

RCRA Inspection Report

1) **Inspector and Author of Report**

Robert S. Nakamoto, P.E., CHMM
Environmental Engineer
Phone: 404-562-9341
nakamoto.robert@epa.gov

U.S. Environmental Protection Agency, Region 4
Enforcement and Compliance Assurance Division
Chemical Safety and Land Enforcement Branch
RCRA Enforcement Section
61 Forsyth Street, S.W.
Atlanta, Georgia 30303

2) **Facility Information**

Century Aluminum of South Carolina Inc.
Mount Holly Plant
3375 Highway 52
Goose Creek, South Carolina 29445

EPA ID: SCD097366165
NAICS: 331313 – Alumina Refining and Primary
Aluminum Production
331314 – Secondary Smelting and Alloying
of Aluminum

3) **Responsible Official**

Scott Courtney, P.E.
Environmental Manager
Century Aluminum of South Carolina
Mount Holly Plant
3375 Highway 52
Goose Creek, South Carolina 29445

4) **Inspection Participants**

Jonathan Brown, Century Aluminum of South Carolina Inc. (Century Aluminum)
Reginald Coleman, Century Aluminum
Jacoby Alsten, Century Aluminum
Tom Richmond, South Carolina Department of Environmental Services (SCDES)
Ryan Donohue, SCDES
Robert Nakamoto, U.S. Environmental Protection Agency (EPA), Region 4

5) **Date and Time of Inspection**

June 26, 2024, at 9:00 a.m.

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.

South Carolina Hazardous Waste Management Act, S.C. Code Ann. § 44-56-10 et seq., and South Carolina Hazardous Waste Management Regulations (SCHWMR), S.C. Code Ann. Regs. 61-79.260-270, 61-79.273 and 61-79.279.

Pursuant to S.C. Code Ann. Regs. 61-79.262.17(a) [40 C.F.R. § 262.17(a)], 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 44-56-60(a)(2) and (b) of the SCHWMA, S.C. Code Ann. § 44-56-60(a)(2) and (b) [Section 3005 of RCRA, 42 U.S.C. § 6925], provided that the generator complies with the conditions listed in S.C. Code Ann. Regs. 61-79.262.17(a) [40 C.F.R. § 262.17(a)] (hereinafter referred to as the “LQG Permit Exemption”).

Pursuant to S.C. Code Ann. Regs. 61-79.262.15(a) [40 C.F.R. § 262.15(a)], a generator may accumulate as much as 55 gallons of non-acute hazardous waste and/or either one quart of liquid acute hazardous waste at or near the point of generation where wastes initially accumulate, which is under the control of the operator of the process generating the waste, without a permit or without having interim status, as required by Section 44-56-60(a)(2) and (b) of the SCHWMA, S.C. Code Ann. § 44-56-60(a)(2) and (b) [Section 3005 of RCRA, 42 U.S.C. § 6925], provided that the generator complies with the satellite accumulation area conditions listed in S.C. Code Ann. Regs. 61-79.262.15(a) [40 C.F.R. § 262.15(a)] (hereinafter referred to as the “SAA Permit Exemption”).

Pursuant to S.C. Code Ann. Regs. 61-79.273.9 [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.

Pursuant to S.C. Code Ann. Regs. 61-79.273.14(a) [40 C.F.R. § 273.14(a)], an SQHUW must label or mark the universal waste to identify the type of universal waste.

Pursuant to S.C. Code Ann. Regs. 61-79.273.15(c) [40 C.F.R. § 273.15(c)], an SQHUW who accumulates universal waste must be able to demonstrate the length of time that universal waste has been accumulated from the date it became a waste or is received.

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

Pursuant to S.C. Code Ann. Regs. 61-107.279(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 S.C. Code Ann. Regs. 61-107.279(d) [40 C.F.R. § 279.22(d)], generators of used oil upon discovery of a release of used oil must stop the release, contain the released used oil, clean up the used oil, and make any necessary repairs or replacements to the container or tank.

7) Purpose of Inspection

The purpose of the inspection was to conduct an unannounced RCRA compliance evaluation inspection (CEI) to determine the compliance of Century Aluminum of South Carolina Inc. with the applicable regulations. This was an EPA lead inspection supported by SCDES inspectors.

8) Facility Description

The Century Aluminum Company was founded in 1995. Century Aluminum Company is a U.S. based metals and mining company that is headquartered in Chicago, Illinois. The company is focused on bauxite, alumina, and aluminum production. The company has operations in the U.S., Iceland, Jamaica, and Netherlands. The company operates a bauxite mining and alumina refinery in Clarendon, Jamaica (Jamalco) that produces smelter grade alumina. The company operates four aluminum reduction facilities. Three of the four aluminum facilities are located in the U.S. They are in Hawesville, Kentucky (Hawesville Plant which is currently idled), Robards, Kentucky (Sebree Plant), and Goose Creek, South Carolina (Mt. Holly Plant). The fourth facility is located in Grundartangi, Iceland (Nordural Plant). The company operates a carbon anode manufacturing facility in Vlissingen, Netherlands. The company produces approximately 800,000 tons of aluminum per year.

The Mt. Holly Plant is located in Goose Creek, South Carolina. The Century Aluminum Mt. Holly Plant (Century Aluminum or “the facility”) has a production capacity of 229,000 metric tons per year. The facility normally operates with approximately 460 employees.

The Mt. Holly Plant operates a primary aluminum reduction facility that produces high grade aluminum from the raw material aluminum oxide (alumina) using the Hall-Heroult electrolytic process. The facility has two Alcoa-designed potlines with a total of 360 reduction cells. There are three steps in the operation: 1) the manufacture of carbon anodes from coke and pitch, 2) the reduction of alumina to produce molten aluminum, and 3) the processing of aluminum for end users. Aluminum is produced via high electrical currents passing through the reduction cell that has the alumina, molten cryolite, and the anodes. The high current separates the aluminum from the oxygen molecules to produce aluminum. The facility contains casting equipment used to cast molten aluminum into standard-grade ingot, HDC ingot, extrusion billet and other value-added primary aluminum products. The facility can produce over 35 different

types of aluminum alloys in a wide variety of shapes and sizes. The Mt. Holly Plant was the first aluminum facility in the world to be registered to the ISO 9001 Quality System Standard. The Mt. Holly facility is also environmentally certified to the ISO 14001:2015 standard.

