

RCRA Inspection Report

1) Inspector and Author of Report

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2) Facility Information

Cymer-Dayton LLC
411 Manufacturers Road
Dayton, Tennessee 37321
Rhea County

EPA ID: TND981023674
NAICS: 325199 - All Other Basic Organic Chemical
Manufacturing

3) Responsible Official

Robert Linn
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Cymer-Dayton LLC
411 Manufacturers Road
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4) Inspection Participants

Robert Linn, Cymer-Dayton LLC
Shaun McMillin, Cymer-Dayton LLC
Hunter Bolton, Cymer-Decatur LLC

Lisa Hutchings, TDEC
Harry Mc Cann, TDEC
Beverly Philpot, TDEC
Paula Whiting, U.S. EPA Region 4

5) Date and Time of Inspection

May 7, 2024, at 9:30 a.m. EDT

6) Applicable Regulations¹

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

¹ As the State's authorized hazardous waste program operates in lieu of the federal RCRA program, the citations of those authorized provisions will be to the authorized State program. However, for ease of reference, the federal citations will follow in brackets.

Tennessee Hazardous Waste Management Act of 1977, Tennessee Code Annotated (Tenn. Code Ann.) § 68-212-101 et seq., and Chapter 0400-12-01 of the Rules and Regulations of the State of Tennessee (Tenn. Comp. R. & Regs.)

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

Pursuant to Tenn. Comp. R. & Regs. 0400-12-01-.03(1)(f)1. [40 C.F.R. § 262.15(a)], a generator may accumulate as much as 55 gallons of non-acute hazardous waste and/or either one quart of liquid acute hazardous waste at or near the point of generation where wastes initially accumulate, which is under the control of the operator of the process generating the waste, without a permit or without having interim status, as required by Section 68-212-108 of the THWMA, Tenn. Code Ann. § 68-212-108 [Section 3005 of RCRA, 42 U.S.C. § 6925], provided that the generator complies with the satellite accumulation area conditions listed in Tenn. Comp. R. & Regs. 0400-12-01-.03(1)(f)1. [40 C.F.R. § 262.15(a)] (hereinafter referred to as the “SAA Permit Exemption”).

Pursuant to Tenn. Comp. R. & Regs. 0400-12-01-.03(1)(h)1.(ii) [40 C.F.R. § 262.17(a)(2)], which incorporates Tenn. Comp. R. & Regs. 0400-12-01-.05(27), (28) and (29) [Subparts AA, BB, and CC of 40 CFR Part 265], and is a condition of the LQG Permit Exemption, a generator is required to comply with applicable organic air emission standards for tanks and equipment.

Pursuant to Tenn. Comp. R. & Regs. 0400-12-01-.12(1)(i) [40 C.F.R. § 273.9], a “Small Quantity Handler of Universal Waste” (SQHUW) is a Universal Waste handler who does not accumulate 5,000 kilograms or more of Universal Waste (batteries, pesticides, mercury-containing equipment, or lamps, calculated collectively) at any time.

7) Purpose of Inspection

The purpose of the inspection was to conduct an unannounced RCRA compliance evaluation inspection (CEI) to determine the compliance of Cymer-Dayton LLC, EPA ID Number: TND981023674 with the applicable regulations. This was an EPA lead inspection.

8) Facility Description

Cymer Chemicals manufactures specialty chemicals for customers worldwide and operates two plants in Tennessee. Both the plants specialize in manufacturing organic chemicals with one plant in Dayton, and the second plant in Decatur, Tennessee. Cymer Chemical provides the following services: Chemical Process Development, Contract and Toll Chemical Manufacturing,

Scale-up and Pilot Programs, Chemical Blending and Formulation, Organic Synthesis, Chemical Processing Services, and Analytical Laboratory Services.

Cymer-Dayton LLC is a specialty chemical plant that produces organic chemicals for specialty coatings, aerospace, cosmetics, asphalt, pharmaceutical industry, and chemical manufacturing intermediates. Cymer-Dayton provides 50% tolling manufacturing and the remaining 50% are organic chemicals manufactured for their own use. Cymer-Dayton LLC sells intermediates, additives, polymers, cosmetics, and acid chlorides by order.

Cymer-Dayton LLC employs 45 employees with one employee handling hazardous waste. Employees work four 12-hour shifts. The plant operates seven days per week.

Cymer-Dayton LLC's most recent Hazardous Waste Generator Notification (EPA Form 8700-12) dated March 1, 2022, characterized the facility as a Large Quantity Generator (LQG) of hazardous waste. Cymer-Dayton LLC may generate hazardous waste streams, floor sweep, powder waste, bulk organic waste, distilled solvents, flammable solvents, flammable acid solvents, spent aerosol cans, used solvent, used oil, universal lamps and batteries, paint waste and other wastes. The hazardous waste may be designated the following EPA Waste Codes- D001, D002, D003, D011, D035, F003, F005, and U122.

9) Previous Inspection History

The Cymer-Dayton LLC facility was last inspected on April 22, 2021, by Tennessee Department of Environment and Conservation (TDEC). Deficiencies of container management were noted.

10) Findings

On May 7, 2024, EPA inspector Paula Whiting, accompanied by TDEC inspectors Lisa Hutchings, Harry McCann and Beverly Philpot arrived at Cymer-Dayton LLC at approximately 9:30 a.m. EDT. The inspectors signed in at the front window and were escorted to a conference room. Mr. Robert Linn, Environmental, Health, and Safety Manager received the inspectors. The inspectors introduced themselves, showed their credentials to the representative, and explained the purpose of the visit.

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

Mr. Linn provided an overview of the facility's history and current operations during the opening conference. The inspection participants also discussed health and safety protocols and were required to wear personal protective equipment before the facility representative led the inspectors on a tour of the facility's operations. Below is a description of the observations made during the inspection.

11) Inspection Observations

Cymer-Dayton has sixteen active hazardous waste streams. Mr. Linn stated that hazardous waste determinations were based on mass balance and not samples sent out for external lab analyses. At the time of the inspection no hazardous waste profiles were available for review.

Pursuant to Tenn. Comp. R. & Regs. 0400-12-01-.03(1)(b) [40 C.F.R. § 262.11], a person who generates a solid waste, as defined in Tenn. Comp. R. & Regs. 0400-12-01-.02(1)(b) (2021) [40 C.F.R. § 261.2], must make an accurate determination as to whether that waste is a hazardous waste in order to ensure wastes are properly managed according to applicable RCRA regulations articulated in Tenn. Comp. R. & Regs. 0400-12-01-.03(1)(b) [40 C.F.R. § 262.11].

11.1 Main Warehouse

The main warehouse is a staging area for in-process raw material and finished chemicals. There was no hazardous waste observed in this area. The warehouse annex is kept warmer than the rest of the building to store the lauric acid. Mr. Hunter Bolton, EHS Manager, Cymer-Decatur LLC joined the inspection team.

The flammable storage area contained finished products that have a storage shelf life up to 5 years. No hazardous waste was observed in this area. The inspectors observe the floor drain which extended outside the door and contained liquid and floor sweepings (Pictures 1-2). The inspectors explained that the floor drain must be kept clean of liquids and debris to capture any potential releases from the stored containers. This is an area of concern.

11.2 Maintenance Shop and Universal Waste Storage

The maintenance shop was a parts and supplies storage room. No hazardous waste was observed in this area. However, the inspectors observed that the emergency contact list on the wall was out of date (Pictures 3-4). While emergency equipment and communication are readily available in the area, the facility failed to post an updated listing of emergency contacts and the locations of its emergency equipment in the maintenance area and near universal waste storage area.

The universal waste storage area in a loading area between the maintenance shop and maintenance offices. The inspectors observed a 4-foot box of universal waste lamps that was not closed, a 4-foot fiberboard box of universal waste lamps, a 3-foot fiberboard box of spent

high intensity discharge lamps that was not closed, and a 55-gallon container of spent aerosol cans that was dated October 24, 2024 (Pictures 5-9). All containers were labeled “Universal Waste”. With the exception, of the spent aerosol cans container, all other containers were dated October 28, 2023. The 3-foot fiberboard container and the HID container were closed, and the October 24, 2024, date was changed to October 24, 2023, during the inspection.

Pursuant Tenn. Comp. R. & Regs. 0400-12-01-.12(2)(d)4. [40 C.F.R. § 273.13(d)], a SQHUW must manage universal waste lamps in a way that prevents releases of any universal waste or component of a universal waste to the environment.

11.3 Central Accumulation Area (CAA)

The central accumulation area (CAA) is a fenced in area with a locked gate (Pictures 10-12, 44). There is a ‘90 Day Hazardous Waste Storage Area’ sign near the gate (Picture 25). However, there were no ‘No Smoking’ signs posted along the fence. This is an area of concern.

Outside the CAA was a staging area with three 55-gallon containers on a wooden pallet (Pictures 13-16). Two of the containers were labeled as hazardous waste, all of the containers were closed but did not have accumulation start dates. In addition, the containers were not authorized to be staged outside the CAA. The area was labeled as satellite accumulation area however, the facility is not allowed to move containers from SAA to SAA. Thus, these containers were not at the point of generation.

Pursuant to Tenn. Comp. R. & Regs. 0400-12-01-.03(1)(h)1.(v)(I) [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 words “Hazardous Waste”; an indication of the hazards of the contents; and the date upon which each period of accumulation begins clearly visible for inspection on each container.

