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REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029**

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CAA Full Compliance Evaluation (FCE)
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Company Name: Befesa Zinc U.S. Inc.
Facility Name: American Zinc Recycling
Facility Location: 900 Delaware Ave, Palmerton, PA 18071
Latitude: 40.803853 **Longitude:** -75.604612

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I. Introduction

On August 26, 2021, the United States Environmental Protection Agency, Region III (“EPA”), Enforcement & Compliance Assurance Division (“ECAD”), RCRA Section, Air Section, and Water Section conducted an unannounced Compliance Schedule Evaluation (“CSE”) under the Resource Conservation and Recovery Act (“RCRA”), as amended, 42 U.S.C. Sections 6901 et seq., as amended, Clean Air Act, and Clean Water Act (“CWA”), of American Zinc Recycling, located in Palmerton, PA, (herein after referred to as “the Facility” or “AZR”). The U.S. EPA inspectors were Rebecca Serfass, Amelie Isin, and Kaitlin McLaughlin. Prior to this inspection, Pennsylvania Department of Environmental Protection (“PADEP”) was notified and participated in the inspection. PADEP was represented by the following for RCRA: Dean Ritter, Chief of Compliance, Monitoring, and Enforcement and David Matcho, Permitting Chief, by the following for Air: Robert Mullin, PADEP Air Quality Specialist, and by the following for Water: Patrick Musinski, Monitoring & Compliance Manager, and Kelsey Glavich, Water Quality Specialist.

The inspection included an evaluation of the Facility’s processes and its compliance with RCRA Subtitle C and the federally authorized Pennsylvania Hazardous Waste Code (“PaHWC”), its Clean Air Act Title V stationary source state operating permit, its National Pollutant Discharge Elimination System (“NPDES”) permit, and the June 23, 2021 Consent Decree between the U.S., PADEP, and American Zinc Recycling Corp (“2021 CD”). All information included in this report is the result of statements by the Facility representatives, materials shown to the inspectors by the Facility representatives and/or documents provided by the Facility representatives to the inspectors at the time of, or subsequent to, the inspection. In addition, information gathered prior to the inspection from a review of EPA and State records may be included in this report.

A. Inspection Opening Conference

The EPA inspectors arrived through the Facility’s guarded gate at approximately 8:50 am and the weather conditions were humid with a temperature of approximately 75 degrees Fahrenheit at the time of arrival, with a high of 91 degrees Fahrenheit throughout the day. The EPA inspectors presented their credentials to the guard at the guard shack and subsequently to Mr. Foster when he greeted them in the parking lot at the Facility. Ms. Serfass (“EPA RCRA Inspector”) inquired with the guard at this time about whether video footage of the Facility’s Pressure Differential (“PD”) Unloading Station was visible to him within the guard shack. The guard indicated that there is a screen that displays the PD Unloading Station where he watches for “dusting” and will call a manager if any is observed. He also stated that he was not aware of any instances of this happening since the process was put in place. The inspectors were then met by Mr. Foster who escorted the EPA and PADEP inspectors into a conference room in the Facility’s main office. During the opening conference, the EPA inspectors explained the purpose and scope of the inspection, informed the Facility representatives that they would be taking photos and requesting copies of records. Additionally, the EPA inspectors informed

the Facility representatives of their right to make confidential business information (“CBI”) claims on information provided and photographs taken during the inspection.

B. Summary of the Facility

AZR was purchased by Befesa Zinc U.S. Inc. the week prior to this inspection. The Facility operates 24 hours a day, seven days a week. It covers about 163 acres, although many parts of the property are owned or leased by other facilities or have been abandoned. AZR mainly processes K061 hazardous waste (Electric Arc Furnace “EAF” dust) obtained from carbon steel manufacturers to recover zinc from the K061.

II. Site Activity

A. Permit and Regulatory Status

The Facility currently operates as a Large Quantity Generator of hazardous waste and has a RCRA Part B Treatment, Storage, and Disposal Permit (Permit #PAD002395887). The RCRA permit allows for the acceptance and handling of approved hazardous wastes with waste code K061 EAF dust. The permit was issued on October 10, 2006 and expired on October 10, 2016. The permit renewal is currently under review with PADEP which was temporarily put on hold during settlement negotiations that led to the 2021 CD. The Facility is currently subject to requirements outlined in this 2021 CD. (CD DOCKET #3:21-cv-00098-RDM). The Facility operates under a Clean Air Act Title V stationary source state operating permit issued by PADEP in March 2019 (permit # 13-00001). The Facility operates under a Clean Water Act NPDES Permit #PA0064378 issued on July 1, 2011. The NPDES Permit expired in 2016 but was administratively extended and is still the effective permit.

During the opening conference, the EPA RCRA Inspector inquired about the transfer of Zinc Rich Material (“ZRM”) at the Facility. ZRM is stored in the Facility’s Cathedral Building and is required to be removed, either by recycling onsite or transfer offsite as a hazardous waste, under a ZRM Storage Pile Removal Plan (“ZRM Removal Plan”) required by the 2021 CD. As of the date of this inspection, the ZRM Removal Plan had not been approved by EPA. AZR submitted the ZRM Removal Plan to EPA on June 30, 2021. The Plan specified that the ZRM would be wetted after it is placed into dump trucks for transfer onsite but did not indicate that the dump trucks would be covered during transport. EPA provided comments to AZR on July 15, 2021 stating that the dump trucks transferring ZRM onsite and offsite should both be covered while in transport. AZR sent EPA an updated ZRM Removal Plan on August 5, 2021, but the updated plan did not include language that the dump trucks must be covered during transfer of ZRM for onsite recycling and asserted that the wetting of the ZRM, trucks following the posted speed limits onsite, and watching for fugitive emissions was sufficient. The EPA RCRA Inspector explained to the Facility representatives at the time of the inspection that the ZRM Removal Plan has not been approved as is and that EPA is requiring the dump trucks to be covered during onsite and offsite transport. The Facility representatives stated that AZR has been recycling

ZRM at the Facility and typically transfers truckloads of ZRM from the Cathedral Building to Building 608 at the rate of approximately two truckloads per day, but that no transfers had been made for a couple weeks.

