

RCRA Inspection Report

1) Inspector and Author of Report

Paula A. Whiting
Environmental Engineer
(706) 355-8625
whiting.paula@epa.gov

U.S. Environmental Protection Agency, Region 4
61 Forsyth Street, SW
Atlanta, Georgia 30303

2) Facility Information

Toray Composite Materials America Inc.
2030 Highway 20
Decatur, Alabama 35601
Morgan County

EPA ID: ALR000036822
NAICS: 335991 - Carbon and Graphite
Product Manufacturing

3) Responsible Official

Pat Hawkes
Manager
Environment, Health, and Safety
Toray Composite Materials America Inc.
2030 Highway 20
Decatur, Alabama 35601
pat.hawkes@toraycma.com

4) Inspection Participants

Pat Hawkes, Toray Composite Materials America Inc.
Dustin Shaneyfelt, Toray Composite Materials America Inc.
Andrew Matthews, Toray Composite Materials America Inc.
Andrea Slay, ADEM
Novelle Smith, US EPA Region 4 Atlanta
Paula Whiting, US EPA Region 4 Atlanta

5) Date and Time of Inspection

November 13, 2024, at 9:00 a.m. CST

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.

Alabama Hazardous Waste Management and Minimization Act of 1978, Ala. Code § 22-30-1 et seq., and rules 335-14-1 to 335-14-17 (2016 and 2018) of the Alabama Department of Environmental Management (ADEM) Administrative Code (ADEM Admin. Code)

Pursuant to ADEM Admin. Code 335-14-1-.02-(1)(a)111. [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 ADEM Admin. Code r. 335-14-3-.01(7)(a) [40 C.F.R. § 262.17], 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 22-30-12(b) of the AHWMMMA, 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-.01(7)(a) [40 C.F.R. § 262.17] (hereinafter referred to as the “LQG Permit Exemption”).

Pursuant to ADEM Admin. Code r. 335-14-3-.01(5)(a) [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, as required by KRS 224.46-520(1) [Section 3005 of RCRA, 42 U.S.C. § 6925], and without complying with ADEM Admin. Code r. 335-14-3-.01(6) (b) or (7)(a)) [40 C.F.R. § 262.16(b) or §262.17(a)], except as required in ADEM Admin. Code r. 335-14-3-.01(5)(a)7 and 8) [40 C.F.R. § 262.15(a)(7) and (8)], provided that the generator complies with the satellite accumulation area conditions listed in ADEM Admin. Code r. 335-14-3-.01(5)(a) [40 C.F.R. § 262.15(a)] (hereinafter referred to as the “SAA Permit Exemption”).

Pursuant to ADEM Admin. Code r. 335-14-11-.02(1)(a)244. [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 this inspection was to conduct an unannounced compliance evaluation inspection to determine Toray Composite Materials America Inc. (EPA ID Number: ALR000036822) compliance with the applicable requirements of RCRA and the corresponding ADEM regulations. This was an EPA lead inspection.

8) Facility Description

Toray Composite Materials America, Inc. (Toray CMA) is an advanced composite materials producer for use in aerospace, defense, industrial, and automotive industries as well as a thermoset composites manufacturer. Toray CMA’s Decatur plant operates production lines from precursor to carbon fiber and has a diverse base of customers in aerospace, defense, industrial, and automotive (Pictures 34-37). The Decatur plant produces carbon fiber using the polyacrylonitrile (PAN) process. The raw material stored in the tank farm is combined and then sent to spinning process, where it is

spun into fibers, heated, washed, and stretched before being transferred to chemical recovery. White PAN fibers on bobbins are moved via forklift to rod and reel winders where they undergo rough carbonization (heated to a very high temperature to form tightly bonded carbon crystals). The heat burns off the chemicals blackening and strengthening the fibers. Sizing (coating) is added to further enhance the fiber's strength. The fiber is then cleaned in an acid bath and reduced to small bobbins for packaging.

Toray Composite Materials America Inc. employs 300 employees with 100 employees handling hazardous waste. The facility operates four shifts, 12 hours a day, seven days per week.

Toray Composite Materials America, Inc.'s most recent Hazardous Waste Generator Notification (EPA Form 8700-12) dated February 15, 2024 characterized the facility as a Large Quantity Generator (LQG) of hazardous waste. Toray Composite Materials America, Inc. may generate hazardous waste streams such as ignitable wastes, corrosive wastes, and toxic wastes, spent aerosol cans, used solvent, used oil, universal lamps and batteries, paint waste and other wastes.

9) Previous Inspection History

ADEM has conducted eight RCRA CEIs at the subject facility between 2006 and 2021 and found eleven violations during those inspections.

On August 31, 2021, ADEM conducted the most recent RCRA CEI at the subject facility and found no apparent violations of the RCRA's requirements.

10) Findings

On November 13, 2024, EPA inspectors Paula Whiting and Novelle Smith, accompanied by ADEM inspector Andrea Slay arrived at Toray Composite Materials America Inc. at approximately 9:00 a.m. CST. The inspectors entered the facility and were escorted to a conference room. Pat Hawkes, Manager, Environment, Health, and Safety immediately received the inspectors. Pat Hawkes and the inspectors were joined by Dustin Shaneyfelt, Safety and Environmental Coordinator, for the opening conference. The inspectors introduced themselves, showed their credentials to Pat Hawkes 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.

Pat Hawkes and Dustin Shaneyfelt 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 the facility representative led the inspectors on a tour of the facility operations. Below is a description of the observations made during the inspection.

11) Inspection Observations

11.1 Main Office Administration

The tour began in the main office administration area. The inspectors observed a universal waste battery collection box hung on the wall near Stair A (Picture 1-2). The box contained three spent lithium-ion batteries, and the remainder were used alkaline batteries. The box was dated September 30, 2024, but was not marked as universal waste. The inspectors explained to Pat Hawkes that used alkaline batteries were not universal waste and not required to be collected in the boxes.

Pursuant to ADEM Admin. Code r. 335-14-11-.02(5)(a) [40 C.F.R. § 273.14(a)], a SQHUW must label or mark each Universal Waste battery or container or tank in which the batteries are contained clearly with one of the following phrases: “Universal Waste - Battery(ies),” or “Waste Battery(ies),” or “Used Battery(ies).”