9) Previous Inspection History

SCDES has conducted four RCRA CEIs at the subject facility between 2004 and 2019 and identified a total of six violations during those inspections. On August 19, 2019, SCDES conducted the most recent RCRA CEI at the subject facility and found one apparent violation of RCRA's requirements for an issue with Contingency Plan requirements. As a result, SCDES issued a Return to Compliance Letter to the facility on November 5, 2019.

10) Opening Conference

On June 26, 2024, EPA inspector Robert Nakamoto, accompanied by South Carolina Department of Environmental Services (SCDES) inspectors Tom Richmond and Ryan Donohue, arrived at Century Aluminum at approximately 9:00 a.m., and registered at the security gate. Reginald Coleman, the facility's Environmental Specialist, came to the security area and escorted the inspection team to a conference area. The inspectors introduced themselves, showed their credentials to Reginald Coleman, and explained the purpose of the inspection. Jacoby Alsten, an Environmental Supervisor at the Mt. Holly Plant, joined the opening conference.

The inspectors described the anticipated use of a digital camera during the inspection and discussed the request for records. The facility's staff objected to having any photographs taken inside of the facility, as the facility had a policy of no photographs being taken by outside parties. After discussing this issue, as a compromise, it was agreed that the facility staff would take photographs and send them to the inspection team prior to the inspection team leaving the site.

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.

It was briefed that the facility was constructed in 1979 and began operation in 1980. The Mt. Holly Plant is located on a 5,000-acre piece of property. The facility is operating around the

clock (24/7) and was estimated to have approximately 450 employees at the time of the inspection. The facility receives its water supply from the City of Charleston Water Utility. Dust from the air pollution control baghouses is recycled back into the production line. It was briefed that the company is operating approximately 39 hazardous waste satellite accumulation areas (SAAs) and two Central Accumulation Areas (CAAs). The facility does not have a wastewater treatment plant. It was briefed that all hazardous waste is managed in containers and that the facility had no hazardous waste tanks. The main hazardous waste that is produced is spent pot liners (SPLs) waste (K088) that is sent to Clean Harbors Canada, Inc. in Ontario, Canada.

11) Inspection Observations

The facility is conducting inspections of its SAAs and maintains an inspection tracking log sheet. Some areas are inspected on a weekly basis. The inspection team elected to inspect the two CAAs and a random sample of the SAAs. Jacoby Alsten took the photographs during the inspection. Both Reginald Coleman and Jacoby Alsten accompanied the inspection team during the entire inspection. The first area inspected was the SAAs for the potline maintenance area, Satellite Area (SA)-1 and SA-1A. SA-1 had a plastic 55-gallon used oil container and a metal 55-gallon used oil container. Neither container had a "Used Oil" label (Photograph 1). SA-1A had a 4-foot tube container of universal waste lamps and a 5-gallon plastic container of universal waste batteries that were closed, labeled, and dated (Photographs 2-4).

Pursuant to S.C. Code Ann. Regs. 61-107.279(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."

Building 270 has an SAA (SA-2) for the Carbon Maintenance. SA-2 had an aerosol can puncturing device that had a hazardous waste label and hazard marking. Facility staff briefed that they manage the punctured cans as hazardous waste due to residuals in the cans after puncturing. The device was not in use but was initially open at the time of the inspection, and then was immediately closed by Century Aluminum staff (Photographs 5-7). SA-2A had a 5-foot container of universal waste lamps that was not labeled or dated, two four-foot containers of universal waste lamps that were labeled and dated, and one 4-foot container was empty. Two 5-gallon containers of universal waste batteries were labeled and dated (Photographs 8-10). There were two metal 15-gallon containers of used oil that were closed and labeled.

Pursuant to S.C. Code Ann. Regs. 61-79.262.15(a)(4) [40 C.F.R. § 262.15(a)], which is a condition of the LQG permit exemption, an SAA container holding hazardous waste must be closed at all times during accumulation, except: (i) When adding, removing, or consolidating waste; or (ii) When temporary venting of a container is necessary (A) For the proper operation of equipment, or (B) To prevent dangerous situations, such as build-up of extreme pressure.

Pursuant to S.C. Code Ann. Regs. 61-79.273.14(a) [40 C.F.R. § 273.14(e)], an SQHUW must label or mark the universal waste lamps to identify the type of universal waste.

Pursuant to S.C. Code Ann. Regs. 61-79.273.15(c) [40 C.F.R. § 273.15(c)], an SQHUW who accumulates universal waste must be able to demonstrate the length of time that universal waste has been accumulated from the date it became a waste or is received.

The inspection team next went to the CAA for containers by Building 139 (Container CAA). The inspectors observed that Building 139 had large hole(s) in the roof, the floor was coated with a clear liquid, powdery material was scattered across the floor, and there was a large pile of a powdery material in one area of the building. Due to safety concerns related to issues with the building's roof and the material and liquid in the building, the inspection team decided not to enter Building 139. The inspectors conservatively estimated that the waste pile of powdery material (also referred to "Waste Bath" by Century Aluminum staff) was approximately 30 feet high by 40 feet by 40 feet wide at the base. The inspectors observed that clear liquid covered approximately half of the visible floor area (Photograph 11). The inspectors observed, approximately a dozen supersacks near the waste bath pile, and near the liquid covering the floor. The super sacks near the pile were in poor condition. There were numerous super sacks stored at the rear of the building that appeared to be in better condition than the ones near the waste bath pile (Photograph 12). The waste bath pile, and the super sacks adjacent to the waste bath pile, appeared to be abandoned, and/or discarded, and did not appear to be being managed as a product. At the time of the inspection, a manager was contacted, who informed the inspectors that the material in the pile, and the supersacks, had been in the building for approximately 4 to 5 years.

Due to the free liquids on the floor and the status of the roof, a review of Building 139's maintenance status and materials management is recommended.

The Container CAA adjacent to Building 139, was surrounded by a chain link fence that was 8 feet tall in places and 5 feet tall in other places and was under a roof. The CAA had a "no smoking" sign, a spill kit, fire extinguisher, and an eye wash and safety shower. There were three 300-gallon tote tanks that were labeled as non-hazardous waste containing non-pumpable oil from maintenance activities. Two of the tote tanks were full and one was half full. The tote tanks were not labeled as used oil but were labeled as "Non-Pumpable Oil" and being managed as a non-hazardous waste (Photographs 13-14). At the time of the inspection, the inspectors observed a leak of a black liquid that appeared to be a used oil leak originating from under one of the tote tanks (Photograph 15). Because the tote tanks still contained some portion of free-flowing used oil they are required to also be labeled as used oil.

