

RCRA Inspection Report

1) Inspector and Author of Report

Brooke York
Environmental Engineer
Phone: 404-562-8025
york.brooke@epa.gov

Nereida Hernandez Morales
Life Scientist
Phone: 404-562-8289
HernandezMorales.Nereida@epa.gov

Tarin Tischler
Life Scientist
Phone: 404-562-9702
Tischler.Tarin@epa.gov

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

2) Facility Information

Purac America d/b/a Corbion (Corbion) EPA ID# GAR000076398
5150 North Royal Atlanta Drive
Tucker, Georgia 30084

3) Responsible Officials

Bradley Buehler
General Manager

4) Inspection Participants

Bradley Buehler, Corbion General
Manager (GM)
Jonathan Bowman, Corbion Senior
Operation Manager (SOM)
Carlos Torres, Corbion Environmental,
Health & Safety (EHS)
Lafayette Coatney, Corbion Warehouse
Logistics Coordinator (WLC)

Christian Touchet, Georgia Environmental
Protection Division (GAEPD)
Ian Hutcheson, GAEPD
Brooke York, USEPA
Tarin Tischler, USEPA
Nereida Hernandez, USEPA

5) Date of Inspection

March 14, 2023, at 9:00 a.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; 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).

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.02(1) [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 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.

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”).

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.07(1) [40 C.F.R. § 261.4(a)(8)], secondary materials that are reclaimed and returned to the original process or processes in which they were generated where they are reused in the production process are not solid wastes provided that the conditions listed in Ga. Comp. R. and Regs. 391-3-11-.07(1) [261.4(a)(8)] (hereinafter referred to as the “Closed-Loop Recycling Exemption”) are met.

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.

7) **Purpose of Inspection**

The purpose of this inspection was to conduct an unannounced compliance evaluation inspection to determine Corbion's compliance with the applicable requirements of RCRA and the corresponding Georgia regulations. This was an EPA lead inspection.

8) **Facility Description**

Corbion began manufacturing resins used in the medical and pharmaceutical industries at its Tucker, Georgia location in 2015. These resins are primarily polyester and polylactic acid resins. Corbion states that its processes are confidential and does not provide flow diagrams or permit access to all areas of its 54,000 square feet facility. The facility employs 34 people and operates one shift, five (5) days a week, from Monday to Friday.

The facility generates hazardous waste solvent and spent carbon filters from its process, and several lab waste streams. The spent solvent is shipped using a uniform hazardous waste manifest (UHW) to Clean Harbors (OHD980587364). Carbon filters, flammable solids, and lab waste are shipped on a UHW to MKC Enterprises (GAD000616367).

The most recent Hazardous Waste Generator Notification (EPA Form 8700-12), dated January 19, 2022, characterized the facility as a large quantity generator (LQG) of hazardous waste. Waste codes from the EPA Form 8700-12 include ignitable (D001), reactive (D003), chloroform characteristically toxic waste (D022), and listed hazardous wastes from non-specific sources (F002, and F003). The facility self-identified with the NAICS 325411 – medicinal and botanical manufacturing.

9) **Previous Inspection History**

On September 12, 2018, GAEPD conducted the most recent RCRA CEI at the subject facility and found one apparent violation of RCRA's requirements for failure to maintain the personnel training documents and records at the facility. The facility was returned to compliance by November 1, 2018. As a result of this violation, GAEPD issued a Notice of Violation (NOV) to Corbion on November 30, 2018, and the violations were resolved.

10) **Opening Conference**

On March 14, 2023, EPA inspectors, Brooke York, Nereida Hernandez Morales, and Tarin Tischler, accompanied by GAEPD inspectors Christian Touchet and Ian Hutcheson, arrived at Corbion at approximately 9:00 am. Jonathan Bowman, Senior Operation Manager, immediately received the inspectors. Jonathan Bowman, and the inspectors were joined by Bradley Buehler, Carlos Torres, and Lafayette Coatney, for the opening conference. The inspectors introduced themselves, showed their credentials to the facility representatives, 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 lead 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 lead inspector 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 asserted a business confidentiality claim.

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

Prior to the facility tour, the facility representatives explained that the spent acetone from the process is stored in a 4,500-gallon Solvent Waste Tank prior to shipment offsite on a UHWM to Clean Harbors. The facility explained their belief that the spent solvent is recycled or used as an ingredient to make a product and therefore believed to be exempt from the RCRA requirements.

Inspectors requested the most recent manifest for the shipment of the spent acetone. The inspectors were provided UHWM 013780674FLE, which lists UN1090, Acetone, 3, PGII as the material shipped on January 19, 2023, with no waste codes identified (Figure 1). The hazardous waste report management method code listed in item 19.1 of the UHWM is H020, which is solvents recovery (distillation, extraction, etc.). The facility did not have the return to generator copy of the UHWM and had not submitted an exception report.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.20(a)(1)], a generator who transports, or offers for transport a hazardous waste for offsite treatment, storage, or disposal, must prepare a Manifest according to the instructions included in the appendix to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. Part 262].

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.42(a)], a LQG (1) 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. (2) 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.

11) **Inspection Observations**

Production Room

Facility representatives explained that the Production Room is a clean room. The control system runs the process. The process begins with raw materials added to the Reactor. The reaction takes place in the Reactor and a polymer is formed. Acetone is added to the Reactor to facilitate the polymer moving to the Purification/Dissolving Vessel. From the Purification/Dissolving Vessel the polymer goes to the carbon filters, then the Evaporation Vessel. The product is discharged from the Evaporation Vessel. The remaining spent solvent goes to either the oven or is condensed and sent to the Distillate Tank. From the Distillate Tank the spent solvent goes to the

Solvent Waste Tank. Following each step in the process the vessels are cleaned/purged with solvent (acetone).

The inspectors were not permitted to take photos in the Production Room. The facility representatives insisted that the equipment was proprietary and expressed concerns that the camera was not intrinsically safe. The inspectors agreed to obtain a hot work permit, if necessary, and the facility had an air monitor to ensure that the lower explosive limit was not being exceeded.

