

RCRA Inspection Report

1) Inspector and Author of Report

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RCRA Enforcement Section
Chemical Safety and Land Enforcement Branch
Enforcement and Compliance Assurance Division
U.S. Environmental Protection Agency, Region 4
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2) Facility Information

Allworth, LLC
500 Medco Road
Birmingham, Alabama 35217
EPA ID No: ALD094476793
NAICS: 325998 – All Other Miscellaneous Chemical Product and Preparation Manufacturing
562112 – Hazardous Waste Collection
562211 – Hazardous Waste Treatment and Disposal

3) Responsible Officials

Sadiqua Williams-Davis, Manager Operational EHS
Office Phone: 1-205-841-1707
swilliams-davis@harsco.com

4) Inspection Participants

Kayla Acosta, U.S. EPA
Parvez Mallick, U.S. EPA
Jonah Harris, ADEM
Todd Williamson, Allworth LLC
Sadiqua Williams-Davis, Allworth LLC

5) Date of Inspection

June 17, 2021

6) Applicable Regulations

Resource Conservation and Recovery Act (RCRA) (42 U.S.C. §§ 6921 – 6939g), Alabama Hazardous Waste Management and Minimization Act of 1978 (AHWMMA), Ala. Code §§ 22-30-1 et seq. 40 Code of Federal Regulation (C.F.R.), Parts 260 - 270, 273 & 279, and Rules 335-14-1 to 335-14-17 of the ADEM Admin. Code.

(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.

ADEM Administrative Code 335 Division 14

Pursuant to ADEM Admin. Code r. 335-14-3-.03(5)(a) [40 C.F.R. § 262.34(a) (2016)], a generator of 1,000 kilograms or greater of hazardous waste in a calendar month is a Large Quantity Generator (LQG) and may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status, as required by Section 22-30-12(b) of the AHW MMA, Ala. Code § 22-30-12(b) [Section 3005 of RCRA, 42 U.S.C. § 6925], provided that the generator complies with the conditions listed in ADEM Admin. Code r. 335-14-3-.03(5)(a)1.-6. [40 C.F.R. § 262.34(a)(1)-(4) (2016)] (hereinafter referred to as the “LQG Permit Exemption”).

Pursuant to ADEM Admin. Code r. 335-14-3-.03(5)(c)1. [40 C.F.R. § 262.34(c)(1) (2016)], a generator may accumulate as much as 55 gallons of hazardous waste in containers at or near the point of generation where wastes initially accumulate, which is under the control of the operator of the process generating the waste, without a permit or without having interim status, as required by Section 22-30-12(b) of the AHW MMA, Ala. Code § 22-30-12(b) [Section 3005 of RCRA, 42 U.S.C. § 6925], and without complying with ADEM Admin. Code r. 335-14-3-.03(5)(a) [40 C.F.R. § 262.34(a) (2016)], provided that the generator complies with the satellite accumulation area (SAA) conditions listed in ADEM Admin. Code r. 335-14-3-.03(5)(c)1.(i)-(ii) [40 C.F.R. § 262.34(c)(1)(i)-(ii) (2016)] (hereinafter referred to as the “SAA Permit Exemption”).

Pursuant to ADEM Admin. Code r. 335-14-3-.03(5)(a)1. (ii) [40 C.F.R. § 262.34(a)(1)(ii) (2016)], which incorporates ADEM Admin. Code r. 335-14-6-.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 of ADEM Admin. Code r. 335-14-6-.28 [40 C.F.R. § 265.1064].

Alabama Hazardous Waste Facility Operating Permit EPA ID# ALD094476793

7) **Purpose of Inspection**

The purpose of this inspection was to conduct an unannounced compliance evaluation inspection to determine Allworth LLC’s (referred to as Allworth or the facility) compliance with the applicable requirements of RCRA and the corresponding ADEM regulations. This was an EPA lead inspection.