Near the CAA were over forty 275-gallon intermediate bulk container (IBC) totes (Pictures 17-18). Mr. Linn explained the totes contained off-specification fatty acids that were left over from the acid chloride process. Mr. Linn had been in his current position for over a year, and the material had been on site prior to him becoming EHS Manager. The totes have been stored for over a year and may be accumulated speculatively². The aisle space between the totes was very

² Pursuant to Tenn. Comp. R. & Regs. 0400-12-01-.02(1) [40 C.F.R. § 261.1(c)(8) and 40 C.F.R. § 261.2(e)(2)], a material is “accumulated speculatively” if it is accumulated before being recycled. A material is not accumulated speculatively, however, if the person accumulating it can show that the material is potentially recyclable and has a feasible means of being recycled; and that—during the calendar year (commencing on January 1)—the amount of material that is recycled, or transferred to a different site for recycling, equals at least 75 percent by weight or volume of the amount of that material accumulated at the beginning of the period. Materials must be placed in a storage unit with a label indicating the first date that the material began to be accumulated. If placing a label on the storage unit is not practicable, the accumulation period must be documented through an inventory log or other appropriate method. In calculating the percentage of turnover, the 75 percent requirement is to be applied to each material of the same type (e.g., slags from a single smelting process) that is recycled in the same way (i.e., from which the same material is recovered or that is used in the same way). Materials accumulating in units that would be exempt from regulation under § 261.4(c) are not to be included in making the calculation. Materials that are already defined as solid wastes also are not to be included in making the calculation. Materials are no longer in this category once they are removed from accumulation for recycling, however.

narrow, and the inspectors observed a white substance released to the ground between the totes (Pictures 19-20). One of the totes were observed to be contracting in on itself (Pictures 21-22). Another tote was observed to be bulging (Picture 23).

Pursuant to Tenn. Comp. R. & Regs. 0400-12-01-.03(1)(b) [40 C.F.R. § 262.11], a person who generates a solid waste, as defined in Tenn. Comp. R. & Regs. 0400-12-01-.02(1)(b) (2021) [40 C.F.R. § 261.2], must make an accurate determination as to whether that waste is a hazardous waste in order to ensure wastes are properly managed according to applicable RCRA regulations articulated in Tenn. Comp. R. & Regs. 0400-12-01-.03(1)(b) [40 C.F.R. § 262.11].

Near the tote storage area was a 55-gallon container of carbon filter and a spill kit (Picture 24). Mr. Linn stated that the carbon filter container was still in use.

Near the CAA entrance was a square container that had coiled hoses with rocks on top. Mr. Matt Riley, EHS Technician, stated the container was a spill kit (Picture 45), however there were wasps and/or bees inside the container that needed to be removed, thus the spill kit was unavailable. This is an area of concern.

Inside the CAA, there were 98 total containers: thirty-four 55-gallon containers of non-hazardous waste (Picture 35) and sixty-four 55-gallon container of hazardous waste. Of the 64 hazardous waste containers, two of the containers did not have start accumulation dates (Pictures 26, 27, 30, 33). These containers were marked with the waste profile number 68692, Waste Solid Containing Flammable Liquids, and Waste Flammable Solid, D001, F003, F005. Mr. Linn pointed out that the container with the curled label did have an accumulation start date of March 23, 2024, but the ink had been washed off (Pictures 30, 33).

Pursuant to Tenn. Comp. R. & Regs. 0400-12-01-.03(1)(h)1.(v)(I) [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 words “Hazardous Waste”; an indication of the hazards of the contents; and the date upon which each period of accumulation begins clearly visible for inspection on each container.

One of the 55-gallon hazardous waste containers dated February 27, 2024, was observed to be damaged near the bottom (Picture 29).

Pursuant to Tenn. Comp. R. & Regs. 0400-12-01-.03(1)(h)1.(i)(II) [40 C.F.R. § 262.17(a)(1)(ii)], which is a condition of the LQG Permit Exemption, if a container holding hazardous waste is not in good condition, or if it begins to leak, the generator must immediately transfer the hazardous waste from this container to a container that is in good condition, or immediately manage the waste in some other way that complies with the LQG Permit Exemption.

The inspectors observed seven black plastic 55-gallon containers of acid chloride fiberglass insulation hazardous waste. The containers had taped on labels that were faded (Pictures 31, 32, 34). The containers did not have indicators of hazard. Mr. Linn had the hazardous waste inventory and stated that the seven containers were not listed on the inventory. Thus, neither Mr. Linn nor Mr. Riley were aware of when the seven containers were added to the CAA.

Pursuant to Tenn. Comp. R. & Regs. 0400-12-01-.03(1)(h)1.(v)(I) [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: an indication of the hazards of the contents; and the date upon which each period of accumulation begins clearly visible for inspection on each container.

In addition, there were five 275-gallon IBC totes of Hazardous Trench Sludge. One of the totes was visibly bulging (Picture 36).

Pursuant to Tenn. Comp. R. & Regs. 0400-12-01-.03(1)(h)1.(i)(II) [40 C.F.R. § 262.17(a)(1)(ii)], which is a condition of the LQG Permit Exemption, if a container holding hazardous waste is not in good condition, or if it begins to leak, the generator must immediately transfer the hazardous waste from this container to a container that is in good condition, or immediately manage the waste in some other way that complies with the LQG Permit Exemption.

The secondary containment surrounding the CAA had a sump area that extended beyond the CAA, past the fatty acid totes and into a small wetland. Inside the CAA, the sump area contained vegetative debris that was approximately one-inch thick. The sump area was not clean or clear to receive a release of the largest container. This is an area of concern.

The inspectors observed that the concrete surface of the CAA had several cracks and had not been maintained or repaired (Pictures 38-43). The facility did not maintain by repairing and/or resealing the secondary containment from gaps and cracks. This is an area of concern.

The inspectors recommended installing a roof and/or overhang on CAA to prevent the weather from damaging the container labels and reduce the damage of the secondary containment concrete.

11.4 Flammable Storage Area

Next to the CAA was the flammable storage area (Picture 51). Facility representatives explained that product and raw material are stored in this area. The inspectors observed eight 55-gallon containers of black dye/toulene/Hexion E-70 resin solution (Pictures 48-49). On at least one of the containers, the inspectors observed a "REV. DATE 26-OCT-2017." Mr. Linn explained that the contents were off specification for the previous customer, but still viable. The containers of resin solution were marked as on 'Hold Do Not Use, Pending Management Approval'. Mr. Linn stated that the facility was currently negotiating with an auto racing company to purchase the resin solution. The condition of the containers and labels, in addition to the 10/26/2017 date, raises concerns about the length of time the containers have been stored. The inspectors

expressed concern about the length of time the containers had been stored on site, whether the resin solution could be used, and whether this material may be accumulated speculatively.

Pursuant to Tenn. Comp. R. & Regs. 0400-12-01-.02(1) [40 C.F.R. § 261.2(c)(4) and 40 C.F.R. § 261.2(e)(2)], spent materials, listed and characteristic sludges, listed and characteristic by-products, and scrap metals are solid wastes when accumulated speculatively. Materials accumulated speculatively are solid wastes, even if the recycling involves use, reuse, or return to the original process.

Pursuant to Tenn. Comp. R. & Regs. 0400-12-01-.03(1)(b) [40 C.F.R. § 262.11], a person who generates a solid waste, as defined in Tenn. Comp. R. & Regs. 0400-12-01-.02(1)(b) (2021) [40 C.F.R. § 261.2], must make an accurate determination as to whether that waste is a hazardous waste in order to ensure wastes are properly managed according to applicable RCRA regulations articulated in Tenn. Comp. R. & Regs. 0400-12-01-.03(1)(b) [40 C.F.R. § 262.11].

Across from the resin solution containers the inspectors observed ten closed, undated 275-gallon IBC totes. Three of the 275-gallon IBC totes were labeled or marked as Hexanol and Water Organic Waste (Picture 46, 47, 50). The remaining seven totes were not properly marked or labeled with words identifying the contents. It was unknown whether the contents were a spent material or a by-product exhibiting a characteristic of hazardous waste. Mr. Linn was unaware of ten 275-gallon IBC totes waste being stored in the flammable storage area, and contacted Mr. Shaun McMillin, Operations Manager for additional information. Mr. McMillin arrived and explained that the totes were to be distilled to reclaim hexanol. After recovery the hexanol would be stored in a 10,000-gallon bulk product tank. The wastewater would be sent off-site to Aqua Treat.

Pursuant to Tenn. Comp. R. & Regs. 0400-12-01-.03(1)(b) (2021) [40 C.F.R. § 262.11], a person who generates a solid waste, as defined in Tenn. Comp. R. & Regs. 0400-12-01-.02(1)(b) (2021) [40 C.F.R. § 261.2], must make an accurate determination as to whether that waste is a hazardous waste in order to ensure wastes are properly managed according to applicable RCRA regulations articulated in Tenn. Comp. R. & Regs. 0400-12-01-.03(1)(b) (2021) [40 C.F.R. § 262.11].

11.5 Line 1 Hazardous Waste Tank Farm

Tanks T-61 and T-62 are hazardous waste tanks sitting inside a walled secondary containment area. In addition, the remaining tanks in this farm are non-hazardous wastewater tanks. The inspectors observed that the secondary containment was clean and free of gaps and cracks.

T-62 was out of service at the time of the inspection. Tank T-61 and its ancillary equipment were marked with Subpart BB tags at the valves only (Pictures 52-58). The leak interfaces were not marked in such a manner that they could be distinguished readily from other pieces of equipment. Mr. Linn and Mr. Riley stated that they thought that the tags covered the flanges

and valves together. Cymer is required to determine if the waste in the tank has an average volatile organic concentration of greater than 500 PPM. It does not appear that Cymer conducted this determination.

