RCRA Inspection Report

1) Inspector and Author of Report

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2) Facility Information

Chemours Company FC, LLC (Chemours DeLisle)
7685 Kiln-DeLisle Road
Pass Christian, Mississippi 39571
EPA ID No. MSD096046792

3) Responsible Officials

Cynthia K. Kouba
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4) Inspection Participants

Suzanne Gibson	Chemours DeLisle
Cynthia Kouba	Chemours DeLisle
David Quigley	Chemours DeLisle
Robert Mills	Chemours DeLisle
Tammy Finkes	Chemours DeLisle
Randy Redmond	Chemours DeLisle
Brandon Bond	Chemours DeLisle
Bobby Conover	Chemours DeLisle

Ron Taglieri	Chemours DeLisle
William Rider	Mississippi Department of Environmental Quality (MDEQ)
Alan Newman	EPA

5) Date and Time of Inspection

July 13, 2022, 8:30 a.m. – 5:00 p.m. CDT

6) Applicable Authority

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; Mississippi Code of 1972, Miss. Code Ann. § 17-17-1 *et seq.,* and Mississippi Hazardous Waste Management Regulations, 11 Miss. Admin. Code Pt. 3, R. 1.1-1.24; and Hazardous Waste Permit MSD096046792.

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

Chemours DeLisle operates under a RCRA Hazardous Waste Permit number MSD096046792 which became effective on 9/17/2019. The Chemours DeLisle has a treatment and storage permit issued by the State of Mississippi that authorizes the facility to store hazardous waste in the Deepwell Storage Vault, the Primary Filter Storage Tanks (2), the Thickener Tanks (2) and the Splitter Feed Tanks (2).

Pursuant to 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.17], a LQG may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status, as required by Section 17-17-27(4) of the Mississippi Code of 1972, Miss. Code Ann. § 17-17-27(4) [Section 3005 of RCRA, 42 U.S.C. § 6925], provided that the generator complies with the conditions listed in 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.17] (hereinafter referred to as the "LQG Permit Exemption").

Pursuant to 11 Miss. Admin. Code Pt. 3, R. 1.3 [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 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 17-17-27(4) of the Mississippi Code of 1972, Miss. Code Ann. § 17-17-27(4) [Section 3005 of RCRA, 42 U.S.C. § 6925], and without complying with 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.16(b) or §262.17(a)], except as required in 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.15(a)(7) and (8)], provided that the generator complies with the satellite accumulation area conditions listed in 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.15(a)] (hereinafter referred to as the "SAA Permit Exemption").

Pursuant to 11 Miss. Admin. Code Pt. 3, R. 1.21 [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, lamps, or aerosol cans, calculated collectively) at any time.

7) Purpose of Inspection

The purpose of this inspection was to conduct an unannounced compliance evaluation inspection to determine The Chemours Company DeLisle compliance with the applicable requirements of RCRA and the corresponding Mississippi regulations. This was an EPA lead inspection.

8) Previous Inspection History

MDEQ has conducted three RCRA CEIs at the subject facility between 2017 and 2020 and found no violations during those inspections.

9) Facility Description

The Chemours DeLisle Plant manufactures titanium dioxide pigment (TiO_2 or pigment) using the chloride-ilmenite process. The chloride-ilmenite process uses ilmenite ore, a low-grade titanium dioxide ore. The facility is located on the north shore of St. Louis Bay in Harrison County, Mississippi. Chemours DeLisle owns approximately 2,500 acres, of which approximately 200 acres have been developed and are used in support of pigment manufacturing operations and five acres are associated with the solids pond and NPDES permitted wastewater treatment surface impoundments. An additional 156 acres are dedicated to a permitted solid waste disposal area authorized under a State of Mississippi Solid Waste Management permit. The Rain Basin, which is part of the NPDES permit, is approximately 87 acres. Chemours DeLisle employs approximately 500-600 people, has approximately 500-600 resident contractors, and operates 24 hours a day, seven days a week unless shut down for short periods for maintenance activities or severe weather.

Titanium dioxide production involves three primary raw materials, petroleum coke (coke), ilmenite ore (ore), and chlorine. The pigment manufacturing process at Chemours DeLisle has the following major process areas: Reaction, Environmental, Purification, Oxidation, Finishing, and Packing. Additional areas of Chemours DeLisle operate in support of facility operation.