8) **Previous Inspection History**

ADEM has conducted three RCRA CEIs at Allworth between 2018 and 2020. ADEM cited seven violations during the 2018 inspection and one violation during the 2019 inspection.

On June 23, 2020, ADEM conducted the most recent RCRA CEI at Allworth, and found one apparent violation, which was corrected onsite.

9) Facility Description

Allworth occupies approximately 1.6 acres of land which includes the following areas: six permitted container storage areas (with a combined capacity of 88,520 gallons), two permitted loading/unloading areas (with a combined capacity of 12,000 gallons), two permitted tank storage systems (with a combined capacity of 94,100 gallons), a permit-exempt solvent recovery unit, a tank farm for storage of recovered solvents, an on-site maintenance shop, and an on-site laboratory. The facility has been in operation since 1978. It was acquired by Clean Earth Environmental Solutions, Inc. on 05/01/2020 and continues to operate under the name Allworth, LLC. Currently the facility operates two shifts: 6:30am-3:00pm and 4:30pm-1:00am, Monday through Friday. The facility has 50 employees. Allworth also has controlled access into the property and secured fencing surrounding the property.

Allworth most recently notified on June 8, 2021 as a permitted Treatment, Storage, and Disposal Facility (TSDF), a permit-exempt recycling facility, a Large Quantity Generator (LQG) of hazardous waste, a marketer of hazardous waste fuel, a used oil generator, and a Large Quantity Handler of Universal Waste. Allworth's current Hazardous Waste Facility Permit was issued on September 1, 2017 and expires on August 31, 2027.

Allworth's operations include managing and storing hazardous and non-hazardous waste, analyzing incoming wastes, solvent recycling, performing liquid fuel blending, and bulking and consolidating hazardous waste debris. Solvents are recovered using the Luwa® thin film solvent distillation unit (LTFSDU) with the column bottoms managed as hazardous waste liquid fuels. Recovered solvent is sold as a product, and unrecoverable material is used as fuel on a cement kiln. The solids bulking are mainly wastes originating from big box retailers that are physically solid, semi-solid, or sludges and are not capable of being dispersed into the solvent recovery process or the liquid fuel blending process. These wastes may be bulked into containers including roll-offs, cartons, and drums, and are stored until shipped off-site to a treatment, storage, and disposal facility.

10) Opening Conference

On June 17, 2021, the EPA inspectors Kayla Acosta and Parvez Mallick, accompanied by ADEM inspector Jonah Harris, arrived at Allworth at approximately 9:00 a.m. Inspectors completed a COVID-19 questionnaire and were screened for temperature. Mr. Todd Williamson, Facility Manager immediately received the inspectors. The inspectors introduced themselves, showed their credentials to Mr. Williamson and explained the purpose of the visit. The inspectors described the anticipated use of a digital camera during the inspection, and 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. Facility representatives provided an overview of the facility's history and current operations during the opening conference. The company does not appear to meet the Small Business Regulatory Enforcement Fairness Act's classification of a "small business," which is generally

set by the Small Business Administration using the business' SIC/NAICS code and annual receipts or number of employees. Therefore, the EPA inspectors did not provide a copy of the agency's information sheet for small businesses, which can be found at <https://www.epa.gov/sites/production/files/2017-06/documents/smallbusinessinfo.pdf>.

The inspection participants also discussed health and safety protocols and required personal protective equipment before Mr. Williamson led the inspectors on a tour of the Facility operations.