Pursuant to S.C. Code Ann. Regs. 61-107.279(d) [40 C.F.R. § 279.22(d)], generators of used oil upon discovery of a release of used oil must stop the release, contain the released used oil, clean up the used oil, and make any necessary repairs or replacements to the container or

tank.

Pursuant to S.C. Code Ann. Regs. 61-107.279(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.”

Universal waste was stored in the Container CAA. There were four 4-foot tube containers of universal waste lamps that were closed but the containers were missing the accumulation dates (Photograph 16). There was also a 3-foot container of universal waste lamps labeled and dated March 28, 2024.

Pursuant to S.C. Code Ann. Regs. 61-79.273.15(c) [40 C.F.R. § 273.15(c)], an SQHUW who accumulates universal waste must be able to demonstrate the length of time that universal waste has been accumulated from the date it became a waste or is received.

At the time of the inspection, the inspectors observed that the Container CAA had a 5,000 gallon Used Oil tank that was labeled as “Used Oil” (Photograph 17). A metal container for collecting used oil from the used oil pumps’ operations, was present but was not closed or labeled as “Used Oil” (Photograph 18).

Pursuant to S.C. Code Ann. Regs. 61-107.279(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.”

At the time of the inspection, the inspectors observed 30 metal 55-gallon containers of materials that the facility staff stated was non-hazardous waste from clean-ups. There were two metal 55-gallon containers of “Used Oil debris” and 28 metal 55-gallon containers of oily grease debris and oily soil that were being managed as non-hazardous waste. Several of the containers appeared to be in poor condition, including one container that appeared to be significantly bulging due to excessive internal pressures (Photographs 20-25).

The facility representatives informed inspectors that the facility had shipped its hazardous waste from the Container CAA on Tuesday, June 25, 2024. At the time of the inspection, the inspectors observed one metal 30-gallon container of ignitable (D001) hazardous waste dated April 23, 2024, remaining in the CAA. The other containers had been shipped. This container was in poor condition as evidenced by being completely coated in rust (Photographs 26-27).

Pursuant to S.C. Code Ann. Regs. 61-79.262.17(a)(1)(ii) [40 C.F.R. § 262.17(a)(1)(ii)], which is a condition of the LQG permit exemption, if a container holding hazardous waste is not in good condition, or if it begins to leak, the LQG must immediately transfer the waste to a container that is in good condition or manage the waste in some other way that complies with the exemption requirements.

The inspectors observed a Universal Waste Connex adjacent to the Container CAA. Inside the Connex, the inspectors observed a metal 55-gallon container of broken lamps being managed as toxic (D009) hazardous waste. This container was being utilized for broken universal waste lamps. The container was labeled as containing hazardous waste and had a Class 9 DOT label, but was not properly marked or labeled with an indication of the hazard of its contents (Photograph 28).

Pursuant to S.C. Code Ann. Regs. 61-79.262.15(a)(5)(ii) [40 C.F.R. § 262.15(a)(5)(ii)], which is a condition of the LQG permit exemption, a generator must mark or label its container with the following: (ii) An indication of the hazards of the contents (examples include, but are not limited to, the applicable hazardous waste characteristic(s) (*i.e.*, ignitable, corrosive, reactive, toxic); hazard communication consistent with the Department of Transportation requirements at 49 CFR part 172 subpart E (labeling) or subpart F (placarding); a hazard statement or pictogram consistent with the Occupational Safety and Health Administration Hazard Communication Standard at 29 C.F.R. § 1910.1200; or a chemical hazard label consistent with the National Fire Protection Association code 704).

At the time of the inspection, the inspector observed a 6-foot container and two other universal lamp containers in the Connex that were open (Photographs 29-30).

Pursuant to S.C. Code Ann. Regs. 61-79.273.13(d)(1) [40 C.F.R. § 273.13(d)(1)], a small quantity handler of universal waste must contain any lamp in containers or packages that are structurally sound, adequate to prevent breakage, and compatible with the contents of the lamps. Such containers and packages must remain closed and must lack evidence of leakage, spillage or damage that could cause leakage under reasonably foreseeable conditions.

The Containment Building CAA, Building 138, was inspected next. Building 138 is where clean-outs and repairs of the aluminum pots are conducted. The clean-out and repair processes generate spent pot liners from primary aluminum reduction (K088), a listed hazardous waste. The pots are large vessels approximately the size of a railcar. The building has a cooling room to allow units to cool down prior to any work being done on the pot. A wall separates the cooling room from the process area (Photographs 31-32). A crane lifts the cooled pot over the wall to the process area. If a pot cannot be repaired, it is recycled for metal recovery (sent to Charleston Steel) after it is cleaned out. The building has an air pollution control unit to remove particles from the air. Particles generated by the air pollution control unit (baghouse) are collected in a hazardous waste container. The container was larger than 55 gallons; was dated June 7, 2024; had a hazardous waste label, and at the bottom of the label it read “contains hazardous or toxic waste” but was missing its hazard marking. The hazardous waste label was also determined to incorrectly list the material in the container as a liquid waste that was a hazardous waste liquid, when it actually contained a solid (Photographs 33-34). Facility staff put the correct hazardous waste label on the container (Photograph 35). The new label did note

that the container contained hazardous waste, but the container did not have a hazard marking or indicator of the type of hazard.

Pursuant to S.C. Code Ann. Regs. 61-79.262.17(a)(5)(i)(B) [40 C.F.R. § 262.17(a)(5)(i)(B)], which is a condition of the LQG permit exemption, a generator must mark or label its container with an indication of the hazards of the contents (examples include, but are not limited to, the applicable hazardous waste characteristic(s) (*i.e.*, ignitable, corrosive, reactive, toxic); hazard communication consistent with the Department of Transportation requirements at 49 CFR part 172 subpart E (labeling) or subpart F (placarding); a hazard statement or pictogram consistent with the Occupational Safety and Health Administration Hazard Communication Standard at 29 C.F.R. § 1910.1200; or a chemical hazard label consistent with the National Fire Protection Association code 704).