The Facility representative stated no fugitive dust issues have been noted with the transfer and when the EPA RCRA Inspector asked to observe a ZRM transfer event, the Facility representatives stated there were no transfers scheduled for the day of the inspection. The Facility representative also stated that none of the ZRM has been transferred offsite as hazardous waste or otherwise, and all of the ZRM removed from the Cathedral Building has been recycled onsite. Subsequent to the inspection, via email on October 7, 2021, AZR sent EPA a revised ZRM Removal Plan, as discussed above, that included a provision to cover dump trucks of ZRM during transport offsite as well as during transfer of the ZRM between buildings onsite.

The EPA RCRA Inspector inquired about whether any visible emissions have occurred at the PD Unloading Station since the installation of cameras and the monitoring of that camera feed, as required by the 2021 CD. The Facility representative stated that there was one instance where dust was observed by the employee, working at the trestle station, monitoring the camera. The Facility representative stated that a manager was called, and that the driver of that PD truck has been banned from making further deliveries at the Facility.

The EPA RCRA Inspector inquired about weekly inspections being conducted at the Facility's Lime Bunker, as required by the 2021 CD if waste is stored in the Lime Bunker. The Facility representative stated that no waste has been stored in the Lime Bunker and subsequently, no weekly inspections have been conducted or documented at the Lime Bunker.

Additionally, the EPA RCRA Inspector mentioned to Facility representatives that EPA had not received the certification that buildings designated for lead chloride storage (Cathedral Building, Barium Building, Warehouse Building, Powders Building, Lithopone Building, and Lead Chloride Packing Building) meet the requirements of 40 CFR 264.14-.17, 264 Subpart C, and 264 Subpart D as required by Paragraph 42.d. of the 2021 CD. This certification was due no later than the date of lodging of the 2021 CD, which was January 19, 2021.

In response to questions related to the 2021 CD asked by Ms. Isin ("EPA Air Inspector"), Mr. Foster said that Bag Leak Detection Systems (BLDSs) were being installed on the Kiln #1, 2, and 5 product collectors that day, and would likely be operational the following week. (These are required to be installed by December 23, 2021 under the 2021 CD.) In addition, Mr. Foster said that bag replacement frequency lab assessments required under the 2021 CD were also underway. He did not have any information to share regarding the required stack testing due under the 2021 CD in 2022, and also said that there were no plans to install an emergency generator for Kiln #6, as required by 2022, given that Kiln #6 has not been used in a long time. Lastly, in response to questions about pressure drop readings

provided to EPA by AZR in the first semi-annual report under the 2021 CD showing a disparity in readings between Kiln #2 East and Kiln #2 West, Mr. Falko explained that the Kiln #2 West readings were inaccurately high given a plug in the long metal air line for the monitor. This is being addressed through a capital project to install new Process Logic Control (PLC) equipment and new cabinets at each baghouse to minimize instrumentation air tubing lengths, but has been a recurring issue in recent years (since 2018).

B. Process Description

AZR initiates the recovery of zinc from K061 EAF dust through a process called Waelzing. At the beginning of the Waelzing process, EAF dust from carbon steel mills is brought in either by hopper railcars, PD railcars, PD trucks, or dump trucks. After entering the Facility, samples are taken of each load of K061 EAF dust to test for radiation and zinc levels. If acceptable, the dust is off-loaded to the Conditioning/Blending Building 608, which is covered by the RCRA permit. Here, it is mixed with coke and wetted, sent through a pelletizer, and fed into a kiln. In the kiln, natural gas burners start an exothermic reaction. The reaction generates fumes which are directed to a baghouse, as well as residual solids. Dust collected from the baghouse is referred to as "crude zinc oxide" (CZO). Previously, this material was stored in the "G & H" Building or CZO Storage Building 644, prior to entering the Calcining process. Since the Facility has ceased running the Calcining step of the process, the CZO is routed through the Lead Chloride Packing Building where it is placed into railcars or sacks for transfer to the North Carolina facility. Prior to being shipped to North Carolina, the CZO contained within sacks onsite is currently being stored in the G&H Building, the Cathedral Building, the Warehouse, and the Lithopone Building.

Solid material that drops out of the Waelzing kilns is referred to as "iron rich material" (IRM). This material is released into quench pits (concrete bunkers full of water) and taken by loader to the "Dome" Building. The IRM is analyzed for hazardous metals concentration by the Toxicity Characteristic Leaching Procedure (TCLP) and is held in the Dome or in a three-walled, roofed shed like structure until the analytical results show that none of these levels exceed the RCRA Hazardous Waste (HW) thresholds. According to Facility representatives, the IRM material occasionally has failed in the past for zinc levels, in which case the IRM is returned to a Building 608 and subsequently a Waelzing kiln for further processing. After confirming the IRM material passes the analytical tests, it is stored in piles in an area on the eastern end of the Facility, known as Stony Ridge, and sold primarily to cement manufacturers.

The Facility previously conducted a second step of the process called Calcining where CZO was fed into kilns leading to the production of dust collected in bag houses, referred to as lead chloride and a solid material that dropped out of the kilns referred to as calcine. At the time of the inspection, the Facility representatives informed the inspectors that they have not conducted the calcining process since April 2020 and that CZO generated at the Facility is shipped to the American Zinc Products

facility located in North Carolina to be processed there. The Facility representatives stated that since calcining has not occurred at the Facility since April 2020, lead chloride and calcine has not been generated at the Facility since that time either.

The Facility has four rotary kilns, numbered 1 (both waelzing and calcining), 2 (waelzing only), 5 (waelzing only), and 6 (calcining only). The process used by these kilns is:

- heat the feed material to a temperature that vaporizes the low boiling point metals (lead, zinc, cadmium, chromium);
- pull those vaporized metals out of the kiln atmosphere;
- allow the vaporized metals to oxidize in the ambient air within ductwork connected to the baghouse;
- collect oxidized metals in a product collector (baghouse) for packaging and sale (waelz oxide from the waelzing process and lead chloride from the calcining process); and
- collect the material that travels through the kiln and comes out of the kiln bottom (either IRM from the waelz kilns or zinc calcine in pebble form from the calcine kilns).