Additionally, tanks subject to Subpart CC are required to have an annual visual inspection of the top of the tank. No records were found for the tank Subpart CC inspections.

Pursuant to Tenn. Comp. R. & Regs. 0400-12-01-.03(1)(h)1.(ii) [40 C.F.R. § 262.17(a)(2)], which incorporates Tenn. Comp. R. & Regs. 0400-12-01-.05(28) [40 C.F.R. Part 265, Subpart BB], and is a condition of the LQG Permit Exemption, a generator accumulating hazardous waste in tanks must comply with the RCRA Subpart BB organic air emission standards for equipment leaks, including, but not limited to, the requirement to mark each piece of equipment in a manner that it can be distinguished readily from other pieces of equipment, Tenn. Comp. R. & Regs. 0400-12-01-.05(28)(a)3. [40 C.F.R. § 265.1050(c)].

Pursuant to Tenn. Comp. R. & Regs. 0400-12-01-.03(1)(h)1.(ii) [40 C.F.R. § 262.17(a)(2)], which incorporates Tenn. Comp. R. & Regs. 0400-12-01-.05(29) [40 C.F.R. Part 265, Subpart CC], a condition of the LQG Permit Exemption, a generator accumulation hazardous waste containing an average volatile organic concentration of greater than 500 ppm at the point of waste generation in tanks must comply with the RCRA Subpart CC Organic Air Emission Standards for tanks.

11.6 Lab Central Accumulation Area

The Line 1 laboratory has an outside CAA in an attached shed. The inspectors observed a 55-gallon container of Waste Solid Containing Flammable Liquid, D001, D035, F003, F005, dated April 25, 2024, sitting inside a concrete secondary containment (Pictures 59-61). The shed was not secured from unauthorized access and did not have 'No Smoking' signs posted. The inspectors observed releases inside the secondary containment.

Pursuant to Tenn. Comp. R. & Regs. 0400-12-01-.03(1)(h)1.(i)(VI) [40 CFR 262.17(a)(1)(vi)(B)] which is a condition of the LQG Permit Exemption, "No Smoking" signs must be conspicuously placed wherever there is a hazard from ignitable or reactive waste.

Pursuant to Tenn. Comp. R. & Regs. 0400-12-01-.03(1)(h)1.(vi) [40 C.F.R. § 262.17(a)(6)], which incorporates Tenn. Comp. R. & Regs. 0400-12-01-.03(12). [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.

Near the CAA were two clamshells containing 55-gallon containers. The first container was a raw material storage container. The second container was a SAA of Waste Resins with Spent Solvents (Pictures 62-63). However, the SAA container was labeled with the words 'hazardous

waste' and the indication of hazard. In addition, the SAA container was not at or near the point of generation, nor under the control of the generator. Mr. Linn stated that the container could not be stored inside the building. The inspectors stated that the SAA container should be placed in the CAA.

Pursuant to Tenn. Comp. R. & Regs. 0400-12-01-.03(1)(f)1. [40 C.F.R. § 262.15(a)], a generator may accumulate as much as 55 gallons of non-acute hazardous waste in containers at or near 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.

Inside the laboratory near the door, was a 55-gallon SAA container of Waste Solid Containing Flammable Liquid, D001, D035, F003, F005 that was labeled and closed (Pictures 64-65). Further inside the laboratory as the following (Pictures 66-71):

- One 55-gallon SAA container of Waste Solid Containing Flammable Liquid, D001, D035, F003, F005 that was closed and labeled;
- A one-gallon SAA container of hazardous waste liquid with a funnel that was not closed but labeled;
- A one-gallon SAA High Performance Liquid Chromatography (HPLC) waste container that was closed and labeled;
- A one-gallon SAA HPLC waste container that was not labeled but closed;
- Two one-gallon SAA containers near and/or adjacent to the sink. The two SAA waste containers had labels but did not have hazard indicators and one container had a funnel that was not closed; and
- An eyewash, a sprinkler system, and a spill kit.

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

Pursuant to Tenn. Comp. R. & Regs. 0400-12-01-.03(1)(f)1.(iv) [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.

11.7 Building 1

Building 1 had three 55-gallon SAA containers, a spill kit and fire extinguisher. The inspectors observed a container of Waste Phosphoric Acid, a container of Waste Liquid Organic Resin Solution on a secondary containment pallet, and a container of Waste Solid Containing

Flammable Liquid, D001, D035, F003, F005 (Picture 72). All containers were observed to be closed and labeled with indication of the hazards of the contents.

11.8 Building 6

Building 6 had two 55-gallon SAA containers. The inspectors observed a container of Waste Flammable Liquid with an open funnel on a secondary containment pallet, and a container of Waste Solid Containing Flammable Liquid, D001, D035, F003, F005 that was not closed (Pictures 73-75). All containers were observed labeled with indication of the hazards of the contents.

Pursuant to Tenn. Comp. R. & Regs. 0400-12-01-.03(1)(f)1.(iv) [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.

Upstairs, the inspectors observed that the hazardous waste Tank 613, its ancillary equipment, and the adjoining pipe rack were marked with Subpart BB tags at the valves only (Pictures 76-79). Tank 613 is a distillation tank that distills, strips, and adjusts the pH. The leak interfaces were not marked in such a manner that they could be distinguished readily from other pieces of equipment. Cymer is required to determine if the waste in the tank has an average volatile organic concentration of greater than 500 PPM. It does not appear that Cymer conducted this determination.

Additionally, tanks subject to Subpart CC are required to have an annual visual inspection of the top of the tank. No records were found for the tank Subpart CC inspections.

The Subpart AA operating records were observed to be incomplete and missing information that included but was not limited to the following:

- Documentation of compliance with the process vent standards;
- Documentation and certification of compliance with the closed-vent systems and control devices standards and reduction of total organics;
- Design documentation and monitoring, operating, and inspection information for each closed-vent system and control device; and
- Up-to-date information and data used to determine process vent applicability.

Pursuant to Tenn. Comp. R. & Regs. 0400-12-01-.03(1)(h)1.(ii) [40 C.F.R. § 262.17(a)(2)], which incorporates Tenn. Comp. R. & Regs. 0400-12-01-.05(27) [40 C.F.R. Part 265, Subpart AA], and is a condition of the LQG Permit Exemption, a generator accumulating hazardous waste in tanks must comply with the RCRA Subpart AA air emission standards for process vents, including, but not limited to, recordkeeping requirements in Tenn. Comp. R. & Regs. 0400-12-01-.05(27)(f) [40 C.F.R. § 265.1035].

Pursuant to Tenn. Comp. R. & Regs. 0400-12-01-.03(1)(h)1.(ii) [40 C.F.R. § 262.17(a)(2)], which incorporates Tenn. Comp. R. & Regs. 0400-12-01-.05(28) [40 C.F.R. Part 265, Subpart BB], and is a condition of the LQG Permit Exemption, a generator accumulating hazardous waste in tanks must comply with the RCRA Subpart BB organic air emission standards for equipment leaks, including, but not limited to, the equipment marking requirements in Tenn. Comp. R. & Regs. 0400-12-01-.05(28)(a)3. [40 C.F.R. § 265.1050(c)].

Pursuant to Tenn. Comp. R. & Regs. 0400-12-01-.03(1)(h)1.(ii) [40 C.F.R. § 262.17(a)(2)], which incorporates Tenn. Comp. R. & Regs. 0400-12-01-.05(29) [40 C.F.R. Part 265, Subpart CC], a condition of the LQG Permit Exemption, a generator accumulation hazardous waste containing an average volatile organic concentration of great than 500 ppm at the point of waste generation in tanks must comply with the RCRA Subpart CC Organic Air Emission Standards for tanks.

11.9 Building 6 Tank Farm

Hazardous waste tanks 631, 632, and 633 are all in service tanks (Pictures 80-82). The inspectors observed each tank, and its ancillary equipment were marked with Subpart BB tags at the valves only (Pictures 76-79). The leak interfaces were not marked in such a manner that they could be distinguished readily from other pieces of equipment. Cymer is required to determine if the waste in the tank has an average volatile organic concentration of greater than 500 PPM. It does not appear that Cymer conducted this determination. Additionally, tanks subject to Subpart CC are required to have an annual visual inspection of the top of the tank. No records were found for the tank Subpart CC inspections.

Pursuant to Tenn. Comp. R. & Regs. 0400-12-01-.03(1)(h)1.(ii) [40 C.F.R. § 262.17(a)(2)], which incorporates Tenn. Comp. R. & Regs. 0400-12-01-.05(28) [40 C.F.R. Part 265, Subpart BB], and is a condition of the LQG Permit Exemption, a generator accumulating hazardous waste in tanks must comply with the RCRA Subpart BB organic air emission standards for equipment leaks, including, but not limited to, the equipment marking requirements in Tenn. Comp. R. & Regs. 0400-12-01-.05(28)(a)3. [40 C.F.R. § 265.1050(c)].

Pursuant to Tenn. Comp. R. & Regs. 0400-12-01-.03(1)(h)1.(ii) [40 C.F.R. § 262.17(a)(2)], which incorporates Tenn. Comp. R. & Regs. 0400-12-01-.05(29) [40 C.F.R. Part 265, Subpart CC], a condition of the LQG Permit Exemption, a generator accumulation hazardous waste containing an average volatile organic concentration of great than 500 ppm at the point of waste generation in tanks must comply with the RCRA Subpart CC Organic Air Emission Standards for tanks.

In addition, the inspectors observed that the ceiling I-beams were corroded (Picture 83). Mr. Linn explained that gas releases from the tanks were potentially corrosive.