11.2 CARB Used Oil Tank

The CARB area had a 100-gallon used oil tank on a secondary containment pallet (Pictures 3-5). On an adjacent secondary containment pallet were eight 10-Liter containers used to collect used oil. One of the used oil collection containers was not closed and missing the lid. The secondary containment pallet had used oil spilled inside and needed cleaning out. In addition, one of the containers did have used oil inside, was closed but did not have a used oil label.

Pursuant to ADEM Admin. Code r. 335-14-17-.03(4)(c)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 ADEM Admin. Code r. 335-14-17-.03(4)(a)1. Used oil generators shall not store used oil in units other than used oil tanks, containers, or units subject to regulation under Chapters 335-14-5 and 335-14-6. A container holding used oil must always be closed during storage, except when it is necessary to add or remove used oil.

Pursuant to ADEM Admin. Code r. 335-14-17-.03(4)(d) [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.

11.3 Carbonization Line 1 (CA1)

The inspectors observed a universal waste battery collection box hung on the wall (Picture 6). At the time of the inspection, no universal waste batteries were observed in the box, only used alkaline batteries. The inspectors advised that a universal waste label will be needed when the first universal waste battery is added to the box. The box was dated October 3, 2024. The inspectors advised that the box should be dated when the first universal waste battery is added to the box. No

issues were observed in this area.

11.4 CARB Maintenance

The inspectors walked through the CARB Maintenance area and observed two red flip-top containers used for oily rags. The containers were empty at the time of the inspection. No issues were observed in this area.

11.5 Maintenance/Engineering Office

The Maintenance/Engineering Office had a universal waste battery collection box sitting on the counter (Pictures 7-8). The box was dated September 29, 2024, and contained one spent lithium-ion battery. However, the box was not marked as universal waste.

Pursuant to ADEM Admin. Code r. 335-14-11-.02(5)(a) [40 C.F.R. § 273.14(a)], a SQHUW must label or mark each Universal Waste battery or container or tank in which the batteries are contained clearly with one of the following phrases: “Universal Waste - Battery(ies),” or “Waste Battery(ies),” or “Used Battery(ies).”

11.6 Hazardous Waste Storage Area

Toray CMA manages a 90-day central accumulation area (CAA) in the Spinning Area. The CAA is located in an enclosed building. The area was identified with a sign which read “danger, hazardous waste storage.” Toray CMA manages corrosive and toxic waste in this CAA, and the inspectors did not observe “No Smoking” signs at the CAA. The inspectors observed the following (Pictures 9-13):

- An eyewash and emergency shower with an inspection tag dated November 2024.
- A spill kit and Oil-Dri (absorbent material).
- 45 black 55-gallon containers stacked four containers on a pallet and two stacks high (Pictures 9-13). The labels were marked hazardous waste, “Waste Corrosive Liquid, Remnant Waste, D002, D010”. The oldest container was dated September 24, 2024.
- The aisle space between the stacked containers was narrow and not sufficient to maneuver through. The CAA technician explained that the small storage space does not allow for wider aisle space or straight rows because the forklift would not be able to maneuver inside the room.

The inspectors recommended extending or moving the CAA to an external space inside the facility that would allow more movement and more storage.

Pursuant to ADEM Admin. Code r. 335-14-3-.01(7)(a)1.(vi)(II) [40 C.F.R. § 262.17(a)(1)(vi)(B)], which is a condition of the LQG Permit Exemption, a generator is required to prevent accidental ignition or reaction of ignitable or reactive waste. This waste must be separated and protected from sources of ignition or reaction including but not limited to the following: Open flames, smoking, cutting and welding, hot surfaces, frictional heat, sparks (static, electrical, or mechanical), spontaneous ignition (e.g., from heat-producing chemical reactions), and radiant heat. While ignitable or reactive waste is being handled, the large quantity generator must confine smoking and open flame to specially designated locations. “No Smoking” signs must be conspicuously placed wherever there is a hazard from ignitable or reactive waste.

Pursuant to ADEM Admin. Code r. 335-14-3-.01(7)(a)6 [40 C.F.R. § 262.17(a)(6)], which incorporates ADEM Admin. Code r. 334-14-3-.14(6) [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.

The facility is equipped with an internal communications or alarm system capable of providing immediate emergency instruction to facility personnel; a device capable of summoning emergency assistance from local police departments, fire departments, or state or local emergency response teams; with portable fire extinguishers, fire control equipment, spill control equipment, and decontamination equipment; and with water to supply water hose streams, or foam producing equipment, or automatic sprinklers, or water spray system.

11.7 Spinning Maintenance

The inspectors observed a used oil storage area with the following (Pictures 14-22):

- Two 275-gallon totes that were labeled “Used Oil” and closed.
- A square used oil tank sitting in secondary containment. The containment was filled with used oil and needed to be cleaned out.
- A red flip-top can of oily rags.
- Seven product oil stations with drain pans and containers full of over spilled oil that will not be used. All the drain pans and containers needed to be cleaned out and labeled as used oil.

Pursuant to ADEM Admin. Code r. 335-14-17-.03(4)(a)1. Used oil generators shall not store used oil in units other than used oil tanks, containers, or units subject to regulation under Chapters 335-14-5 and 335-14-6. A container holding used oil must always be closed during storage, except when it is necessary to add or remove used oil.

Pursuant to ADEM Admin. Code r. 335-14-17-.03(4)(c)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 ADEM Admin. Code r. 335-14-17-.03(4)(d) [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.

11.8 Universal Waste Storage

Toray CMA manages universal waste lamps and batteries in the Spinning Area. The inspectors observed two 4-foot fiberboard containers of universal waste lamps, a 55-gallon container of crushed bulbs with a bulb crushed attached, and a pallet of spent lead acid batteries (SLAB) in this area during the inspection (Pictures 23-30).

The two fiberboard containers of spent lamps were closed, however only one container was marked with an accumulation start date of June 20, 2024, and labeled universal waste. The marked container held 4-foot spent lamps. The second container was not labeled or dated and held

universal waste lamps such as high intensity discharge (HID) lamps. Each lamp was wrapped and dated. The oldest date in the unmarked container was August 7, 2024. However, these lamps were at the bottom of the container, and the inspectors noted as the container fills the oldest lamps with their dates will be buried. The inspectors advised Pat Hawkes that the oldest lamp start accumulation date be placed on the fiberboard container instead of on the individual lamps to track the one-year start.

Pursuant to ADEM Admin. Code r. 335-14-11-.02(5)(e) [40 C.F.R. § 273.14(e)], a SQHUW must label or mark each lamp or container of lamps clearly with one of the following phrases: “Universal Waste-Lamp(s),” or “Waste Lamp(s),” or “Used Lamps.”