Coke and Ore Unloading, Processing and Storage

Coke is removed from the railcar via gravity. The coke is then pneumatically transported to the "Coke Storage Bin." Coke captured in bag filters is returned to the process. The bag filter is changed, as necessary, and land disposed. Ore is unloaded from the railcar using gravity onto a belt conveyor system. The ore is initially stored in the "Wet Ore Bins." Ore is transported from the Wet Ore Bins through one of two natural gas dryers and stored in the "Dry Ore Bins."

The Line 1 dryer uses a cyclone and wet scrubber in series. The Line 2 dryer uses a cyclone and wet scrubber in series. Material from the Line 1 and 2 cyclone and Ore dust from the wet scrubber is sent back into the manufacturing process.

Coke and ore are sent to the "Mix Bins." Fines from the coke and ore transfer system are captured in containers, exit a baghouse, and are sent to the onsite solid waste disposal area.

Fugitive ore dust created from the off-loading is captured and returned to the belt conveyor system.

Chlorine Unloading, Storage and Processing

Liquid chlorine is off-loaded from a railcar into one of three storage tanks. Residual chlorine in purge lines and the storage tank vents is captured and sent to a scrubber creating a wastewater. The wastewater is sent to Spent Chemical Treatment.

Spent Chemical Treatment

Wastewater from chlorine unloading, wastewater from oxidation, and wastewater from Reaction are all sent to Spent Chemical Treatment. A treating agent is added to ensure that any pH change does not liberate chlorine. Wastewater discharged from Spent Chemical Treatment is sent to Wastewater Treatment.

Reaction

Chemours DeLisle operates two process lines, Line 1 and Line 2. Even though the process in each line is identical, the lines operate separately. In the reaction process, Chemours DeLisle uses ore, chlorine gas, and petroleum coke. The chlorine gas is a mixture of virgin chlorine gas and recycled chlorine gas from the oxidation process. The coke, ore, and chlorine gas, are reacted in a fluidized bed reactor called a "chlorinator." This produces titanium tetrachloride ($TiCl_4$), also called "tickle," in a gaseous state, as well as iron and other metal chlorides. After the chlorinator, the product gases, unreacted solids (including unreacted ore and petroleum coke fines), and tail gases are separated. The $TiCl_4$ is condensed from the gas stream and captured. Iron chloride and hydrochloric acid are removed by water for recycle. A process gas scrubbing system uses a water and caustic mixture to remove chlorine, $TiCl_4$, sulfur dioxide, and particulate matter. The iron chloride solution purge stream contains unreacted coke and unreacted ore. Chemours DeLisle has determined the iron chloride solution a D002/D007/D008 hazardous waste. The iron chloride solution is sent to the Environmental (Filtration) Area.

There are several intermittent streams generated in the Reaction area. Vacuum equipment is used to collect vapors during maintenance and may be used for small leaks. These vapors are sent to a scrubber. Emissions from process equipment are vented to the Start-up Scrubber during start-ups. Coke and ore dust from equipment vents. The chlorinator will undergo periodic maintenance to remove unreacted solids from the bottom of the chlorinator. During this maintenance period the chlorinator will be rebricked, as necessary. The removed solids and brick are disposed in the onsite waste disposal area.

Purification

Crude $TiCl_4$ is pumped to the purification treatment reactor. Here the crude $TiCl_4$ is recirculated through a heat exchanger and evaporated into a column. An additive is pumped into the column to aid in impurity removal. Impurities from the column are removed and eventually managed with the iron chloride solution in Environmental. The $TiCl_4$ vapor exiting the column is condensed to form "pure" $TiCl_4$. The pure $TiCl_4$ is then pumped to a series of storage tanks and held until use in oxidation. Emissions from Purification tank vents are routed to a scrubber. The scrubber discharge is sent to the Recycle Water Storage Area.

Oxidation

Pure liquid $TiCl_4$ from Purification is sent to a vaporizer and then to a reactor. In the reactor, the vaporized $TiCl_4$ is reacted with oxygen and process additives to form raw titanium dioxide pigment (TiO_2 or pigment) and chlorine gas. Pigment and chlorine gas exit the reactor together where they are separated in a cyclone and two parallel bag filters. The pigment is slurried in water in a slurry tank and sent to storage tanks. The chlorine gas is captured and recycled back to the process. Oxidation utilizes a scrubber to capture and remove emissions from vented gases. The scrubber uses water which creates hydrochloric acid, to which a treatment chemical is added to control pH. This wastewater is sent to the Spent Chemical Treatment in Reaction.