The Distillate Tank was not labeled with the words “Hazardous Waste,” and indication of the hazards of its contents, or dated. The Facility does not appear to be complying with the requirements for the management of volatile organic hazardous waste in hazardous waste systems, or equipment, including those requirements for organic air emissions.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.17(a)(5)(ii)], which is a condition of the LQG Permit Exemption, a generator must mark or label its tanks with the words “Hazardous Waste”; mark or label its tanks with an indication of the hazards of the contents; use inventory logs, monitoring equipment or other records to demonstrate that hazardous waste has been emptied within 90 days of first entering the tank; and keep inventory logs or records with the above information on site and readily available for inspection.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.17(a)(2)], which incorporates Ga. Comp. R. and Regs. 391-3-11-.10(1) [40 C.F.R. Part 265, Subparts J, AA, BB, and CC], and is a condition of the LQG Permit Exemption, a generator accumulating hazardous waste in tank systems is required to comply with the applicable requirements of Ga. Comp. R. and Regs. 391-3-11-.10(1) [40 C.F.R. Part 265, Subparts J, AA, BB, and CC], which includes standards for managing hazardous waste in tanks, tank systems, and standards for managing volatile organic hazardous waste in tanks, containers, and equipment.

The inspectors observed a SAA behind the carbon filters in the Production Room. There was one (1) 55-gallon container of UN3175 acetone carbon filters labeled and closed, and one (1) 55-gallon drum containing acetone carbon filters labelled with “hazardous waste”, but no indication of the hazards of the container’s contents. The drum was also improperly sealed.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [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 (i) with the words “Hazardous Waste” and (ii) with an indication of the hazards of the contents.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [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.

Warehouse and Central Accumulation Area (CAA)

The Warehouse is used to store products and waste. The CAA (Figure 2) was fenced off by a yellow rolling fence, with signage. At the time of the CEI, the inspectors observed a closed 250-gallon container labeled hazardous waste (D001 and F003) (Figure 6), a closed 55-gallon black poly container labeled hazardous waste flammable solids (D001 and F003) (Figure 3), and a 55-gallon black poly container labeled non-RCRA regulated waste (Figure 5). The hazardous waste containers were both dated March 6, 2023 and had an indication of the hazards of their contents.

Maintenance Area

The inspectors observed one open, unlabeled, and undated container of four feet spent universal waste lamps and miscellaneous universal waste batteries and ballasts (Figure 4).

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.18 [40 C.F.R. § 273.15(a) and (c)], a SQHUW may accumulate universal waste no longer than one year and must 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.

Pursuant Ga. Comp. R. and Regs. 391-3-11-.18 [40 C.F.R. § 273.13(a) and (d)], a SQHUW must manage universal waste batteries and lamps in a way that prevents releases of any universal waste or component of a universal waste to the environment.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.18 [40 C.F.R. § 273.14(a)], a SQHUW 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).”

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.18 [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.”

Tank Farm

The Tank Farm contained two (2) 4000-gallon tanks (Figures 40 and 41). One contained acetone for use in the production process while the other contained used acetone, both connected to the production room on the other side of the wall. The inspectors observed the tank farm which included a tank for unused acetone and the Solvent Waste Tank, which holds spent acetone from the production process. The secondary containment pit was observed to have liquid in it (Figure 7) and several openings/pipes (Figures 10 and 18) that can convey stormwater offsite from the secondary containment pit.

The Solvent Waste Tank was not labeled with the words “Hazardous Waste” or any indication of the tank’s hazards. The Solvent Waste Tank had a plate that read “Solvent Waste Tank” (Figure 31) and a label read “Used Acetone” (Figure 11). Additionally, no documentation was presented showing that the facility was maintaining inventory logs to ensure that the used acetone had been emptied within the last 90 days. At the time of the CEI, the Facility was not able to demonstrate its compliance with the hazardous waste tank standards, or the organic air emission

requirements. The Facility does not appear to be complying with the requirements for the management of volatile organic hazardous waste in hazardous waste systems, or equipment, including those requirements for organic air emissions.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.17(a)(5)(ii)], which is a condition of the LQG Permit Exemption, a generator must mark or label its tanks with the words “Hazardous Waste”; mark or label its tanks with an indication of the hazards of the contents; use inventory logs, monitoring equipment or other records to demonstrate that hazardous waste has been emptied within 90 days of first entering the tank; and keep inventory logs or records with the above information on site and readily available for inspection.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.17(a)(2)], which incorporates Ga. Comp. R. and Regs. 391-3-11-.10(1) [40 C.F.R. Part 265, Subparts J, AA, BB, and CC], and is a condition of the LQG Permit Exemption, a generator accumulating hazardous waste in tank systems is required to comply with the applicable requirements of Ga. Comp. R. and Regs. 391-3-11-.10(1) [40 C.F.R. Part 265, Subparts J, AA, BB, and CC], which includes standards for managing hazardous waste in tanks, tank systems, and standards for managing volatile organic hazardous waste in tanks, containers, and equipment.

A visible and active leak was flowing from the pump in-between the tanks and left a trail of liquid acetone into the containment pit filled with rainwater. Inspectors noted a white solid residue from the continuous or previous leaks (Figures 8, 9, 12, 13, 15 and 16). The facility was able to produce a daily inspection for the day of the CEI of the Tank Farm. However, the daily checklist did not mention the leak, and consisted of information that could be gathered from the control system.

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. § 262.251], 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.

Inspectors informed the Facility that the pump should be repaired and the liquid in the secondary containment pit (waste) should be containerized, characterized, and sent for disposal. Bradley Buehler did not appear to agree with the inspectors’ observations or recommendations. Following the inspection, the Facility failed to containerize or characterize the waste at the point of generation. On March 24, 2023, Clean Harbors removed 2,800 gallons of waste from the secondary containment pit. This waste was manifested offsite as a non-hazardous waste.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.11], a person who generates a solid waste, as defined in Ga. Comp. R. and Regs. 391-3-11-.08(1) [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 Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.11].

The containment pit has an inlet and outlet pipe. The outlet pipe leads to a valve controlling the release of rainwater behind the facility. The Facility had established a standard operating procedure (SOP) “Draining of the Tank Farm Pit” which calls for the sampling, analysis and discharge of the rainwater accumulated in the secondary containment pit. The SOP requires that the liquid in the secondary containment pit be sampled and analyzed once the level has reached the yellow line on the west wall (Figure 10). The SOP indicates that the liquid be discharged from the facility if the volatile organic compound (VOC) concentration is less than 22.82 g/L. Once the personnel have determined that the VOC concentration is below 22.82 g/L the water is discharged, and a record of the discharge is recorded. Acetone when used as a solvent is listed hazardous waste bearing the waste code F003. Acetone that is a commercial chemical product is a listed hazardous waste bearing the waste code U002(I).

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.11], a person who generates a solid waste, as defined in Ga. Comp. R. and Regs. 391-3-11-.08(1) [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 Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.11].

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. § 262.251], 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 reviewed the discharge log. The discharge log reviewed at the time of the inspection indicated that wastewater containing concentrations of acetone above the UTS (0.28 mg/L or 280 ug/L), had been routinely discharged. A summary of the discharge log can be seen in Table 1.