There were 91 SLABs, ten spent LINCOLN power tool batteries, four spent battery packs and one spent lithium-ion battery on the pallet. At least twelve of the spent batteries were not labeled and at least ten of the spent batteries were not marked with start accumulation dates. The remaining batteries had dates. The rear row against the wall had 21 spent batteries marked with start accumulation dates that exceeded one year. The oldest battery was dated October 23, 2023.

Pursuant to ADEM Admin. Code r. 335-14-11-.02(5)(a) [40 C.F.R. § 273.14(a)], a SQHUW must label or mark each Universal Waste battery or container or tank in which the batteries are contained clearly with one of the following phrases: “Universal Waste - Battery(ies),” or “Waste Battery(ies),” or “Used Battery(ies).”

Pursuant to ADEM Admin. Code r. 335-14-11-.02(6)(a) and (c) [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.

11.9 Tech Center Chemical Lab

Toray CMA manages a satellite accumulation area (SAA) in a fume hood of hazardous waste organic solvent wash that is generated by a quality control testing in the Tech Center Chemical Lab (Pictures 31-33). The inspectors observed one 4-Liter container in this SAA. The container had a red lid funnel in the opening, and it was closed. The container was marked as hazardous waste flammable liquid. An inspection log for the SAA was posted on the wall. No issues were observed in this area.

11.10 CARB Lab 1

There are two SAAs in the CARB Lab for managing hazardous waste flammable liquid generated by quality control testing. The inspectors observed a 55-gallon container with a closed red funnel in the back storage room sitting on a secondary containment pallet and two 4-Liter containers with open funnels in the tops (Pictures 38-42). The 55-gallon container was closed, labeled as hazardous waste with EPA waste codes D001, D035, F002, F003 and F005 and hazard indications of ignitable and toxic. The two 4-Liter containers were in a fume hood, not closed, and marked as “Chemical Waste.” Pat Hawkes contacted the lab manager, who arrived and explained that waste resin from quality testing was draining into the two transfer containers. The inspectors inquired whether the

resin containers had finished draining and, if so, requested that the lab manager close the containers. The lab manager closed the containers during the inspection.

Pursuant to ADEM Admin. Code r. 335-14-3-.01(5)(a)4 [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.

The inspectors left the lab and passed by a baghouse that collects dust from the thermal oxidizer (Pictures 43-44). The inspectors asked if the dust had been analyzed and Dustin Shaneyfelt stated that the dust was non-hazardous and was a by-product of carbon scale and silicon dioxide listed under waste profile 990087 which was last analyzed on December 3, 2019. However, Toray CMA has an approved special waste disposal letter from ADEM that allow them to dispose of the baghouse dust in the Morris Farm Landfill, approved in 2023 until January 31, 2026. Per ADEM, to obtain special waste approval the facility must submit current waste analysis. The 2019 waste profile was the most current analyses provided to the inspectors.

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 ADEM Admin. Code r. 335-14-2-.01(2) [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 ADEM Admin. Code r. 335-14-3-.01(2) [40 C.F.R. § 262.11].

11.11 AN Waste Tanks

The facility has two hazardous waste tanks 1011 (PV-TF-1) and 2011 (PV-TF-2) (Picture 45). The tanks are 30 cubic meters in volume and contain waste acrylonitrile (AN) solution. The inspectors observed metal tags that marked the valves and flanges on the ancillary piping connected to the tanks. Some of the tags had to be uncovered from the piping insulation prior to verification. The tank farm personnel took pictures of the top of the tank, its ancillary piping and conservation vents (Pictures 46-49). The inspectors observed that part of the tank ancillary piping did not have secondary containment.

Pursuant to ADEM Admin. Code r. 335-14-3-.01(7)(a)2. [40 C.F.R. § 262.17(a)(2)], which incorporates ADEM Admin. Code r. 335-14-6-.10(4)(f)1. [40 C.F.R. § 265.193(f)(1)], ancillary equipment must be provided with full secondary containment (e.g., trench, jacketing, double-walled piping) that meets the requirements of paragraphs (b) and (c) of this section except for: (1) Aboveground piping (exclusive of flanges, joints, valves, and connections) that are visually inspected for leaks on a daily basis.

The tank farm personnel provided the daily inspection records for the tank farm. As explained by the tank farm personnel, the facility management decided that all tanks will be visually inspected only on Tuesdays and Thursdays, instead of daily inspections. The daily tank inspection records that were reviewed by the inspectors appeared to be incomplete.

Pursuant to ADEM Admin. Code r. 335-14-3-.01(7)(a)2. [40 C.F.R. § 262.17(a)(2)], which incorporates ADEM Admin. Code r. 335-14-6-.10(6)(e) [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.

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 on April 1, 2024. As of October 24, 2024, the plan is undergoing updates. As of November 22, 2024, Pat Hawkes provided via email a copy of the updated Toray CMA Decatur Business Interruption and Emergency Action Plan (EAP) dated November 13, 2024.

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. However, the documentation of the arrangements has not been sent to the local authorities since 2010.

Pursuant to ADEM Admin. Code r. 335-14-3-.01(7)(a)6 [40 C.F.R. § 262.17(a)(6)], which incorporates ADEM Admin. Code r. 334-14-3-.14(7) [40 C.F.R. § 262.256], and is a condition of the LQG Permit Exemption, a generator must: (a) attempt to make arrangements with the local authorities identified, as appropriate for the type of waste handled at the Facility and the potential need for the services of these authorities, and (b) maintain records documenting the arrangements made.

The plan lists the names and emergency telephone numbers for persons identified as emergency coordinators.

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 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.

A copy of the Contingency Plan was most recently submitted to the local authorities in 2010. However, the quick reference guide was not available for review, and no documentation was available to show it has been submitted to the local authorities.

The quick reference guide must include 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).

Pursuant to ADEM Admin. Code r. 334-14-3-.14(10)(b) [40 C.F.R. § 262.262(b)] requires an LQG that is amending its contingency plan to submit a quick reference guide of the contingency plan to the local emergency responders. The required contents of the contingency plan are specified in ADEM Admin. Code r. 334-14-3-.14(9) [40 C.F.R. § 262.261], and the required contents of the quick reference guide are specified in ADEM Admin. Code r. 334-14-3-.14(10)(b) [40 C.F.R. § 262.262(b)].