11) **Findings**

Laboratory: The onsite laboratory is located in an enclosed room next to the office and Container Storage Area A. Mr. Williamson and the inspectors met with Mr. Jim Shaner, Laboratory Manager. The laboratory is used to test samples of incoming waste. Samples are held for 30 days in a metal fireproof cabinet before being properly disposed of. The following hazardous wastes were observed in Satellite Accumulation Areas (SAA):

- One (1) 55-gallon drum labeled "Lab Waste", closed, with a hazard identification sticker marked for flammability (Photo #1). The drum was not marked "Hazardous Waste."
- One (1) pint-size glass jar of Sulfuric Acid under a fume hood labeled "Hazardous Waste," closed, and no indication of hazard (Photo #2)
- One (1) 5-gallon container of lab sample waste under a fume hood labeled "Hazardous Waste," closed, and with an indication of hazard for flammability (Photo #3)

Pursuant to ADEM Admin. Code r. 335-14-3-.01(5)(a)5. [40 C.F.R. § 262.15(a)(5)], which is a condition of the SAA Permit Exemption, a generator is required to mark or label its containers (i) with the words "Hazardous Waste" and (ii) with an indication of the hazards of the contents.

Container Storage Area-A: Located inside the main warehouse next to Container Storage Area B and has a permitted storage capacity of 18,920 gallons. According to the facility's permit the secondary containment in this area has a total capacity of 3,637 gallons. It primarily stores inbound waste and waste from the laboratory. Secondary containment consists of coated concrete berms on top of concrete flooring which was also coated and appeared to be in good condition. Adequate aisle was observed while inspecting hazardous waste containers. The following hazardous wastes were observed in this area:

- Two (2) 55-gallon drums of laboratory waste on spill containment pallets labeled "Hazardous Waste", closed, dated, and with DOT placards to indicate the hazardous contents. (Photos #4 and #5)
- Approximately 71 additional pallets of hazardous waste containers were observed varying in size from 5-55 gallons and one (1) cubic yard box. All hazardous waste containers were properly labeled, placarded, dated, and closed.

Container Storage Area-B: Located inside the main warehouse next to Container Storage Area A and has a permitted storage capacity of 19,800 gallons. According to the facility's permit the

secondary containment in this area has a total capacity of 2,019 gallons. Secondary containment appeared to be in good condition. This area primarily stores outbound waste. Adequate aisle was observed while inspecting hazardous waste containers (Photo #6). The following hazardous wastes were observed, all containers were properly labeled, placarded, dated, and closed.

- Four (4) pallets with containers/ drums ranging from 5-gallons to 55-gallons
- 15 pallets with 55-gallon drums
- (53) 5-gallon containers
- (26) 55-gallon drums
- Two (2) 10-gallon containers
- Five (5) 25-gallon drums
- Three (3) cubic yard boxes
- Two (2) 250-gallon totes

Solvent Recycling Area:

The Luwa® thin film solvent distillation unit (LTFSDU) is located in Allworth's main warehouse. It is used to reclaim spent solvent from acetone, MEK, and paint thinners. The LTFSDU can process 6,000 gallons of spent solvent which takes 6-7 hours to produce approximately 3,100 gallons of solvent product. At the time of the inspection, the inspection team observed the piping associated with the solvent recovery unit (valves, flanges, and pumps) were tagged; however, some of the tags were not legible (Photos #7 and #8). On some parts of the piping, it appeared that some valves, flanges, and pumps were not tagged (Photo #9).

Pursuant to ADEM Admin. Code r. 335-14-6-.28 [40 C.F.R. § 264.1050(d)], Each piece of equipment to which this subpart applies shall be marked in such a manner that it can be distinguished readily from other pieces of equipment.

On the second floor just above the Solvent Recycling Area, one (1) 55-gallon drum labeled "Hazardous Waste – Empty Paint Cans" was observed open, containing spent air filters only. Mr. Williamson explained that the filters are not hazardous waste and do not come into contact with any hazardous waste or hazardous waste constituents. Mr. Williams further explained that the filters were placed inside the pre-labeled drum in error which would be relabeled (Photo #10).

Pursuant to ADEM Admin. Code r. 335-14-3-.01(2) [40 C.F.R. § 262.11], A person who generates a solid waste, as defined in 335-14-2-.01(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 AHWMA regulations.