The Facility conducts kiln cleanouts approximately every 60 days where kiln rubble is generated and conducts kiln rebricking approximately 1 to 2 times a year where kiln brick is generated. The Facility previously managed the kiln rubble and kiln brick as D006, D008 hazardous wastes. The Facility representatives stated that approximately two years ago, the Facility ceased managing the kiln rubble and kiln brick in roll-off containers managed as hazardous waste and now the material is transferred into Building 608, the Facility's permitted RCRA containment building, where it is crushed and processed with the incoming EAF dust.

In addition, the following information was obtained during the opening conference of the inspection: Only Kiln #5 was in operation at the time of the inspection. Kilns #1 and #2 were not in operation and Kiln #6, formerly used for calcining, has not been run since approximately April 2020, when calcining operations ceased at the Facility. The Facility representatives stated that they do not believe calcining will be taking place at the Palmerton Facility any time soon and that there are currently no plans to operate Kiln #6. AZR now ships the CZO generated in Palmerton to North Carolina in either railcars or sacks and the North Carolina facility ships the railcars back to the Facility empty.

C. Hazardous and Non-Hazardous Waste Generation

Waste generated at the Facility includes, but is not limited to:

- **Kiln rubble/brick:** generated from maintenance and/or renovation of the kilns, primarily consisting of refractory brick that is either damaged or covered with burn residue. Previously stored in roll-off containers onsite and managed as D006, D008 hazardous waste prior to offsite

disposal; currently, once generated is placed in Building 608 and managed with EAF dust to be processed

- **Spent baghouse bags:** placed into kilns to recover any remaining material.
- **PPE, hoses, conveyor belts:** managed as D006, D008 HW and stored in roll-off containers, prior to shipment offsite.

III. Observations

A walkthrough of the Facility began at approximately 10:10am, with the inspectors being accompanied by Mr. Foster, Mr. Falko, and Mr. Perkins. Photographs taken by Ms. Serfass, Ms. Isin, and Ms. McLaughlin during the inspection can be found in the Photographic Log included with this report as Attachment #1. Many areas of the Facility can only be accessed with a respirator; those areas were not inspected. In addition, inspectors were told by Facility representatives that the Facility control room (Attachment 1, Photo #8) and all of the kiln baghouse pressure gauges (with the exception of F1 and F2) can only be accessed with a respirator, so EPA inspectors relied on AZR staff to provide information on pressure drop readings at the time of the inspection. The walkthrough resulted in the following observations:

EPA Air Inspector Observations

A. Roadways

Just outside the Facility's main office, and also outside the PD Truck Unloading Area, the EPA Air Inspector saw 10 mph speed limit signs (Attachment 1, Photo #1), as required under the 2021 CD's Fugitive Dust Control Plan (FDP) to minimize the potential for fugitive emissions from roadways. The EPA Air Inspector also observed the big sweeper truck required to operate daily under the FDP on its route, but the truck was only vacuuming, and was not using its sweeper brush (Attachment 1, Photo #2). Facility representatives said that this is the default mode, that the sweeper uses a positive pressure air "vacuum" and that they do not use the brush of the sweeper because it generates more dust than it picks up. The EPA Air Inspector also observed the water truck (Attachment 1, Photo #3), but it was not on its route.

B. Outdoor Material Stockpiles

EPA inspectors observed the area where coke/carbon was previously stored, between the PD Unloading Station and the Building 608 EAF dust storage building and did not see any material stored there at the time of the inspection. The Facility representatives stated that the coke/carbon material is now stored in a 3-sided, roofed structure further east at the Facility that was previously used to store zinc calcine. This change was made since the Facility no longer produces zinc calcine.

C. Material Loading/Unloading Operations Area

Inspectors walked towards the Material Loading/Unloading Operations Area. There, the EPA Air Inspector observed three PD trucks unloading and waiting to unload EAF dust. The Standard Operating Procedure (SOP) listed in Appendix D to the FDP, references, among other things, an unloading limit of 14 psi. Respirators are required to get into the Pneumatic Delivery Truck Unloading area, however, during the time of the inspection, AZR staff informed EPA that a truck containing EAF dust reading 14 psi was waiting for unloading.

Respirators are required to check the differential pressure gauges for EAF Dust Railcar Unloading B1 and B2 baghouses, but Mr. Falko provided a photo which showed the gauges at 0.6 and 0.5 inches of H₂O, respectively. Similarly, the differential pressure gauges for the Pneumatic Material Handling Receiving Silos (C64A-E) were inaccessible to the EPA Air Inspector due to respirator requirements, and Mr. Falko provided photos which showed the gauges at 2.4, 1.6, 5.0, 2.5, and 1.6 inches of H₂O, respectively. These values are within the 0.5-5.0 inches of H₂O pressure drop range provided in paragraph 86 of the 2021 CD.

D. Material Conveying Equipment

The EPA Air Inspector looked for material accumulation beneath the equipment or holes and gaps in the enclosure and did not observe any at the time of the inspection (Attachment 1, Photo #4).

Respirators are required to check the differential pressure gauge for the Kiln Feed Conveying System baghouse (C63), but AZR staff provided a photo which showed the gauge at 1.1 inches of H₂O, within the 0.5-5.0 inches of H₂O pressure drop range provided in paragraph 86 of the 2021 CD. This was the only operational pressure drop gauge in this area, since Kiln #5 was the only kiln in operation at the time of inspection (Attachment 1, Photo #5).