Training Records

The inspectors requested the names, job titles and job descriptions for the employees that handle hazardous waste. On November 22nd, 25th, and 28th, Pat Hawkes via email provided employee training records for 2022-2024. The records included the department and job title that each employee was assigned but not the job description that included the requisite skill, education, or other qualifications, and duties of facility personnel assigned to that position.

Toray CMA did not provide a written description of the type and amount of both introductory and continuing training to be given to each person filling the positions listed above. The inspectors reviewed records of employee hazardous waste training completed in 2022-2024.

Pursuant to ADEM Admin. Code r. 335-14-3-.01(7)(a)7(iv) [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.

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 2022. Hazardous waste manifest records show that (D002, D010) hazardous waste Evaporator Remnants collected from the bottom of Process Evaporator Vessels, waste codes (D001, Toxic) hazardous Waste Acrylonitrile (AN), and waste codes (D001, D035, F002, F003, F005 hazardous waste Laboratory Wastes, are routinely shipped to Clean Harbors LaPorte LLC (EPA ID TXD982290140), Safety Kleen Systems Smithfield (EPA ID KYD053348108), AES Environmental Calvert City (EPA ID KYD985073196), and Systech Environmental Corporation (EPA ID OHD005048947) and the most recent shipment was made on

September 24, 2024. Universal wastes were shipped to LEI Inc. (EPA ID LAR000055467).

The facility's records did not include a signed return copy of hazardous waste manifest number 008606619SKS and 008604197SKS for a shipment of (D001, D035, F002, F003, F005) hazardous waste flammable liquids to Safety Kleen Systems Smithfield (EPA ID KYD053348108) on December 20, 2023, and August 16, 2024; and for hazardous waste manifest number 022589413JJK for a shipment of (D001) hazardous Waste Acrylonitrile to Systech Environmental Corporation (EPA ID OHD005048947) on October 26, 2022. No records were provided to show that Toray CMA contacted the transporter or the owner or operator of the designated facility to determine the status of this waste, and Toray CMA did not submit exception reports for these missing manifests. On November 22, 2024, via email Pat Hawkes provided copies of the signed return copy of the missing hazardous waste manifests.

Weekly Inspection Records

The inspectors reviewed the Toray CMA's available inspection records of the hazardous waste central accumulation area (CAA) from January 2022 to present. 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 about container storage time. The records include the date and time of the inspection and the name, signature and initials of the employee conducting the inspection. Employees do routinely record inspection observations and subsequent follow-up actions on the inspection log. No inspection records were provided for the universal waste batteries that were stored past one year.

Hazardous Waste Tank Records

The inspectors requested the Toray CMA's available hazardous waste tank records which included:

- Daily Inspection Records
- Organic Air Emission Monitoring required by 264/265 Subparts AA, BB and CC
- Tank Integrity Testing
- Tank Assessments
- Tank Design and Installation Certification

Daily Inspection Records

During the walkthrough the inspectors observed that the daily inspections of the hazardous waste tanks T-1011 and T-2011 were being conducted on Tuesdays and Thursdays each week instead of daily. On November 22nd, Pat Hawkes provided via email the statement *"Eric Cleveland spoke to Andrea Slay (ADEM Land Division) on the phone, and we already follow this ADEM requirement, so daily visual not required per ADEM Land Division."*

The following additional tank-related documents were provided: graphs of the MSA Chemgard Infrared Gas Monitor (Acrylonitrile) for Tank Farms 1 and 2 and Waste AN Tank Levels, the Toray CMA Decatur Business Interruption and Emergency Action Plan (AL-PROC-0029), dated November 13, 2024, Chemical Spill/Release section on the devices used to monitor and detect possible releases of Acrylonitrile (AN), and the Tank Farm Inspection (AL-WI-0446), Section (7.2) which states *"Check all points listed on the checklist for both Tank Farm 1 and Tank Farm 2. Perform this check at least weekly."* In this document provided by Pat Hawkes, it is stated that Toray CMA DE is

performing this inspection currently two times per week. These inspections and gas monitor graphs are for the tank farms which include the hazardous waste tanks but does not provide a separate output of the hazardous waste tank operations. Pat Hawkes' response also stated that visual inspections are allowed weekly if Toray CMA is daily checking the monitoring system.

On November 28th, via email, Pat Hawkes provided further explanation for the graphs. The graphs are for the MSA CHEMGARD Infrared Gas Monitors (Acrylonitrile) for Tank Farm #1 (R1A002I) and Tank Farm #2 (R2A002I). The graphs display the AN Concentrations (ppm) in the tank farms for November 19 through November 26, 2024. The email further stated the graph review frequency as *"AN Concentrations are monitored continuously. Data from this equipment is displayed (in numerical format) on the "Operations" screen within the SA1 DCS / Spinning Control Room. These graphs have been provided as evidence of continuous monitoring meeting the definition of a "Leak-Detection System" as defined in ADEM Admin. Code R. Chapter 335-14-1-.02."*

The November 28th email provided that the MSA Chemgard Infrared Gas Monitors are calibrated on a quarterly-basis and is monitored in-house by a qualified CMA Spinning Maintenance Instrument Technician. The 2022-2024 calibration forms were attached in the email.

Organic Air Emission Monitoring required by 264/265 Subparts AA, BB and CC

The 2022-2024 leak detection and repair records for the hazardous waste tank ancillary piping were reviewed. The monitoring report from October 2023 to March 2024, dated March 28, 2024, showed no leaks detected.

Tank integrity testing was conducted on March 7, 2022, by Mistras Group, Princeton Junction, New Jersey. The report results for Tank T-1011 and T-2011 stated that *"All TML's were shot through ports installed in insulation. No indications were discovered during the inspection."*

A tank assessment (inspection) for Tank T-1011 was conducted on August 26, 2015, and issues were found. On October 21, 2015, a follow up inspection was conducted, and the tank was deemed ready for use. A tank assessment for Tank T-2011 was not provided, instead a duplicate of Tank T-1011 was attached.

Pursuant to ADEM Admin. Code r. 335-14-3-.01(7)(a)2. [40 C.F.R. § 262.17(a)(2)], which incorporates [40 C.F.R. § 265.191(a)] and is a condition of the LQG Permit Exemption, for each existing tank system that does not have secondary containment meeting the requirements of § 265.193, the owner or operator must determine that the tank system is not leaking or is unfit for use. Except as provided in paragraph (c) of this section, the owner or operator must obtain and keep on file at the facility a written assessment reviewed and certified by a qualified Professional Engineer in accordance with § 270.11(d) of this chapter, that attests to the tank system's integrity by January 12, 1988.