Emissions from intermittent equipment are scrubbed with water. This is sent to Wastewater Treatment. Emissions from the additive Feeder Vents are captured in a recirculated water scrubber.

Treatment

Slurried pigment from Purification is pumped into treatment tanks where various chemicals are added. The chemicals are precipitated onto the surface of the pigment as colorless hydrated oxides by neutralizing the slurry with either a base or acid. The coating is added to the titanium dioxide (TiO_2) to produce a physical property in accordance with customer specifications. After treatment, the pigment is stored in the Treated Tanks.

Finishing

The treated pigment is passed through a filter and sent to a natural gas dryer where the remaining water is evaporated. The water collected from filtration is sent to Wastewater Treatment. After drying, the pigment is stored in various feed bins. It is then sent to grinders to break down agglomerates into uniform pigment particles. The pigment is then sent to a packing bin for final packaging or to a silo for slurry production. In the case of slurry production, dry pigment is mixed with water and dispersant. The final slurry is loaded in rail cars and tanker trucks.

Environmental (Filtration) Area

The Environmental (Filtration) Area includes equipment that is part of Chemours DeLisle's Hazardous Waste Permit, permit number MSD096046792. This permit includes seven (7) permitted hazardous waste tanks for storage and treatment. The iron chloride solution is pumped into one of two Thickener tanks. A flocculant is added to the Thickener to begin solids removal. The iron chloride solids (primarily coke and ore) are filtered, washed, neutralized, re-slurried, and either recycled into the manufacturing process or disposed in the onsite waste disposal area. Coke and Ore solids are dredged from the Solids Pond, and they are separated. The ore is collected and recycled back into the process, the coke is pressed and disposed in the onsite land disposal area. Return water is used to transport solids, is decanted, and returned to the process for reuse.

The iron chloride solution overflows the Thickener and is further clarified, filtered, and sent to the Deepwell Storage Vault in a series of permitted and central accumulation area tanks. The waste iron chloride solution is then injected into one of four Class I hazardous waste injection

wells permitted under the Underground Injection Control Program. Environmental Area trenches and sumps are pumped to the Recycle Water Storage area for reuse. The Environmental Area has two scrubbers to capture emissions. Scrubber discharge is pumped to the Recycle Water Storage area for reuse.

Recycle Water Storage

Chemours DeLisle collects and reuses water from the process Environmental (Filtration) Area, as well as from Reaction and Purification. The water is stored in aboveground vaults which provide storage for the recirculating process water stream. These storage vaults are located within secondary containment. Solids that accumulate in the storage vaults are dredged periodically. The solids are sent to the Solids Pond. Coke and Ore solids are dredged from the Solids Pond, and they are separated. The ore is collected and recycled back into the process, the coke is pressed and disposed in the onsite land disposal area. The Recycle Water Storage Area vaults vent to a water scrubber to remove hydrochloric acid vapors. The scrubber discharge is sent back to the Recycle Water Storage Area.

Wastewater Treatment

The Wastewater Treatment Area collects wastewater from Oxidation, Finishing and Power Areas. The wastewater is treated and ultimately discharged to Bay St. Louis through the facility's NPDES permitted outfall. Process wastewater is discharged to the equalization basin or the hold pond and then enters a neutralization tank to adjust the pH to meet the NPDES permit requirements. A flocculant is then added to the neutralization tank and the water is then discharged to the disengagement pond. The flocculant is added to the water to aid in the removal of TiO_2 solids. The water then travels through a cooling pond to allow further settling of pigment. After cooling, the wastewater is discharged at the facility's NPDES permitted outfall. The surface impoundments associated with the NPDES system are periodically dredged to remove TiO_2 solids. These solids are sent to the onsite waste disposal area as non-hazardous waste. Return water from those waste disposal units that handle TiO_2 solids is sent back to Wastewater Treatment.

The onsite waste disposal area will be used for the disposal of coke generated at the facility. The first unit was constructed in 2011 but did not begin receiving waste until 2014. This unit is currently the only unit under this permit that is receiving waste. The second unit, waste disposal unit 22, was recently constructed, however it is not receiving any waste. The plant operates 24 hours a day, seven days a week. The facility is surrounded by a fence and access is controlled by contracted security.