E. Product Collector and Baghouse Areas

Respirators are required to check the differential pressure gauges for Kiln #5 product collectors (Attachment 1, Photo #9), but AZR staff provided a photo which showed gauges for all compartments at 3.0 inches of H₂O or below. The EPA Air Inspector was able to see the differential pressure gauge for the F1 Kiln Baghouse (C61) (Attachment 1, Photo #10), which had a reading of 4.0 inches of H₂O, within the 0.5-5.0 inches of H₂O pressure drop range provided in Paragraph 86 of the 2021 CD. In addition, the EPA Air Inspector was able to see the differential pressure gauges for the F2 Kiln Baghouse (C60) (Attachment 1, Photos #11 and 12), which read between 0-2.0 inches of H₂O, within the 0.5-5.0 inches of H₂O pressure drop range provided in paragraph 86 of the 2021 CD.

In addition, under the 2021 CD, AZR is required to visually evaluate, on a daily basis, the condition of the kiln seals for natural wear and tear. The EPA Air Inspector checked the kiln seal for Kiln #1 (Attachment 1, Photo #6), which appeared not to show warping or other signs of significant wear.

Lastly, PADEP inspector, Mr. Mullin, pointed out three, 10-15 second puffs of fugitive dust over the course of three minutes of observation time at the elevator associated with Kiln #5. The problem was resolved when the area was re-surveyed approximately 75 minutes later and Mr. Falko advised that the drag belt was operating again as normal.

EPA RCRA Inspector Observations

F. Truck Wash Building

The inspectors observed the Facility's Truck Wash Building (Attachment 1, Photos #13 and 14). This building is attached to the Building 608 EAF dust storage building. As required by the 2021 CD, a camera was installed on the outside of the building in order to record whether trucks leaving the building, after unloading EAF dust in Building 608, are exiting the building thoroughly washed of EAF dust or if they are tracking dust out of the building (Attachment 1, Photo #15). Additionally, the inspectors observed a sign on the building that informed employees and drivers that they are on camera in this area. The Facility representatives informed inspectors that because of the diameter of the tires on the dump trucks, in order to avoid track out of EAF dust, it has been determined that the Truck Wash Building needs to be extended by 85 feet. The Facility representatives estimated that this project would be complete by February 2022. Later on during the Facility tour, the inspectors observed a truck leaving the Truck Wash Building (Attachment 1, Photos #16 and 17 taken by PADEP inspector Robert Mullin). The dump truck and its tires did not appear to have EAF dust on them when it was exiting the Truck Wash Building. The water track out from the dump truck was observed (Attachment 1, Photos #18 - 20). A minimal amount of brown sediment was observed in two small puddles just outside the exit of the Truck Wash Building, as seen in Attachment 1, Photo #20.

G. EAF Dust Storage Building 608

Next, the inspectors observed the exterior of Building 608, which is covered under the RCRA Permit allowing for the storage of K061 EAF dust. As required by the 2021 CD, an inspection conducted by a Professional Engineer (PE) was performed to determine Building 608 and the Truck Wash Building's compliance with the RCRA Permit and the 2021 CD. The PE found a number of corrective action items that were outlined in the PE inspection report. The Facility representatives stated they are in the process of completing those items. The 2021 CD requires that the corrective action items are completed within 90 Days of the PE inspection report unless the Facility requests an extension that is approved by EPA. On August 30, 2021, AZR requested an extension of this deadline to complete the action items, which includes extending the Truck Wash Building as mentioned above, to February 1, 2022. On September 23, 2021, EPA approved this request, via email. Some track out of what appeared to be EAF dust was observed at the bay door of Building 608 (Attachment 1, Photo #21) and an overview of the south side of Building 608 can be seen in Attachment 1, Photo #22 and a dump truck waiting to unload EAF dust into Building 608 can be seen in Attachment 1, Photo #23.

H. PD Unloading Station

The inspectors observed the Facility's PD Unloading Station, where PD trucks unload EAF dust into Building 608 (Attachment 1, Photos #24 - 27). The inspectors observed that the area had been partially enclosed and cameras had been placed inside and outside of the structure at the PD Unloading Station as required by the 2021 CD. The Facility representatives stated that the cameras feed to monitors at the guard shack at the main entry of the Facility and at the trestle station. The Facility representatives also pointed out to inspectors that there was an AZR employee acting as an attendant of the PD Unloading Station. The inspectors observed three PD trucks unloading at the time of the inspection and did not observe any signs of visible emissions at that time.

As the inspectors continued on with the Facility tour, they observed the conveyors leading from Building 608 to the kilns and the ground between Building 608 and the kilns (Attachment 1, Photos #28 - 29).

I. Lime Bunker

The inspectors observed the Facility's Lime Bunker that was previously used to store hazardous waste kiln rubble (Attachment 1, Photo #30). The Facility has posted signs, as required by the 2021 CD, to inform employees that hazardous waste is prohibited from being stored within the Lime Bunker, unless it is placed in a RCRA compliant container (Attachment 1, Photos #31 - 32). At the time of the inspection, the inspectors observed black material being stored in the Lime Bunker, which the Facility representatives stated was road salt with anti-skid aggregate.

J. IRM Quench Pit Area

The inspectors observed IRM falling out of the Waelzing process after being quenched with water (Attachment 1, Photos #34 - 35). The Facility representatives stated that the quench water observed on the ground gravity flows into a sump and is reused to quench the IRM coming out of the process. The inspectors observed the quench water slowly flowing across the ground to an entry point to the sump (Attachment 1, Photo #36). The Facility representatives also stated that AZR plans to pave the area and create a trench that will convey the quench water to the sump and that this is being done as part of the Facility's stormwater plan required as part of the 2021 CD. The Facility representatives stated that the quench water is not disposed of as waste but is continuously reused for the IRM quench process.

K. CZO Storage (former Lead Chloride Storage) Areas

Lithopone Building

The EPA RCRA inspector observed the Lithopone Building, one of the buildings designated as a potential accumulation building for lead chloride under the 2021 CD (Attachment 1, Photo #37). The Facility representative stated that since the Facility stopped producing lead chloride, the Lithopone Building has been used to store sacks of CZO. The inspector inquired about emergency response systems and how an emergency in this area would be communicated. The Facility representative

stated that a radio or cell phone would be used to communicate an emergency. The inspector observed that the Lithopone Building was filled with sacks of CZO that weigh approximately 3,000 - 4,000 pounds each (Attachment 1, Photos #38 - 39). The inspector observed that the sacks were stored closely together (Attachment 1, Photo #40) and the Facility representative stated that the sacks of CZO are shipped to the American Zinc Products facility located in Mooresboro, NC. The earliest date the inspector observed on the CZO sacks in the Lithopone building was “7/23”.