Tank design and installation certification for tank T-1011 was provided in the November 28th email. This tank was designed in 2004. The schematics did not indicate whether the tank was single-walled or a double-walled tank. However, the tank is wrapped in insulation. There was no indication in the schematics to provide that Tank T-1011, an aboveground tank had an interstitial

monitoring device per 40 C.F.R. 260.10, the definition of leak-detection system (*means a system capable of detecting the failure of either the primary or secondary containment structure or the presence of a release of hazardous waste or accumulated liquid in the secondary containment structure. Such a system must employ operational controls (e.g., daily visual inspections for releases into the secondary containment system of aboveground tanks) or consist of an interstitial monitoring device designed to detect continuously and automatically the failure of the primary or secondary containment structure or the presence of a release of hazardous waste into the secondary containment structure.*) Per the EPA website <https://www.epa.gov/ust/release-detection-underground-storage-tanks-usts-interstitial-method#interstimon>, interstitial monitoring method detects leaks in the space between the underground storage tank (UST) and a second barrier. Tank T-2011 tank design and certification was not provided, instead a duplicate of Tank T-1011 was attached.

Based on the information provided for Tanks T-1011 and T-2011, there does not appear to be sufficient information to show that the two hazardous waste tanks are being monitored with a leak detection device that is monitoring for leaks either in the interstitial of the tanks (if the tanks are double-walled) or is monitoring for releases of hazardous waste into the secondary containment structure. If such a leak detection device does not exist for the two hazardous waste tanks or within the secondary containment (meeting the requirements of 40 C.F.R. § 265.193) then daily visual tank inspections should be conducted daily and not twice a week.

Pursuant to ADEM Admin. Code r. 335-14-3-.01(7)(a)2. [40 C.F.R. § 262.17(a)(2)], which incorporates [40 C.F.R. § 265.195(g)] and is a condition of the LQG Permit Exemption, the owner or operator must document in the operating record of the facility an inspection of those items in paragraphs (a) and (b) of this section.

13) Closing Conference

The inspectors conducted the exit meeting at 5:00 PM CST with Andrew Matthews, Pat Hawkes, and Dustin Shaneyfelt. During this meeting, the inspectors stated their preliminary conclusions of the inspection. Toray CMA agreed to provide the information below.

On November 22, 2024 and November 25, 2024, Pat Hawkes provided the documentation in the attached table in an email to Paula Whiting, Novelle Smith, and Andrea Slay.

On November 28, 2024, Pat Hawkes provided via email the additional information requested by the EPA about the Waste AN Tanks.

No.	Item	Photo Name	Document Name	Comments
1	Need universal waste labels at each used batteries location.	Universal Waste Used Battery 1-3, Carb Lab, SA1 DCS	N/A	https://archive.epa.gov/epawaste/hazard/web/html/batteries.html 40 CFR 273.14 (a) Universal waste batteries (i.e., each battery), or a container in which the batteries are contained, must be labeled or marked clearly with any one of the following phrases: "Universal Waste -- Battery(ies)," or "Waste Battery(ies)," or "Used Battery(ies);"

No.	Item	Photo Name	Document Name	Comments
2	Carb Utilities area missing cap on small used oil container and need the secondary containment cleaned out.	Carb Maint Used Oil Container Lid 11.15.24, Carb Maint Used Oil Containment Cleaned Out 11.21.24	N/A	Entered CATSWEB WIN - 5S #138955 to get corrected.
3	90 day waste storage area aisle space is insufficient, need to reorganize totes so have aisle space.	See 90 Day Aisle Space 1-4	N/A	
4	Need to clean oil drips out daily in Spinning Maint. areas that catch oil beneath each of the new oil areas. Need to label the catch areas as used oil.	Spinning Maint. Used Oil Cleaned Containment 1-2 11.21.24	N/A	(CATSWEB WIN - 5S #138956) Drip pans labeled, photos saved to server.
5	Spinning Utilities need label on outside of unlabeled container that says universal waste and need accumulation start date.	See Spinning Maint. Used Bulbs 11.20.24	N/A	
6	Spinning Utilities batteries in back row were past the 1 year date of accumulation (11/13/23) need to get picked up asap, labels missing and also faded on batteries need new labels applied.	See TORAY CMA Waste Manifest - Waste Batteries (11.18.2024), Used Batteries Spinning Maint. Picked Up 11.18.24	TORAY CMA Waste Manifest - Waste Batteries (11.18.2024)	Pickup by A&S Metals pallet of waste batteries
7	AN Waste Tank Inspections not being completed daily, need to update the inspection form and send photo showing being completed daily.	N/A	Word Doc Inspection of Hazardous Waste Tanks	
8	No quick reference guide available at time of the inspection	N/A	Toray CMA Contingency Plan Quick Reference Guide	https://adem.alabama.gov/programs/land/landforms/ContingencyPlanQuickReferenceGuide.pdf
9	Latest contingency plan not sent to local authorities.	N/A	UPDATED EMERGENCY RESPONSE UPDATE - TORAY COMPOSITE MATERIALS (AMERICA) INC.	Emailed to local agencies.
10	3 manifests missing final destination signature.	N/A	Waste Manifest(s)	
11	Universal Waste battery inspections did not show storage over a year.	N/A	N/A	Will have proper inspections going forward.
12	Training records not available at time of inspection.	N/A	Hazardous Waste Mgmt Training record (2022-current)	Records generated

14) Summary of Observations

During the inspection, observations were made concerning the following RCRA requirements:

One of the 10-Liter used oil containers did have used oil inside, was closed but did not have a used oil label.

Pursuant to ADEM Admin. Code r. 335-14-17-.03(4)(c)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.”

The inspectors observed a universal waste battery collection box in the main office administration area contained three spent lithium-ion batteries, was dated September 30, 2024, but was not marked as universal waste.

Pursuant to ADEM Admin. Code r. 335-14-11-.02(5)(a) [40 C.F.R. § 273.14(a)], a SQHUW must label or mark each Universal Waste battery or container or tank in which the batteries are contained clearly with one of the following phrases: “Universal Waste - Battery(ies),” or “Waste Battery(ies),” or “Used Battery(ies).”

One 10-Liter used oil collection container in the CARB area was not closed and missing the lid. The secondary containment pallet had used oil spilled inside and needed cleaning out.