At the time of the inspection, the inspectors observed:

- a small hole in the wall and loose metal siding on Building 138, that had led to a release of hazardous waste (K088) to the environment in the area immediately adjacent to the hole and loose siding (Photograph 36);
- the roll-up vehicle door on Building 138 would not close due to a buildup of hazardous waste (K088) at the edges of the door, and hazardous waste (K088) appeared to be escaping to the environment through the gap created by the improperly maintained roll-up vehicle door;
- the metal siding near the roll-up vehicle door was bent and damaged, which appeared to have resulted in a gap, allowing the release of hazardous waste (K088) to the environment immediately outside of Building 138 (Photographs 37-38); and
- the emergency contact information was not posted on the exterior of Building 138.

Pursuant to S.C. Code Ann. Regs. 61-79.262.17(a)(4) [40 C.F.R. § 262.17(a)(4)], which incorporates S.C. Code Ann. Regs. 61-79.265.1101(c)(1) [40 C.F.R. § 265.1101(c)(1)], and is a condition of the LQG Permit Exemption, owners or operators of all containment buildings must: (1) Use controls and practices to ensure containment of the hazardous waste within the unit; and, at a minimum: (i) Maintain the primary barrier to be free of significant cracks, gaps, corrosion, or other deterioration that could cause hazardous waste to be released from the primary barrier; (ii) Maintain the level of the stored/treated hazardous waste within the containment walls of the unit so that the height of any containment wall is not exceeded; (iii) Take measures to prevent the tracking of hazardous waste out of the unit by personnel or by equipment used in handling the waste. An area must be designated to decontaminate equipment and any rinsate must be collected and properly managed; and (iv) Take measures to control fugitive dust emissions such that any openings (doors, windows, vents, cracks, etc.) exhibit no visible emissions. In addition, all associated particulate collection devices (e.g., fabric filter, electrostatic precipitator) must be operated and maintained with sound air pollution control practices. This state of no visible emissions must be maintained effectively

at all times during normal operating conditions, including when vehicles and personnel are entering and exiting the unit.

Pursuant to S.C. Code Ann. Regs. 61-79.262.17(a)(4) [40 C.F.R. § 262.17(a)(4)], which incorporates S.C. Code Ann. Regs. 61-79.265.1101(c)(3) [40 C.F.R. § 265.1101(c)(3)], throughout the active life of the containment building, if the owner or operator detects a condition that could lead to or has caused a release of hazardous waste, the owner or operator must repair the condition promptly, in accordance with the following procedures: (i) Upon detection of a condition that has led to a release of hazardous waste (e.g., upon detection of leakage from the primary barrier) the owner or operator must: (A) Enter a record of the discovery in the facility operating record; (B) Immediately remove the portion of the containment building affected by the condition from service; (C) Determine what steps must be taken to repair the containment building, remove any leakage from the secondary collection system, and establish a schedule for accomplishing the cleanup and repairs; and (D) Within 7 days after the discovery of the condition, notify the Department (SCDES) of the condition, and within 14 working days, provide a written notice to SCDES with a description of the steps taken to repair the containment building, and the schedule for accomplishing the work.

The inspectors inspected the CAA Roll-off containers for K088 hazardous waste. These five 20-yard metal containers were closed and properly labeled and marked. However, the containers are over 200 yards from Building 138 and this distance precludes this area from being classified as part of Building 138 CAA (Photograph 39). This area is required to be a separate CAA.

SAA SA-19D was inspected. This SAA is in the maintenance area for the cast house area. This SAA had an aerosol can puncturing device on top of a 55-gallon metal container. The 55-gallon metal container was labeled as hazardous waste and had an appropriate hazard marking (Photograph 40).

SAA SA-24 was inspected. This area accumulates hazardous waste (D038) pitch residue generated from the production process. Due to moving machinery, the inspection team could not approach close to the metal 55-gallon container but observed it from a distance of about 20 feet. The container appeared to be properly closed, labeled, and marked. The inspectors decided not to have a photograph taken of the container since this container was in an active production area with moving machinery. This area only contained the single 55-gallon container at the time of the inspection.

12) Records Review

At the time of the inspection, the inspection team reviewed hazardous waste manifests, land disposal restriction notifications, inspection records, training, and the Contingency Plan. Some records were emailed to the inspection team after the inspection. This included waste

determinations for the oil contaminated debris, training records and job description for the environmental manager, and training records for other facility personnel.

On July 24, 2024, the inspectors received a letter from the facility, which included:

- multiple EPA Acknowledgement of Consent pertaining to the exports of K088 hazardous waste;
- a Professional Engineer (PE) certification, from February 5, 2004, of the Containment Building (Building 138);
- available weekly inspections records documenting inspections of the Containment Building (Building 138) conducted during April 2022, February 2023, and March 2024; and
- documentation that the pile of material in Building 139 had been present for approximately a year.

Hazardous Waste Manifests

The hazardous waste manifests and land disposal notifications for 2022, 2023, and 2024 were inspected. No issues with the hazardous waste manifests or land disposal notifications were identified.

Contingency Plan

At the time of the inspection, the inspectors reviewed the facility-specific Contingency Plan dated October 2020. The inspectors observed that the Contingency Plan did not include the location of the hazardous waste roll-off containers on the map and the facility did not have a Quick Reference Guide (QRG). The copies of the agreements with local emergency responders was missing from the Contingency Plan's Appendix C, but copies were later found during the inspection documenting that the Contingency Plan had been sent out on July 27, 2020, on November 23, 2020, and May 4, 2021. The facility did not have a QRG to submit to the local emergency responders. The 2020 Contingency Plan was produced before the Mt. Holly Plant was temporarily idled and some of the former safety and emergency response equipment (Fire Truck and Ambulance) and personnel (fire personnel) are no longer on site or may be inactive. The Contingency Plan must be updated to better organize the plans so that information is more readily found, to delete equipment that was no longer on site or in use, and to include a QRG.

Pursuant to S.C. Code Ann. Regs. 61-79.262.17(a)(6) [40 C.F.R. § 262.17(a)(6)], which incorporates S.C. Code Ann. Regs. 61-79.262.262(b)) [40 C.F.R. § 262.262(b)], and is a condition of the LQG Permit Exemption, a generator that first becomes subject to these provisions after May 30, 2017, or a large quantity generator that is otherwise amending its contingency plan must at that time submit a quick reference guide of the contingency plan to the local emergency responders identified at paragraph (a) of this section or, as appropriate, the Local Emergency Planning Committee.

