the weekly inspections during 2023 or

2024, and that the inspections were occurring every week at the same time. The inspectors stated that the time of the inspections should reflect the actual time conducted.

Pursuant to S.C. Code Ann. Regs. 61-79.262.17(a)(1)(v) [40 C.F.R. § 262.17(a)(1)(v)], which is a condition of the LQG Permit Exemption, a generator is required to, at least weekly, inspect central accumulation areas looking for leaking containers and for deterioration of containers caused by corrosion or other factors.

The Waste Minimization Plans for 2019-2023 were reviewed.

Hazardous and non-hazardous manifests were reviewed for 2020-2023. Hazardous wastes were shipped to the following locations:

- EnviroSafe of Pennsylvania Inc. (EPA ID PAD010154045) in York, PA (via US Ecology);
- Chemical Waste Management (EPA ID ALD070513767) in Emelle, AL (via Vickery);
- Chemtron Corporation (EPA ID OHD066060609) in Akron, OH;
- Vickery Environmental, Inc. (EPA ID OHD020273819) in Vickery, OH; and
- EnviroSafe Services of Ohio (EPA ID OHD045243706) in Oregon, OH.

The land disposal restriction forms were reviewed.

The nonhazardous waste charcoal media filters were shipped to CMEG (EPA ID SCR000003442) in Walterboro, SC.

13) Summary

The inspectors conducted the exit meeting with Mr. Tucker, Mr. Rinehart, Mr. Turner, and Mr. Coursey. During this meeting, the EPA and SCDHEC presented the preliminary results of the inspection. Greenwood Fabricating and Plating Inc. was inspected as a LQG of hazardous waste.

On April 15, 2024, Mr. Tucker emailed the inspectors the following countermeasures:

1. Photo of all applicable hazards are labeled on the yellow labels;
2. Email attached showing the timeline of Line 8 pit clean out;
3. Photos showing housekeeping at the sandblaster and corrected label on the used sand;
4. Photos showing closed super sacks with a different method used;
5. Photo of aerosol drum closed and labeled. The old aerosol satellite drum is being profiled and will be shipped out upon profile approval;
6. Photo of labeled used oil drums and manifests;
7. Photo of oil soaked up on the floor;
8. Purchase order for an oil/water separator;
9. Revised contingency plan including satellite nitric drum, supersacks, and max quantities of all hazardous waste;
10. RCRA certification for OU operators;
11. Example of RCRA form "wet signed" and dated;
12. Photo of the new universal waste drum;
13. Attached are job descriptions for the employees that identify and/or handle hazardous material;
14. Brad Rinehardt is no longer employed with GFP. We are working with someone from

Piedmont Technical College that will be doing our site-specific training. We are awaiting a timeline for this to be scheduled; and

15. We do not have transportation paperwork for the drum of silver strip from Hoges. This drum is being treated in house.

14) List of Attachments

Attachment A – Photo Log: Greenwood Fabricating and Plating Inc.

15) Signed

PAULA WHITING

 Digitally signed by PAULA WHITING
Date: 2024.06.07 12:14:56 -04'00'

Paula A. Whiting
Environmental Engineer

16) Concurrence

ALAN NEWMAN

 Digitally signed by ALAN NEWMAN
Date: 2024.06.07 13:50:51 -04'00'

Alan R. Newman
Acting Chief
RCRA Enforcement Section

ATTACHMENT A

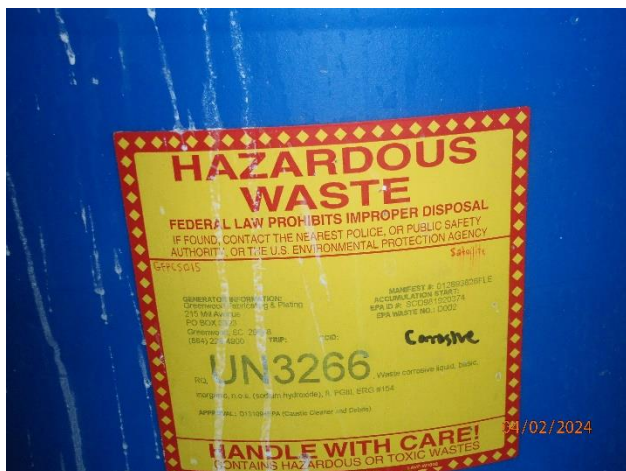
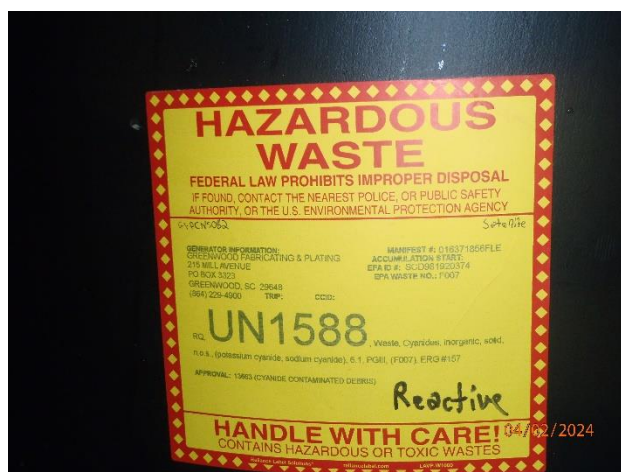
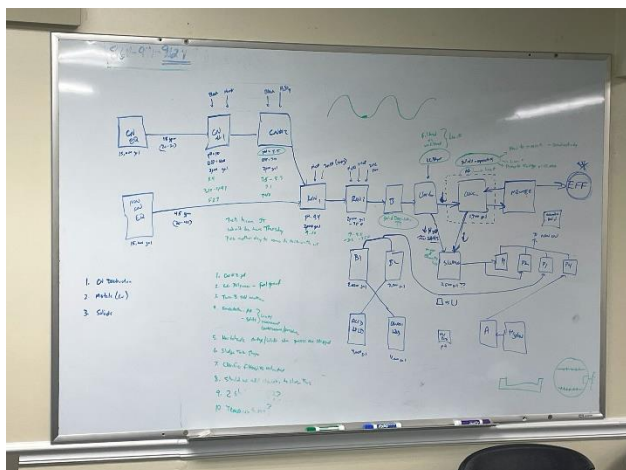
GREENWOOD FABRICATING AND PLATING INC.