Cathedral Building

The EPA RCRA inspector observed the Cathedral Building, one of the buildings designated as a potential accumulation building for lead chloride under the 2021 CD, where the Facility currently stores CZO and ZRM. The Facility representative stated that a loader operator staff at the Facility loads the ZRM into a dump truck and transfers it to Building 608 whenever the Facility is actively introducing ZRM into the kilns. The current accumulation of ZRM in the Cathedral Building can be seen in Attachment 1, Photos #41 - 44. Additionally, CZO sacks stored in the Cathedral Building can be seen in Attachment 1, Photos #45 and 46).

Barium Building

The EPA RCRA inspector observed the Barium Building, one of the buildings designated as a potential accumulation building for lead chloride under the 2021 CD. The EPA RCRA inspector did not observe any sacks of CZO or lead chloride in the Barium Building at the time of the inspection. The Facility representative stated that AZR does not typically store any materials in this building and that it is used by Air Gas, another company that operates on parts of the site.

Warehouse

Next, the EPA RCRA Inspector observed the Facility’s Warehouse Building, one of the buildings designated as a potential accumulation building for lead chloride under the 2021 CD. The Warehouse contained additional sacks of CZO awaiting shipment to American Zinc Products in North Carolina (Attachment 1, Photos #47 - 49). The earliest start date on the CZO sacks observed by the inspector was 7/14/21. The Facility representative reiterated that the Facility is no longer accepting CZO at the Facility since they are no longer conducted the Calcining process, but that the CZO stored onsite is all generated onsite.

L. Facility Perimeter

Throughout the inspection, the inspectors watched for evidence of fugitive dust emissions at the site. While walking and driving around the Facility, inspectors observed the Facility perimeter. No signs of fugitive dust escaping the site were observed at the Facility perimeter at the time of the inspection. The inspectors took a break for lunch at 12:45pm and returned to the Facility at 1:35pm to conduct the records review portion of the inspection. When returning from lunch, the inspectors observed that the Facility’s entrance sign indicated that the Facility operates 24 hours a day and 7 days a week, a requirement of the 2021 CD.

M. Roll-Off Containers

After returning to the Facility from lunch and prior to conducting the records review, the EPA RCRA Inspector inquired about the four roll-off containers that were observed in the parking lots between the main office and the G&H Building. The first roll-off container was labeled as hazardous waste solids (lead, cadmium) Belting – Hoses (Attachment 1, Photos #50 and 51). The roll off appeared to be closed and was marked with a start accumulation date of 7/23/21.

The second roll-off container was labeled as nonhazardous waste with no further description or start accumulation date. The Facility representative stated that this roll off contained siding from a building renovation and that the building renovated was most likely the G&H Building or the Blender Building. The roll-off container appeared to be closed (Attachment 1, Photos #52 and 53). Lastly, the other two roll-off containers located in the parking lot to the east appeared to be covered, not labeled, and according to the Facility representatives, were empty at the time of the inspection.

EPA Water Inspector Observations

N. Settling Basins

After returning to the Facility from lunch, Ms. McLaughlin (“EPA Water Inspector”) observed the settling basins. Non-contact cooling water from kiln bearings is pumped to a wet well (Attachment 1, Photo #60). Water from that wet well is pumped to the north settling basin (Attachment 1, Photo #61). The Facility representative stated the south settling basin is not used and that the water in the south settling basin is rainwater that has accumulated over time (Attachment 1, Photo #62). The water from the north settling basin is gravity fed to Outfall 004 via the wet well building (Attachment 1, Photo #63).

O. Outfalls

The EPA Water Inspector observed the Facility’s two outfalls that discharge to the Aquashicola Creek. Outfall 004 is along the northeast perimeter of the Facility. Effluent samples and flow monitoring for Outfall 004 occurs at a location along the interior fence line of the Facility before the outfall pipe reaches the Aquashicola Creek as it is an easier location to obtain a sample. There were two filter socks tied across the water channel at this location (Attachment 1, Photo #55). At Aquashicola Creek, Outfall 004 pipe was slightly overgrown with vegetation. Farther into Aquashicola Creek, in front of Outfall 004, there was a filter sock. The filter sock appeared soiled, had vegetation growing on it, and had debris built up behind it (Attachment 1, Photo #57). The Facility representative stated that he has been working at this Facility for over 4 years and has never changed the filter sock. Outfall 005 is along the northwest perimeter of the Facility (Attachment 1, Photo #59). Effluent samples and flow monitoring for Outfall 005 occurs where the effluent enters the Aquashicola Creek (Attachment 1, Photo #58).

The Facility representative stated that he takes 24-hour composite samples twice a month at both outfalls for total suspended solids, oil & grease, cadmium, lead, and zinc. Flow and pH are continuously monitored.

This concluded the physical walkthrough portion of the inspection.

IV. Records Review

After the walkthrough, EPA inspectors, PADEP inspectors, and Facility representatives returned to the Facility's conference room in the Main Office to review records requested prior to the inspection. The following records were provided as requested for review. Notes related to EPA's on-site review are provided in *italics* below each item.