Weekly Inspections Records

The inspectors reviewed the weekly inspection records for the Container CAA from January 2022 to May 2024 and observed:

- weekly inspection records from July 20, 2022, through December 7, 2022, were missing (approximately four and a half months of inspection records);
- three inspection forms in 2024 were missing the signature, date, and time; and
- five different inspection forms in 2024 were missing the date.

Pursuant to S.C. Code Ann. Regs. 61-79.262.17(a)(1)(v)) [40 C.F.R. § 262.17(a)(1)(v)], which is a condition of the LQG permit exemption, at least weekly the generator must inspect central accumulation areas.

The inspectors reviewed the weekly inspection records for the Containment CAA (Building 138) for April 2022, February 2023, and March 2024, and observed:

- three weekly inspection records were not recorded in April 2022;
- two weekly inspection records were not recorded in February 2023; and
- one inspection record was missing for March 2024.

The Containment Building CAA (Building 138) inspection sheets included documentation of how many pots were processed during the week, how many containers of Spent Pot Liner waste were shipped, the condition of any waste in the accumulation area, the housekeeping status of Building 138, and the structural integrity of Building 138, the weather conditions, emergency communications operable, firefighting equipment available and operable, and the overall condition of the area as either satisfactory or unsatisfactory.

Some of the Containment Building inspection sheets did not appear to be completely or correctly filled out. None of the inspection sheets had the time filled in the “Date and Time” block. The date was entered on the sheets, but not the time. It was noted on the April 6, 2022, inspection sheet that the date for when 90 days will be reached was not filled in. On the question “Building roof and walls are free of damage?”, that was answered “No”. The dates for the questions “Oldest shipping container date”, “Date will reach 90 days”, and “Last room cleanout date?” were all lacking the date. On all of the inspection sheets the rating of satisfactory was circled. It is recommended that the facility review the inspection procedures and training to address these issues.

For the Building 138 CAA, three inspection sheets for March 2024 all noted, as observed during the June 26, 2024, inspection, that the area outside of containment was not free of K088 material. This condition was documented on the March 6, 2024, March 13, 2024, and March 20, 2024, inspections and was still present on June 26, 2024. The overall condition for Building 138 was marked “Satisfactory.” No notification was made to the South Carolina Department of Environmental Services.

Pursuant to S.C. Code Ann. Regs. 61-79.262.17(a)(4) [40 C.F.R. § 262.17(a)(4)], which incorporates S.C. Code Ann. Regs. 61-79.265.1101(c)(4) [40 C.F.R. § 265.1101(c)(4)], and is a condition of the LQG Permit Exemption, owners and operators of all containment buildings must inspect and record in the facility's operating record at least once every seven days data gathered from monitoring and leak detection equipment as well as the containment building and the area immediately surrounding the containment building to detect signs of releases of hazardous waste.

Pursuant to S.C. Code Ann. Regs. 61-79.262.17(a)(4) [40 C.F.R. § 262.17(a)(4)], which incorporates S.C. Code Ann. Regs. 61-79.265.1101(c)(3) [40 C.F.R. § 265.1101(c)(3)], and is a condition of the LQG Permit Exemption, for containment buildings (i) Upon detection of a condition that has led to a release of hazardous waste (e.g., upon detection of leakage from the primary barrier) the owner or operator must: (A) Enter a record of the discovery in the facility operating record; (B) Immediately remove the portion of the containment building affected by the condition from service; (C) Determine what steps must be taken to repair the containment building, remove any leakage from the secondary collection system, and establish a schedule for accomplishing the cleanup and repairs; and (D) Within 7 days after the discovery of the condition, notify the Department of the condition, and within 14 working days, provide a written notice to the Department with a description of the steps taken to repair the containment building, and the schedule for accomplishing the work.

The inspectors reviewed the brief one-page Professional Engineer (PE) Certification "SPL Containment at Building 138" dated February 5, 2004. The inspectors observed that the PE Certification:

- only reviewed a portion of Containment Building 138, specifically the portion related to Capital Project MH00-140, which provided decontamination areas to Containment Building 138 for the removal of spent pot lining (SPL) from personnel and equipment prior to leaving the existing containment building;
- does not have any supporting documentation or calculations or analysis; and
- lacks any statement on examining the required areas other than not observing visible emissions. The PE certification does not address the required elements of S.C. Code Ann. Regs. 61-79.265.1101 [40 C.F.R. § 265.1101]. The PE certification is silent on if any other areas, other than "no visible emissions", were evaluated; and,
- lacks any information addressing design standards established by professional organizations generally recognized by the industry such as, American Concrete Institute (ACI) and the American Society of Testing Materials (ASTM).

In addition, given that the building and related waste management activity (in regard to maintenance issues and releases of K088 hazardous waste) is no longer in compliance with S.C. Code Ann. Regs. 61-79.262.17(a)(4) [40 C.F.R. § 262.17(a)(4)], which incorporates S.C. Code Ann. Regs. 61-79.265.1100 and 1101 [40 C.F.R. § 265.1100 and 1101], and the amount of time that has transpired since the last certification, a new PE certification of the repaired building

that fully complies with S.C. Code Ann. Regs. 61-79.262.17(a)(4)(i) [40 C.F.R. § 262.17(a)(4)(i)], is required to maintain the generator exemption for operating a containment building.

Pursuant to S.C. Code Ann. Regs. 61-79.262.17(a)(4)(i) [40 C.F.R. § 262.17(a)(4)(i)], and is a condition of the LQG Permit Exemption, a generator is required to have a professional engineer certification stating that the containment building complies with the design standards specified in S.C. Code Ann. Regs. 61-79.265.1101 [40 C.F.R. § 265.1101]. This certification must be in the generator's files prior to operation of the unit.

The inspectors requested the hazardous waste determination and/or the Safety Data Sheet (SDS) on the waste pile and the material in the supersacks in Building 139. The facility provided a Solid Waste Determination and SDS to the inspectors via email on July 24, 2024. The Solid Waste Determination was dated October 3, 2013, and addressed the Waste Bath material but not the compromised super sacks. The SDS, issued on January 5, 2011, was for unused cryolite. The Century Aluminum SDS provided to the inspectors for the Crushed Bath material notes the health hazard risk for the material is a 1. It notes that the material has no potential toxic effects. It also has no cautions on firefighting or transportation and notes that the material is not regulated under CFR 49.