Table 1: Summary of the Discharge Log

Date of Sample Collection	VOC Concentration	Date of Discharge
December 2, 2022	23,000 ug/L	December 14, 2022
January 25, 2023	7,900 ug/L	January 27, 2023
March 1, 2023	5,300 ug/L	March 7, 2023

Pursuant to the Georgia Hazardous Waste Management Act, O.C.G.A. 12-8-66, et seq. as amended [Section 3005 of RCRA, 42 U.S.C. § 6925], owners and operators of treatment, storage and disposal facilities shall obtain a permit for the treatment, storage, and disposal of hazardous waste before first treating, storing, or disposing of hazardous waste.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.17(a)(9)], which incorporates Ga. Comp. R. and Regs. 391-3-11-.16 [40 C.F.R. Part 268], and is a condition of the LQG Permit Exemption, a generator is required to comply with land disposal restrictions (LDR) for hazardous waste, including meeting the universal treatment standards (UTS).

Quality Control Lab

The inspectors observed the Quality Control (QC) Lab to have numerous workstations and hoods that include SAAs. These containers were dated as seen in Figures 36 through 39. The lab containers were not included on the weekly inspection logs. This is an area of concern.

The inspectors observed used wipes in the general trash. The waste determination relating to the lab general trash including the used wipes was not observed. This is an area of concern.

Used Equipment Room

An acidic or alkaline aqueous solution is used to clean equipment from the manufacturing process. The Facility claimed that the waste generated by the cleaning operation was managed in accordance with its Pretreatment Permit.

Records Review

At the beginning of the inspection the inspector provided a list of records that a LQG is required to maintain. The inspectors informed the facility that the records would be reviewed for the previous three (3) years.

The following records were requested for review: 2021 Biennial Report and 2022 Waste Reduction Plan, uniform hazardous waste manifests from the last three years, land disposal restrictions, bills of lading, waste profiles, most recent contingency plan, personnel training records, documentation of weekly inspections, and copies of all applicable permits.

Permits

At the time of the CEI, the Facility could not produce any valid permits, including any NPDES or Pretreatment Permits held. This is an area of concern. Additionally, the Industrial Wastewater Discharge Permit appears to have categorized the Facility in the wrong category based on the NAICS.

Contingency Plan and Quick Reference Guide

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 November 29, 2021.

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 does not describe 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. Facility representatives provided documentation of a fire escape plan review from Dekalb Fire Department, but no description of arrangements with local police, hospitals, or other emergency response teams.

The plan lists the names and emergency telephone numbers for persons identified as emergency coordinators. Bradley Buehler is listed at the top of the emergency coordinator, and the other

individuals are listed below. The primary and secondary emergency coordinators were not clearly designated.

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 does not include the location and a physical description of each item on the list, or a brief outline of its capabilities.

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. § 262.261(c)-(f)], and is a condition of the LQG Permit Exemption, (c) the contingency plan must describe arrangements agreed to with the local police department, fire department, other emergency response teams, emergency response contractors, equipment suppliers, local hospitals or, if applicable, the Local Emergency Planning Committee, pursuant to 40 C.F.R. § 262.256; (d) the contingency plan must list names and emergency telephone numbers of all persons qualified to act as emergency coordinator (see 40 C.F.R. § 262.264), and this list must be kept up to date; (e) the contingency plan must include a list of all emergency equipment at the facility where this equipment is required, and this list must be kept up to date; (f) the contingency plan must include an evacuation plan for generator personnel where there is a possibility that evacuation could be necessary.

The plan includes an evacuation plan for personnel. This plan describes signals to be used to begin evacuation, but evacuation procedures are to “find the nearest exit,” and does not include evacuation routes and alternate evacuation routes.

The contingency plan did not include a quick reference guide.

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. § 262.262(b)], and is a condition of the LQG Permit Exemption, A copy of the contingency plan and all revisions to the plan must be maintained at the large quantity generator and— A large quantity generator that first becomes subject to these provisions after May 30, 2017 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 at paragraph (a) of this section or, as appropriate, the Local Emergency Planning Committee.

Job Titles and Employee Names

The inspectors requested the facility job descriptions and employee names for review. Only one job description was available for review for Lafayette Coatney. The job description specifically addressed or described hazardous waste management duties of the position and included the name of employee filling the position.

Training Records

The Facility provided a list of employees who had completed the hazardous waste training. The inspectors requested records of Bradley Buehler’s hazardous waste training. These records were

not available at the time of the inspection. Following the inspection evidence of Bradley Buehler's completion of the training on March 17, 2023, was provided.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.17(a)(7)], which is a condition of the LQG Permit Exemption, (i) Facility personnel must successfully complete a program of classroom instruction or on-the-job training that teaches them to perform their duties in a way that ensures the facility's compliance with the regulations; (ii) Facility personnel must complete personnel training within six months of being hired or of being assigned to a new position at the Facility; (iii) Facility personnel must take part in an annual review of the initial training required by this section; and/or (iv) 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.

Waste Manifest Records

The inspectors reviewed available hazardous waste manifest records and land disposal restriction forms for shipments of hazardous waste for the last three years. At the time of the CEI, 18 UHWM were available for review (of those available for review six (6) did not have the return to generator copy). Following the CEI, an analysis of the UHWMs from Corbion was conducted. The inspectors found that at least 110 UHWMs were created as a result of shipments originating from the Facility. A summary of the UHWM data is included as Appendix 1 to this Report. No exception reports were available for review.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.40(a)], a generator must keep a copy of each manifest signed in accordance with § 262.23(a) for three years or until he receives a signed copy from the designated facility which received the waste. This signed copy must be retained as a record for at least three years from the date the waste was accepted by the initial transporter.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.42(a)], a LQG (1) 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. (2) 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.

Weekly Inspection

The inspectors requested the previous 3 years of inspections of the hazardous waste CAA records for review. The weekly inspection logs for November and December 2022 were provided. The records do not include the date and time of the inspection and the name, signature and initials of the employee conducting the inspection. No notes or observations were made.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [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.

Biennial Report

The most recent Biennial Report (BR) was reviewed. The only waste stream reported on the Facility's BR was the bulk waste acetone being sent to OHD980587386.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.41(a)], a LQG who ships any hazardous waste off-site to a treatment, storage or disposal facility within the United States must accurately complete and submit EPA Form 8700-13 A/B to the Regional Administrator by March 1 of the following even-numbered year and must cover generator activities during the previous year.

