

RCRA Inspection Report

1) Inspector and Author of Report

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2) Facility Information

Century Aluminum
9404 State Route 2096
Robards, Kentucky 42452
Henderson County
EPA ID No.: KYD058692526

3) Responsible Officials

Mr. Chris Goddard
Environmental Manager- Sebree Plant
(270) 521-6215 (Office)
(270) 929-1277 (Mobile)
(270) 521-7365
christopher.goddard@centuryaluminum.com

4) Inspection Participants

Chris Goddard	Century Aluminum
Zak Kleinschmidt	Century Aluminum
Sean Raes	Century Aluminum
Jim Phelps	Century Aluminum
Jeff Zachary	Century Aluminum
Royce McElwain	Century Aluminum
Ross Hardy	Century Aluminum
Curtis Scott	KDEP
Leslie Carr-Poly	KDEP
Alan Newman	EPA

5) Date and Time of Inspection

December 1, 2021, 7:55 A.M. to 4:30 P.M. C.S.T. and December 2, 2021, 7:55 A.M. to 4:30 P.M. C.S.T.

6) **Applicable Regulations**

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; Rules Governing Hazardous Waste Management Title 401 of Kentucky Administrative Regulations (401 K.A.R.) Chapters 30 through 40 and 44 Kentucky Department for Environmental Protection.

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

Kentucky Revised Statutes Title XVIII, Chapter 224, Subchapter 46-Hazardous Waste *et seq.* (2006), and Title 401 of the Kentucky Administrative Regulations (K.A.R.) Chapters 30 through 38, 43 and 44 (2006).

Pursuant to 401 KAR 39:080 Section 1 [40 C.F.R. § 260.10], a large quantity generator of hazardous waste (LQG) is a generator who generates greater than or equal to 1,000 kilograms (2,200 pounds) of non-acute hazardous waste in a calendar month.

Pursuant to 401 KAR 39:080 Section 1 [40 C.F.R. § 262.17], an LQG may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status, as required by KRS 224.46-520(1) [Section 3005 of RCRA, 42 U.S.C. § 6925], provided that the generator complies with the conditions listed in 401 KAR 39:080 Section 1 [40 C.F.R. § 262.17] (hereinafter referred to as the "LQG Permit Exemption").

Pursuant to 401 KAR 39:080 Section 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 KRS 224.46-520(1) [Section 3005 of RCRA, 42 U.S.C. § 6925], and without complying with 401 KAR 39:080 Section 1 [40 C.F.R. § 262.16(b) or § 262.17(a)], except as required in 401 KAR 39:080 Section 1 [40 C.F.R. § 262.15(a)(7) and (8)], provided that the generator complies with the satellite accumulation area conditions listed in 401 KAR 39:080 Section 1 [40 C.F.R. § 262.15(a)] (hereinafter referred to as the "SAA Permit Exemption").

Pursuant to 401 KAR 39:080 Section 3(1) [40 C.F.R. § 273.9], a small quantity handler of universal waste (SQHUW) is a universal waste handler who does not accumulate 5,000 kilograms or more of universal waste (batteries, pesticides, mercury-containing equipment, lamps, or aerosol cans, calculated collectively) at any time.

7) **Purpose of Inspection**

The purpose of this inspection was to conduct an unannounced compliance evaluation inspection to determine Century Aluminum compliance with the applicable requirements of RCRA and the corresponding Kentucky regulations. This was an EPA lead inspection.

8) **Previous Inspection History**

KDEP has conducted three RCRA CEIs at the subject facility between 2016 and 2020 and found seven violations during those inspections. On July 6, 2020, KDEP conducted the most recent RCRA CEI at the subject facility and found six apparent violations of RCRA's requirements for used oil, universal waste, satellite accumulation area, and the contingency plan. As a result, KDEP issued an informal enforcement action to Century Aluminum on July 16, 2020, and later verified that the facility had returned to compliance during a follow-up inspection on August 14, 2020.