SDS from other companies for Cryolite materials are substantially different. For example, the toxicity rating is Category 4. Label requirements and precautionary statements are present in those SDSs that are absent from the Century Aluminum SDS provided to the inspectors. The other SDSs note that when working with cryolite, when engineering controls are not sufficient, respiratory protection is required. Inhaling cryolite can potentially cause death or serious injury and cryolite is hazardous to the skin. Cryolite is also toxic to aquatic life.

Based on the information provided by the facility, the main ingredient in the supersacks and for the waste bath was Cryolite (Sodium Hexafluoroaluminate). This information supported that approximately 80% of the material in Building 139 was cryolite. This cryolite is mixed with waste carbon, waste coke, and other contaminants that it may come in contact with or mix with. Cryolite must be kept dry and away from any water sources that could convey cryolite into watersheds or water supplies. Cryolite is a hazardous material that is an inhalation and skin hazard and is highly toxic to aquatic life. The facility's solid waste determination is devoid of any warnings or information on the hazards of the material that is being sent to a solid waste disposal site. The solid waste determination is also lacking any analytical data.

In the facility's July 24, 2024, letter, the facility noted, "The supersacks of material in Building 139 has been there roughly two years and is the by-product Crushed Bath that is stored for use internally or sold." Given the status of the building (the compromised roof) and the large amount of liquids on the floor, and that Crushed Bath Materials (in the supersacks) have been there for two years, it is not clear if the materials are still viable. These conditions are a concern and can call into question whether the material in the supersacks is still a viable product.

Pursuant to S.C. Code Ann. Regs. 61-79.262.11 [40 C.F.R. § 262.11], A person who generates a solid waste, as defined in S.C. Code Ann. Regs. 61-79.261.2 [40 C.F.R. § 262.11], 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.

The inspectors reviewed the September 9, 2005, nonhazardous waste profile completed for “Miscellaneous Oil Sludges” generated from the clean-out of oil water separators and machinery at Alumax of South Carolina (a former name of Century Aluminum) going to the Ashland Distribution for disposal. This profile was provided on July 3, 2024, as a waste determination for the “Non-Pumpable Oil” observed at the time of the inspection. The waste name noted on the profile was “Misc. Oil Sludges”. Based on the leak, this material appears to have some portion of free-flowing used oil in it. The profile is dated September 8, 2005, and does not include analytical results. On the profile there is a block for 50-99% free liquids that is not checked. However, it is implied that there are probably some free liquids in the waste due to the composition being listed as 1-50% emulsified oil solids, 50-99% water, and 0-50% anti-freeze. Due to the age of the waste profile, and the lack of any analytical analysis, the profile may not be an accurate hazardous waste determination.

Pursuant to S.C. Code Ann. Regs. 61-79.262.11 [40 C.F.R. § 262.11], A person who generates a solid waste, as defined in S.C. Code Ann. Regs. 61-79.261.2 [40 C.F.R. § 262.11], 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.

Training

On July 3, 2024, the facility submitted training records for 2023 and 2024. The inspectors reviewed the records. No training issues were identified in the review.

13) Closing Conference and Follow-up

The inspectors conducted the exit meeting with Mr. Coleman, Mr. Alsten, and Mr. Brown. During this exit briefing Ms. Steinunn Dögg Steinsen (Corporate Vice President, Health, Safety, and Environment, Century Aluminum) joined via telephone. During this meeting, the EPA and SCDES presented the preliminary results of the inspection, including the concerns about releases from Containment Building 138. Additional records were requested and promptly sent by Century Aluminum following the on-site inspection. Century Aluminum was inspected as an LQG.

14) Summary of Observations

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

- **Pursuant to S.C. Code Ann. Regs. 61-107.279(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.”

SA-1 had a plastic 55-gallon used oil container and a metal 55-gallon used oil container. Neither container had a “Used Oil” label.

- **Pursuant to S.C. Code Ann. Regs. 61-79.262.15(a)(4) [40 C.F.R. § 262.15(a)], which is a condition of the LQG permit exemption, an SAA container holding hazardous waste must be closed at all times during accumulation, except: (i) When adding, removing, or consolidating waste; or (ii) When temporary venting of a container is necessary (A) For the proper operation of equipment, or (B) To prevent dangerous situations, such as build-up of extreme pressure.**

Building 270 has an SAA for the Carbon Maintenance. SA-2 had an aerosol can puncturing device that had a hazardous waste label and hazard marking. The device was open at the time of the inspection but was immediately closed by Century Aluminum staff.

- **Pursuant to S.C. Code Ann. Regs. 61-79.273.14(e) [40 C.F.R. § 273.14(e)], an SQHUW must label or mark the universal waste lamps to identify the type of universal waste.**
- **Pursuant to S.C. Code Ann. Regs. 61-79.273.15(c) [40 C.F.R. § 273.15(c)], an SQHUW who accumulates universal waste must be able to demonstrate the length of time that universal waste has been accumulated from the date it became a waste or is received.**

SA-2A had a 5-foot container of universal waste lamps that was not labeled or dated.

- **Pursuant to S.C. Code Ann. Regs. 61-107.279(d) [40 C.F.R. § 279.22(d)], generators of used oil upon discovery of a release of used oil must stop the release, contain the released used oil, clean up the used oil, and make any necessary repairs or replacements to the container or tank.**
- **Pursuant to S.C. Code Ann. Regs. 61-107.279(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 Container CAA had three 300-gallon tote tanks that were labeled as non-hazardous waste containing non-pumpable oil from maintenance activities. Two of the tote tanks were full and one was half full. The tote tanks were not labeled as “Used Oil” but were labeled as “Non-Pumpable Oil” and being managed as a non-hazardous waste. At the time of the inspection, the inspectors observed a leak of a black liquid that appeared to be a used oil leak originating from under one of the tote tanks.

- Pursuant to S.C. Code Ann. Regs. 61-79.273.15(c) [40 C.F.R. § 273.15(c)], an SQHUW who accumulates universal waste must be able to demonstrate the length of time that universal waste has been accumulated from the date it became a waste or is received.

In the Container CAA there were four 4-foot tube containers of universal waste lamps that were closed and labeled but the containers were missing the accumulation dates.