Waste Reduction Plan

LQGs are required to complete a waste reduction plan (WRP). The Facility's WRP was submitted late and did not include all the waste streams generated by the Facility. Therefore, the waste reduction plan was not accurate.

Pursuant to the Georgia Hazardous Waste Management Act, O.C.G.A. 12-8-65.1(a), et seq. as amended, hazardous waste reduction plans are required to be submitted to GAEPD.

12) **Closing Conference**

The inspectors conducted the exit meeting at approximately 4:30 pm with Carlos Torres, Jonathan Bowman and Bradley Buehler. During this meeting, the inspectors stated their preliminary findings of the inspection. The Closing Conference Agenda has been included as Figure 43.

13) **Summary of Observations**

Based on the observations made during the inspection, the following RCRA requirements appear to be applicable at the subject facility:

- **Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.11], a person who generates a solid waste, as defined in Ga. Comp. R. and Regs. 391-3-11-.08(1) [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 Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.11].**

At the time of the CEI, the inspector observed that the Facility appeared to have routinely failed to make an accurate hazardous waste determination on the acetone contaminated storm/wastewater accumulating in the secondary containment pit. During the CEI, the

inspectors observed a pump leaking acetone into the secondary containment pit, and brought the need for containerization of the waste and an accurate hazardous waste determination to the attention of the Facility. Following the CEI, the Facility shipped off the storm/wastewater from the containment pit without having containerized it and have not provided a hazardous waste determination on the waste as generated.

- **Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [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.**

At the time of the CEI, the inspector observed an improperly sealed 55-gallon container of hazardous waste acetone carbon filters in the SAA behind the carbon filters in the Production Room.

- **Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [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 (i) with the words “Hazardous Waste” and (ii) with an indication of the hazards of the contents.**

At the time of the CEI, the inspectors observed a observed an improperly sealed 55-gallon container of hazardous waste acetone carbon filters labelled with “hazardous waste”, but no indication of the hazards of the container’s contents, in the SAA behind the carbon filters in the Production Room

- **Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [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.**

At the time of the CEI, the inspectors requested the previous 3 years of inspections of the hazardous waste CAA records for review, only two (2) months of were provided. The records provided for November and December 2022, did not include the date and time of the inspection and the name, signature and initials of the employee conducting the inspection. No notes or observations were made.

- **Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.17(a)(2)], which incorporates Ga. Comp. R. and Regs. 391-3-11-.10(1) [40 C.F.R. Part 265, Subparts J, AA, BB, and CC], and is a condition of the LQG Permit Exemption, a generator accumulating hazardous waste in tank systems is required to comply with the applicable requirements of Ga. Comp. R. and Regs. 391-3-11-.10(1) [40 C.F.R. Part 265, Subparts J, AA, BB, and CC], which includes standards for managing hazardous waste in tanks, tank systems, and standards for managing volatile organic hazardous waste in tanks, containers, and equipment.**

At the time of the CEI, the inspectors observed that the Hazardous Waste Tank System, which may include but is not limited to the Distillate Tank, the Solvent Waste Tank, all piping and all ancillary equipment associated with the tank system, appeared to have been operating without consideration to the RCRA Hazardous Waste Tank Standards, or the Organic Air Emission Standards for equipment or tanks.

- **Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.17(a)(5)(ii)], which is a condition of the LQG Permit Exemption, a generator must mark or label its tanks with the words “Hazardous Waste”; mark or label its tanks with an indication of the hazards of the contents; use inventory logs, monitoring equipment or other records to demonstrate that hazardous waste has been emptied within 90 days of first entering the tank; and keep inventory logs or records with the above information on site and readily available for inspection.**

At the time of the CEI, the inspectors observed that the Distillate Tank, and the Solvent Waste Tank were not labelled with the words “Hazardous Waste,” with an indication of the hazards of the contents, or with the date upon which accumulation began.

- **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. § 262.251], 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.**

At the time of the CEI, the inspectors observed a visible and active leak flowing from the pump in-between the tanks, which left a trail of liquid acetone into the containment pit filled with rainwater. Inspectors noted a white solid residue from the continuous or previous leaks (Figures 8, 9, 12, 13, 15 and 16). Inspectors asked the Facility if the pump could be turned off or redirected, and for the waste to be collected and the Facility personnel did not act while inspectors were present.

At the time of the CEI, the inspectors found that the Facility had established a SOP “Draining of the Tank Farm Pit” which calls for the sampling, analysis and discharge of the rainwater accumulated in the secondary containment pit. The SOP requires that the liquid in the secondary containment pit be sampled and analyzed once the level has reached the yellow line on the west wall (Figure 10). The SOP indicates that the liquid be discharged from the facility if the VOC concentration is less than 22.82 g/L. Once the personnel have determined that the VOC concentration is below 22.82 g/L the water is discharged, and a record of the discharge is recorded. Acetone when used as a solvent is listed hazardous waste bearing the waste code F003. Acetone that is a commercial chemical product is a listed hazardous waste bearing the waste code U002(I).

- **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. § 262.261(c)-(f)], and is a condition of the LQG Permit Exemption, (c) the contingency plan must**

describe arrangements agreed to with the local police department, fire department, other emergency response teams, emergency response contractors, equipment suppliers, local hospitals or, if applicable, the Local Emergency Planning Committee, pursuant to 40 C.F.R. § 262.256; (d) the contingency plan must list names and emergency telephone numbers of all persons qualified to act as emergency coordinator (see 40 C.F.R. § 262.264), and this list must be kept up to date; (e) the contingency plan must include a list of all emergency equipment at the facility where this equipment is required, and this list must be kept up to date; (f) the contingency plan must include an evacuation plan for generator personnel where there is a possibility that evacuation could be necessary.

At the time of the CEI, the inspectors reviewed the contingency plan for the Facility, and found that the plan does not; describe 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. Facility representatives provided documentation of a fire escape plan review from Dekalb Fire Department, but no description of arrangements with local police, hospitals, or other emergency response teams; clearly designate the primary and secondary emergency coordinators were not clearly designated; include the location and a physical description of each item on the list, or a brief outline of its capabilities; and does not evacuation routes and alternate evacuation routes.

- **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. § 262.262(b)], and is a condition of the LQG Permit Exemption, A copy of the contingency plan and all revisions to the plan must be maintained at the large quantity generator and a large quantity generator that first becomes subject to these provisions after May 30, 2017 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 at paragraph (a) of this section or, as appropriate, the Local Emergency Planning Committee.**

At the time of the CEI, the inspectors observed that the contingency plan did not include a quick reference guide.