9) **Facility Description**

Century Aluminum-Sebree LLC (Century Aluminum or the facility) is a primary aluminum smelting plant and operates as a large quantity generator of hazardous waste, a small quantity handler of universal waste, and a used oil generator. Century Aluminum most recently notified KDEP of their hazardous waste activity on June 2, 2021. The facility generates 15 hazardous waste streams historically including:

1. Waste Aluminum Smelting By-Product (K088) (Toxic, Reactive)
2. Mixed Laboratory Waste Solvent (D001, D019, F003, F005) (Ignitable, Toxic)
3. Laboratory Waste Acid Mix (D001, D006, D007) (Ignitable)
4. Miscellaneous Petroleum Based Waste (D001, D018) (Ignitable)
5. Lab Pack Waste – Solid (P, D, U wastes) (Corrosive)
6. Lab Pack Waste - Liquid (P, D, U wastes) (Corrosive)
7. Lead Paint Chips (D008) (Toxic)
8. Waste Mercury Contained in Manufactured Articles (D009) (Toxic)
9. Waste Aerosols (D001) (Ignitable)
10. Waste Compressed Gas (Ethyl Ether (D001) (Ignitable))
11. Waste Ink/Solvent Mixture (D001) (Ignitable)
12. Waste Sodium Hydroxide and Sodium Hypochlorite Mixture (D001, D002) (Ignitable, Corrosive)
13. Potassium Cyanide (P098, D003) (Toxic, Reactive)
14. Waste Paint and Paint Related Material - Solid (D001) (Ignitable)
15. Waste Paint and Paint Related Material – Liquid (D001) (Ignitable)

Generally, aluminum ore is shipped to the facility by barge. The aluminum ore is stored prior to introduction into the process. During production, alumina is placed into reduction cells (pots) along with carbon electrodes that are manufactured on site. When electric current is applied, a reduction reaction separates the aluminum metal. The molten aluminum sinks to the bottom of the pot, and gaseous by-products form at the top of pot. The gases are cleaned with fluoride scrubbers to remove contaminants before being released. Molten aluminum is siphoned from the bottom of the pot and then transported to a holding furnace to be cast into ingots and billets. Century Aluminum manufactures approximately 226,000 tons of aluminum each year. The NAICS code for this process is 331313 – alumina refining and primary aluminium production.

Century Aluminum began operations at this location in 1974 and employs approximately 510 workers. Workers are on four 12-hour rotating shifts. The facility occupies approximately 2,600 acres. Century Aluminum operates 24 hours a day, seven days a week, 365 days a year.

10) Opening Conference

On December 1-2, 2021, EPA inspector Alan Newman, accompanied by KDEP's Curtis Scott arrived at Century Aluminum at approximately 7:55 a.m. Chris Goddard, Environmental Manager, immediately received the inspectors. During 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. The inspectors discussed the company's ability, pursuant to 40 C.F.R. §2.203, to assert a business confidentiality claim for information submitted to EPA. The company asserted a business confidentiality claim for photographs being taken of the potlines. Inspectors did not take photographs of the potlines due to additional personal protective gear being required. The inspection participants also discussed health and safety protocols and required personal protective equipment before Mr. Goddard led the inspectors on a tour of the Facility operations.

Mr. Goddard provided an overview of the facility's history and current operations during the opening conference. The company does not appear to meet the Small Business Regulatory Enforcement Fairness Act's classification of a "small business," which is generally set by the Small Business Administration using the business' SIC/NAICS code and annual receipts or number of employees. Therefore, the EPA inspector did not provide a copy of the agency's information sheet for small businesses, which can be found at <https://www.epa.gov/sites/production/files/2017-06/documents/smallbusinessinfo.pdf>.

11) Findings

Century Aluminum operates three pot lines with 128 pots per line for a total of 384 pots. The pots have a steel shell with a series of insulating linings including refractory brick. Inside the pot, cathode carbon blocks are cemented together with ramming paste at the bottom of the pot. The top surface of the cathode is in contact with the molten metal. The prebaked anode block is also made of carbon and is suspended at the top and into the electrolytic reducing bath. The life of a pot is approximately four to five years.

The bulk of hazardous waste generated at this facility occurs during the routine maintenance of the pots, which generates spent pot liner (SPL), a K088 listed hazardous waste (spent aluminum potliner from primary aluminum reduction). "Tap out" occurs when the insulation layers of the pot are breached, and the wall of the pot fails. When tap out occurs, the pot is taken out of service for maintenance. The resulting K088 SPL hazardous waste removed from the pot is collected in a roll off box, which is located next to the pot. During tap out, when waste material falls into the basement underneath the pot, workers separate materials that can be reworked and accumulate K088 SPL hazardous waste into hoppers. Roll off boxes are taken to the 90-day or less intermodal hazardous waste container storage area on the west side of the facility. Once the pot is cleaned out, the end portions of the shell are reused.

