

RCRA Inspection Report

1) Inspector and Author of Report

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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

The Sherwin-Williams Co.
404 East Mallory
Memphis, Tennessee 38109

EPA ID#: TND007017304
NAICS #: 32551 – Paint and Coating
Manufacturing

3) Responsible Officials

Douglas Garland
Plant Manager
doug.garland@sherwin.com

4) Inspection Participants

Adrian Williams, EH&S Manager, The
Sherwin-Williams Co.
Stanley Harvey, Lab Technician, The
Sherwin-Williams Co.

Donya Sharafoddinzadeh, Tennessee
Department of Environment and Conservation
(TDEC)
Jason Simpson, TDEC
Cliff Caudle, TDEC
Kayla Acosta, USEPA

5) Date of Inspection

April 10, 2024 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; 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.)

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

Pursuant to Tenn. Comp. R. & Regs. 0400-12-01-.01(2)(a) [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 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 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 Tenn. Comp. R. & Regs. 0400-12-01-.03(1)(f)1. [Section 3005 of RCRA, 42 U.S.C. § 6925], and without complying with Tenn. Comp. R. & Regs. 0400-12-01-.03(1)(g)2. or 0400-12-01-.03(1)(h)1. [40 C.F.R. § 262.16(b) or § 262.17(a)], except as required in Tenn. Comp. R. & Regs. 0400-12-01-.03(1)(f)1.(vii and viii) [40 C.F.R. § 262.15(a)(7) and (8)], provided that the generator complies with the satellite accumulation area conditions listed in Ten 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) [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 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) [40 C.F.R. § 262.17] (hereinafter referred to as the “LQG Permit Exemption”).

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, fluorescent lamps, or aerosol cans, calculated collectively) at any time.

7) Purpose of Inspection

The purpose of this inspection was to conduct an unannounced compliance evaluation inspection to determine The Sherwin-Williams Co.’s compliance with the applicable requirements of RCRA and the corresponding Tennessee regulations. This was an EPA lead inspection.

8) Facility Description

The Sherwin-Williams Co. (known hereinafter as “Sherwin-Williams” or “the facility”) was founded in 1866 and is a manufacturer of paint and coating products. Sherwin-Williams operates over 5,000 stores and facilities which are located throughout the United States, Canada, the Caribbean, and Latin America. According to the company’s website Sherwin-Williams also supplies a broad range of highly engineered solutions for construction, industrial, packaging, and transportation markets in more than 120 countries.

The Sherwin-Williams facility in Memphis, Tennessee was previously owned by Pratt & Lambert (another paint manufacturing company) from 1968-1996. Sherwin-Williams began operations in 1996 and specializes in the manufacturing of road traffic paint and highway paint, which can

consist of latex or alkyd paints. Raw materials are received in designated bulk offloading areas from tanker trucks and stored in above-ground storage tanks. Customer orders are received as batch tickets. Once a customer batch is created, it goes through a quality check in the QC laboratory. If the batch passes customer specifications, it is sent for filling into one of three fill lines for 5-gallon pales, 55-gallon drums, or 250-gallon totes. After filling, the products are transported to staging lanes and prepared for delivery.

The facility occupies approximately 7.36 acres, operates Monday through Friday with two shifts (6:00 A.M. to 2:30 P.M. and 2:00 P.M. to 10:30 P.M.), and employs 30 workers.

Sherwin-William's first notified of its regulated waste activities on March 01, 1997, as an LQG of hazardous waste. The facility most recently notified as an LQG on October 13, 2023. Hazardous waste generated at the facility is mainly paint-related waste and waste generated from the QC laboratory. Hazardous waste is accumulated and stored in 55-gallon containers. The facility generates the following hazardous wastes with associated EPA waste codes: ignitable waste (D001), Methyl Ethyl Ketone waste (D035), and spent non-halogenated solvent waste (F003). The facility may also generate universal waste lamps and universal waste batteries.

9) Previous Inspection History

On December 11, 2019, TDEC conducted the most recent RCRA CEI at the subject facility and found four apparent violations of RCRA's requirements for universal waste and pre-transport requirements for LQGs. As a result, TDEC issued an informal enforcement action to Sherwin-Williams and later verified that the facility had returned to compliance during a follow-up inspection on January 17, 2020.