1. Current list of baghouses and their associated pressure drop ranges (per 2021 CD ¶ 93)
 - *Provided by e-mail from Mr. Basilone on September 5, 2021. This list did not include pressure drop ranges for the baghouses associated with kilns #2 and #5.*
2. The following records related to the FDP, 6/23/21 to present:
 - Copies of FDP inspection logs:
 - Daily Street Sweeping Log (roadways)
The following required FDP daily inspection logs for the Sweeper Truck were missing: 7/1, 7/3, 7/4, 7/10, 7/11, 7/17, 7/18, 7/24, 7/25, 7/31, 8/1, 8/8, 8/15, 8/22, 8/23, 8/24, and 8/25. AZR staff said that these logs are only completed on dry days when receiving trucks.
 - Daily Industrial Sweeping Log (roadways and other processing areas)
The following required FDP daily inspection logs for the Industrial Sweeper were missing: 6/26, 6/27, 7/3, 7/4, 7/10, 7/11, 7/17, 7/18, 7/24, 7/25, 7/31, 8/1, 8/7, 8/8, 8/14, 8/15, 8/16, 8/21, 8/22, 8/23, 8/24, and 8/25.
 - Daily Water Truck Log (roadways and outdoor material stockpiles)
The following required FDP daily inspection logs for the Water Truck were missing: 6/26, 6/27, 7/3, 7/4, 7/10, 7/11, 7/17, 7/18, 7/24, 7/25, 7/31, 8/1, 8/7, 8/8, 8/14, 8/15, 8/21, and 8/22 (all weekends).
 - Daily Carbon Stockpile Inspection Log
The following required FDP daily inspection logs for the Carbon Stockpile were missing: 7/10 and 7/11 (weekend).
 - Daily IRM Processing Area Inspection Log
The following required FDP daily inspection logs for the IRM Processing Area were missing: 6/23, 6/24, 6/25, 6/26, 6/27, 7/3, 7/4, 7/9, 7/10, 7/11, 7/17, and 7/18. All of the logs were initialed "KS" (Karey Schonberger?).
 - Daily EAF Unloading Area Inspection Log
There were missing required FDP daily inspections for the EAF Unloading Area, for all shifts but the 7am-3pm shift for June and July 2021. In addition, there were no weekend logs except for 7/10 (7am-3pm shift).

- Daily CZO Unloading Area Inspection Log
These records were provided and reviewed on-site.
 - Daily IRM/Calcine Loading/Unloading Area Inspection Log
These records were provided and reviewed on-site.
 - Daily Dust Catcher Unloading Area Inspection Log
The following required FDP daily inspection logs for the Dust Catcher Unloading Area were missing: 6/23, 6/24, 6/25, and 8/16-25.
 - Daily (when in use) Vac-Rack Area Inspection Log
All of the logs were initialed "EC".
 - Weekly EAF Material Conveying Equipment Inspection Log
These records were provided and reviewed on-site.
 - Weekly CZO Material Conveying Equipment Inspection Log
These records were provided and reviewed on-site.
 - Weekly Kiln Feed/Discharge Material Conveying Equipment Inspection Log
These records were provided and reviewed on-site.
 - Weekly Lead Chloride Material Conveying Equipment Inspection Log
None available given that there is no longer any lead chloride generated on site.
 - Daily Product Collector Inspection Log
These records were provided and reviewed on-site.
 - Daily Fugitive Baghouse Weekly Inspection Log
These records were provided and reviewed on-site.
 - Daily Facility Perimeter Fugitive Emission Evaluation Log
The Daily Perimeter Inspection log sheets did not contain any specific location information for the inspections, and generally only stated "no issues". The log sheets for 8/16-25 were missing.
-
- All occurrences of visible fugitive emissions and corrective actions taken
According to Mr. Falko, no visible emissions were observed since 6/23/21.
 - Any incident forms submitted to the environmental manager
According to Mr. Falko, no incident forms were submitted since 6/23/21.
 - Any Method 22 log sheets
According to Mr. Falko, no Method 22 log sheets were created since 6/23/21.
 - Any work orders related to maintenance performed due to FDP inspections
These records were provided and reviewed on-site. Copies of work orders 600616, 642148, 743115, 934970, 943611, and 963782 on file.
 - FDP training materials and personnel training records
These records were provided and reviewed on-site. Copies on file.
 - Method 9 certification and Method 22 training records
These records were provided and reviewed on-site. Copies on file.

3. Pressure drop readings per 2021 CD ¶ 83, 6/23/21 to present:
- Feed Hopper Loading (PROC 233, Control C54)
Some pressure drop readings on 6/26 and 6/27 were missing. The first semi-annual report submitted by AZR under the 2021 CD also mentions that the Facility failed to record pressure drop on 6/23 and 6/24.
 - Truck Sweep Station/Material Conveyor Transfer (Building 608 Pickup) (PROC 236, Control C58)
The pressure drop readings on 6/25, 6/26, 6/27, 7/12, 7/23, 7/25, 7/31, and 8/17 were outside the 0.5-5.0 inches of H₂O pressure drop range provided in paragraph 86 of the 2021 CD, and some pressure drop and visible emissions readings on 6/26 and 6/27 were missing. The first semi-annual report submitted by AZR under the 2021 CD also mentions that the Facility failed to record pressure drop on 6/23 and 6/24.
 - F2 Kiln Discharge Fugitive Dust Collector (PROC 238, Control C60)
These records were provided and reviewed on-site. Copies on file.
 - F1 Kiln Discharge Fugitive Dust Collector (PROC 239, Control C61)
The pressure drop readings on 6/25, 6/29, 6/30, 7/1, 7/4, 7/5, 7/7-19, 7/21, 7/22, 7/23, 7/26, 7/28, 7/29, 7/30, 8/1, 8/7, 8/10, 8/12, 8/16, and 8/25 were outside the 0.5-5.0 inches of H₂O pressure drop range provided in Paragraph 86 of the 2021 CD.
 - Kiln Feed Conveying System (PROC 245, Control C63)
The pressure drop readings on 7/4, 7/6, and 8/12-18 were outside the 0.5-5.0 inches of H₂O pressure drop range provided in Paragraph 86 of the 2021 CD. The first semi-annual report submitted by AZR under the 2021 CD also mentions that the Facility failed to record pressure drop on 6/23 and 6/24.
4. Pressure drop readings per 2021 CD ¶ 84, 6/23/21 to present:
- Lead Concentrate Pneumatic Conveyer (PROC 230, Control C51)
The pressure drop readings on 7/13, 7/15, 7/16, 7/20, 7/21, 8/1, and 8/17 were outside the 0.5-5.0 inches of H₂O pressure drop range provided in paragraph 86 of the 2021 CD. Visible emissions were observed on 7/31/21.
 - EAF Dust Railcar Unloading (PROC 235, Controls C56 and C57)
The pressure drop and visible emissions readings on the B1 (C56) and B2 (C57) baghouses were missing on the following days: 7/9, 7/11, 7/17, 7/18, 7/24, 7/25, 7/31, 8/1, 8/7, 8/8, 8/14, and 8/15.
 - PD Railcar Unloading (PROC 213, Controls C29 and C29A)
None available.
 - CZO Unloading System (PROC 214, Control C66)
None available (no unloading is happening).
 - Pneumatic Materials Handling (PROC 246, Controls C64A, C64B, C64C, C64D, C64E)
The pressure drop and visible emissions readings for the Pneumatic Material Handling Receiving Silos (C64A-E) were missing on the following days: 7/11, 7/17, 7/18, 7/24, 7/25, 7/31, 8/1, 8/7, 8/8, 8/14, and 8/15 (all weekends).