Chemours DeLisle's most recent Hazardous Waste Generator Notification (EPA Form 8700-12) dated February 23, 2022, characterized the facility as a large quantity generator (LQG) and treatment, storage, and disposal facility (TSDF) of hazardous waste. RCRA activity at the facility is regulated by the MDEQ permit referenced above which addresses the operation of seven hazardous waste storage tanks which store waste prior to injection underground. Routine hazardous waste generated at the facility consists of waste paint, waste flammable liquids, waste isopropyl alcohol, among other wastes (EPA Waste Codes D001, D002, D004, D007, D008,

D010, D018, D035, D039, D040, F003, F005, U002, U031, U210, and U220). Chemours DeLisle reported that they were operating under the following NAICSs code: 325130 – Synthetic dye and pigment manufacturing. Permit number MSD096046792 was issued on September 17, 2019 and expires on August 31, 2029.

10) Opening Conference

On July 13, 2022, EPA inspector Alan Newman, accompanied by Mississippi inspector William Rider, arrived at The Chemours Facility Delisle at approximately 8:30 am. Suzanne Gibson, immediately received the inspectors. Suzanne Gibson, and the inspectors were joined by Robert Mills, for the opening conference. The inspectors introduced themselves, showed their credentials to Suzanne Gibson, 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 inspectors 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 asserted a business confidentiality claim. The inspection participants also discussed health and safety protocols and required personal protective equipment before Suzanne Gibson led the inspectors on a tour of the Facility operations.

Suzanne Gibson provided an overview of the facility's history and current operations during the opening conference. The company does not appear to meet the Small Business Regulatory Enforcement Fairness Act's classification of a "small business," which is generally set by the Small Business Administration using the business' SIC/NAICS code and annual receipts or number of employees. Therefore, the EPA inspector did not provide a copy of the agency's information sheet for small businesses, which can be found at https://www.epa.gov/compliance/small-business-resources-information-sheet.

11) Findings

- Permitted tanks.

Chemours operates two Chlorinators with refractory brick. A six-inch pipe transfers unreacted waste solids from Chlorinator to Environmental. Unreacted wastes are treated and prepared for underground injection at Environmental. Chemours adds flocculants to the waste slurry in the pipe as the waste is transferred from the Chlorinator to Environmental. Waste is initially added to one of two thickener tanks (126,240 gallons each) (Photo 1). The waste moves from the thickener tanks to one of two splitter feed tanks (12,120 gallons each) (Photos 2-3). The thickener and splitter feed tanks were labeled as hazardous waste but were not labeled with an indication of the hazard (IOH) or with an accumulation start date (ASD). Neither the IOH nor ASD labels appear to be required by the permit on the tank. Chemours DeLisle demonstrated through documentation that the tanks turn over approximately 500 times each year.

The waste stream is transported to the one of six Lamella tanks where treated liquids go to primary filter storage and solids are returned to the thickener tanks (Photos 4-5). The Lamella tanks are regulated as CAA tanks and labeled with the words "Hazardous Waste" but were not labeled with either an IOH or an ASD. The vapors from the Lamella tanks are vented to scrubbers. The liquids are pumped to one of two the Primary Filter Storage Tanks (87,240 and 67,110 gallons respectively) (Photos 6-8). These tanks were labeled with the words "Hazardous Waste" and with an IOH. The liquids are treated in the primary filters which are regulated as CAA tanks (Photos 9). These filter tanks are labeled with the words "Hazardous Waste" but were not labeled with either an IOH or an accumulation start date. Waste further flows to the polishing filter tanks and at times to the Deck Tank. Both the Deck Tank and the six polishing tanks are regulated as CAA tanks. These tanks are labeled with the words "Hazardous Waste" but were not labeled with either an IOH or an ASD. The treated liquids are pumped to the deep well vault (476,000 gallons). Chemours DeLisle representatives stated that they maintain a log to record when tanks are cleaned out and ensures that each CAA tank is cleaned out every 90 days. This record was reviewed, and all CAA tanks were within the 90-day maximum storage time. The facility has a trench system that also serves as a leak detection system in the areas where waste is treated.

Pursuant to 11 Miss. Admin. Code Pt. 3, R. 1.21] [40 C.F.R. § 262.17(a)(5)(ii)], which is a condition of the LQG Permit Exemption, a large quantity generator must (B) Mark or label its tanks with an indication of the hazards of the contents (examples include, but are not limited to, the applicable hazardous waste characteristic(s) (i.e., ignitable, corrosive, reactive, toxic); hazard communication consistent with the Department of Transportation requirements at 49 CFR part 172 subpart E (labeling) or subpart F (placarding); a hazard statement or pictogram consistent with the Occupational Safety and Health Administration Hazard Communication Standard at 29 CFR 1910.1200; or a chemical hazard label consistent with the National Fire Protection Association code 704).