10) Opening Conference

On April 10, 2024, EPA inspector Kayla Acosta, accompanied by TDEC inspectors Donya Sharafoddinzadeh, Jason Simpson, and Cliff Caudle, arrived at Sherwin-Williams at approximately 9:00 A.M. Adrian Williams, EH&S Manager, immediately received the inspectors and participated in the opening conference. The inspectors introduced themselves, showed their credentials, 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. Mr. Williams indicated that photos can be taken but only with an intrinsically safe camera. Therefore, photos were taken by Adrian Williams with an intrinsically safe digital camera owned by Sherwin-Williams. The EPA inspector explained that the Small Business Regulatory Enforcement Fairness Act's classification of a "small business" is generally set by the Small Business Administration using the business' SIC/NAICS code and annual receipts or number of employees. A copy of the EPA's information sheet for small businesses can be found at <https://www.epa.gov/sites/production/files/2017-06/documents/smallbusinessinfo.pdf>. The EPA inspector also discussed the company's ability, pursuant to 40 C.F.R. § 2.203, to assert a business confidentiality claim for information submitted to EPA. The company did not assert a business confidentiality claim.

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

11) **Inspection Observations**

QC Laboratory:

The inspectors met with Stanley Harvey, Laboratory Technician, to discuss the quality control sampling process for paint products. Laboratory samples are kept for three years before being disposed of. The inspectors observed a 5-gallon red container used to store solvent-contaminated wipes. The container was closed and contained a flammables placard on it to indicate the hazard of the contents but did not have a hazardous waste label on it (Photo 1). Sherwin-Williams manages used solvent-contaminated wipes as hazardous waste.

Pursuant to Tenn. Comp. R. & Regs. 0400-12-01-.03(1)(f)1.(v) [40 C.F.R. § 262.15(a)(5)(i)], a generator must mark or label its container with the following: (i) The words "Hazardous Waste".

Facility personnel immediately placed a hazardous waste label on the container during the inspection (Photo 2).

QC Laboratory Central Accumulation Area (CAA):

Facility personnel was using this enclosed room as a satellite accumulation area (SAA) for different waste streams generated in the QC Laboratory. This enclosed room is connected by a hallway and two double doors to the QC Laboratory. The inspectors explained that the room is not at or near the point of generation for the hazardous waste generated in the laboratory and therefore cannot be used as an SAA. Therefore, these containers must be managed as less than 90-day CAA containers stored in a CAA for the laboratory waste. The container management for hazardous waste stored in a CAA would include adding an accumulation start date to the containers and conducting weekly CAA inspections in this area. A fire extinguisher is located at the entrance to the room. The inspectors observed the following hazardous waste:

- One 55-gallon closed container labeled "Hazardous Waste H Alkyd Liquid Cans" but was not marked with an indication of the hazard of the contents or labeled with an accumulation start date;
- One 55-gallon closed container labeled "Hazardous Waste H Alkyd Liquid". The container was marked with an indication of the hazard of the contents but was not labeled with an accumulation start date;
- One 55-gallon closed container labeled "Hazardous Waste H Rags". The container was marked with an indication of the hazard of the contents but not labeled with an accumulation start date; and
- One 55-gallon closed container labeled "Hazardous Waste H Coal Tar Cans" but was not marked with an indication of the hazard of the contents or labeled with an accumulation start date.

Pursuant to Tenn. Comp. R. & Regs. 0400-12-01-.03(1)(h)1.(v)(I)II. [40 C.F.R. § 262.17(a)(5)(i)(B)], a large quantity generator must mark or label its containers with the following: (B) An indication of the hazards of the contents (examples include, but are not limited to, the applicable hazardous waste characteristic(s) (i.e., ignitable, corrosive, reactive, toxic); hazard communication consistent with the Department of Transportation requirements at 49 CFR part 172 subpart E (labeling) or subpart F (placarding); a hazard statement or pictogram consistent with the Occupational Safety and Health Administration Hazard Communication Standard at 29 CFR 1910.1200; or a chemical hazard label consistent with the National Fire Protection Association code 704).

Facility personnel immediately placed flammable placards on the hazardous waste containers missing indications of the hazards of the contents (Photos 3-6).

Pursuant to Tenn. Comp. R. & Regs. 0400-12-01-.03(1)(h)1.(v)(I)III. [40 C.F.R. § 262.17(a)(5)(i)(C)], a large quantity generator must mark or label its containers with the following: (C) The date upon which each period of accumulation begins clearly visible for inspection on each container.