- **Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.17(a)(7)], which is a condition of the LQG Permit Exemption, (i) Facility personnel must successfully complete a program of classroom instruction or on-the-job training that teaches them to perform their duties in a way that ensures the facility's compliance with the regulations; (ii) Facility personnel must complete personnel training within six months of being hired or of being assigned to a new position at the Facility; (iii) Facility personnel must take part in an annual review of the initial training required by this section; and/or (iv) 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.

At the time of the CEI, the inspectors observed that Bradley Buehler had not completed hazardous waste training.

- **Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.17(a)(9)], which incorporates Ga. Comp. R. and Regs. 391-3-11-.16 [40 C.F.R. Part 268], and is a condition of the LQG Permit Exemption, a generator is required to comply with LDR for hazardous waste, including meeting the UTS.**

At the time of the CEI, the inspectors observed the discharge log which indicated that wastewater containing concentrations of acetone above the UTS (0.28 mg/L or 280 ug/L), had been routinely discharged.

- **Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.20(a)(1)], a generator who transports, or offers for transport a hazardous waste for offsite treatment, storage, or disposal, must prepare a Manifest according to the instructions included in the appendix to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. Part 262].**

The inspectors observed that the approximately 26 UHWMs for the outbound shipments of hazardous waste acetone to the Clean Harbors in Ohio did not have waste codes.

- **Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.40(a)], a generator must keep a copy of each manifest signed in accordance with § 262.23(a) for three years or until he receives a signed copy from the designated facility which received the waste. This signed copy must be retained as a record for at least three years from the date the waste was accepted by the initial transporter.**

The inspectors observed that 92 UHWMs were not maintained by the Facility.

- **Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.41(a)], a LQG who ships any hazardous waste off-site to a treatment, storage or disposal facility within the United States must accurately complete and submit EPA Form 8700-13 A/B to the Regional Administrator by March 1 of the following even-numbered year and must cover generator activities during the previous year.**

The inspectors reviewed the most recent BR to find that the only waste stream reported was the bulk waste acetone being sent to OHD980587364.

At the time of the CEI, 18 UHWM were available for review (of those available for review six (6) did not have the return to generator copy). Following the CEI, an analysis of the UHWM from Corbion was conducted. The inspectors found that at least 110 UHWM were created as a result of shipments originating from the Facility. A summary of the UHWM data is included as Appendix 1 to this Report.

- Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.42(a)], a LQG (1) 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. (2) 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.

At the time of the CEI, the inspectors observed at least 98 UHWM that did not have the return to generator copy from the designated facility and no exception report was made.

- Pursuant Ga. Comp. R. and Regs. 391-3-11-.18 [40 C.F.R. § 273.13(a) and (d)], a SQHUW must manage universal waste batteries and lamps in a way that prevents releases of any universal waste or component of a universal waste to the environment.

At the time of the CEI, the inspectors observed open unlabeled and undated containers of four foot spent universal waste lamps and miscellaneous universal waste batteries and ballasts (Figure 4).

- Pursuant to Ga. Comp. R. and Regs. 391-3-11-.18 [40 C.F.R. § 273.14(a)], a SQHUW 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).”

At the time of the CEI, the inspectors observed open unlabeled and undated containers of four foot spent universal waste lamps and miscellaneous universal waste batteries and ballasts (Figure 4).

- Pursuant to Ga. Comp. R. and Regs. 391-3-11-.18 [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.”

At the time of the CEI, the inspectors observed open unlabeled and undated containers of four foot spent universal waste lamps and miscellaneous universal waste batteries and ballasts (Figure 4).

- Pursuant to Ga. Comp. R. and Regs. 391-3-11-.18 [40 C.F.R. § 273.15(a) and (c)], a SQHUW may accumulate universal waste no longer than one year and must 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.

At the time of the CEI, the Facility could not demonstrate the length of time that the universal waste had been stored onsite.

- **Pursuant to the Georgia Hazardous Waste Management Act, O.C.G.A. 12-8-66, et seq. as amended [Section 3005 of RCRA, 42 U.S.C. § 6925], owners and operators of treatment, storage and disposal facilities shall obtain a permit for the treatment, storage, and disposal of hazardous waste before first treating, storing, or disposing of hazardous waste.**

At the time of the CEI, the inspectors observed the discharge log that documented the routine discharge of hazardous waste from the facility. These releases were only recorded beginning December 2022. It is the inspectors understanding that this was the practice prior to December 2022. At least three (3) occasions of apparent illegal disposal were recorded on the December 2, 2022, January 25, 2023, and March 1, 2023.

- **Pursuant to the Georgia Hazardous Waste Management Act, O.C.G.A. 12-8-65.1(a), et seq. as amended, hazardous waste reduction plans are required to be submitted to GAEPD.**

At the time of the CEI, the inspectors determined that the hazardous waste reduction plan was not late and inaccurate.

14) **List of Appendices**

Appendix 1 – List of UHWM for the last three (3) years

Appendix 2 – Photo Log: Photos taken with: Olympus Tough 575550

Appendix 3 – Photo Log: Photos taken with: Canon Power Shot ELPH 180

15) **Signed**

BROOKE YORK Digitally signed by BROOKE YORK
Date: 2023.05.08 10:26:53 -04'00'

Brooke York
Environmental Engineer

TARIN TISCHLER Digitally signed by TARIN
TISCHLER
Date: 2023.05.10 10:22:06 -04'00'

Tarin Tischler
Life Scientist

NEREIDA HERNANDEZ MORALES

Digitally signed by NEREIDA HERNANDEZ MORALES
Date: 2023.05.10 10:47:46 -04'00'

Nereida Hernandez Morales
Life Scientist

16) **Concurrence**

ARACELI CHAVEZ Digitally signed by ARACELI
CHAVEZ
Date: 2023.05.10 11:49:02 -04'00'