K088 SPL hazardous waste is transported off-site daily; and other hazardous waste streams are shipped off-site, as needed.

- Intermodal Boxes Central Accumulation Area (CAA)

Century Aluminum was operating a 90-day or less hazardous waste container storage area on the west side of the facility in an uncovered gravel parking lot. This area was flat. There was no secondary containment or bermed areas. There were 11 intermodal boxes in storage on the day of the inspection (Photos 1-4). The oldest accumulation start date was November 3, 2021. Each of the boxes appeared to be closed and in good condition. Two of the boxes were stored without aisle space in-between them. Facility personnel separated the boxes to allow for adequate aisle space during the inspection. A full container would weigh about 16 tons (32,000 lbs) with a tare weight of 7500 lbs tare wt.

Pursuant to 401 KAR 39:080 Section 1(1) [40 C.F.R. § 262.17(a)(6)], which incorporates 401 KAR 39:080 Section 1(1) [40 C.F.R. § 262.255], and is a condition of the LQG Permit Exemption, a generator is required to maintain aisle space to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment to any area of facility operation in an emergency, unless aisle space is not needed for any of these purposes.

- Rodding and the Laboratory

The inspection team noted several satellite accumulation areas throughout the site. In rodding, there was one 55-gallon metal container accumulating waste acetone from cleaning the sprayer head from the ink jet printer (Photo 5). This container was labeled and in good condition. The bung on this container was open. Facility personnel closed the container during the inspection.

The inspection team noted three containers outside the laboratory, two hazardous waste overpack containers and one container of transformer oil (Photos 6-15). One container of spent acid/metal was inside an overpack container. This overpack was not labeled with a toxic indication of hazard to match the container inside. Facility personnel labeled this container during the inspection.

Inside the laboratory, the inspection team noted two partially full 2.5-liter plastic jugs, one of which was connected to the newly installed ICP (Photos 16-18). Neither of these containers were labeled with the words hazardous waste or with an indication of the hazard. One of these containers was open. Facility personnel labeled and closed these containers during the inspection.

Pursuant to 401 KAR 39:080 Section 1 [40 C.F.R. § 262.15(a)(4)], which is a condition of the SAA Permit Exemption, a generator is required to keep containers of hazardous waste closed at all times during accumulation, except when adding, removing, or consolidating waste; or when temporary venting of a container is necessary for the proper operation of equipment, or to prevent dangerous situations, such as build-up of extreme pressure.

Pursuant to 401 KAR 39:080 Section 1 [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.

The inspection team noted multiple fire extinguishers that were marked with inspection tags that were over one year. The dates observed on these fire extinguishers were 11/2018, 6/2020, and 10/2020 (Photos 19-21). Century Aluminum changed how the testing for these fire extinguishers are tracked. Fire extinguishers are scanned; and annual testing is recorded in electronic format. The inspection team reviewed the electronic log and determined there were no violations with the fire extinguishers.

- Vehicle Maintenance Building

The inspection team noted multiple containers and a tank storing used oil, hazardous waste, and spent lead acid batteries in the vehicle maintenance shop (Photos 22-30). Facility representatives stated that spent, intact, lead-acid batteries are managed under 40 CFR Part 266 (Photo 22). A 230-gallon tank was utilized to store used oil (Photo 23). Century Aluminum was accumulating mixed fuel in a hazardous waste satellite accumulation container that was labeled, in good condition, and open (Photos 24-25). Facility personnel closed this container at the time of the inspection. The inspection team noted several inches of used oil accumulating in three yellow secondary containment pallets (Photos 26-27). The used oil in the secondary containment pallets were drained into containers. The inspection team noted four containers used to accumulate used oil that were not labeled with the words used oil (Photos 28-30).

Pursuant to 401 KAR 39:080 Section 1 [40 C.F.R. § 262.15(a)(4)], which is a condition of the SAA Permit Exemption, a generator is required to keep containers of hazardous waste closed at all times during accumulation, except when adding, removing, or consolidating waste; or when temporary venting of a container is necessary for the proper operation of equipment, or to prevent dangerous situations, such as build-up of extreme pressure.

Pursuant to 401 KAR 39:080 Section 4(1) [40 C.F.R. § 279.22(c)(1)], containers and aboveground tanks used to store used oil at generator facilities must be labeled or marked clearly with the words “Used Oil.”