Coal Tar Line SAA:

The inspectors observed the following hazardous waste in an SAA next to the Coal Tar Line (Photos 7-10):

- One 55-gallon container labeled “Flammable Liquid”. The container was closed, marked with an indication of the hazard of the contents, but did not have a hazardous waste label on it;
- One 55-gallon container labeled “Hazardous Waste Rags”. The container was closed and marked with an indication of the hazard of the contents;
- One 55-gallon container labeled “Hazardous Waste Aerosol Cans”. The container was closed and marked with an indication of the hazard of the contents;
- One 55-gallon container labeled “Hazardous Waste H Alkyd Liquids”. The container was closed and marked with an indication of the hazard of the contents; and
- One 55-gallon container labeled “Hazardous Waste H Coal Tar”. The container was closed and marked with an indication of the hazard of the contents.

Pursuant to Tenn. Comp. R. & Regs. 0400-12-01-.03(1)(f)1.(v) [40 C.F.R. § 262.15(a)(5)(i)], a generator must mark or label its container with the following: (i) The words “Hazardous Waste”.

Facility personnel immediately placed a hazardous waste label on the container (Photo 11).

Mixing Area:

The inspectors observed one 55-gallon SAA container of hazardous waste in the mixing area. The container was closed, labeled “Hazardous Waste Filters”, and marked with an indication of the hazard of the contents (Photo 12).

Bulk Offload:

This area is for the offloading of bulk raw material. The inspectors observed one 55-gallon SAA container in the bulk offloading area. The container was closed, labeled “Hazardous Waste H. Alkyd Liquids”, and marked with an indication of the hazard of the contents.

Main CAA:

The facility’s main CAA is located on a concrete pad outside of the main warehouse building on the northeast side of the property. The area was identified with a sign which read “Memphis Plant 90 Day Waste Accumulation Area Rules” (with a list of rules for the area). The facility manages ignitable waste in this CAA. The entire facility is smoke-free and there is signage posted at the front entrance of the facility.

The entire facility is equipped with an alarm system capable of providing immediate emergency instruction to facility personnel; facility personnel also carry two-way radios, the facility is equipped with devices capable of summoning emergency assistance from local police departments, fire departments, or state or local emergency response teams; the CAA is equipped with portable fire extinguishers and is equipped with water to supply water hose streams. The inspectors did not observe spill control equipment close by.

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)(c)3 [40 C.F.R. § 262.252(c)], and is a condition of the LQG Permit Exemption, all areas deemed applicable by § 262.250 must be equipped with the items in paragraphs (a) through (d) of this section (unless none of the hazards posed by waste handled at the facility could require a particular kind of equipment specified below or the actual hazardous waste generation or accumulation area does not lend itself for safety reasons to have a particular kind of equipment specified below). A large quantity generator may determine the most appropriate locations within its facility to locate equipment necessary to prepare for and respond to emergencies: Portable fire extinguishers, fire control equipment (including special extinguishing equipment, such as that using foam, inert gas, or dry chemicals), spill control equipment, and decontamination equipment.

The inspectors observed 41 55-gallon containers of hazardous waste (Photo 13-14) in this CAA. Adequate aisle space was observed for the containers which were all closed, labeled “Hazardous Waste”, and dated (the oldest date observed was 02/22/2024). All but four of the containers were marked with an indication of the hazard of the contents.

Pursuant to Tenn. Comp. R. & Regs. 0400-12-01-.03(1)(h)1.(v)(I)II. [40 C.F.R. § 262.17(a)(5)(i)(B)], a large quantity generator must mark or label its containers with the following: (B) An indication of the hazards of the contents (examples include, but are not limited to, the applicable hazardous waste characteristic(s) (i.e., ignitable, corrosive, reactive, toxic); hazard communication consistent with the Department of Transportation requirements at 49 CFR part 172 subpart E (labeling) or subpart F (placarding); a hazard statement or pictogram consistent with the Occupational Safety and Health Administration

Hazard Communication Standard at 29 CFR 1910.1200; or a chemical hazard label consistent with the National Fire Protection Association code 704).

Facility representatives immediately placed flammable placards on the four-container missing an indication of the hazard of the contents.

Filling Area:

In the paint filling area, the inspectors observed the following hazardous wastes in SAAs:

- One 55-gallon container labeled “Hazardous Waste H Alkyd Liquids” (Photo 15). The container was closed and marked with an indication of the hazard of the contents; and
- One 10-gallon container labeled “Hazardous Waste Rags” (Photo 16). The container was closed and marked with an indication of the hazard of the contents.

As shown in photos 15 and 16, there was paint-related material splattered on the floor and walls which did not appear to be cleaned up often. Footsteps with yellow paint appeared to be tracking from the Filling Area to other areas in the building.

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)(b) [40 C.F.R. § 262.251], a large quantity generator must 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.