Araceli B. Chavez
RCRA Enforcement Section

Appendix 1 – List of UHWM for the last three (3) years

UHWM Number	Date of Shipment	Return to Generator Copy Present during CEI	Disposal Company EPA Identification Number	Manifest at the Facility
018786520JJK	11/27/2018	no	GAD000616367	no
018786685JJK	1/22/2019	no	GAD000616367	no
018786684JJK	2/15/2019	no	GAD000616367	no
018786776JJK	2/15/2019	no	GAD000616367	no
005205948JJK	3/6/2019	no	ALD981020894	no
018786888JJK	3/15/2019	no	GAD000616367	no
018786889JJK	3/15/2019	no	GAD000616367	no
018786985JJK	4/12/2019	no	GAD000616367	no
019524550JJK	5/2/2019	no	GAD000616367	no
019524806JJK	7/12/2019	no	GAD000616367	no
019524888JJK	8/8/2019	no	GAD000616367	no
019524976JJK	8/27/2019	no	GAD000616367	no
006267655GBF	10/1/2019	no	GAD000616367	no
006267747GBF	10/22/2019	no	GAD000616367	no
006267748GBF	10/22/2019	no	GAD000616367	no
006267819GBF	11/15/2019	yes	GAD000616367	yes
006265818GBF	12/11/2019	yes	GAD000616367	yes
006266064BGF	2/25/2020	yes	GAD000616367	yes
006266064GBF	2/25/2020	yes	GAD000616367	yes
006266381GBF	2/25/2020	yes	GAD000616367	yes
006266394GBF	2/28/2020	yes	GAD000616367	yes
007150951SKS	3/4/2020	no	OHD980587364	no
006266435GBF	3/10/2020	no	GAD000616367	yes
006266437GBF	3/10/2020	no	GAD000616367	yes
006266520GBF	4/14/2020	no	GAD000616367	no
006266567GBF	5/12/2020	no	GAD000616367	no
013249150FLE	5/26/2020	no	OHD980587364	no
006258878GBF	6/16/2020	no	GAD000616367	no
013249146FLE	6/29/2020	no	OHD980587364	no
006259014GBF	7/21/2020	no	GAD000616367	no
006259103GBF	8/18/2020	no	GAD000616367	no
006259163GBF	9/9/2020	no	GAD000616367	no
006259165GBF	9/9/2020	no	GAD000616367	no

UHWM Number	Date of Shipment	Return to Generator Copy Present during CEI	Disposal Company EPA Identification Number	Manifest at the Facility
006250880GBF	10/13/2020	no	GAD000616367	no
013249148FLE	10/22/2020	no	OHD980587364	no
006250947GBF	11/3/2020	no	GAD000616367	no
006251037GBF	11/24/2020	no	GAD000616367	no
006251038GBF	11/24/2020	no	GAD000616367	no
006250534GBF	12/22/2020	no	GAD000616367	no
006250541GBF	12/22/2020	yes	GAD000616367	yes
006930582SKS	12/29/2020	no	OHD980587364	no
006250604GBF	1/12/2021	no	GAD000616367	no
006930583SKS	1/25/2021	no	OHD980587364	no
006250642GBF	1/26/2021	no	GAD000616367	no
006250719GBF	2/16/2021	no	GAD000616367	no
006250720GBF	2/16/2021	no	GAD000616367	no
013807961FLE	2/24/2021	no	OHD980587364	no
006284383GBF	3/5/2021	no	GAD000616367	no
006284443GBF	3/19/2021	no	GAD000616367	no
006284516GBF	4/13/2021	no	GAD000616367	no
006930584SKS	4/27/2021	no	OHD980587364	no
006284569GBF	5/4/2021	no	GAD000616367	no
006284618GBF	5/18/2021	no	GAD000616367	no
006279282GBF	6/18/2021	no	GAD000616367	no
006279283GBF	6/18/2021	no	GAD000616367	no
006279362GBF	7/13/2021	no	GAD000616367	no
006279363GBF	7/13/2021	no	GAD000616367	no
006279388GBF	7/20/2021	no	GAD000616367	no
006279440GBF	8/5/2021	no	GAD000616367	no
006279446GBF	8/5/2021	no	GAD000616367	no
006279480GBF	8/17/2021	no	GAD000616367	no
006279496GBF	8/24/2021	no	GAD000616367	no
007529748SKS	8/24/2021	no	OHD980587364	no
006279548GBF	9/8/2021	no	GAD000616367	no
006279549GBF	9/8/2021	no	GAD000616367	no
013807958FLE	9/27/2021	no	OHD980587364	no
006280219GBF	10/5/2021	no	GAD000616367	no

UHWM Number	Date of Shipment	Return to Generator Copy Present during CEI	Disposal Company EPA Identification Number	Manifest at the Facility
006280220GBF	10/5/2021	no	GAD000616367	no
006280235GBF	10/12/2021	no	GAD000616367	no
013807960FLE	10/14/2021	no	OHD980587364	no
006280252GBF	10/25/2021	no	GAD000616367	no
013807959FLE	10/28/2021	no	OHD980587364	no
006280288GBF	11/8/2021	no	GAD000616367	no
013780395FLE	11/18/2021	no	OHD980587364	no
006280357GBF	12/2/2021	no	GAD000616367	no
006280358GBF	12/2/2021	no	GAD000616367	no
006280435GBF	1/12/2022	no	GAD000616367	no
006280464GBF	1/25/2022	no	GAD000616367	no
013780396FLE	2/16/2022	no	OHD980587364	no
016680909FLE	2/18/2022	no	GAD000616367	no
007529786SKS	3/3/2022	no	OHD980587373	no
016680995FLE	3/15/2022	no	GAD000616367	no
016680996FLE	3/15/2022	no	GAD000616367	no
016344875FLE	3/17/2022	no	OHD980587364	no
016681028FLE	4/1/2022	no	GAD000616367	no
016681130FLE	5/9/2022	no	GAD000616367	no
016344873FLE	5/16/2022	no	OHD980587364	no
016699172FLE	5/25/2022	no	GAD000616367	no
016699249FLE	6/30/2022	no	GAD000616367	no
016699250FLE	6/30/2022	no	GAD000616367	no
016699296FLE	7/13/2022	yes	GAD000616367	yes
016699295FLE	7/13/2022	no	GAD000616367	no
013780682FLE	7/14/2022	no	OHD980587364	yes
016699333FLE	7/29/2022	yes	GAD000616367	yes
016699334FLE	7/29/2022	yes	GAD000616367	yes
013780398FLE	8/3/2022	no	OHD980587364	yes
013780399FLE	8/15/2022	no	OHD980587364	no
016699369FLE	8/16/2022	no	GAD000616367	no
016699428FLE	9/6/2022	no	GAD000616367	no
016699429FLE	9/6/2022	no	GAD000616367	no
016344903FLE	9/14/2022	no	OHD980587364	no

UHWM Number	Date of Shipment	Return to Generator Copy Present during CEI	Disposal Company EPA Identification Number	Manifest at the Facility
016344892FLE	10/11/2022	no	OHD980587364	no
018001597FLE	10/28/2022	no	GAD000616367	no
016344902FLE	11/9/2022	no	OHD980587364	no
016344901FLE	12/2/2022	no	OHD980587364	no
018001598FLE	12/7/2022	yes	GAD000616367	yes
018001688FLE	12/7/2022	no	GAD000616367	yes
013780673FLE	12/28/2022	no	OHD980587364	no
013780674FLE	1/19/2023	no	OHD980587364	yes
018005414FLE	2/7/2023	yes	GAD000616367	yes