11.10 Building 6 Loading Dock

The inspectors were walking past the Building 6 loading dock and observed the oily releases on the ground (Pictures 84-86). The concrete surface was black and slippery, and the sump was full of oily liquid. Mr. Linn explained that the material was not used oil but a polymer resin used at the facility. However, the material was released to the ground and the sump was full and not cleaned out.

Pursuant to Tenn. Comp. R. & Regs. 0400-12-01-.03(1)(h)1.(vi) [40 C.F.R. § 262.17(a)(6)], which incorporates Tenn. Comp. R. & Regs. 0400-12-01-.03(12). [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 also observed approximately twenty-five 275-gallon IBC totes stored in this area (Picture 87). Mr. Linn explained that the totes contained material from hazardous waste tank T-60 that needed to be distilled. However, the inspectors expressed concern about containers not being marked or labeled with words 'hazardous waste' and indication of hazard, the length of time the containers had been stored on site, and when the material would be distilled. Mr. Linn had been in his current position for over a year, and the material had been on site prior to him becoming EHS Manager. The totes have been stored for over a year. This is an area of concern.

Pursuant to Tenn. Comp. R. & Regs. 0400-12-01-.03(1)(h)1.(v)(I) [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 words "Hazardous Waste"; an indication of the hazards of the contents; and the date upon which each period of accumulation begins clearly visible for inspection on each container.

11.11 Tanker Lot

Across from Building 6 was the Tanker Lot. The facility began using this area on January 5, 2024, to store 275-gallon IBC totes of hydrochloric acid water from R-604 manufactured and used on site, and 275-gallon IBC totes of Cleanout Solvent Requiring Distillation (Pictures 88-89, 93-94). The TDEC inspectors counted 267 totes of cleanout solvent pending distillation stored in this area. The aisle space was very narrow between the tote rows. The totes were marked Mr. Linn explained that the totes had been in storage before he assumed his current position over a year ago.

Pursuant to Tenn. Comp. R. & Regs. 0400-12-01-.03(1)(b) (2021) [40 C.F.R. § 262.11], a person who generates a solid waste, as defined in Tenn. Comp. R. & Regs. 0400-12-01-.02(1)(b) (2021) [40 C.F.R. § 261.2], must make an accurate determination as to whether that waste is a hazardous waste in order to ensure wastes are properly managed according to applicable RCRA regulations articulated in Tenn. Comp. R. & Regs. 0400-12-01-.03(1)(b) (2021) [40 C.F.R. § 262.11].

Pursuant to Tenn. Comp. R. & Regs. 0400-12-01-.02(1) [40 C.F.R. § 261.2(c)(4) and 40 C.F.R. § 261.2(e)(2)], spent materials, listed and characteristic sludges, listed and characteristic by-products, and scrap metals are solid wastes when accumulated speculatively. Materials accumulated speculatively are solid wastes, even if the recycling involves use, reuse, or return to the original process.

The inspectors also observed an active and visible leak from one of the pending distillation totes (Pictures 90-92, 95). Mr. Linn immediately contacted staff to remove the leaking tote.

Pursuant to Tenn. Comp. R. & Regs. 0400-12-01-.03(1)(h)1.(vi) [40 C.F.R. § 262.17(a)(6)], which incorporates Tenn. Comp. R. & Regs. 0400-12-01-.03(12). [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.

Pursuant to Tenn. Comp. R. & Regs. 0400-12-01-.03(1)(h)1.(i)(II) [40 C.F.R. § 262.17(a)(1)(ii)], which is a condition of the LQG Permit Exemption, if a container holding hazardous waste is not in good condition, or if it begins to leak, the generator must immediately transfer the hazardous waste from this container to a container that is in good condition, or immediately manage the waste in some other way that complies with the LQG Permit Exemption.

The inspectors questioned the compatibility of storing the hydrochloric acid water and the cleanout solvent in the same area. In addition, the Tanker Lot was not covered; and the totes were exposed to the weather.

Pursuant to Tenn. Comp. R. & Regs. 0400-12-01-.03(1)(h)1.(i)(VII)III. [40 C.F.R. § 262.17(a)(1)(vii)(C)], and is a condition of the LQG Permit Exemption, a container holding a hazardous waste that is incompatible with any waste or other materials accumulated or stored nearby in other containers, piles, open tanks, or surface impoundments must be separated from the other materials or protected from them by means of a dike, berm, wall, or other device.

11.12 Tanker 6119

In the Tanker Lot, Tanker 6119 was being used as a less than 90-day storage for 4,800-gallons of hazardous waste process water that was pumped off from the distillation process (Pictures 97-99). The tanker was not labeled, not dated, and the Tanker Lot did not have 'No Smoking' signs posted. The tanker and totes were stored on a concrete surface that was not sealed, to prevent gaps and cracks. However, the concrete is sloped to a closed valve that would allow for capture and collection on any releases. This is an area of concern.

Pursuant to Tenn. Comp. R. & Regs. 0400-12-01-.03(1)(h)1.(v)(I) [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 words “Hazardous Waste”; an indication of the hazards of the contents; and the date upon which each period of accumulation begins clearly visible for inspection on each container.

12) Records Review

The inspectors requested the training records, the contingency plan, the daily and weekly inspection records, LDAR records, tank integrity records, the hazardous waste reduction plans, annual reports, the 2021-2024 hazardous, non-hazardous, and used oil manifests. The generator status notification (EPA Form 8700-12) was last updated March 1, 2022.

The inspectors requested the training records for the employees handling hazardous waste. Training records for Robert Linn and Matthew Riley. Mr. Linn and Mr. Riley received Safety Compliance Management DOT HazMat Employee and 8-Hour RCRA Hazardous Waste Training on May 19, 2023, and May 10, 2023, respectively. Mr. Gadsden received RCRA Hazardous Waste Management Online Course by Lion Technology on January 17, 2024, and the RCRA Hazardous Waste Management Refresher Webinar by Lion Technology on February 9, 2024.

However, training records for 2021-2022 and job titles and descriptions were not available for review at the time of the inspection.

Pursuant to Tenn. Comp. R. & Regs. 0400-12-01-.03(1)(h)1.(vii) [40 C.F.R. § 262.17(a)(7)(iv)], which is a condition of the LQG Permit Exemption, the generator must maintain training records that include, among others: the job title for each position at the facility related to hazardous waste management, and the name of the employee filling each job; a written job description for each position; a written description of the type and amount of both introductory and continuing training that will be given to each person filling a position; and records documenting that the training required has been given to and completed by Facility personnel.

The inspectors requested the Contingency Plan dated April 2024 for review. The plan did have an emergency contact list, an updated evacuation map, a fire extinguisher inspection list, a list of emergency response equipment, the Quick Reference Guide, but did not have documentation (i.e., green return receipt cards, emails) that copies of the current contingency plan were provided to the local emergency response agencies (i.e., fire, police, hospital). In addition, the Quick Reference Guide was missing the location of water supplies and onsite notification.

Pursuant to Tenn. Comp. R. & Regs. 0400-12-01-.03(1)(h)1.(vi) [40 C.F.R. § 262.17(a)(6)], which incorporates Tenn. Comp. R. & Regs. 0400-12-01-.03(12)(i) [40 C.F.R. § 262.261(c)], 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 Tenn. Comp. R. & Regs. 0400-12-01-.03(1)(h)1.(vi) [40 C.F.R. § 262.17(a)(6)], which incorporates Tenn. Comp. R. & Regs. 0400-12-01-.03(12)(j)2.(vi)-(vii) [40 C.F.R. § 262.262(b)] and is a condition of the LQG Permit Exemption, 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. The quick reference guide must include the following elements:

- (6) The locations of water supply (e.g., fire hydrant and its flow rate); and
- (7) The identification of on-site notification systems (e.g., a fire alarm that rings off site, smoke alarms).

The weekly inspection records for 2021-2024 were reviewed. The inspectors observed the following:

- the cold trailer was still listed as a CAA;
- the laboratory clamshell needs to be added to the CAA list;
- the tote was leaking in the Tanker Lot was not documented;
- the two 55-gallon containers in the Main CAA that were not dated was not documented;
- no notes were documented in 2023 and 2024;
- no notes documenting the poor condition of the secondary containment in the Main CAA; and
- no notes documenting the lack of signage around the CAAs.

Pursuant to Tenn. Comp. R. & Regs. 0400-12-01-.03(1)(h)1.(i)(V) [40 C.F.R. § 262.17(a)(1)(v)], which is a condition of the LQG Permit Exemption, a generator is required to, at least weekly, inspect central accumulation areas looking for leaking containers and for deterioration of containers caused by corrosion or other factors.

The daily tank inspection records for 2021-2023 were reviewed. The inspectors observed that the tank inspections were conducted twice a day, once per shift. The forms documented T-75 as a hazardous waste tank, but when Mrs. Hutchings inspected the tank on May 8th, she was told that the tank was no longer used as a hazardous waste tank. In addition, the inspectors observed that no notes were documented on the tank inspection forms and the facility did not have the means to track the hazardous waste tank levels. Instead, the facility was removing 3,000 gallons per tank during the disposal pick-ups.

Pursuant to Tenn. Comp. R. & Regs. 0400-12-01-.03(1)(h)1.(ii) [40 C.F.R. § 262.17(a)(2)], which incorporates Tenn. Comp. R. & Regs. 0400-12-01-.05(10)(f) [40 C.F.R. § 265.195(e)], and is a condition of the LQG Permit Exemption, a generator accumulating hazardous waste in tanks

must conduct daily inspections of tank ancillary equipment that is not provided with secondary containment.