Pursuant to 401 KAR 39:080 Section 4(1) [40 C.F.R. § 279.22(d)], upon detection of a release of used oil to the environment, the facility must clean up and manage properly the released used oil and other materials.

- Universal Waste Area and Stores

Century Aluminum stores universal waste in a shed with designated wooden boxes for 4-lamps and 8-foot lamps and other wastes (Photos 31-32). The two cardboard boxes inside the wooden box were dated 10/6/2021 and 11/22/2021. There was one 55-gallon metal container for broken fluorescent lamps (Mercury D009) that was labeled and closed, a 5-gallon bucket for mercury containing devices that was empty, and a wooden box to store miscellaneous lamps including metal halide lamps which was dated 11/4/2021 (Photo 32). There were two empty accumulation containers in the Stores area of the facility, one for universal waste lithium batteries and one for universal waste NiCad batteries (Photos 33-34). There were no violations noted in these areas.

- Used Oil Pad and Building 138.

The inspection team toured the used oil pad (Photos 35-43). There were multiple containers and tanks of used oil in this area. There was one used oil pipe that was labeled as “Waste Oil” (Photo 36). All containers and tanks were labeled and in good condition. This pipe was correctly labeled used oil during the inspection (Photo 37). This was an area of concern for the inspection team. The inspection team noted that the secondary containment for the Used Oil Pad appeared to be compromised by heavy equipment activity along the side to the pad (Photos 42-43). There was no waste in Building 138 on the day of the inspection. Two portions of pot shells were in this building (Photos 45-46). There was one empty SAA container in this building (Photos 47-48). There were no hazardous waste violations noted in these areas.

- Environmental Storage Shed

The inspection team inspected the environmental storage shed and noted multiple containers of universal waste and hazardous waste (Photos 49-52). There was one 55-gallon container used to accumulate waste aerosol cans as hazardous waste (Photos 50-51). There were three 5-gallon plastic containers used to accumulate universal waste lithium batteries and NiCad batteries and non-hazardous alkaline batteries. Each of these containers were empty on the day of the inspection (Photos 53).

- Building 43 CAA

Century Aluminum utilizes Building 43 as a CAA for storage of containerized wastes (Photos 53-56). The inspection team noted one large battery in this area on the day of the inspection (Photo 56). The battery was in poor condition such that it could not be considered intact and would not be eligible for management under 40 CFR 266 Subpart G. At the time of the inspection the facility had not made a hazardous waste determination on this battery.

Pursuant to 401 KAR 39:080 Section 1 [40 C.F.R. § 262.11], a person who generates a solids waste as defined in 40 C.F.R. § 261.2, must determine if that waste is a hazardous waste.

- On-site Clinic

Century Aluminum operates an on-site medical clinic (Photos 57-58). The inspection team discussed the potential applicability of the new 40 CFR 266 Subpart P regulations. Century Aluminum should perform a waste determination for any waste generated from clinic activities. Depending on the waste generated, the facility may be required to notify as a health care facility.

- Stores Department Old CAA

The inspection team noted multiple containers stored in the former CAA area for container storage which is now maintained by the Stores Department (Photos 59-76). The inspection team

asked for an accurate inventory of all the containers in this area and for documentation regarding their hazardous waste determination, if applicable. The inspection team noted 41 containers of materials on the concrete pad. Many of the containers were in poor condition. The inspection team noted one transformer that was leaking oil (Photos 59-61). The facility does not have the last analytical on this oil and will have to retest or treat as PCBs. An oil-like leak on the pad was in the vicinity of multiple containers (Photos 67 and 76). The inspection team noted one container appeared to have water displacement. Used oil was visible on top of the container.

Pursuant to 401 KAR 39:080 Section 1 [40 C.F.R. § 262.11], a person who generates a solids waste as defined in 40 C.F.R. § 261.2, must determine if that waste is a hazardous waste.

Pursuant to 401 KAR 39:080 Section 4(1) [40 C.F.R. § 279.22(b)(2)], containers and aboveground tanks used to store used oil at generator facilities must not leak (no visible leaks).

Pursuant to 401 KAR 39:080 Section 4(1) [40 C.F.R. § 279.22(d)], upon detection of a release of used oil to the environment, the facility must clean up and manage properly the released used oil and other materials.