GREENWOOD, SOUTH CAROLINA

COMPLIANCE EVALUATION INSPECTION PHOTOGRAPHS

April 2, 2024

**Photos taken by Paula A. Whiting
Camera Type: Olympus Tough
Serial Number: SC7374**

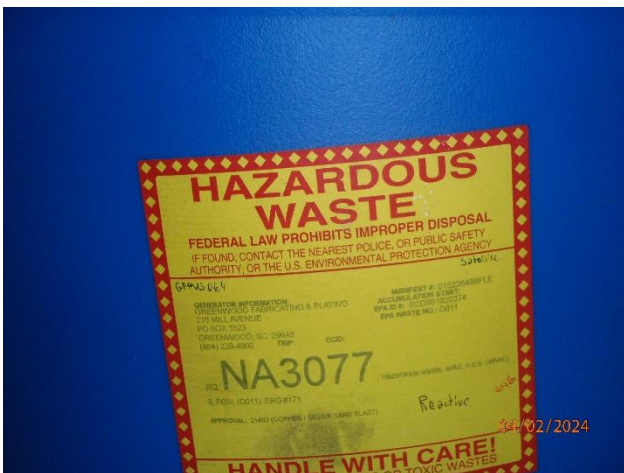




Picture 7 – Spent sand blast media SAA



Picture 10 – Spent sand blast media released to ground



Picture 8 – Spent sand blast media SAA label



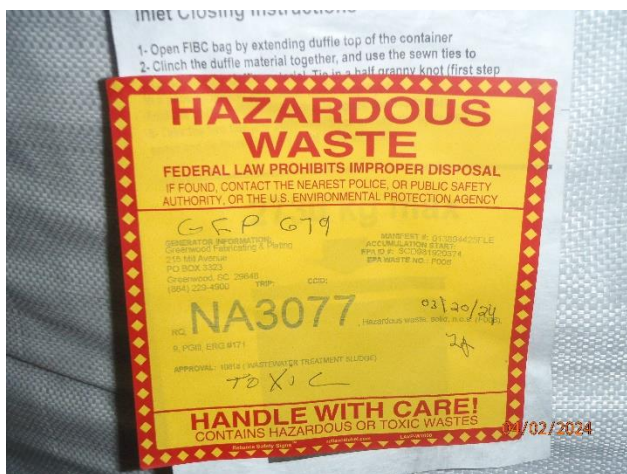
Picture 11 – Clean sand blast media released to ground



Picture 9 – Spent sand blast media released to ground



Picture 12 – Clean sand blast media released to ground



Picture 13 – CAA WWTP Sludge label



Picture 16 – Spent Nitric Acid SAA near CAA



Picture 14 – CAA WWTP Sludge supersacks



Picture 17 – CAA WWTP Sludge supersack



Picture 15 – Hoges Plant spent silver stripper - full



Picture 18 –WWTP



Picture 19 –WWTP CAA sign



Picture 22 – WWTP floor press



Picture 20 – WWTP CAA open supersacks



Picture 23 – WWTP aerosol can puncture SAA not labeled



Picture 21 – WWTP CAA open supersacks



Picture 24 – Cyanide waste tank



Picture 25 – Non cyanide waste tank



Picture 26 – Universal waste HID lamps



Picture 27 – Universal waste lamp boxes



Picture 28 – Universal waste lamp boxes



Picture 29 – Air Compressor Room used oil containers



Picture 30 – Air Compressor Room used oil released to ground



Picture 31 – Air Compressor Room used oil released to ground