The hazardous waste tank integrity assessment records were reviewed by Mrs. Hutchings on May 8th. Tank T-60 was tested on August 23, 2012, Tank T-75 on August 13, 2014, Tank T-61 on June 12, 2021, Tank T-631 on December 27, 2012, Tank T-632 on June 12, 2021, and Tank T-633 on June 12-2021. Tank T-613 did not have a tank integrity assessment report but had the professional engineer's certification for installation. The certification was dated January 18, 2012.

Pursuant to Tenn. Comp. R. & Regs. 0400-12-01-.03(1)(h)1.(ii) [40 C.F.R. § 262.17(a)(2)], which incorporates Tenn. Comp. R. & Regs. 0400-12-01-.05(10)(c)1. [40 C.F.R. § 265.192(a)], and is a condition of the LQG Permit Exemption, a generator accumulating hazardous waste in tanks must obtain a written tank assessment reviewed and certified by a qualified Professional Engineer, attesting that the system has sufficient structural integrity and is acceptable for the storing and treating of hazardous waste.

The secondary containment is a concrete box with a liner, a pipe and a valve that is manually opened to release to the ground and follows the natural stormwater pathway. Tanks T-61 and T-62 did not have level indicators or high-level alarms to alert when there are releases to the secondary containment. The control room does not have an electronic notification when the valve is open and releasing.

Pursuant to Tenn. Comp. R. & Regs. 0400-12-01-.03(1)(h)1.(ii) [40 C.F.R. § 262.17(a)(2)], which incorporates Tenn. Comp. R. & Regs. 0400-12-01-.05(10)(f) [40 C.F.R. § 265.194], and is a condition of the LQG Permit Exemption, a generator accumulating hazardous waste in tanks must have adequate spill prevention controls and overfill prevention controls for its hazardous waste tank system.

The 2021-2023 leak detection and repair records for the hazardous waste tank ancillary piping were reviewed. The inspectors observed that the forms provided were incomplete and incorrectly filled out.

Pursuant to Tenn. Comp. R. & Regs. 0400-12-01-.03(1)(h)1.(ii) [40 C.F.R. § 262.17(a)(2)], which incorporates Tenn. Comp. R. & Regs. 0400-12-01-.05(28) [40 C.F.R. Part 265, Subpart BB], and is a condition of the LQG Permit Exemption, a generator accumulating hazardous waste in tanks must comply with the RCRA Subpart BB organic air emission standards for equipment leaks, including, but not limited to, the recordkeeping requirements in Tenn. Comp. R. & Regs. 0400-12-01-.05(28)(o)40 C.F.R. § 265.1064].

The Hazardous Waste Reduction Plan annual reports for 2021-2024 dated April 2024 were reviewed. No issues were observed.

The hazardous waste annual reports for 2021-2023 were reviewed. The 2023 annual report and new waste stream updates had the following incorrect or missing information:

- Form HN-EA (Hazardous Waste Environmental Activity Notification), page 1, Generator Wastewater and Generator Episodic were marked incorrectly and on page 2, Destination Facility, Lamp Crusher was marked incorrectly.
- Box 1f and box 1h on the following WSR forms were inconsistent: WS#1226, WS#1236, WS#1242, WS#1245, WS#1246, WS#1247, WS#1248, WS#1243.
- Form OSR and WSR for WS#1252 were inconsistent.

Pursuant to Tenn. Comp. R. & Regs. 0400-12-01-.03(2)(d)1.(ii), Small and large quantity generators shall be responsible for maintaining an up-to-date notification file by reviewing the most current notification information on file with the Commissioner, as made available by the Commissioner with the annual report, correcting inaccurate data or supplying all the information needed to ensure the Commissioner is maintaining an accurate notification file. The updated or corrected information shall be returned to the Commissioner by March 1st following the receipt of the notification information on file or as instructed otherwise by the Commissioner.

Hazardous and non-hazardous manifests were reviewed for 2021-2023. Hazardous wastes were shipped to the following:

- Giant Resource Recovery Sumter (EPA ID SCD036275626) in Sumter, SC;
- Giant Resource Recovery Attalla (EPA ID ALD070513767) in Attalla, AL; and
- Reclaimed Energy (EPA ID IND000780403) in Connersville, IN.

The land disposal restriction forms were reviewed.

Non-hazardous wastes were shipped to AquaTreat Inc. (EPA ID TNR000007476) in Chattanooga, TN.

The inspectors observed that some of the 2021-2023 manifests were missing the designated facility to generator copies. In addition, no exception reports were provided to the EPA or TDEC.

Pursuant to Tenn. Comp. R. & Regs. 0400-12-01-.03(5)(a)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 Tenn. Comp. R. & Regs. 0400-12-01-.03(5)(a)2. [40 C.F.R. § 262.42(a)(2)], a large quantity generator must submit an Exception Report to the EPA Regional Administrator for the Region in which the generator is located if he has not received a copy of the manifest with the handwritten signature of the owner or operator of the designated facility within 45

days of the date the waste was accepted by the initial transporter. The Exception Report must include: (i) A legible copy of the manifest for which the generator does not have confirmation of delivery; (ii) A cover letter signed by the generator or his authorized representative explaining the efforts taken to locate the hazardous waste and the results of those efforts.

13) Closing Conference

The inspectors did not conduct an exit meeting with Mr. Linn on May 7th. However, on May 8th Mrs. Hutchings, TDEC, returned to continue the records review and follow up on inspection items. During this meeting, TDEC presented the preliminary results of the inspection. Cymer-Dayton LLC was inspected as a LQG of hazardous waste.

14) Summary of Observations

- a. The following wastes were accumulated speculatively and stored over a year:
- over forty 275-gallon intermediate bulk container (IBC) totes contained off-specification fatty acids that were left over from the acid chloride process;
 - eight 55-gallon containers of black dye/toulene/Hexion E-70 resin solution that were off specification;
 - eight 275-gallon IBC totes stored in the Building 6 Loading Dock contained material from hazardous waste tank T-60 that needed to be distilled; and
 - Two hundred sixty-seven (267) 275-gallon IBC totes of Cleanout Solvent Requiring Distillation stored in this Tanker Lot.

Pursuant to Tenn. Comp. R. & Regs. 0400-12-01-.02(1) [40 C.F.R. § 261.2(c)(4) and 40 C.F.R. § 261.2(e)(2)], spent materials, listed and characteristic sludges, listed and characteristic by-products, and scrap metals are solid wastes when accumulated speculatively. Materials accumulated speculatively are solid wastes, even if the recycling involves use, reuse, or return to the original process.

- b. The following wastes need clarification of hazardous waste determinations:
- hazardous waste determinations were based on mass balance and not samples sent out for external lab analyses;
 - eight 55-gallon containers of black dye/toulene/Hexion E-70 resin solution that were off specification; and
 - Ten 275-gallon IBC totes marked as Hexanol and Water Organic Waste that were to be distilled of the hexanol.

Pursuant to Tenn. Comp. R. & Regs. 0400-12-01-.03(1)(b) [40 C.F.R. § 262.11], a person who generates a solid waste, as defined in Tenn. Comp. R. & Regs. 0400-12-01-.02(1)(b) (2021) [40 C.F.R. § 261.2], must make an accurate determination as to whether that waste is a hazardous waste in order to ensure wastes are properly managed according to applicable

RCRA regulations articulated in Tenn. Comp. R. & Regs. 0400-12-01-.03(1)(b) [40 C.F.R. § 262.11].

- c. These wastes were not at or near the point of generation, nor under the control of the generator:
- Outside the main CAA was an unauthorized staging area with three 55-gallon containers on a wooden pallet used as satellite accumulation area however, the facility is not allowed to move containers from SAA to SAA.
 - A SAA container of Waste Resins with Spent Solvents near the Lab Central Accumulation Area.

Pursuant to Tenn. Comp. R. & Regs. 0400-12-01-.03(1)(f)1. [40 C.F.R. § 262.15(a)], a generator may accumulate as much as 55 gallons of non-acute hazardous waste in containers at or near 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.

- d. Failure to keep containers of hazardous waste closed at all times:
- A one-gallon SAA container of hazardous waste liquid with a funnel that was not closed but labeled in the Line 1 Lab;
 - A one-gallon SAA container near and/or adjacent to the sink with a funnel that was not closed in the Line 1 Lab; and
 - Building 6 had a container of Waste Flammable Liquid with an open funnel on a secondary containment pallet, and a container of Waste Solid Containing Flammable Liquid, D001, D035, F003, F005 that was not closed.

Pursuant to Tenn. Comp. R. & Regs. 0400-12-01-.03(1)(f)1.(iv) [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.

- e. Failure to mark or label its containers (i) with the words “Hazardous Waste” and (ii) with an indication of the hazards of the contents:
- Two one-gallon SAA containers near and/or adjacent to the sink. The two SAA waste containers had labels but did not have hazard indicators.

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

f. Failure to use a container in good condition:

- One of the 55-gallon hazardous waste containers dated February 27, 2024, was observed to be damaged near the bottom in the main CAA;
- A 275-gallon IBC tote of Hazardous Trench Sludge was visibly bulging in the main CAA; and
- A 275-gallon IBC tote of Cleanout Solvent Requiring Distillation in the Tanker Lot.