- Record Review

The inspection team reviewed multiple records at the facility including manifests, inspections, training records, the contingency plan and quick reference guide, waste minimization report, annual notification of hazardous waste activity, and waste determinations.

The actions that facility personnel should take in response to an emergency are described in the facility's Contingency Plan, which was last updated on 8/10/2020. The plan does not describe 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. Bradley Curry is listed as the primary emergency coordinator, and the other individuals are listed in the order in which they will assume responsibility as alternates.

The plan does not include an evacuation plan for personnel. This plan does describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes.

The quick reference guide does not include a map of the facility showing where hazardous wastes are generated, accumulated and treated and routes for accessing these wastes; the locations of water supply (e.g., fire hydrant and its flow rate); and the identification of on-site notification systems (e.g., a fire alarm that rings off site, smoke alarms. The guide includes locations that are no longer designated as storage areas and is missing the recently implemented satellite area within the laboratory.

Pursuant to 401 KAR 39:080 Section 1 [40 C.F.R. § 262.17(a)(6)], which incorporates 401 KAR 39:080 Section 1 [40 C.F.R. § 262.261 (f)], and is a condition of the LQG Permit Exemption, the contingency plan must include an evacuation plan for generator personnel where there is a possibility that evacuation could be necessary.

Pursuant to 401 KAR 39:080 Section 1 [40 C.F.R. § 262.17(a)(6)], which incorporates 401 KAR 39:080 Section 1 [40 C.F.R. § 262.262(b) (4,6-7)], and is a condition of the LQG Permit Exemption, a generator's quick reference guide to the contingency plan must include the following elements: a map of the facility showing where hazardous wastes are generated, accumulated and treated and routes for accessing these wastes; the locations of water supply (*e.g.*, fire hydrant and its flow rate); and the identification of on-site notification systems (*e.g.*, a fire alarm that rings off site, smoke alarms).

12) Closing Conference

The inspectors conducted the exit meeting at 3:00 p.m. with Christopher Goddard and James Phelps. During this meeting, the inspectors stated their preliminary conclusions of the inspection. Century Aluminum agreed to provide an inventory of containers in the old CAA area by within two weeks. As of the date of this report, the records had not been received.

13) Inspection Findings

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

- Pursuant to 401 KAR 39:080 Section 1 [40 C.F.R. § 262.11], a person who generates a solids waste as defined in 40 C.F.R. § 261.2, must determine if that waste is a hazardous waste.
- Pursuant to 401 KAR 39:080 Section 1 [40 C.F.R. § 262.15(a)(4)], which is a condition of the SAA Permit Exemption, a generator is required to keep containers of hazardous waste closed at all times during accumulation, except when adding, removing, or consolidating waste; or when temporary venting of a container is necessary for the proper operation of equipment, or to prevent dangerous situations, such as build-up of extreme pressure.
- Pursuant to 401 KAR 39:080 Section 1 [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 401 KAR 39:080 Section 1(1) [40 C.F.R. § 262.17(a)(6)], which incorporates 401 KAR 39:080 Section 1(1) [40 C.F.R. § 262.255], and is a condition of the LQG Permit Exemption, a generator is required to maintain aisle space to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment to any area of facility operation in an emergency, unless aisle space is not needed for any of these purposes.

- Pursuant to 401 KAR 39:080 Section 1 [40 C.F.R. § 262.17(a)(6)], which incorporates 401 KAR 39:080 Section 1 [40 C.F.R. § 262.261 (f)], and is a condition of the LQG Permit Exemption, the contingency plan must include an evacuation plan for generator personnel where there is a possibility that evacuation could be necessary.
- Pursuant to 401 KAR 39:080 Section 1 [40 C.F.R. § 262.17(a)(6)], which incorporates 401 KAR 39:080 Section 1 [40 C.F.R. § 262.262(b) (4,6-7)], and is a condition of the LQG Permit Exemption, a generator's quick reference guide to the contingency plan must include the following elements: a map of the facility showing where hazardous wastes are generated, accumulated and treated and routes for accessing these wastes; the locations of water supply (*e.g.*, fire hydrant and its flow rate); and the identification of on-site notification systems (*e.g.*, a fire alarm that rings off site, smoke alarms).
- Pursuant to 401 KAR 39:080 Section 4(1) [40 C.F.R. § 279.22(b)(2)], containers and aboveground tanks used to store used oil at generator facilities must not leak (no visible leaks).
- Pursuant to 401 KAR 39:080 Section 4(1) [40 C.F.R. § 279.22(c)(1)], containers and aboveground tanks used to store used oil at generator facilities must be labeled or marked clearly with the words "Used Oil."
- Pursuant to 401 KAR 39:080 Section 4(1) [40 C.F.R. § 279.22(d)], upon detection of a release of used oil to the environment, the facility must clean up and manage properly the released used oil and other materials.