Pursuant to ADEM Admin. Code r. 335-14-17-.03(4)(a)1. Used oil generators shall not store used oil in units other than used oil tanks, containers, or units subject to regulation under Chapters 335-14-5 and 335-14-6. A container holding used oil must always be closed during storage, except when it is necessary to add or remove used oil.

Pursuant to ADEM Admin. Code r. 335-14-17-.03(4)(d) [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.

The Maintenance/Engineering Office had a universal waste battery collection box sitting on the counter was dated September 29, 2024, and contained one spent lithium-ion battery. However, the box was not marked as universal waste.

Pursuant to ADEM Admin. Code r. 335-14-11-.02(5)(a) [40 C.F.R. § 273.14(a)], a SQHUW must label or mark each Universal Waste battery or container or tank in which the batteries are contained clearly with one of the following phrases: “Universal Waste - Battery(ies),” or “Waste Battery(ies),” or “Used Battery(ies).”

The inspectors did not observe “No Smoking” signs at the CAA.

Pursuant to ADEM Admin. Code r. 335-14-3-.01(7)(a)1.(vi)(II) [40 C.F.R. § 262.17(a)(1)(vi)(B)], which is a condition of the LQG Permit Exemption, a generator is required to prevent accidental ignition or reaction of ignitable or reactive waste. This waste must be separated and protected from sources of ignition or reaction including but not limited to the following: Open flames, smoking, cutting and welding, hot surfaces, frictional heat, sparks (static, electrical, or mechanical), spontaneous ignition (e.g., from heat-producing chemical reactions), and radiant heat. While ignitable or reactive waste is being handled, the large quantity generator must confine smoking and open flame to specially designated locations. “No Smoking” signs must be conspicuously placed wherever there is a hazard from ignitable or reactive waste.

The aisle space between the stacked containers was narrow and not sufficient to maneuver through.

Pursuant to ADEM Admin. Code r. 335-14-3-.01(7)(a)6 [40 C.F.R. § 262.17(a)(6)], which incorporates ADEM Admin. Code r. 334-14-3-.14(6) [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.

A used oil storage area with the following:

- A square used oil tank sitting in secondary containment that needed to be cleaned out
- Seven product oil stations with drain pans and containers full of over spilled oil that will not be used. All the drain pans and containers need to be cleaned out and labeled as used oil.

Pursuant to ADEM Admin. Code r. 335-14-17-.03(4)(a)1. Used oil generators shall not store used oil in units other than used oil tanks, containers, or units subject to regulation under Chapters 335-14-5 and 335-14-6. A container holding used oil must always be closed during storage, except when it is necessary to add or remove used oil.

Pursuant to ADEM Admin. Code r. 335-14-17-.03(4)(c)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 ADEM Admin. Code r. 335-14-17-.03(4)(d) [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.

The one fiberboard container of spent lamps was not labeled or dated and held universal waste lamps such as high intensity discharge (HID) lamps. Each lamp was wrapped and dated. The oldest date in the unmarked container was August 7, 2024.

Pursuant to ADEM Admin. Code r. 335-14-11-.02(5)(e) [40 C.F.R. § 273.14(e)], a SQHUW must label or mark each lamp or container of lamps clearly with one of the following phrases: “Universal Waste-Lamp(s),” or “Waste Lamp(s),” or “Used Lamps.”

Ninety-one SLABs, ten spent LINCOLN power tool batteries, four spent battery packs and one spent lithium-ion battery were set on a pallet. At least twelve of the spent batteries were not labeled and at least ten of the spent batteries were not marked with start accumulation dates. The remaining batteries had dates. The rear row against the wall had 21 spent batteries that start accumulation dates exceeded one year. The oldest battery was dated October 23, 2023.

Pursuant to ADEM Admin. Code r. 335-14-11-.02(5)(a) [40 C.F.R. § 273.14(a)], a SQHUW must label or mark each Universal Waste battery or container or tank in which the batteries are contained clearly with one of the following phrases: “Universal Waste - Battery(ies),” or “Waste Battery(ies),” or “Used Battery(ies).”

Pursuant to ADEM Admin. Code r. 335-14-11-.02(6)(a) and (c) [40 C.F.R. § 273.15(a) and (c)], a SQHUW may accumulate universal waste no longer than one year and must be able to demonstrate the length of time that the universal waste has accumulated from the date that it became a waste or was received.

The two 4-Liter containers were in the CARB Lab 1 fume hood, were not closed, and marked as “Chemical Waste.”

Pursuant to ADEM Admin. Code r. 335-14-3-.01(5)(a)4 [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.

The thermal oxidizer baghouse dust did not have a current waste analysis. The 2019 waste profile was the most current analyses provided to the inspectors.

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 ADEM Admin. Code r. 335-14-2-.01(2) [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 ADEM Admin. Code r. 335-14-3-.01(2) [40 C.F.R. § 262.11].

Tank ancillary piping not within secondary containment is not visually inspected daily.

Pursuant to ADEM Admin. Code r. 335-14-3-.01(7)(a)2. [40 C.F.R. § 262.17(a)(2)], which incorporates ADEM Admin. Code r. 335-14-6-.10(4)(f)1. [40 C.F.R. § 265.193(f)(1)], ancillary equipment must be provided with full secondary containment (e.g., trench, jacketing, double-walled piping) that meets the requirements of paragraphs (b) and (c) of this section except for: (1) Aboveground piping (exclusive of flanges, joints, valves, and connections) that are visually inspected for leaks on a daily basis.

The daily tank inspection records appeared to be incomplete.

Pursuant to ADEM Admin. Code r. 335-14-3-.01(a)(7)2. [40 C.F.R. § 262.17(a)(2)], which incorporates ADEM Admin. Code r. 335-14-6-.10(6)(e) [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.

A tank assessment for Tank T-2011 was not provided, instead a duplicate of Tank T-1011 was attached.

Pursuant to ADEM Admin. Code r. 335-14-3-.01(7)(a)2. [40 C.F.R. § 262.17(a)(2)], which incorporates [40 C.F.R. § 265.191(a)] and is a condition of the LQG Permit Exemption, for each existing tank system that does not have secondary containment meeting the requirements of §

265.193, the owner or operator must determine that the tank system is not leaking or is unfit for use. Except as provided in paragraph (c) of this section, the owner or operator must obtain and keep on file at the facility a written assessment reviewed and certified by a qualified Professional Engineer in accordance with § 270.11(d) of this chapter, that attests to the tank system's integrity by January 12, 1988.