Pursuant to Tenn. Comp. R. & Regs. 0400-12-01-.03(1)(h)1.(i)(II) [40 C.F.R. § 262.17(a)(1)(ii)], which is a condition of the LQG Permit Exemption, if a container holding hazardous waste is not in good condition, or if it begins to leak, the generator must immediately transfer the hazardous waste from this container to a container that is in good condition, or immediately manage the waste in some other way that complies with the LQG Permit Exemption.

g. Failure to conduct inspect weekly inspections for less than 90-day central accumulation areas:

- over forty 275-gallon intermediate bulk container (IBC) totes contained off-specification fatty acids that were left over from the acid chloride process;
- eight 55-gallon containers of black dye/toulene/Hexion E-70 resin solution that were off specification;
- eight 275-gallon IBC totes stored in the Building 6 Loading Dock contained material from hazardous waste tank T-60 that needed to be distilled;
- Two hundred sixty-seven (267) 275-gallon IBC totes of Cleanout Solvent Requiring Distillation stored in this Tanker Lot;
- the cold trailer was still listed as a CAA;
- the laboratory clamshell needs to be added to the CAA list;
- the tote was leaking in the Tanker Lot was not documented;
- the two 55-gallon containers in the Main CAA that were not dated was not documented;
- no notes were documented in 2023 and 2024;
- no notes documenting the poor condition of the secondary containment in the Main CAA; and
- no notes documenting the lack of signage around the CAAs.

Pursuant to Tenn. Comp. R. & Regs. 0400-12-01-.03(1)(h)1.(i)(V) [40 C.F.R. § 262.17(a)(1)(v)], which is a condition of the LQG Permit Exemption, a generator is required to, at least weekly, inspect central accumulation areas looking for leaking containers and for deterioration of containers caused by corrosion or other factors.

h. Failure to post 'No Smoking' signs around the CAA:

- The central accumulation area (CAA) did not have 'No Smoking' signs posted along the fence;
- The Line 1 laboratory has an outside CAA in an attached shed was not secured from unauthorized access and did not have 'No Smoking' signs posted; and
- The Tanker Lot did not have 'No Smoking' signs posted.

Pursuant to Tenn. Comp. R. & Regs. 0400-12-01-.03(1)(h)1.(i)(VI) [40 CFR 262.17(a)(1)(vi)(B)] which is a condition of the LQG Permit Exemption, “No Smoking” signs must be conspicuously placed wherever there is a hazard from ignitable or reactive waste.

- i. Failure to store waste nearby other containers that are compatible:
 - The compatibility of storing the hydrochloric acid water and the cleanout solvent in the same area.

Pursuant to Tenn. Comp. R. & Regs. 0400-12-01-.03(1)(h)1.(i)(VII)III. [40 C.F.R. § 262.17(a)(1)(vii)(C)], and is a condition of the LQG Permit Exemption, a container holding a hazardous waste that is incompatible with any waste or other materials accumulated or stored nearby in other containers, piles, open tanks, or surface impoundments must be separated from the other materials or protected from them by means of a dike, berm, wall, or other device.

- j. Failure to mark equipment as required by Subpart BB:
 - Tank T-61 and its ancillary equipment;
 - Tank 613, its ancillary equipment, and the adjoining pipe rack; and
 - Hazardous waste tanks 631, 632, and 633, and its ancillary equipment.

Pursuant to Tenn. Comp. R. & Regs. 0400-12-01-.03(1)(h)1.(ii) [40 C.F.R. § 262.17(a)(2)], which incorporates Tenn. Comp. R. & Regs. 0400-12-01-.05(28) [40 C.F.R. Part 265, Subpart BB], and is a condition of the LQG Permit Exemption, a generator accumulating hazardous waste in tanks must comply with the RCRA Subpart BB organic air emission standards for equipment leaks, including, but not limited to, the equipment marking requirements in Tenn. Comp. R. & Regs. 0400-12-01-.05(28)(a)3. [40 C.F.R. § 265.1050(c)].

- k. Failure to inspect tank roof vents as required by Subpart CC:
 - Tank T-61 and its ancillary equipment;
 - Tank 613, its ancillary equipment, and the adjoining pipe rack; and
 - Hazardous waste tanks 631, 632, and 633, and its ancillary equipment.

Pursuant to Tenn. Comp. R. & Regs. 0400-12-01-.03(1)(h)1.(ii) [40 C.F.R. § 262.17(a)(2)], which incorporates Tenn. Comp. R. & Regs. 0400-12-01-.05(29) [40 C.F.R. Part 265, Subpart CC], a condition of the LQG Permit Exemption, a generator accumulation hazardous waste containing an average volatile organic concentration of greater than 500 ppm at the point of waste generation in tanks must comply with the RCRA Subpart CC Organic Air Emission Standards for tanks.

- l. Failure to obtain a written tank assessment report:
 - Tank T-613 did not have a tank integrity assessment report but had the professional engineer’s certification for installation.

Pursuant to Tenn. Comp. R. & Regs. 0400-12-01-.03(1)(h)1.(ii) [40 C.F.R. § 262.17(a)(2)], which incorporates Tenn. Comp. R. & Regs. 0400-12-01-.05(10)(c)1. [40 C.F.R. § 265.192(a)], and is a condition of the LQG Permit Exemption, a generator accumulating hazardous waste in tanks must obtain a written tank assessment reviewed and certified by a qualified Professional Engineer, attesting that the system has sufficient structural integrity and is acceptable for the storing and treating of hazardous waste.

m. Failure to maintain spill prevention controls for a hazardous waste tank:

- Tanks T-61 and T-62 did not have level indicators or high-level alarms to alert when there are releases to the secondary containment. The control room does not have an electronic notification when the valve is open and releasing.

Pursuant to Tenn. Comp. R. & Regs. 0400-12-01-.03(1)(h)1.(ii) [40 C.F.R. § 262.17(a)(2)], which incorporates Tenn. Comp. R. & Regs. 0400-12-01-.05(10)(f) [40 C.F.R. § 265.194], and is a condition of the LQG Permit Exemption, a generator accumulating hazardous waste in tanks must have adequate spill prevention controls and overfill prevention controls for its hazardous waste tank system.

n. Failure to conduct daily tank inspections:

- The forms documented T-75 as a hazardous waste tank, but the inspector was told that the tank was no longer used as a hazardous waste tank. In addition, the inspectors observed that no notes were documented on the tank inspection forms and the facility did not have the means to track the hazardous waste tank levels. Instead, the facility was removing 3,000 gallons per tank during the disposal pick-ups.

Pursuant to Tenn. Comp. R. & Regs. 0400-12-01-.03(1)(h)1.(ii) [40 C.F.R. § 262.17(a)(2)], which incorporates Tenn. Comp. R. & Regs. 0400-12-01-.05(10)(f) [40 C.F.R. § 265.195(e)], and is a condition of the LQG Permit Exemption, a generator accumulating hazardous waste in tanks must conduct daily inspections of tank ancillary equipment that is not provided with secondary containment.

o. Failure to ensure the operating records for the distillation tank was complete:

The operating record was incomplete. Missing or incomplete information included but was not limited to the following:

- Documentation of compliance with the process vent standards;
- Documentation and certification of compliance with the closed-vent systems and control devices standards and reduction of total organics;
- Design documentation and monitoring, operating, and inspection information for each closed-vent system and control device; and
- Up-to-date information and data used to determine process vent applicability;

Pursuant to Tenn. Comp. R. & Regs. 0400-12-01-.03(1)(h)1.(ii) [40 C.F.R. § 262.17(a)(2)], which incorporates Tenn. Comp. R. & Regs. 0400-12-01-.05(27) [40 C.F.R. Part 265, Subpart AA], and is a condition of the LQG Permit Exemption, a generator accumulating hazardous waste in tanks must comply with the RCRA Subpart AA air emission standards for process vents, including, but not limited to, recordkeeping requirements in Tenn. Comp. R. & Regs. 0400-12-01-.05(27)(f) [40 C.F.R. § 265.1035].

p. Failure to maintain leak detection and repair records:

- The 2021-2023 leak detection and repair records for the hazardous waste tank ancillary piping were incomplete and incorrectly filled out.

Pursuant to Tenn. Comp. R. & Regs. 0400-12-01-.03(1)(h)1.(ii) [40 C.F.R. § 262.17(a)(2)], which incorporates Tenn. Comp. R. & Regs. 0400-12-01-.05(28) [40 C.F.R. Part 265, Subpart BB], and is a condition of the LQG Permit Exemption, a generator accumulating hazardous waste in tanks must comply with the RCRA Subpart BB organic air emission standards for equipment leaks, including, but not limited to, the recordkeeping requirements in Tenn. Comp. R. & Regs. 0400-12-01-.05(28)(o)40 C.F.R. § 265.1064].

q. Failure to mark or label the hazardous waste containers:

- Outside the CAA was a staging area with three 55-gallon containers on a wooden pallet did not have accumulation start dates;
- Inside the CAA, two of the containers did not have start accumulation dates. These containers were marked with the waste profile number 68692, Waste Solid Containing Flammable Liquids, and Waste Flammable Solid, D001, F003, F005;
- Seven black plastic 55-gallon containers of hazardous waste contained acid chloride fiberglass insulation; the labels were taped on fading;
- Eight 275-gallon IBC totes stored in the Building 6 Loading Dock contained material from hazardous waste tank T-60 that needed to be distilled; and
- In the Tanker Lot, Tanker 6119 was being used as a less than 90-day storage for 4,800-gallons of hazardous waste process water that was pumped off from the distillation process (Pictures 97-99). The tanker was not labeled, not dated, and the Tanker Lot did not have 'No Smoking' signs posted.