- Satellite Accumulation Areas

The inspection team toured multiple satellite accumulation areas (SAAs). Two containers at SAA-2/SAA-2A, one 55-gallon container storing calibration gas cylinders and some punctured cans, and one 5-gallon container for filters were not labeled with an IOH (Photos 10-14). One container at SAA-10 and multiple containers at SAA 10-A were not labeled with an IOH (Photo 18). Each of these containers was either corrected at the time of the inspection or was documented that they were labeled in an email dated August 27, 2022. Each of these containers were closed and were in good condition.

Pursuant to 11 Miss. Admin. Code Pt. 3, R. 1.3 [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 (ii) with an indication of the hazards of the contents.

The inspection team toured SAAs 5, 9, 9a, 9c, 11, and 11a in buildings 575, painting, the Garage. Each of the SAA containers were labeled, closed, and in good condition. Each of the containers

of used oil were labeled and in good condition.

- CAA

Chemours DeLisle manages a hazardous waste CAA at the edge of the developed area of the property on the portage road. The area was identified with a sign which read "danger, hazardous waste storage." Chemours DeLisle manages ignitable/toxic waste in this CAA, and the inspectors observed "No Smoking" signs posted in the CAA. There were six containers in the central accumulation area (Photos 15-17). The oldest accumulation start date was May 4, 2022. There was one 5-gallon that was not dated. Facility personnel added the date during the inspection. There were two 55-gallon containers of universal waste batteries. The containers were labeled, closed, and in good condition. The oldest accumulation start date was May 2, 2022. The area is equipped with portable fire extinguishers, spill control equipment, and decontamination equipment; and has access to fire hydrants within 300 feet.

Pursuant to 11 Miss. Admin. Code Pt. 3, R. 1.21] [40 C.F.R. § 262.17(a)(5)(i)], which is a condition of the LQG Permit Exemption, a generator must mark or label its containers with the following: the date upon which each period of accumulation begins clearly visible for inspection on each container.

- Records Review

The inspection team reviewed records including the contingency plan, the permit, the permit application, the financial assurance documentation, inspections, training, and waste reduction documentation among other records.

The Contingency Plan: The actions that facility personnel should take in response to an emergency are described in the facility's Iron Chloride Management Contingency Plan, which was last updated in January 2014. 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. Evan Standish 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 appears to be up to date. 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 Iron Chloride Management Contingency Plan (and its quick reference guide) was most recently submitted to

the police department, fire department, hospital, State and local emergency response teams and the Local Emergency Planning Committee on October 14, 2020.

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 each job title. Each description did include the requisite skill, education, or other qualifications, and duties of facility personnel assigned to that position. Chemours DeLisle 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 2020-2022.

Waste Manifest Records: The inspectors reviewed available hazardous waste manifest records and land disposal restriction forms for shipments of hazardous waste sent since 2020. Hazardous waste manifest records show that D001/D035/F003/F005 hazardous waste solids containing flammable liquid and D004/D007 hazardous waste solids are routinely shipped to Clean Harbors Deer Park (TXD055141378), and the most recent shipment was made on July 7, 2022. The records included signed return copies of manifests for shipments sent during this timeframe.

Inspection Records: The inspectors reviewed Chemours DeLisle's available records of inspections of the hazardous waste central accumulation area (CAA) since 2020. The inspection log includes a checklist to record observations about leaking containers and for deterioration of containers caused by corrosion or other factors. 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 5:00 p.m. CDT with Suzanne Gibson, Robert Mills, and Cynthia Kouba. During this meeting, the inspectors stated their preliminary conclusions of the inspection. Chemours DeLisle agreed to provide photo documentation of the corrections made at the facility. Photos of corrective actions taken were provided to EPA and MDEQ inspectors on August 28, 2022. Chemours DeLisle also reviewed the facility description to ensure accuracy.

13) List of Appendices

Appendix 1 – Photo Log:
Eighteen Photos taken on: July 13, 2022
Photos taken by: Alan Newman
Photos taken with: Panasonic Lumix
EPA Property Tag: S75870

14) Signed

ALAN NEWMAN Digitally signed by ALAN NEWMAN
Date: 2022.09.19 13:15:20 -04'00'

Alan Newman Date
Environmental Engineer

Concurrence

ARACELI CHAVEZ Digitally signed by ARACELI CHAVEZ
Date: 2022.09.20 09:52:34 -04'00'

Araceli B. Chavez Date
Chief
RCRA Enforcement Section

Photographs

Photos taken on July 13, 2022
Photos taken by Alan Newman
Camera: Panasonic Lumix
Serial Number: S75870

Photo 1: Thickener Tanks.