Based on the information provided for Tanks T-1011 and T-2011, there does not appear to be sufficient information to show that the two hazardous waste tanks are being monitored with a leak detection device that is monitoring for leaks either in the interstitial of the tanks (if the tanks are double-walled) or is monitoring for releases of hazardous waste into the secondary containment structure. If such a leak detection device does not exist for the two hazardous waste tanks, then daily visual tank inspections should be conducted daily and not twice a week.

Pursuant to ADEM Admin. Code r. 335-14-3-.01(7)(a)2. [40 C.F.R. § 262.17(a)(2)], which incorporates [40 C.F.R. § 265.195(g)] and is a condition of the LQG Permit Exemption, the owner or operator must document in the operating record of the facility an inspection of those items in paragraphs (a) and (b) of this section.

The documentation of the arrangements has not been sent to the local authorities since 2010.

Pursuant to ADEM Admin. Code r. 335-14-3-.01(7)(a)6 [40 C.F.R. § 262.17(a)(6)], which incorporates ADEM Admin. Code r. 334-14-3-.14(7) [40 C.F.R. § 262.256], and is a condition of the LQG Permit Exemption, a generator must: (a) attempt to make arrangements with the local authorities identified, as appropriate for the type of waste handled at the Facility and the potential need for the services of these authorities, and (b) maintain records documenting the arrangements made.

The quick reference guide was not available at the time of the inspection.

Pursuant to ADEM Admin. Code r. 334-14-3-.14(10)(b) [40 C.F.R. § 262.262(b)] requires an LQG that is amending its contingency plan to submit a quick reference guide of the contingency plan to the local emergency responders. The required contents of the contingency plan are specified in ADEM Admin. Code r. 334-14-3-.14(9) [40 C.F.R. § 262.261], and the required contents of the quick reference guide are specified in ADEM Admin. Code r. 334-14-3-.14(10)(b) [40 C.F.R. § 262.262(b)].

The records did not include the job title nor a job description that included the requisite skill, education, or other qualifications, and duties of facility personnel assigned to that position. A written description of the type and amount of both introductory and continuing training to be given to each person filling the positions listed were not available for review.

Pursuant to ADEM Admin. Code r. 335-14-3-.01(7)(a)7(iv) [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.

15) List of Attachments

Attachment A – Photo Log: Toray Composite Materials America Inc.

16) Signed

PAULA WHITING



Digitally signed by PAULA WHITING

Date: 2025.01.14 18:34:57 -05'00'

Paula A. Whiting
Environmental Engineer

17) Concurrence

BROOKE YORK



Digitally signed by BROOKE YORK

Date: 2025.01.21 12:20:42 -05'00'

Brooke York
Acting Chief
RCRA Enforcement Section

ATTACHMENT A

TORAY COMPOSITE MATERIALS AMERICA INC.

DECATUR, ALABAMA

COMPLIANCE EVALUATION INSPECTION PHOTOGRAPHS

NOVEMBER 13, 2024

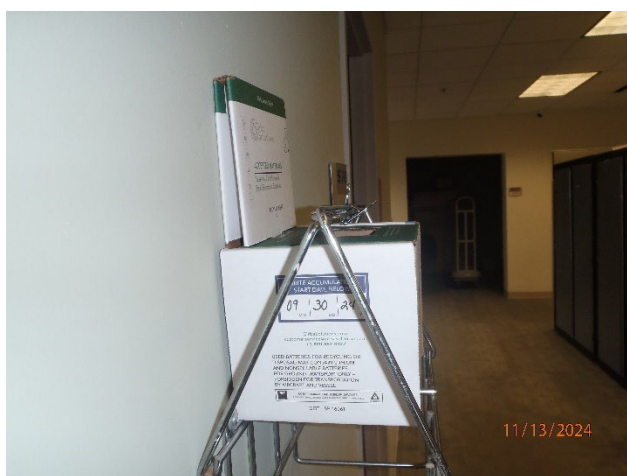
**Photos taken by Paula A. Whiting
Camera Type: Olympus Tough
Serial Number: SC7374**



Picture 1 – Main Office Admin UW Battery box



Picture 4 – CARB Used Oil containers – one not closed



Picture 2 – Main Office Admin UW Battery box dated



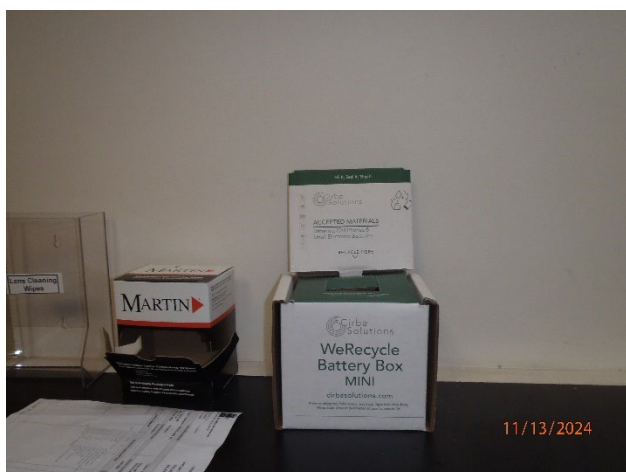
Picture 5 – CARB Used Oil secondary containment need clean out



Picture 3 – CARB Used Oil tank and containers



Picture 6 – Carbonization Line 1 UW Battery box need label



Picture 7 – Maintenance Office UW battery box need label



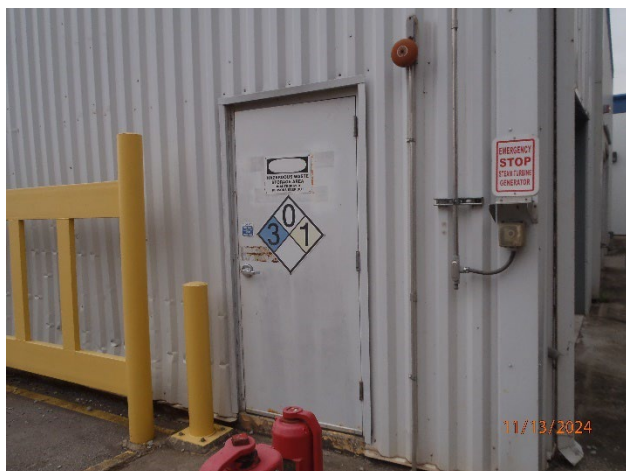
Picture 10 – Hazardous Waste Storage Area inspection check log