- Pursuant to S.C. Code Ann. Regs. 61-107.279(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.”

In the Container CAA, a 3-gallon container for collecting used oil from the used oil pumps’ operations, was present but was not closed or labeled as “Used Oil”.

- Pursuant to S.C. Code Ann. Regs. 61-79.262.17(a)(1)(ii) [40 C.F.R. § 262.17(a)(1)(ii)], which is a condition of the LQG permit exemption, if a container holding hazardous waste is not in good condition, or if it begins to leak, the LQG must immediately transfer the waste to a container that is in good condition or manage the waste in some other way that complies with the exemption requirements.

The facility had shipped its hazardous waste from the Container CAA on Tuesday, June 25, 2024. At the time of the inspection, the inspectors observed one metal 30-gallon container of ignitable (D001) hazardous waste dated April 23, 2024, remaining in the Container CAA. The other hazardous waste containers had been shipped on June 25, 2024. This container was in poor condition as evidenced by being completely coated in rust.

- Pursuant to S.C. Code Ann. Regs. 61-79.262.15(a)(5)(ii) [40 C.F.R. § 262.15(a)(5)(ii)], which is a condition of the LQG permit exemption, a generator must mark or label its container with the following: (ii) An indication of the hazards of the contents (examples include, but are not limited to, the applicable hazardous waste characteristic(s) (*i.e.*, ignitable, corrosive, reactive, toxic); hazard communication consistent with the Department of Transportation requirements at 49 CFR part 172 subpart E (labeling) or subpart F (placarding); a hazard statement or pictogram consistent with the Occupational Safety and Health Administration Hazard Communication Standard at 29 C.F.R. § 1910.1200; or a chemical hazard label consistent with the National Fire Protection Association code 704).

The inspectors observed, a Connex adjacent to the CAA. Inside the Connex the inspectors observed a metal 55-gallon container of broken lamps being managed as toxic (D009) hazardous waste. The container was labeled as containing hazardous waste

but was not marked or labeled with an indication of the hazard of its contents

- Pursuant to S.C. Code Ann. Regs. 61-79.273.13(d)(1) [40 C.F.R. § 273.13(d)(1)], a small quantity handler of universal waste must contain any lamp in containers or packages that are structurally sound, adequate to prevent breakage, and compatible with the contents of the lamps. Such containers and packages must remain closed and must lack evidence of leakage, spillage or damage that could cause leakage under reasonably foreseeable conditions.

In the Connex near the Container CAA, there was a 6-foot container and two other universal lamp containers in the Connex that were open.

- Pursuant to S.C. Code Ann. Regs. 61-79.262.15(a)(5)(i)(B) [40 C.F.R. § 262.15(a)(5)(i)(B)], which is a condition of the LQG permit exemption, a generator must mark or label its container with the following: (i) The words “Hazardous Waste” and (ii) An indication of the hazards of the contents (examples include, but are not limited to, the applicable hazardous waste characteristic(s) (*i.e.*, ignitable, corrosive, reactive, toxic); hazard communication consistent with the Department of Transportation requirements at 49 CFR part 172 subpart E (labeling) or subpart F (placarding); a hazard statement or pictogram consistent with the Occupational Safety and Health Administration Hazard Communication Standard at 29 CF 1910.1200; or a chemical hazard label consistent with the National Fire Protection Association code 704).

There was a metal hazardous waste container in Building 138 had a hazardous waste label but was missing its hazard marking.

- Pursuant to S.C. Code Ann. Regs. 61-79.262.17(a)(4) [40 C.F.R. § 262.17(a)(4)], which incorporates S.C. Code Ann. Regs. 61-79.265.1101(c)(1) [40 C.F.R. § 265.1101(c)(1)], and is a condition of the LQG Permit Exemption, owners or operators of all containment buildings must: (1) Use controls and practices to ensure containment of the hazardous waste within the unit; and, at a minimum: (i) Maintain the primary barrier to be free of significant cracks, gaps, corrosion, or other deterioration that could cause hazardous waste to be released from the primary barrier; (ii) Maintain the level of the stored/treated hazardous waste within the containment walls of the unit so that the height of any containment wall is not exceeded; (iii) Take measures to prevent the tracking of hazardous waste out of the unit by personnel or by equipment used in handling the waste. An area must be designated to decontaminate equipment and any rinsate must be collected and properly managed; and (iv) Take measures to control fugitive dust emissions such that any openings (doors, windows, vents, cracks, etc.) exhibit no visible emissions. In addition, all associated particulate collection devices (e.g., fabric filter, electrostatic precipitator) must be operated and maintained

with sound air pollution control practices. This state of no visible emissions must be maintained effectively at all times during normal operating conditions, including when vehicles and personnel are entering and exiting the unit.

- Pursuant to S.C. Code Ann. Regs. 61-79.262.17(a)(4) [40 C.F.R. § 262.17(a)(4)], which incorporates S.C. Code Ann. Regs. 61-79.265.1101(c)(3) [40 C.F.R. § 265.1101(c)(3)], throughout the active life of the containment building, if the owner or operator detects a condition that could lead to or has caused a release of hazardous waste, the owner or operator must repair the condition promptly, in accordance with the following procedures: (i) Upon detection of a condition that has led to a release of hazardous waste (e.g., upon detection of leakage from the primary barrier) the owner or operator must: (A) Enter a record of the discovery in the facility operating record; (B) Immediately remove the portion of the containment building affected by the condition from service; (C) Determine what steps must be taken to repair the containment building, remove any leakage from the secondary collection system, and establish a schedule for accomplishing the cleanup and repairs; and (D) Within 7 days after the discovery of the condition, notify the Department (SCDES) of the condition, and within 14 working days, provide a written notice to SCDES with a description of the steps taken to repair the containment building, and the schedule for accomplishing the work.

There was a small hole in the wall, and loose metal siding on Building 138, that had led to a release of hazardous waste (K088) to the environment in the area immediately adjacent to the hole and loose siding. The roll-up vehicle door on Building 138 would not close due to a buildup of hazardous waste (K088) at the edges of the door. Hazardous waste (K088) appeared to be escaping to the environment through the gap created by the improperly maintained roll-up vehicle door the metal siding near the roll-up vehicle door was bent and damaged, which appeared to have resulted in a gap, allowing the release of hazardous waste (K088) to the environment immediately outside of Building and the emergency contact information was not posted on the exterior of the building.