- Calcine Kiln Feed Receiving Bin (PROC 248, Control C67)
None available given that the Facility is no longer calcining.
 - Lead Concentrate Sack Packer (PROC 237, Control C59)
The pressure drop readings on 7/12, 8/1, and 8/17 were outside the 0.5-5.0 inches of H₂O pressure drop range provided in Paragraph 86 of the 2021 CD. Visible emissions were observed on 7/31/21.
 - C2 Conveyor Transfer Point (PROC 234, Control C55)
The pressure drop readings on 6/25, 6/27, 8/3, 8/5, 8/6, 8/9, 8/11, 8/12, 8/13, 8/14, and 8/17 were outside the 0.5-5.0 inches of H₂O pressure drop range provided in Paragraph 86 of the 2021 CD, and some pressure drop and visible emissions readings on 6/26 and 6/27 were missing. The first semi-annual report submitted by AZR under the 2021 CD also mentions that the Facility failed to record pressure drop on 6/23 and 6/24.
5. Records of any pressure drop excursion, 6/23/21 to present, per 2021 CD ¶ 89 – including the starting and ending date and time of the event, the length of time to the commencement of corrective action, the cause of the event (including unknown cause), and a description of the corrective actions taken.
A summary file showing about 19 differential pressure excursions from the 0.5-5.0 inches of H₂O range specified in the 2021 CD on 7/22, 8/3, 8/5, 8/6, 8/9-8/18 was provided. In addition to missing roughly 31 days of excursions listed above, the file did not show the location of the event, the start or end time of the event, the length of time to the commencement of corrective action, or the cause of the event. In addition, the corrective actions listed were not technical in nature and stated either “communication given to the shift foreman reinforcing CD compliance” or “reinforced urgency to get an issue like this repaired faster”.
6. Any notifications or reports submitted to PADEP starting 6/23/21
According to Mr. Falko, no notifications or reports were submitted to PADEP other than Title V compliance reports. A review of AZR’s 2020 annual compliance report lists eight deviations related to visible emissions on 4/2/20, 4/13/20, 4/14/20, 6/5/20, 6/9/20, 8/8/20, 8/18/20, and 12/2/20. The first semi-annual compliance report for 2021 also lists deviations related to visible emissions at various kilns on 3/10/21, 3/21/21, 5/25/21, and 6/21/21.
7. Records related to Kiln #2 West pressure drop monitoring improvement project(s)
Purchase orders from AZR to Grantek Systems Integration Corp, DSI Innovations LLC, and Tri-M Group, LLC for transmitters, tubing, annunciator panels and other equipment dating back to June 2020 were provided by e-mail from Mr. Basilone on September 22, 2021.
8. Lime Bunker Weekly Inspection Logs
The Facility representatives stated that no weekly inspections of the Lime Bunker have been conducted because they have not stored hazardous waste in this area.

9. RCRA Permit Inspection Logs

The EPA RCRA Inspector reviewed the Facility's RCRA Permit Inspection Logs from January 2021 through July 2021. The Inspector noted that there were no employee initials on the March 2021 Kiln 1 monthly checklist, there was no supervisor signature on the June 2021 Kiln 1 monthly checklist, the July 2021 monthly emergency lighting checklist was completed on 8/21/21 (See Attachment #2), and that there were no comments on any of the inspection logs, everything was marked as "okay" or not "applicable".

10. RCRA Training Records

The EPA RCRA Inspector requested to review three years of hazardous waste training records for Facility employees involved in the management of hazardous waste. The Facility representative provided the Inspector with a spreadsheet with employee names and training dates. The Inspector observed on the provided spreadsheet that Safety and RCRA Hazardous Waste Materials training was conducted in 2019, 2020, and 2021. The Inspector confirmed that eight specific employees, who were responsible for hazardous waste activities at the Facility, received the training each of those years.

The Inspector noted that Katrina White, who signed hazardous waste manifests in 2021 was not on the spreadsheet. The Facility representatives provided the Inspector with a certificate for Hazardous Material Ground Shipper (DOT) training for Ms. White in 2018 and 2021.

The Inspector also noted that the Facility was unable to provide hazardous waste training records for Raquel Lutton who signed 2019 hazardous waste manifests.

11. Hazardous Waste Accumulation Area (HWAA) Weekly Inspection Logs

The EPA RCRA Inspector reviewed the Facility's 2020 and 2021 HWAA weekly inspection logs. The Inspector noted that the inspections were all conducted by Facility representative, Joe Falko. See Attachment #3 for three examples of the weekly inspection logs. The Inspector did not observe any missing weeks during the reviewed time period.

12. RCRA Hazardous Waste Manifests

The EPA RCRA Inspector requested to review three years of the Facility's hazardous waste manifests. The Inspector reviewed manifests for 2019, 2020, and 2021 at the time of the inspection.

The Inspector observed that manifest # 000266161GRR for a shipment of D006, D008 hazardous waste solids made to Giant Cement Company on 7/22/21 was not signed by the designated facility (See Attachment #4).