Pursuant to Tenn. Comp. R. & Regs. 0400-12-01-.03(1)(h)1.(v)(I) [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 words "Hazardous Waste"; an indication of the hazards of the contents; and the date upon which each period of accumulation begins clearly visible for inspection on each container.

r. Failure to prevent releases to the environment:

- The floor drain in the Main Warehouse which extended outside the door and contained liquid and floor sweepings and was not kept clean of liquids and debris to capture any potential releases from the stored containers.

- The secondary containment surrounding the CAA had a sump area that extended beyond the CAA, past the fatty acid totes and into a small wetland. Inside the CAA, the sump area contained vegetative debris that was approximately one-inch thick. The sump area was not clean or clear to receive a release of the largest container.
- The inspectors observed that the concrete surface of the CAA had several cracks and had not been maintained or repaired. The facility did not maintain by repairing and/or resealing the secondary containment from gaps and cracks.
- The Line 1 laboratory has an outside CAA in an attached shed. The shed was not secured from unauthorized access and did not have 'No Smoking' signs posted. The inspectors observed releases inside the secondary containment.
- The concrete surface was black and slippery, and the sump was full of oily liquid. The material was not used oil, but a polymer resin used at the facility. However, the material was released to the ground and the sump was full and not cleaned out.
- In the Tanker Lot was an active and visible leak from one of the 275-gallon IBC totes of Cleanout Solvent Requiring Distillation.
- In the Tanker Lot, Tanker 6119 and the 275-gallon IBC totes were stored on a concrete surface that was not sealed, to prevent gaps and cracks.

Pursuant to Tenn. Comp. R. & Regs. 0400-12-01-.03(1)(h)1.(vi) [40 C.F.R. § 262.17(a)(6)], which incorporates Tenn. Comp. R. & Regs. 0400-12-01-.03(12). [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.

- s. Failure to make arrangement with the local emergency response agencies:
- The Contingency Plan dated April 2024 did not have documentation (i.e., green return receipt cards, emails) that copies of the current contingency plan were provided to the local emergency response agencies (i.e., fire, police, hospital).

Pursuant to Tenn. Comp. R. & Regs. 0400-12-01-.03(1)(h)1.(vi) [40 C.F.R. § 262.17(a)(6)], which incorporates Tenn. Comp. R. & Regs. 0400-12-01-.03(12)(i) [40 C.F.R. § 262.261(c)], 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.

- t. Failure to submit a complete quick reference guide:
- The Quick Reference Guide was missing the location of water supplies and onsite notification.

Pursuant to Tenn. Comp. R. & Regs. 0400-12-01-.03(1)(h)1.(vi) [40 C.F.R. § 262.17(a)(6)], which incorporates Tenn. Comp. R. & Regs. 0400-12-01-.03(12)(j)2.(vi)-(vii) [40 C.F.R. §

262.262(b)] and is a condition of the LQG Permit Exemption, 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. The quick reference guide must include the following elements:

- (6) The locations of water supply (e.g., fire hydrant and its flow rate); and**
- (7) The identification of on-site notification systems (e.g., a fire alarm that rings off site, smoke alarms).**

- u. Failure to provide training records for 2021-2022 and job titles and descriptions at the time of the inspection.

Pursuant to Tenn. Comp. R. & Regs. 0400-12-01-.03(1)(h)1.(vii) [40 C.F.R. § 262.17(a)(7)(iv)], which is a condition of the LQG Permit Exemption, the generator must maintain training records that include, among others: the job title for each position at the facility related to hazardous waste management, and the name of the employee filling each job; a written job description for each position; a written description of the type and amount of both introductory and continuing training that will be given to each person filling a position; and records documenting that the training required has been given to and completed by Facility personnel.

- v. Failure to obtain a signed copies of the designated facility to the generator forms for seventeen 2021-2023 manifests.

Pursuant to Tenn. Comp. R. & Regs. 0400-12-01-.03(5)(a)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.

- w. Failure to submit exception reports to the EPA or TDEC for 17 manifests missing the designated facility to generator forms.

Pursuant to Tenn. Comp. R. & Regs. 0400-12-01-.03(5)(a)2. [40 C.F.R. § 262.42(a)(2)], a large quantity generator must submit an Exception Report to the EPA Regional Administrator for the Region in which the generator is located if he has not received a copy of the manifest with the handwritten signature of the owner or operator of the designated facility within 45 days of the date the waste was accepted by the initial transporter. The Exception Report must include: (i) A legible copy of the manifest for which the generator does not have confirmation of delivery; (ii) A cover letter signed by the generator or his authorized representative explaining the efforts taken to locate the hazardous waste and the results of those efforts.

- x. Failure to close universal waste lamp containers:
 - A 4-foot box of universal waste lamps
 - A 3-foot fiberboard box of spent high intensity discharge lamps.

Pursuant Tenn. Comp. R. & Regs. 0400-12-01-.12(2)(d)3. [40 C.F.R. § 273.13(d)], a SQHUW must manage universal waste lamps in a way that prevents releases of any universal waste or component of a universal waste to the environment.

- y. Failure to demonstrate the length of time that a universal waste was stored:
 - A 55-gallon container of spent aerosol cans that was dated October 24, 2024.

Pursuant to Tenn. Comp. R. & Regs. 0400-12-01-.12(2)(f)1 [40 C.F.R. § 273.15(a) and (c)], a SQHUW may accumulate universal waste no longer than one year and must to be able to demonstrate the length of time that the universal waste has accumulated from the date that it became a waste or was received.

- z. Failure to correctly mark the Form HN-EA (Hazardous Waste Environmental Activity Notification):
 - Page 1, Generator Wastewater and Generator Episodic, and page 2, Destination Facility, Lamp Crusher.
 - Box 1f and box 1h were inconsistent on WSR forms: WS#1226, WS#1236, WS#1242, WS#1245, WS#1246, WS#1247, WS#1248, WS#1243.
 - Form OSR and WSR for WS#1252 were inconsistent.

Pursuant to Tenn. Comp. R. & Regs. 0400-12-01-.03(2)(d)1.(ii), Small and large quantity generators shall be responsible for maintaining an up-to-date notification file by reviewing the most current notification information on file with the Commissioner, as made available by the Commissioner with the annual report, correcting inaccurate data or supplying all the information needed to ensure the Commissioner is maintaining an accurate notification file. The updated or corrected information shall be returned to the Commissioner by March 1st following the receipt of the notification information on file or as instructed otherwise by the Commissioner.

15) List of Attachments

Attachment A – Photo Log: Cymer-Dayton LLC

16) Signed

**PAULA
WHITING**

Digitally signed by
PAULA WHITING
Date: 2024.08.07
07:28:20 -04'00'

Paula A. Whiting
Environmental Engineer

17) Concurrence

**ALAN
NEWMAN**

Digitally signed by ALAN
NEWMAN
Date: 2024.08.08
16:50:25 -04'00'