Picture 8 – Maintenance Office UW battery box need label



Picture 11 – Hazardous Waste Storage Area – limited aisle space



Picture 9 – Hazardous Waste Storage Area



Picture 12 – Hazardous Waste Storage Area



Picture 13 – Hazardous Waste Storage Area container label



Picture 16 – Spinning Maintenance Used Oil need cleanout



Picture 14 – Spinning Maintenance Used Oil totes



Picture 17 – Spinning Maintenance red can of used oily rags



Picture 15 – Spinning Maintenance Used Oil tank



Picture 18 – Spinning Maintenance red can of used oily rags



Picture 19 – Spinning Maintenance lube oil station drain pan full of used oil



Picture 22 – Spinning Maintenance lube oil station drain pan full of used oil



Picture 20 – Spinning Maintenance lube oil station drain pan full of used oil



Picture 23 – Universal Waste Storage Area



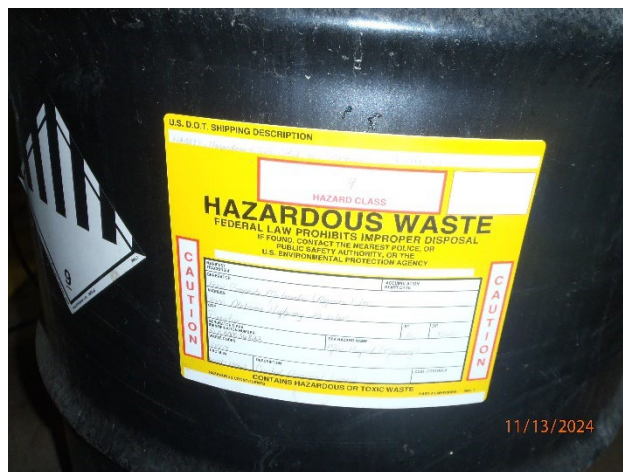
Picture 21 – Spinning Maintenance lube oil station drain pan full of used oil



Picture 24 – UWSA – UW lamp fiberboard containers



Picture 25 – UWSA spent bulbs individually labeled



Picture 28 – UWSA spent bulb crusher label



Picture 26 – UWSA spent fluorescent and LED lamps



Picture 29 – UWSA spent lead acid battery labels – exceeded the storage date



Picture 27 – UWSA spent lead acid batteries



Picture 30 – UWSA spent lead acid battery labels – exceeded the storage date



Picture 31 – Technical Center Chemical Lab fume hood SAA



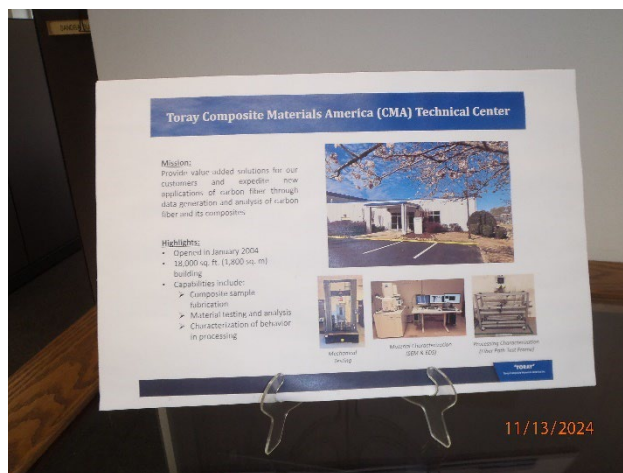
Picture 33 – Technical Center Chemical Lab fume hood SAA



Picture 32 – Technical Center Organic Solvent Waste Log



Picture 34 – Technical Center product display cabinet



Picture 35 – Technical Center information poster



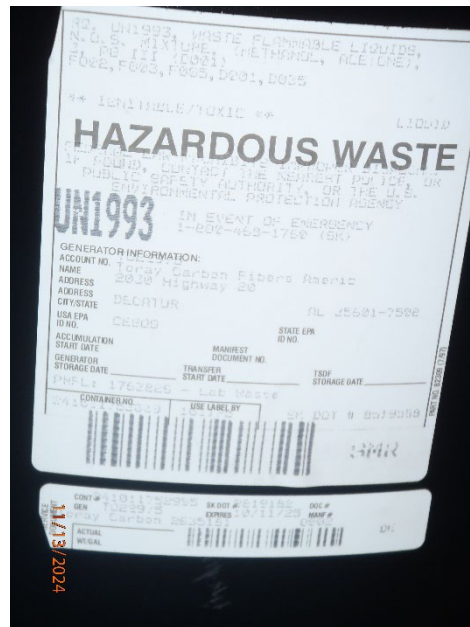
Picture 36 – Technical Center product example



Picture 37 – Technical Center product example



Picture 38 – CARB Lab 1 SAA



Picture 39 – CARB Lab 1 SAA label



Picture 40 – CARB Lab 1 SAA sign



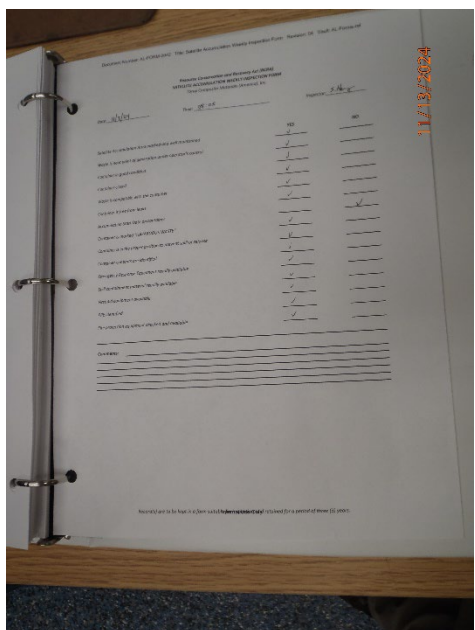
Picture 43 – Thermal Oxidizer Baghouse dust



Picture 41 – CARB Lab 1 fume hood SAA open containers



Picture 44 – Thermal Oxidizer Baghouse dust



Picture 42 – CARB Lab 1 SAA weekly inspection form



Picture 45 – AN Waste Tanks



Picture 46 – AN Waste Tank conservation vent



Picture 49 – AN Waste Tanks top of the tank piping



Picture 47 – AN Waste Tanks top of the tank piping



Picture 48 – AN Waste Tanks top of the tank piping