An accurate waste determination should be performed on the spent air filters or the facility should provide a written response determining whether the waste is hazardous or non-hazardous based on generator knowledge. Acceptable knowledge that may be used in making an accurate determination as to whether the waste is listed may include waste origin, composition, the process producing the waste, feedstock, and other reliable and relevant information.

Container Storage Area-F: Located inside the main warehouse and has a permitted storage

capacity of 1,320 gallons. According to the facility's permit the secondary containment in this area has a total capacity of 254 gallons and appeared to be in good condition with adequate aisle space. This area primarily stores lab pack waste stored on top of spill containment pallets. Approximately 84 containers of hazardous waste were observed on top of spill containment pallets, varying in size between 5-55 gallons. All containers were properly labeled, placarded, dated, and closed.

Maintenance Area: The maintenance area is located in a small building on the east side of the main warehouse. Facility employees store equipment and materials to provide regular or scheduled maintenance around the facility. No hazardous waste was observed inside the maintenance area.

Tank System 2: Located outside of the warehouse next to the Maintenance Storage Area and near the Solvent Recycling Area. This area consists of six (6) fixed-roof above ground storage tanks (F-1, F-2, F-3, F-4, F-5, and F-6). Each tank has a permitted storage capacity of 6,000 gallons or 36,000 gallons in total. The tank farm is situated within a coated concrete secondary containment structure with a total containment capacity of 8,387 gallons. The tanks store spent solvent wastes prior to being introduced into the facility's solvent recovery unit. All tanks were labeled with the words "Hazardous Waste". Tanks lines and associated equipment (flanges/pumps/end caps) used when transferring the hazardous waste to the tank were tagged as required by Subpart BB (Photo #11). As required by Subpart CC, no visible cracks, holes, or gaps between each fixed roof's edge and tank walls were observed. All openings in the roof were secured in their closed positions. Tags were observed in place on latched manway hatch (Photo #12).

Loading/ Unloading Area-2 (LUA-2): Located next to permitted Container Storage Areas D and E and Loading/ Unloading Area-1 (LUA-1), each permitted area is separated by concrete berms. LUA-2 has a permitted storage capacity of 6,000 gallons. According to the facility's permit the secondary containment in this area has a total capacity of 8,012 gallons and appeared to be in good condition with adequate aisle space. LUA-2 primarily stores retail waste that are sorted and repackaged in bulk. The following was observed:

- One (1) cubic yard box of hazardous waste was not labeled (Photo #13). This was corrected onsite by facility personnel before the end of the inspection.
- Four (4) 250-gallon totes labeled Hazardous Waste, placarded, dated, not properly closed (Photos #14 and #15)
- Eight (8) 55-gallon containers labeled Hazardous Waste, placarded, dated, not properly closed (Photo #16).

Pursuant to ADEM Admin. Code r. 335-14-3-.01 (5)(i) [40 CFR 262.17(a)(5)(i)], A generator must mark or label its container with the following: (i) The words "Hazardous Waste" and (ii) An indication of the hazards of the contents.

Pursuant to Permit Condition III.G.2., Management of Containers, A container holding hazardous waste must always be closed during storage. Except when it is necessary to add, remove, sample, or inspect the waste.

Facility personnel properly closed all containers prior to the end of the inspection.

Container Storage Area E: Container Storage Area E has a permitted storage capacity of 30,000 gallons. According to the facility's permit the concrete secondary containment in this area has a total capacity of 8,182 gallons and appeared to be in good condition with adequate aisle space. The following was observed:

- Six (6) 55-gallon containers of Hazardous Waste with dates greater than one year (Photo #17).

Pursuant to Permit Condition II. L.2.b., Land Disposal Prohibitions and Treatment Standards, the storage of hazardous wastes restricted from land disposal under ADEM Admin. Code Rule 335- 14-9 is prohibited unless the requirements of ADEM Admin. Code Rule 335-14-9-.05 are met.