Appendix 2 – Photo Log:

Photos taken on: March 14, 2023

Photos taken by: Tarin Tischler

Photos taken with: Olympus Tough

HAZARDOUS WASTE MANIFEST

1. Generator Name: **UNIVERSAL WASTE**

2. Generator Address: **10000 100th Ave NE, Suite 100, Redmond, WA 98073**

3. Generator Phone: **206-881-1234**

4. Generator EPA ID: **WA000000000000**

5. Manifest Number: **013780674 FLE**

6. Manifest Date: **03/14/2023**

7. Manifest Status: **Final**

8. Manifest Type: **HAZARDOUS WASTE**

9. Manifest Category: **UN3175**

10. Manifest Description: **FLAMMABLE SOLIDS, ORGANIC, N.O.S.**

11. Manifest Quantity: **19113 LBS**

12. Manifest Unit: **LB**

13. Manifest Container: **DRUM**

14. Manifest Container Size: **55 GALS**

15. Manifest Container Material: **STEEL**

16. Manifest Container Closure: **W/ PLUG**

17. Manifest Container Condition: **GOOD**

18. Manifest Container Label: **HAZARDOUS WASTE**

19. Manifest Container Marking: **UN3175**

20. Manifest Container Identification: **UN3175**

21. Manifest Container Identification: **UN3175**

22. Manifest Container Identification: **UN3175**

23. Manifest Container Identification: **UN3175**

24. Manifest Container Identification: **UN3175**

25. Manifest Container Identification: **UN3175**

26. Manifest Container Identification: **UN3175**

27. Manifest Container Identification: **UN3175**

28. Manifest Container Identification: **UN3175**

29. Manifest Container Identification: **UN3175**

30. Manifest Container Identification: **UN3175**

31. Manifest Container Identification: **UN3175**

32. Manifest Container Identification: **UN3175**

33. Manifest Container Identification: **UN3175**

34. Manifest Container Identification: **UN3175**

35. Manifest Container Identification: **UN3175**

36. Manifest Container Identification: **UN3175**

37. Manifest Container Identification: **UN3175**

38. Manifest Container Identification: **UN3175**

39. Manifest Container Identification: **UN3175**

40. Manifest Container Identification: **UN3175**

41. Manifest Container Identification: **UN3175**

42. Manifest Container Identification: **UN3175**

43. Manifest Container Identification: **UN3175**

44. Manifest Container Identification: **UN3175**

45. Manifest Container Identification: **UN3175**

46. Manifest Container Identification: **UN3175**

47. Manifest Container Identification: **UN3175**

48. Manifest Container Identification: **UN3175**

49. Manifest Container Identification: **UN3175**

50. Manifest Container Identification: **UN3175**

51. Manifest Container Identification: **UN3175**

52. Manifest Container Identification: **UN3175**

53. Manifest Container Identification: **UN3175**

54. Manifest Container Identification: **UN3175**

55. Manifest Container Identification: **UN3175**

56. Manifest Container Identification: **UN3175**

57. Manifest Container Identification: **UN3175**

58. Manifest Container Identification: **UN3175**

59. Manifest Container Identification: **UN3175**

60. Manifest Container Identification: **UN3175**

61. Manifest Container Identification: **UN3175**

62. Manifest Container Identification: **UN3175**

63. Manifest Container Identification: **UN3175**

64. Manifest Container Identification: **UN3175**

65. Manifest Container Identification: **UN3175**

66. Manifest Container Identification: **UN3175**

67. Manifest Container Identification: **UN3175**

68. Manifest Container Identification: **UN3175**

69. Manifest Container Identification: **UN3175**

70. Manifest Container Identification: **UN3175**

71. Manifest Container Identification: **UN3175**

72. Manifest Container Identification: **UN3175**

73. Manifest Container Identification: **UN3175**

74. Manifest Container Identification: **UN3175**

75. Manifest Container Identification: **UN3175**

76. Manifest Container Identification: **UN3175**

77. Manifest Container Identification: **UN3175**

78. Manifest Container Identification: **UN3175**

79. Manifest Container Identification: **UN3175**

80. Manifest Container Identification: **UN3175**

81. Manifest Container Identification: **UN3175**

82. Manifest Container Identification: **UN3175**

83. Manifest Container Identification: **UN3175**

84. Manifest Container Identification: **UN3175**

85. Manifest Container Identification: **UN3175**

86. Manifest Container Identification: **UN3175**

87. Manifest Container Identification: **UN3175**

88. Manifest Container Identification: **UN3175**

89. Manifest Container Identification: **UN3175**

90. Manifest Container Identification: **UN3175**

91. Manifest Container Identification: **UN3175**

92. Manifest Container Identification: **UN3175**

93. Manifest Container Identification: **UN3175**

94. Manifest Container Identification: **UN3175**

95. Manifest Container Identification: **UN3175**

96. Manifest Container Identification: **UN3175**

97. Manifest Container Identification: **UN3175**

98. Manifest Container Identification: **UN3175**

99. Manifest Container Identification: **UN3175**

100. Manifest Container Identification: **UN3175**

Figure 1: P3140002.JPG: UHWM
013780674FLE

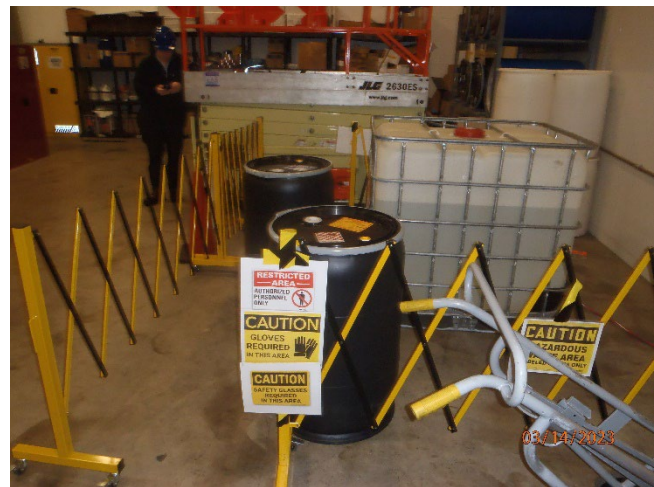


Figure 2: P3140003.JPG: CAA



Figure 3: P3140004.JPG: Label on container in
CAA



Figure 4: P3140010.JPG: Universal Waste
Storage



Figure 5: P3140005.JPG: Label on container in CAA



Figure 6: P3140008.JPG: Label on container in CAA



Figure 7: P3140014.JPG: Secondary Containment Pit



Figure 8: P3140016.JPG: Active leak from pump in secondary containment



Figure 9: P3140017.JPG: Acetone flowing from actively leaking pump and solidified waste.