Photo 2: #1 East Splitter Tank.

Photo 3: #2 West Splitter Tank.

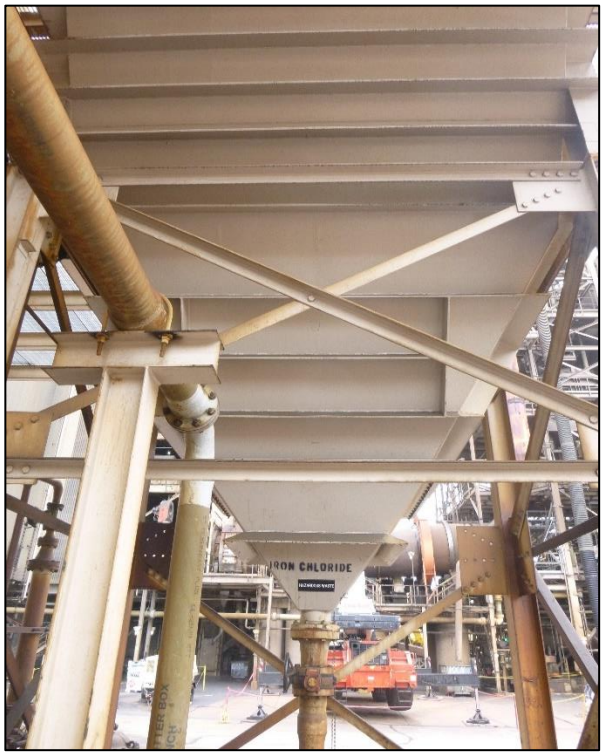

Photo 4: Lamella Unit.


Photo 5: Top of Lamella Unit.


Photo 6: Primary Filter Storage Tank #1.

Photo 7: Primary Filter Storage Tank #2.


Photo 8: Primary Filter Storage Tank #2.

Photo 9: Primary Filters.

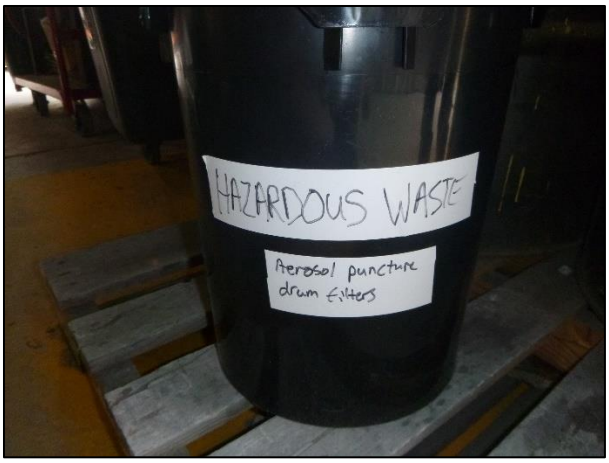

Photo 12: Building SAA-2 and SAA-2A.

Photo 10: Building SAA-2 and SAA-2A.

Photo 13: Building SAA-2 and SAA-2A.

Photo 11: Building SAA-2 and SAA-2A.

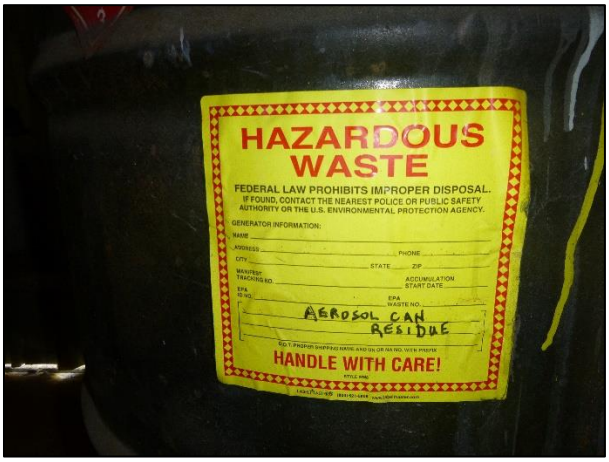

Photo 14: Building SAA-2 and SAA-2A

Photo 15: CAA containers.

Photo 18: SAA 10 containers.

Photo 16: CAA containers.

Photo 17: CAA containers.