14) **List of Appendices**

Appendix 1 – Photo Log:

76 Photos taken on: December 1-2, 2021

Photos taken by: Alan Newman, EPA and Curtis Scott, KDEP

Photos taken with: Panasonic DMC TS-20 Digital Camera

EPA Property Tag: S75870

Photos taken by: Curtis Scott, KDEP

Photos taken with iPhone

15) **Signed**

ALAN NEWMAN Digitally signed by ALAN NEWMAN
Date: 2022.02.08 12:08:25 -05'00'

Alan Newman

Environmental Engineer

Date

Concurrence

ARACELI CHAVEZ

Digitally signed by ARACELI CHAVEZ
Date: 2022.02.08 12:37:04 -05'00'

Araceli B. Chavez

Date

Chief

RCRA Enforcement Section

Photographs

Photos taken on December 1-2, 2021

Photos taken by

Alan Newman, EPA

Photos taken with: Panasonic DMC TS-20

Digital Camera

EPA Property Tag: S75870

And Curtis Scott, KDEP

On iPhone



Photo 1: CAA Roll offs.



Photo 4: CAA Roll offs.



Photo 2: CAA Roll offs.



Photo 5: Rodding SAA.



Photo 3: CAA Roll offs.



Photo 6: Laboratory SAAs.



Photo 7: Laboratory SAAs.



Photo 10: Laboratory SAAs.



Photo 8: Laboratory SAAs.



Photo 11: Laboratory SAAs.



Photo 9: Laboratory SAAs.



Photo 12: Laboratory SAAs.



Photo 13: Laboratory SAAs.



Photo 16: Laboratory SAAs.



Photo 14: Laboratory SAAs.



Photo 17: Laboratory SAAs.



Photo 15: Laboratory SAAs.



Photo 18: Laboratory SAAs.



Photo 19: Fire Extinguisher recharged 6/2020.

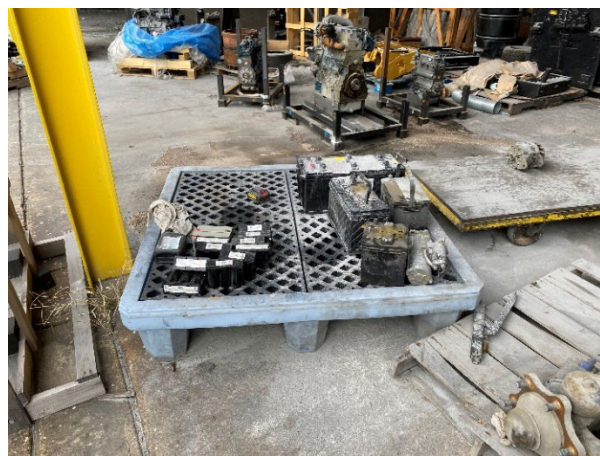


Photo 22: Vehicle Maintenance Building wastes.



Photo 20: Fire Extinguisher recharged 11/2018.



Photo 23: Used Oil Tank.



Photo 21: Fire Extinguisher recharged 10/2020.



Photo 24: Vehicle Maintenance Building SAA.



Photo 25: Vehicle Maintenance Building SAA.



Photo 27: Used Oil containers.



Photo 28: Used Oil container.



Photo 26: Used Oil container.



Photo 29: Used Oil containers.



Photo 30: Used Oil container.



Photo 33: Stores universal waste storage.



Photo 31: Universal Waste Storage Shed.



Photo 34: Stores universal waste storage.



Photo 32: Universal Waste Storage Shed.



Photo 35: Used Oil Pad.



Photo 36: Used Oil Pad.



Photo 39: Used Oil Pad.



Photo 37: Used Oil Pad.



Photo 40: Used Oil Pad.



Photo 38: Used Oil Pad.



Photo 41: Used Oil Pad.



Photo 42: Used Oil Pad.



Photo 45: Building 138.