Alan R. Newman
Acting Chief
RCRA Enforcement Section

ATTACHMENT A

CYMER-DAYTON LLC

DAYTON, TENNESSEE

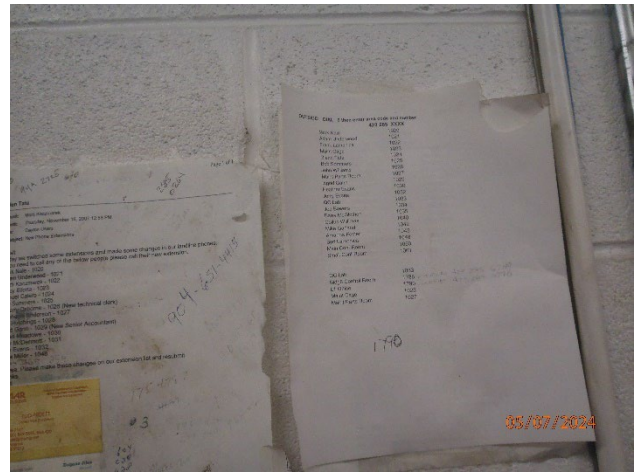
COMPLIANCE EVALUATION INSPECTION PHOTOGRAPHS

MAY 7, 2024

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



Picture 1 – Main Warehouse floor drain sump need pump out



Picture 4 – Maintenance out of date emergency contact list



Picture 2 – Main Warehouse floor drain sump need pump out



Picture 5 – Maintenance Universal Waste Storage



Picture 3 – Maintenance out of date emergency contact list



Picture 6 – Maintenance Universal Waste Storage



Picture 7 – Maintenance Universal Waste Storage open spent HID lamps



Picture 8 – Maintenance Universal Waste Storage open spent lamps



Picture 9 – Maintenance Universal Waste Storage



Picture 10 – HWCAA no signs



Picture 11 – HWCAA no signs



Picture 12 – HWCAA no signs



Picture 13 – HWCAA staging area w/3 containers



Picture 16 – HWCAA staging area HW container



Picture 14 – HWCAA staging area waste determination pending



Picture 17 – Fatty Acid Tote Storage



Picture 15 – HWCAA staging area HW container



Picture 18 – Fatty Acid Tote Storage label



Picture 19 – Fatty Acid Tote Storage release to ground



Picture 21 – Fatty Acid Tote contracting in



Picture 20 – Fatty Acid Tote Storage release to ground



Picture 22 – Fatty Acid Tote contracting in



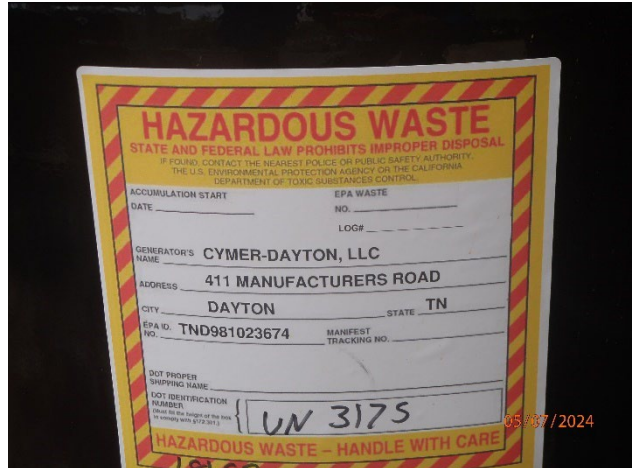
Picture 23 – Fatty Acid Tote bulging



Picture 26 – HWCAA



Picture 24 – Carbon Filter drum and spill kit



Picture 27 – HWCAA label missing date



Picture 25 – HWCAA signs



Picture 28 – HWCAA poison ivy



Picture 29 – HWCAA damage HW container



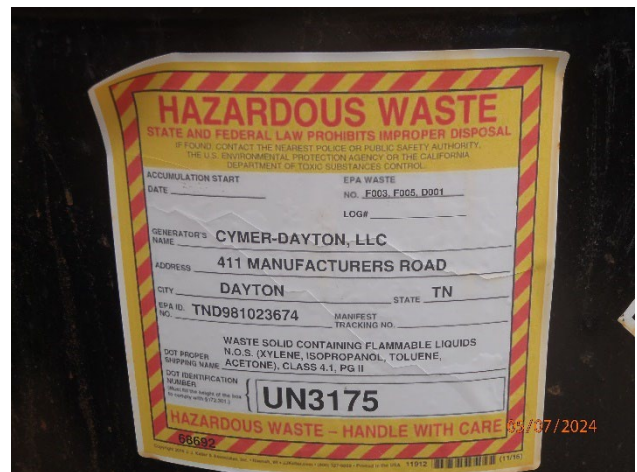
Picture 30 – HWCAA HW container missing date



Picture 31 – HWCAA damaged HW label



Picture 32 – HWCAA containers w/ damaged HW label



Picture 33 – HWCAA missing date



Picture 34 – HWCAA containers w/ damaged HW label



Picture 37 – HWCAA secondary containment sump



Picture 35 – HWCAA non-HW labels



Picture 38 – HWCAA secondary containment damaged



Picture 36 – HWCAA bulging tote



Picture 39 – HWCAA secondary containment cracks



Picture 40 – HWCAA secondary containment cracks



Picture 43 – HWCAA secondary containment cracks and damage



Picture 41 – HWCAA secondary containment cracks



Picture 44 – HWCAA



Picture 42 – HWCAA secondary containment cracks and damage



Picture 45 – HWCAA spill kit



Picture 46 – Flammable Storage totes to be distilled



Picture 49 – Flammable Storage black dye/toluene resin solution



Picture 47 – Flammable Storage totes to be distilled



Picture 50 – Flammable Storage totes to be distilled



Picture 48 – Flammable Storage black dye/toluene resin solution



Picture 51 – Flammable Storage



Picture 52 – Hazardous Waste T-61 missing BB tags



Picture 55 – Hazardous Waste T-61 missing BB tags



Picture 53 – Hazardous Waste T-61 missing BB tags



Picture 56 – Hazardous Waste T-61 missing BB tags



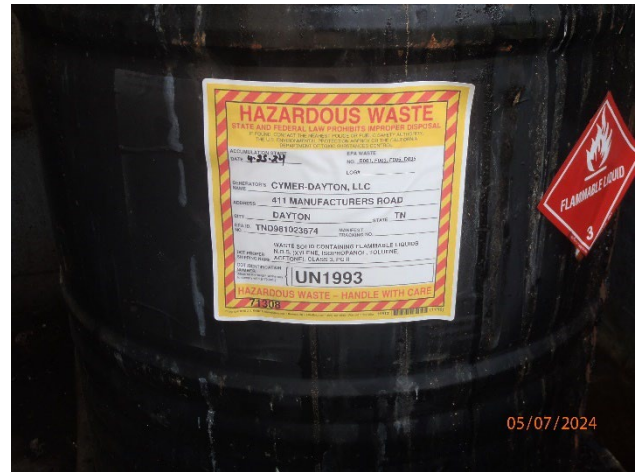
Picture 54 – Hazardous Waste T-61 missing BB tags



Picture 57 – Hazardous Waste T-61 missing BB tags



Picture 58 – Hazardous Waste T-61 missing BB tags



Picture 61 – Lab CAA label



Picture 59 – Lab CAA



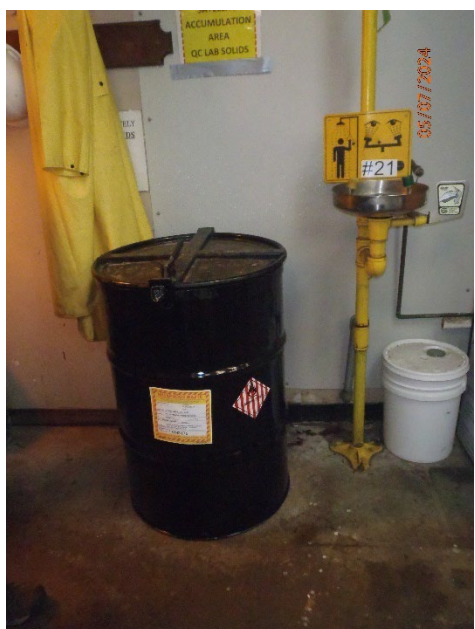
Picture 62 – Lab SAA not at or near generation point



Picture 60 – Lab CAA secondary containment needs clean out



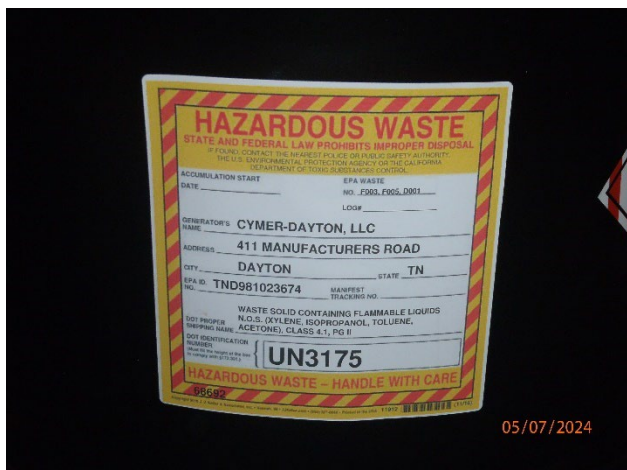
Picture 63 – Lab SAA not at or near generation point



Picture 64 – Lab SAA for PPE/debris/rags



Picture 66 – Lab SAA for PPE/debris/rags



Picture 65 – Lab SAA label



Picture 67 – Lab SAA container w/funnel



Picture 68 – Lab HPLC SAA



Picture 71 – Lab SAA containers



Picture 69 – Lab HPLC SAA



Picture 72 – Building 1 SAA



Picture 70 – Lab SAA containers



Picture 73 – Building 6 SAA open containers



Picture 74 – Building 6 SAA open container



Picture 75 – Building 6 SAA open container



Picture 76 – Building 6 HW Tank 613 missing BB tags



Picture 77 – Building 6 HW Tank 613 missing BB tags



Picture 78 – Building 6 HW Tank 613 roof missing BB tags



Picture 79 – Building 6 HW Tank 613 roof missing BB tags



Picture 80 – Building 6 Tank Farm missing BB tags



Picture 81 – Building 6 Tank Farm missing BB tags



Picture 82 – Building 6 Tank Farm missing BB tags



Picture 83 – Building 6 Tank Farm roof corrosion



Picture 84 – Building 6 sump drain of resin and water



Picture 85 – Building 6 loading area with resin and water on ground



Picture 86 – Building 6 loading area with resin and water on ground



Picture 89 – Tanker Lot tote of cleanout solvent to be distilled



Picture 87 – Building 6 totes needing to be distilled



Picture 90 – Tanker Lot with clean out solvent release to ground



Picture 88 – Tanker Lot



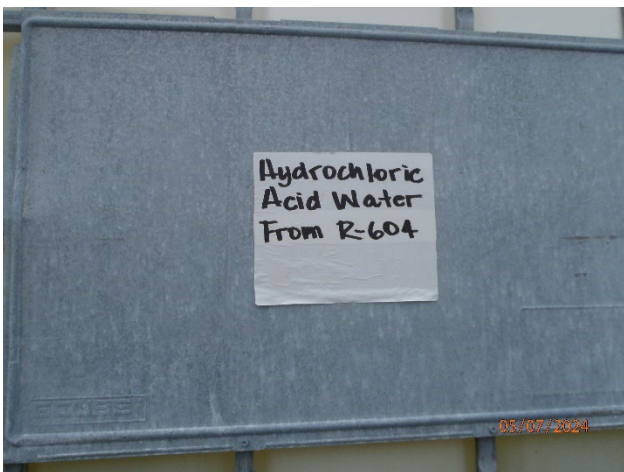
Picture 91 – Tanker Lot with clean out solvent release to ground



Picture 92 – Tanker Lot with clean out solvent release to ground



Picture 95 – Tanker Lot with clean out solvent tote leaking



Picture 93 – Tanker Lot Hydrochloric Acid Water totes



Picture 96 – Tanker Lot with clean out solvent tote leaking



Picture 94 – Tanker Lot tote of cleanout solvent to be distilled



Picture 97 – HW Tanker 6119 not labeled or dated



Picture 98 – HW Tanker 6119 not labeled or dated



Picture 99 – HW Tanker 6119 not labeled or dated