Figure 10: P3140018.JPG: Secondary Containment Pit



Figure 11: P3140019.JPG: Used Acetone label on tank



Figure 12: P3140020.JPG: Leaking pump



Figure 13: P3140021.JPG: Leaking Pump

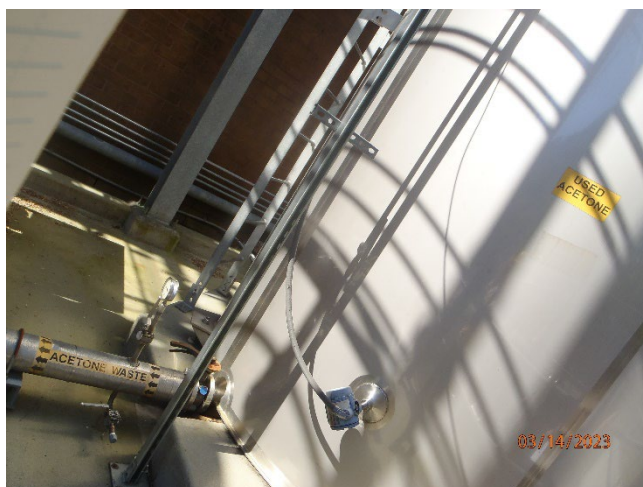


Figure 14: P3140025.JPG: Acetone Waste Tank and piping



Figure 15: P3140026.JPG: Leaking pump



Figure 16: P3140027.JPG: Leaking Pump



Figure 17: P3140028.JPG: Valve used to control the release of liquid from the Secondary Containment Pit



Figure 18: P3140030.JPG: Secondary Containment Pit



Figure 19: P3140031.JPG: Secondary Containment Pit



Figure 20: P3140032.JPG: Equipment on the top of the Used Acetone Tank



Figure 21: P3140033.JPG: Equipment on the top of the Used Acetone Tank



Figure 22: P3140034.JPG: Equipment on the top of the Used Acetone Tank



Figure 23: P3140035.JPG: Equipment on the top of the Used Acetone Tank



Figure 24: P3140036.JPG: Equipment on the top of the Used Acetone Tank



Figure 25: P3140037.JPG: Equipment on the top of the Used Acetone Tank



Figure 26: P3140038.JPG: Equipment on the top of the Used Acetone Tank



Figure 27: P3140039.JPG: Equipment on the top of the Used Acetone Tank



Figure 28: P3140040.JPG: Equipment on the top of the Used Acetone Tank



Figure 29: P3140041.JPG: Equipment on the top of the Used Acetone Tank



Figure 30: P3140042.JPG: Equipment on the top of the Used Acetone Tank



Figure 31: P3140043.JPG: Manufacturer's Plate on the Used Acetone Tank



Figure 32: P3140044.JPG: Stormwater collection in loading and unloading area.



Figure 33: P3140046.JPG: Loading and unloading area



Figure 34: P3140047.JPG: Used Acetone Pipe



Figure 35: P3140048.JPG: Used Acetone Pipe

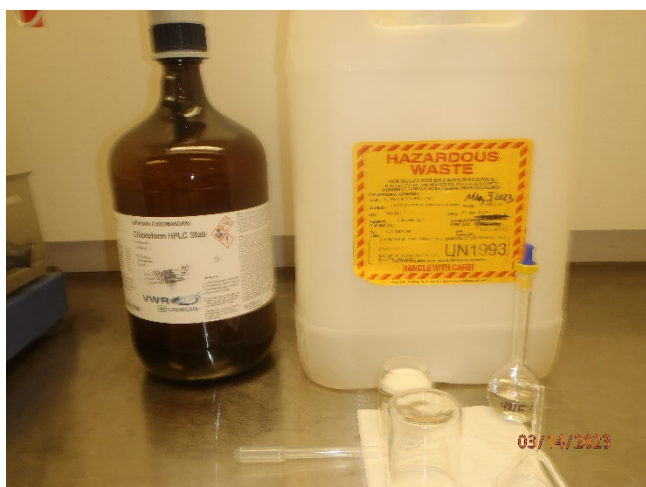


Figure 36: P3140049.JPG: Lab waste



Figure 37: P3140054.JPG: Lab waste



Figure 38: P3140055.JPG: Lab waste



Figure 39: P3140057.JPG: Lab waste

Appendix 3 – Photo Log:

Photos taken on: March 14, 2023

Photos taken by: Nereida Hernandez Morales

Photos taken with: Canon Power Shot ELPH 180

Serial Number: 922063017858



Figure 40: IMG_0070.JPG: Tank Farm Overview



Figure 41: IMG_0071.JPG: Tank Farm Overview

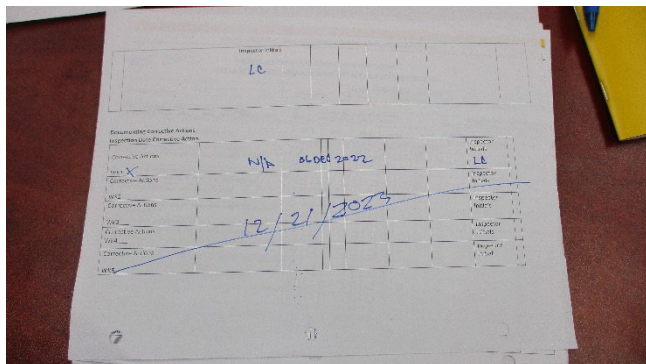


Figure 42: IMG_0074.JPG: Inspection Log Example

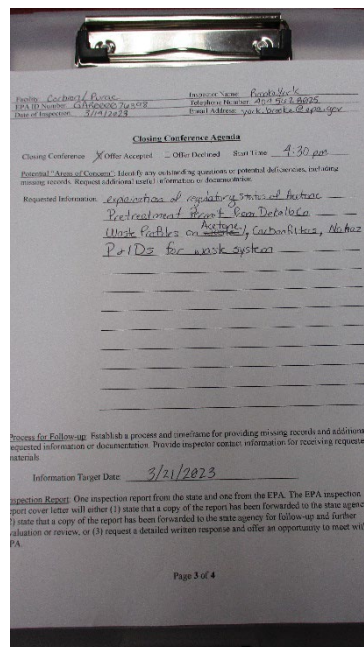


Figure 43: IMG_0079.JPG: Closing Conference Agenda