Photo 43: Used Oil Pad.



Photo 46: Building 138.



Photo 44: Building 138.



Photo 47: Building 138 SAA.



Photo 48: Building 138 SAA.



Photo 51: Plating Lines SAAs.



Photo 49: Plating Lines SAAs.



Photo 52: Plating Lines SAAs.



Photo 50: Plating Lines SAAs.



Photo 53: Plating Lines SAAs.

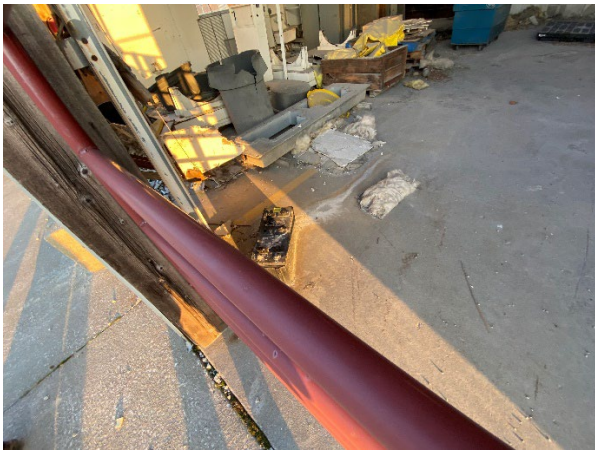


Photo 54: Plating Lines SAAs.



Photo 57: Plating Lines SAAs.



Photo 55: Plating Lines SAAs.



Photo 58: Plating Lines SAAs.



Photo 56: Plating Lines SAAs.



Photo 59: Non-PCB Transformer leaking oil.



Photo 60: Non-PCB Transformer leaking oil.



Photo 63: Miscellaneous materials in containers.

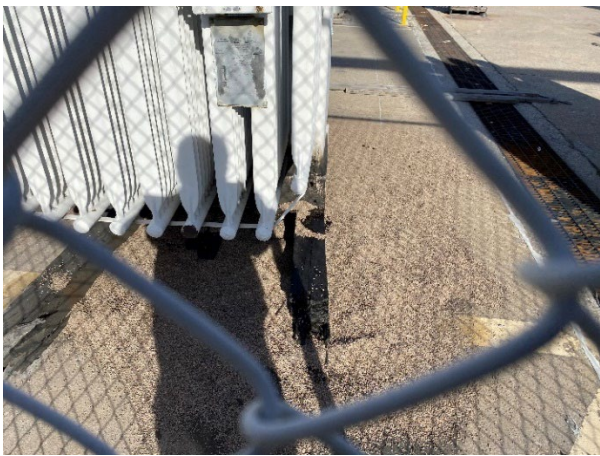


Photo 61: Non-PCB Transformer leaking oil.



Photo 64: Miscellaneous materials in containers.



Photo 62: Miscellaneous materials in containers.



Photo 65: Miscellaneous materials in containers.



Photo 66: Miscellaneous materials in containers.



Photo 69: Miscellaneous materials in containers.



Photo 67: Oil-like spill.



Photo 70: Miscellaneous materials in containers.



Photo 68: Miscellaneous materials in containers.

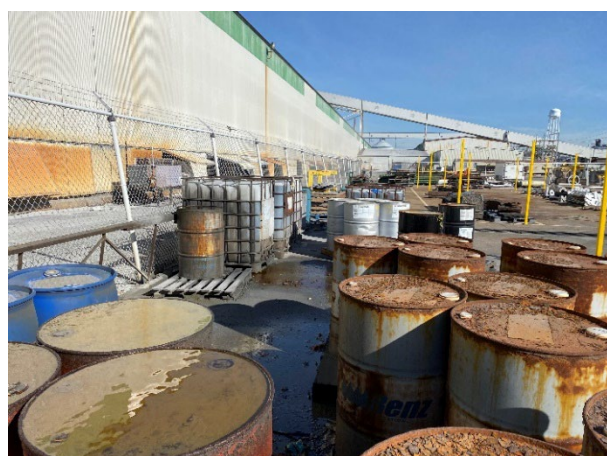


Photo 71: Miscellaneous materials in containers.



Photo 72: Miscellaneous materials in containers.



Photo 73: Miscellaneous materials in containers.



Photo 76: Miscellaneous materials in containers.



Photo 74: Miscellaneous materials in containers.