Mr. Williamson stated that the dates were incorrect on the six containers that were dated over a year. After the inspection, Mr. Williamson provided the inspectors with documentation supporting his assertion and that the drums in question actually contained vermiculite to be used in the lab pack process (not waste). The waste that was previously in these drums had already been consolidated into other containers and shipped offsite. The six drums in question were inadvertently removed from their storage area and placed on pallets with other drums that contained waste the week of the inspection.

Container Storage Area-D: Container Storage Area D has a permitted storage capacity of 18,480 gallons. According to the facility's permit the concrete secondary containment in this area has a total capacity of 3,308 gallons and appeared to be in good condition with adequate aisle space. All hazardous waste containers in this area were properly labeled, closed, placarded, and properly dated. However, several containers were observed not to be in good condition, either due to rusting or bulging (Photo #18 and Photo #19). Mr. Williamson stated that these drums would be placed in an oversized drum.

Pursuant to Permit Condition III.E. Condition of Containers, if a container holding hazardous waste is not in good condition (e.g., severe rusting, apparent structural defects) or if it begins to leak, upon discovery the Permittee shall immediately transfer the hazardous waste from such container to a container that is in good condition or otherwise manage the waste in compliance with the conditions of ADEM Admin. Code Rule 335-14-5.09(2).

LUA-1: LUA-1 has a permitted storage capacity of 6,000 gallons. According to the facility's permit the concrete secondary containment in this area has a total capacity of 8,012 gallons and appeared to be in good condition with adequate aisle space. This area is a staging area for wastes that are awaiting laboratory sampling and analysis. The inspectors observed one (1) 30-gallon hazardous waste drum properly labeled and dated but was not properly closed.

Pursuant to Permit Condition III.G.2., Management of Containers, A container holding hazardous waste must always be closed during storage. Except when it is necessary to add, remove, sample. or inspect the waste.

Facility personnel properly closed the container prior to the conclusion of the inspection.

Tank System 1: Located behind LUA-1. The tank farm has a total permitted storage capacity of 58,100 gallons. The tank farm is situated within a coated concrete secondary containment structure with a total containment capacity of 38,544 gallons. This tank farm consists of the following above ground storage tanks:

- One (1) 4,100-gallon above ground storage tank (O-1), not in use.
- Three (3) 6,000-gallon above ground storage tanks (W-1, W-2, NH-2), not in use.
- Two (2) 18,000-gallon above ground storage tanks (B-5 and B-7), which store hazardous waste fuel generated by the Luwa® solvent recovery unit. These tanks were labeled with the words “Hazardous Waste”. Tanks lines and associated equipment (flanges/pumps/end caps) were tagged as required by Subpart BB (Photo #20).

Universal Waste Storage Area: Universal waste was being stored in a trailer on the northside of the facility. The inspectors observed two pallets of cardboard boxes labeled “Universal Waste – Waste Lamps”. All boxes of universal waste were closed, dated, and properly labeled (Photo #21).

Security Fence: The perimeter fence surrounding the property appeared to be in poor condition in certain areas (Photo #22).

Pursuant to Permit Condition II.B.2., Security, in order to comply with ADEM Admin. Code Rule 335-14-5-.02(5), the hazardous waste storage areas of the facility shall remain fenced with at least a six-foot high chain link fence. The fence shall be kept in good repair. All entrances to the permitted hazardous waste management areas shall be closed and locked when security and/or operations personnel are not present.

Records Review: Mr. Williamson and the inspectors were later joined by Mrs. Sadiqua Williams-Davis, Environmental Health and Safety Manager for the records review portion of the inspection. The following records were provided by facility personnel: a copy of the facility’s permit, daily/weekly/monthly container and tank inspections (2020-2021), inbound and outbound manifests (2018-2021), position descriptions and personnel hazardous waste management training documentation for Todd Williamson, Cody Foster, and Andrew Lake, biennial report, waste analysis plan, financial assurance/cost estimates/closure documents, annual tank integrity test, quarterly air monitoring testing logs for the Luwa®, Subpart BB equipment, and tanks. Calibration records were also available for review for the Honeywell PHD6 PID.