Maintenance Room:

This room is used for universal wastes storage. The inspectors observed the following universal waste:

- Three 4-foot cardboard boxes of used lamps labeled “Universal Waste”, closed, and dated with the oldest date being 12/01/2023;
- One 8-foot cardboard box of used lamps labeled “Universal Waste”, closed, and dated 01/01/2024;
- One 5-gallon closed container of used light bulbs, labeled “Universal Waste”, and dated 06/12/2023; and
- One 5-gallon closed container of used batteries. Labeled “Universal Waste”, and dated 09/05/2023.

12) Records Review

Contingency Plan and Quick Reference Guide (QRG):

The actions that facility personnel should take in response to an emergency are described in the facility’s contingency plan, which was last updated in February 2023.

The plan describes actions facility personnel must take in response to fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water at the facility. The plan describes arrangements agreed to with the

local police department, fire department, other emergency response teams, emergency response contractors, equipment suppliers, local hospitals, or the Local Emergency Planning Committee.

The plan lists the names and emergency telephone numbers for persons identified as emergency coordinators; however, the list is outdated and includes employees who no longer work at the facility as emergency coordinators.

Tenn. Comp. R. & Regs. 0400-12-01-.03(12)(k) [40 C.F.R. § 262.263(d)], the contingency plan must be reviewed, and immediately amended, if necessary, whenever: (d) The list of emergency coordinators changes.

The plan includes a list of all emergency equipment at the facility. The list includes fire extinguishing systems, spill control equipment, communications and alarm systems, and decontamination equipment. The list appears to be up to date. The plan includes the location and a physical description of each item on the list, and a brief outline of its capabilities.

The plan includes an evacuation plan for personnel. This plan describes signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes.

Records of the facility submitting a copy of the contingency plan (and its quick reference guide) to the local emergency responders were not available for review.

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)(g)2. [40 C.F.R. § 262.256(b)], the large quantity generator shall maintain records documenting the arrangements with the local fire department as well as any other organization necessary to respond to an emergency. This documentation must include documentation in the operating record that either confirms such arrangements actively exist or, in cases where no arrangements exist, confirms that attempts to make such arrangements were made.

The quick reference guide includes the types/names of hazardous waste in layman's terms and the associated hazard associated with each hazardous waste present at any one time; the estimated maximum amount of each hazardous waste that may be present at any one time; the identification of any hazardous wastes where exposure would require unique or special treatment by medical or hospital staff; a map of the facility showing where hazardous wastes are generated, accumulated and treated and routes for accessing these wastes; a street map of the facility in relation to surrounding businesses, schools and residential areas; the locations of water supply; the identification of on-site notification systems; and the name of the emergency coordinator(s) and emergency telephone number(s).

Training Records:

The inspectors reviewed facility job descriptions and training records for Adrian Williams, Stanley Harvey, and Corey Palms. Each job description included the requisite skill, education, or other qualifications, and duties of facility personnel assigned to that position. The inspectors reviewed records of employee hazardous waste training completed from 2022-2024.

Waste Manifest and Land Disposal Restriction (LDR) Records:

The inspectors reviewed available hazardous waste manifest records and land disposal restriction forms for shipments of hazardous waste sent since 2021. Hazardous waste manifest records show that hazardous wastes are routinely shipped to Tradebe Treatment & Recycling of TN (EPA ID TND000772186), and the most recent shipment was made on 02/22/2024.

TDEC provided a printout of manifests that were available for review on the e-manifest database to compare what the facility had onsite. Manifest 022451279JJK was not available for review at the facility and facility personnel did not have access to the e-manifest database to retrieve an electronic copy of the manifest.

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.

Weekly Inspection Records:

The inspectors reviewed the facility's available records of inspections of the main CAA since 2021. The inspection log includes a checklist to record observations about leaking containers and for deterioration of containers caused by corrosion or other factors. The inspection log includes a checklist to record observations for the condition of containers, type of containers, and number of containers. The records include the date and time of the inspection and the name, signature and initials of the employee conducting the inspection.

Since the QC Laboratory CAA was being managed as a SAA, there were no records of weekly inspections.

Pursuant to Tenn. Comp. R. & Regs. 0400-12-01-.03(1)(h)1.(i)(V)I. [40 C.F.R. § 262.17(a)(1)(v)], at least weekly, the large quantity generator must inspect central accumulation areas. The large quantity generator must look for leaking containers and for deterioration of containers caused by corrosion or other factors. See paragraph (a)(1)(ii) of this section for remedial action required if deterioration or leaks are detected.