The Inspector also noted that a HWAA weekly inspection log generated on 5/14/21 indicated that a hazardous waste container located in the Facility's Parking Lot had a start accumulation date 90 days prior to 5/18/21. A review of hazardous waste manifests provided to the Inspector during the inspection showed that a hazardous waste shipment was made on 2/19/21 and the next hazardous waste shipment was made on 5/27/21 (See Attachment #5). Upon review of RCRAInfo's e-manifest system, it appears that a hazardous waste shipment was also made on 5/18/21 for which the Inspector did not observe the manifest for at the time of the inspection.

The Inspector noted that a Land Disposal Restriction Notification form was not available for review for shipments of a D006, D008 hazardous waste solids to the designated facility Envirosafe Services of Ohio Inc. located in Oregon, OH (OHD045243706).

13. Kiln Rubble Waste Profile

The EPA RCRA Inspector requested the Facility provide a waste profile for the kiln rubble waste stream that the Facility previously sipped offsite as hazardous waste and at the time of the inspection and approximately two years prior to the inspection began placing the kiln rubble and kiln brick into Building 608 after it is generated. The waste profile can be seen in Attachment #6.

V. Closing Conference

After completing the records review, a brief closing conference was held at approximately 5:15pm. Present during the closing conference were EPA representatives Ms. Serfass, Ms. Isin, and Ms. McLaughlin and Facility representatives Mr. Foster and Mr. Falko in addition to Mr. Basilone and Mr. Bruce Morgan on the phone. The inspectors informed the Facility representatives that no violation determinations were being made at the time of the inspection and that they would be communicating initial observations and potential areas of concern during the closing conference that are subject to change. EPA indicated that an inspection report, that includes the photo log, would be forwarded to the Facility, but that copies of documents obtained during the inspection and attached to the report would not be sent back to the Facility with the report, and that a copy of the inspection report would also be sent to PADEP.

The following observations will be further reviewed by EPA:

- 1) The sweeper truck required to operate daily under the Fugitive Dust Plan (FDP) was only vacuuming, not sweeping (AZR staff said that this is the default mode).
- 2) AZR may need to amend its permit to reflect that it has not been operating its calcining kilns. Any amendment should also include the recent name change to Befesa Zinc U.S. Inc.

- 3) We were told by AZR management that the pressure drop readings for Kiln #2 West are inaccurate due to a potential plug in the air line connected to the monitor. This issue should have been referenced in the product collector log, Title V compliance reports, and potentially also should have been reported to PADEP/EPA when inaccurate differential pressure readings were provided in the first semi-annual report under the 2021 CD.
- 4) At the Material Loading/Unloading Operations Area, attendants need to be reminded to follow the SOP listed in Appendix D to the FDP, which references, among other things, an unloading limit of 14 psi. During the time of the inspection, a truck containing EAF dust reading 14 psi was waiting for unloading.
- 5) Fugitive dust was briefly observed at the elevator associated with Kiln #5, likely due to the pathway being overwhelmed (as described by AZR management).
- 6) There were missing required FDP daily inspections for the following logs: Street Sweeper, Industrial Sweeper, Water Truck, Carbon Stockpile, IRM Processing Area, EAF Unloading Area, Dust Catcher Unloading Area, and the Facility Perimeter.
- 7) The Daily Perimeter Inspection log sheets did not contain any specific location information for the inspection, and generally only stated “no issues”.
- 8) There is no information regarding what actions were taken in response to the visible emissions observed on 7/31/21 at the Lead Concentrate Pneumatic Conveyer (PROC 230, Control C51) and Lead Concentrate Sack Packer (PROC 237, Control C59).
- 9) Based on review of the pressure drop records received during the inspection, there were over 50 differential pressure excursions from the 0.5-5.0 inches of H₂O range specified in the 2021 CD since 6/23/21.
- 10) Records showing the information required under Paragraph 89 of the 2021 CD were not available for the majority of the differential pressure excursions identified in EPA’s records review. For those excursions with some information regarding corrective action, information about the length of time to the commencement of corrective action, or the cause of the event, were not available. In addition, the corrective actions listed were not technical in nature and stated either “communication given to the shift foreman reinforcing CD compliance” or “reinforced urgency to get an issue like this repaired faster”.
- 11) There were at least 32 instances of missing differential pressure readings identified in EPA’s records review and the first semi-annual report submitted by AZR under the 2021 CD.

- 12) There were about 27 instances of missing visible emissions readings identified in EPA's records review.
- 13) AZR's 2020 annual compliance report (reviewed after the inspection) lists eight deviations related to visible emissions on 4/2/20, 4/13/20, 4/14/20, 6/5/20, 6/9/20, 8/8/20, 8/18/20, and 12/2/20. The first semi-annual compliance report for 2021 also lists deviations related to visible emissions at various kilns on 3/10/21, 3/21/21, 5/25/21, and 6/21/21.
- 14) AZR's current list of baghouses and their associated pressure drop ranges (per 2021 CD ¶ 93) did not include pressure drop ranges for the baghouses associated with kilns #2 and #5.
- 15) No certification for lead chloride buildings as required by Paragraph 42d of the 2021 CD.
- 16) Minimal aisle space in areas where CZO sacks are being stored.
- 17) No LDR notification form was observed for D006, D008 hazardous waste stream to EnviroSAFE in Ohio.
- 18) HW Manifest #000266161GRR sent on 7/22/21 not signed by designated facility.

The inspection concluded at approximately 5:45 pm.

After the inspection, Facility representatives reviewed the documents obtained during the inspection and the photographs taken with regards to CBI claims. Per an email sent to EPA on 9/5/21 by Mr. Basilone, none of the photographs or documents attached to this report were claimed as CBI.

VI. List of Attachments

- Attachment 1: CAA, RCRA, and CWA Photo Log
- Attachment 2: Monthly Emergency Lighting Checklist
- Attachment 3: RCRA HWAA Weekly Inspection Logs
- Attachment 4: 7/22/21 HW Manifest
- Attachment 5: Additional 2021 HW Manifests
- Attachment 6: Kiln Rubble Waste Profile