The contingency plan was available for review and last updated in July 2020; however, the contingency plan did not include a Quick Reference Guide (QRG). Documentation demonstrating that copies of the contingency plan were sent to the local authorities were not available for review.

Pursuant to ADEM Admin. Code r. 335-14-3.14(10)(b) [40 CFR 262.262(b)], A large quantity generator must 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: 1. The types/names of hazardous wastes in layman's terms and the associated hazard associated with each hazardous waste present at any one time (e.g., toxic paint wastes, spent ignitable solvent, corrosive acid); 2. The estimated maximum amount of each hazardous waste that may be present at any one time; 3. The identification of any hazardous wastes where exposure would require unique or special treatment by medical or hospital staff; 4. A map of the facility showing where hazardous wastes are generated and accumulated, and routes for accessing these wastes; 5. A street map of the facility in relation to surrounding businesses, schools and residential areas to understand how best to get to the facility and also evacuate citizens and workers; 6. The locations of water supply (e.g., fire hydrant and its flow rate); 7. The identification of on-site notification systems (e.g., a fire alarm that rings off site, smoke alarms); and 8. The name of the emergency coordinator(s) and 7/24-hour emergency telephone number(s) or, in the case of a facility where an emergency coordinator is continuously on duty, the emergency telephone number for the emergency coordinator.

Pursuant to Permit Condition II.H.2., Contingency Plan, Copies of the Contingency Plan, Copies of Plan, A copy of the Contingency Plan and all current revisions to the plan must be maintained at the facility and submitted to all local police departments, fire departments, hospitals, and state and local emergency response teams that may be called upon to provide emergency services, as described in Section 6.0 of the permit application, and as required by ADEM Admin. Code Rule 33 5- 14-5-.04(4).

12) Closing Conference

An exit meeting was held at the end of the inspection with Mr. Williamson and Mrs. Williams-Davis to discuss preliminary conclusions and to go over any pending items or missing records such as the QRG and notification to local authorities that were not available during the actual inspection. Mr. Williamson agreed to provide photos and documentation related to the inspection findings by email to the inspectors.

13) Inspection Findings

Based on the observations made during the inspection, Allworth was apparently deficient with the following RCRA requirements:

Pursuant to ADEM Admin. Code r. 335-14-3-.01(5)(a)5. [40 C.F.R. § 262.15(a)(5)], which is a condition of the SAA Permit Exemption, a generator is required to mark or label its containers (i) with the words “Hazardous Waste” and (ii) with an indication of the hazards of the contents.

Pursuant to ADEM Admin. Code r. 335-14-6-.28 [40 C.F.R. § 264.1050(d)], Each piece of equipment to which this subpart applies shall be marked in such a manner that it can be distinguished readily from other pieces of equipment.

Pursuant to ADEM Admin. Code r. 335-14-3-.01 (5)(i) [40 CFR 262.17(a)(5)(i)], A

generator must mark or label its container with the following: (i) The words “Hazardous Waste” and (ii) An indication of the hazards of the contents.

Pursuant to Permit Condition III.G.2., Management of Containers, A container holding hazardous waste must always be closed during storage. Except when it is necessary to add, remove, sample, or inspect the waste.

Pursuant to Permit Condition II. L.2.b., Land Disposal Prohibitions and Treatment Standards, the storage of hazardous wastes restricted from land disposal under ADEM Admin. Code Rule 335- 14-9 is prohibited unless the requirements of ADEM Admin. Code Rule 335-14-9-.05 are met.