Annual Reports:

Annual reports were available for review for 2021-2023. The inspectors observed some errors in the annual reports which included the following: In the 2023 annual report, Waste Stream Report (WSR) form for waste stream # 41, section 1f, the toxicity criteria associated with D035 waste code has not been checked. In the 2023 annual report, WSR form for waste stream # 43, section 1f, the listed criteria associated with F003 waste code has not been checked.

Pursuant to Tenn. Comp. R. & Regs. 0400-12-01-.03(5)(b)1.(iii)(I), a generator who is a large or small quantity generator for at least one month of the calendar year who ships any hazardous waste off-site to a treatment, storage, or disposal facility within the United States must complete and submit an annual report to the Commissioner by March 1 for the preceding

calendar year. Such report must be submitted on forms provided by the Commissioner, and the form must be completed according to the instructions accompanying it. The report must include, but shall not necessarily be limited to, the following information: (iii) For each hazardous waste stream (i.e., each separate waste but not necessarily each batch or shipment of such waste) generated by the generator during the reporting year, except for those wastes identified in part 4 of this subparagraph, the following information: (I) A descriptive name of the waste and the appropriate waste code(s) from Rule 0400-12-01-.02.

Hazardous Waste Reduction Plan:

The facility's hazardous waste reduction plan was available for review. The plan was not signed and dated by management. The facility had also not submitted their annual progress report to TDEC for their hazardous waste reduction plan since 2021.

Pursuant to Tenn. Comp. R. & Regs. Rule 0400-12-01-.03(6)(b)1.(i), a hazardous waste reduction plan shall include, at a minimum, the following: (i) a dated and signed written policy articulating management support for the generator's hazardous waste reduction plan.

Pursuant to Tenn. Comp. R. & Regs. Rule 0400-12-01-.03(6)(c)1., all generators shall annually review their waste reduction plan and complete a hazardous waste reduction progress report which shall: (i) analyze and quantify progress made, if any, in hazardous waste reduction, relative to each performance goal established under subparagraph (b) of this paragraph. (ii) set forth amendments, if needed, to the hazardous waste reduction plan and explain the need for the amendments.

13) Closing Conference

The inspectors conducted the exit meeting at with Adrian Williams. During this meeting, the inspectors stated their preliminary conclusions of the inspection and discussed follow-up items such as amending the facility's contingency plan and QRG and providing records of submitting copies of the documents to the local emergency responders, documenting weekly containers inspections for the QC Laboratory CAA, and revising the Annual Reports and Hazardous Waste Reduction Plan.

14) List of Attachments

Attachment 1 – Photo Log:

15) Signed

KAYLA
ACOSTA

Digitally signed by KAYLA
ACOSTA
Date: 2024.06.17 09:47:59
-04'00'

Kayla Acosta
Physical Scientist

16) Concurrence

LAURIE
DIGAETANO

Digitally signed by LAURIE
DIGAETANO
Date: 2024.06.17 09:58:33
-04'00'

For Alan Newman, Acting Chief
RCRA Enforcement Section

Attachment 1 – Photo Log

[16] Photos taken on: April 10, 2024

Photos taken by: Adrian Williams

Photos taken with: Intrinsically Safe Camera Owned by The Sherwin-Williams Co.

EPA Property Tag: N/A



Photo 1: 5-gallon red container used to store solvent-contaminated wipes missing a hazardous waste label on it in the QC Laboratory.



Photo 2: Hazardous waste label placed on 5-gallon container of solvent-contaminated wipes.



Photo 3: 55-gallon container of hazardous waste labeled H Coal Tar Can in the QC Laboratory CAA.



Photo 4: 55-gallon container of hazardous waste labeled H Rags in the QC Laboratory CAA.



Photo 5: 55-gallon container of hazardous waste labeled H Alkyd Liquid in the QC Laboratory CAA.



Photo 6: 55-gallon container of hazardous waste labeled H Alkyd Liquid Cans in the QC Laboratory CAA.



Photo 7: 55-gallon Hazardous waste SAA container near Coal Tar Line.



Photo 8: 55-gallon Hazardous waste SAA container near Coal Tar Line.



Photo 9: 55-gallon Hazardous waste SAA container near Coal Tar Line.



Photo 10: 55-gallon Hazardous waste SAA container near Coal Tar Line.



Photo 11: 55-gallon Hazardous waste SAA container near Coal Tar Line that was missing a hazardous waste label. Corrected onsite.



Photo 12: 55-gallon SAA container of hazardous waste in the mixing area.



Photo 13: Main CAA



Photo 14: Main CAA



Photo 15: 55-gallon container labeled "Hazardous Waste H Alkyd Liquids" in the Filling Area.



Photo 16: 10-gallon container labeled "Hazardous Waste Rags" in the Filling Area.