Pursuant to ADEM Admin. Code r. 335-14-3.14(10)(b) [40 CFR 262.262(b)], A large quantity generator must 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: 1. The types/names of hazardous wastes in layman's terms and the associated hazard associated with each hazardous waste present at any one time (e.g., toxic paint wastes, spent ignitable solvent, corrosive acid); 2. The estimated maximum amount of each hazardous waste that may be present at any one time; 3. The identification of any hazardous wastes where exposure would require unique or special treatment by medical or hospital staff; 4. A map of the facility showing where hazardous wastes are generated and accumulated, and routes for accessing these wastes; 5. A street map of the facility in relation to surrounding businesses, schools and residential areas to understand how best to get to the facility and also evacuate citizens and workers; 6. The locations of water supply (e.g., fire hydrant and its flow rate); 7. The identification of on-site notification systems (e.g., a fire alarm that rings off site, smoke alarms); and 8. The name of the emergency coordinator(s) and 7/24-hour emergency telephone number(s) or, in the case of a facility where an emergency coordinator is continuously on duty, the emergency telephone number for the emergency coordinator.

Pursuant to Permit Condition II.H.2., Contingency Plan, Copies of the Contingency Plan, Copies of Plan, A copy of the Contingency Plan and all current revisions to the plan must be maintained at the facility and submitted to all local police departments, fire departments, hospitals, and state and local emergency response teams that may be called upon to provide emergency services, as described in Section 6.0 of the permit application, and as required by ADEM Admin. Code Rule 33 5- 14-5-.04(4).

14) List of Appendices

Appendix 1 – Photo Log:

{22} Photos taken on: [06/17/2021]

Photos taken by: Kayla Acosta

EPA Photos taken with: Olympus Tough Digital Camera

EPA Property Tag: S75903

Signed

**KAYLA
ACOSTA**

Digitally signed by
KAYLA ACOSTA
Date: 2021.08.17
11:58:19 -04'00'

Kayla Acosta
Enforcement and Compliance Specialist

Date

Concurrence

**ARACELI
CHAVEZ**

Digitally signed by
ARACELI CHAVEZ
Date: 2021.08.17 13:11:28
-04'00'

Araceli Chavez
RCRA Enforcement Section

Date

Appendix 1 - Photo Log



Photo 1: 55-gallon drum labeled “Lab Waste”, closed, with a hazard identification sticker marked for flammability.



Photo 2: Pint-size glass jar of Sulfuric Acid under a fume hood labeled “Hazardous Waste”, closed, and no indication of hazard



Photo 3: 5-gallon container of lab sample waste under a fume hood labeled “Hazardous Waste”, closed, and with an indication of hazard for flammability



Photo 4: 55-gallon drums of laboratory waste on spill containment pallet labeled “Hazardous Waste”, closed, dated, and with DOT placards to indicate the hazardous contents.





Photo 6: A portion of Container Storage Area-B



Photo 7: Luwa® Solvent Recovery Unit illegible tags for equipment.



Photo 8: Luwa® Solvent Recovery Unit illegible tags for equipment.



Photo 9: Luwa® Solvent Recovery Unit, missing tagging of connections, flanges, etc tags for equipment.



Photo 10: One (1) 55-gallon drum labeled “Hazardous Waste – Empty Paint Cans” was observed open, containing spent air filters only.



Photo 11: Tank System 2



Photo 12: Tank System 2 – Roof Top



Photo 13: One (1) cubic yard box of hazardous waste was not labeled. Corrected onsite.



Photo 14: 250-gallon totes labeled Hazardous Waste, placarded, dated, not properly closed.



Photo 15: 250-gallon totes labeled Hazardous Waste, placarded, dated, not properly closed.



Photo 16: One of eight 55-gallon containers not properly closed, missing locking ring.



Photo 17: One of six 55-gallon containers of Hazardous Waste with dates greater than one year (06/11/20).



Photo 18: Bulging drum.



Photo 19: Rusted drums with damaged/ dented top.



Photo 20: Tank System 1



Photo 21: Universal Waste Storage Area



Photo 22: Fence in poor condition.