- Pursuant to S.C. Code Ann. Regs. 61-79.262.262(b)) [40 C.F.R. § 262.262(b)], A large quantity generator that first becomes subject to these provisions after May 30, 2017, or a large quantity generator that is otherwise amending its contingency plan must at that time submit a quick reference guide of the contingency plan to the local emergency responders identified at paragraph (a) of this section or, as appropriate, the Local Emergency Planning Committee.

The facility did not have a Quick Reference Guide (QRG). The facility did not have a QRG to submit to the local emergency responders.

- Pursuant to S.C. Code Ann. Regs. 61-79.262.17(a)(1)(v)) [40 C.F.R. § 262.17(a)(1)(v)],

which is a condition of the LQG permit exemption, at least weekly the generator must inspect central accumulation areas.

The weekly inspection records for July 20, 2022, through December 7, 2022, were missing (approximately 4 & ½ months of inspection records). Three inspection forms in 2024 were missing the signature, date, and time, and five inspection forms were missing the date.

- **Pursuant to S.C. Code Ann. Regs. 61-79.262.17(a)(4) [40 C.F.R. § 262.17(a)(4)], which incorporates S.C. Code Ann. Regs. 61-79.265.1101(c)(4) [40 C.F.R. § 265.1101(c)(4)], and is a condition of the LQG Permit Exemption, all containment buildings must be inspected at least once every seven days.**

For the containment building three weekly inspection records were not recorded in April 2022, two weekly inspection records were not recorded in February 2023, and one inspection record was missing for March 2024.

- **Pursuant to S.C. Code Ann. Regs. 61-79.262.17(a)(4) [40 C.F.R. § 262.17(a)(4)], which incorporates S.C. Code Ann. Regs. 61-79.265.1101(c)(3) [40 C.F.R. § 265.1101(c)(3)], and is a condition of the LQG Permit Exemption, for containment buildings (i) Upon detection of a condition that has led to a release of hazardous waste (e.g., upon detection of leakage from the primary barrier) the owner or operator must: (A) Enter a record of the discovery in the facility operating record; (B) Immediately remove the portion of the containment building affected by the condition from service; (C) Determine what steps must be taken to repair the containment building, remove any leakage from the secondary collection system, and establish a schedule for accomplishing the cleanup and repairs; and (D) Within 7 days after the discovery of the condition, notify the Department of the condition, and within 14 working days, provide a written notice to the Department with a description of the steps taken to repair the containment building, and the schedule for accomplishing the work.**

The three inspection sheets for Building 138 for March 2024 all noted, as observed during the June 26, 2024, inspection, that the area outside of containment was not free of K088 material. This condition was documented on the March 6, 2024, March 13, 2024, and March 20, 2024, inspections, and was still present during the June 26, 2024, inspection. The overall condition of the Containment Building was marked "Satisfactory". No notification was made to the South Carolina Department of Environmental Services.

- **Pursuant to S.C. Code Ann. Regs. 61-79.262.17(a)(4)(i) [40 C.F.R. § 262.17(a)(4)(i)], and is a condition of the LQG Permit Exemption, a generator is required to have a professional engineer certification stating that the containment building complies**

with the design standards specified in S.C. Code Ann. Regs. 61-79.265.1101 [40 C.F.R. § 265.1101]. This certification must be in the generator's files prior to operation of the unit.

The brief one-page Professional Engineer (PE) Certification “SPL Containment at Building 138” dated February 5, 2004, was limited in its scope. The PE Certification only reviewed a portion of Containment Building 138, specifically the portion related to Capital Project MH00-140, which provided decontamination areas to Containment Building 138 for the removal of spent pot lining (SPL) from personnel and equipment prior to leaving the existing containment building. The certification does not have any supporting documentation or calculations or analysis; and lacks any statement on examining the required areas other than not observing visible emissions. The PE certification does not address the required elements of S.C. Code Ann. Regs. 61-79.265.1101 [40 C.F.R. § 265.1101]. The PE certification is silent on if any other areas, other than “no visible emissions”, were evaluated. The certification also lacks information addressing any of the design standards established by professional organizations generally recognized by the industry such as, American Concrete Institute (ACI) and the American Society of Testing Materials (ASTM)

- **Pursuant to S.C. Code Ann. Regs. 61-79.262.11 [40 C.F.R. § 262.11], A person who generates a solid waste, as defined in S.C. Code Ann. Regs. 61-79.261.2 [40 C.F.R. § 262.11], 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.**

Based on the liquids leaking from the non-pumpable oil containers, this material appears to have some portion of free-flowing used oil in it. The profile is dated September 8, 2005, and does not have any analytical results on the waste. Due to the age of the waste profile and the lack of any analytical analysis, the profile is not a valid hazardous waste determination.

- **Pursuant to S.C. Code Ann. Regs. 61-79.262.11 [40 C.F.R. § 262.11], A person who generates a solid waste, as defined in S.C. Code Ann. Regs. 61-79.261.2 [40 C.F.R. § 262.11], 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.**

The October 3, 2013, solid waste determination for the waste bath material was reviewed. The facility’s solid waste determination does not adequately reflect the hazards of the waste material being managed. Since the material is primarily cryolite, precautions must be taken when working with the material and shipping it for disposal. According to the solid waste determination this was to characterize the cryolite bath

material that has spilled on the ground and is periodically cleaned up. No hazardous waste determination was provided.

15) List of Attachments

Attachment A - Photo Log
Attachment B – February 5, 2004, PE Certification of the Containment Building
Attachment C - Crushed Bath Safety Data Sheet
Attachment D - Waste Bath Solid Waste Determination
Attachment E - Safety Data Sheet for Cryolite
Attachment F - Weekly inspection sheets (for three months) for the Building 138 CAA

16) Signed

**GEORGE
MCBROOM**

Digitally signed by GEORGE
MCBROOM
Date: 2025.01.10 11:14:35 -05'00'

for Robert S. Nakamoto
Environmental Engineer
RCRA Enforcement Section

17) Concurrence

BROOKE YORK Digitally signed by BROOKE YORK
Date: 2025.01.10 11:48:29 -05'00'

Brooke York
Acting Chief
RCRA Enforcement Section

ATTACHMENT A

Century Aluminum of South Carolina
Mt. Holly Plant
Goose Creek, South Carolina

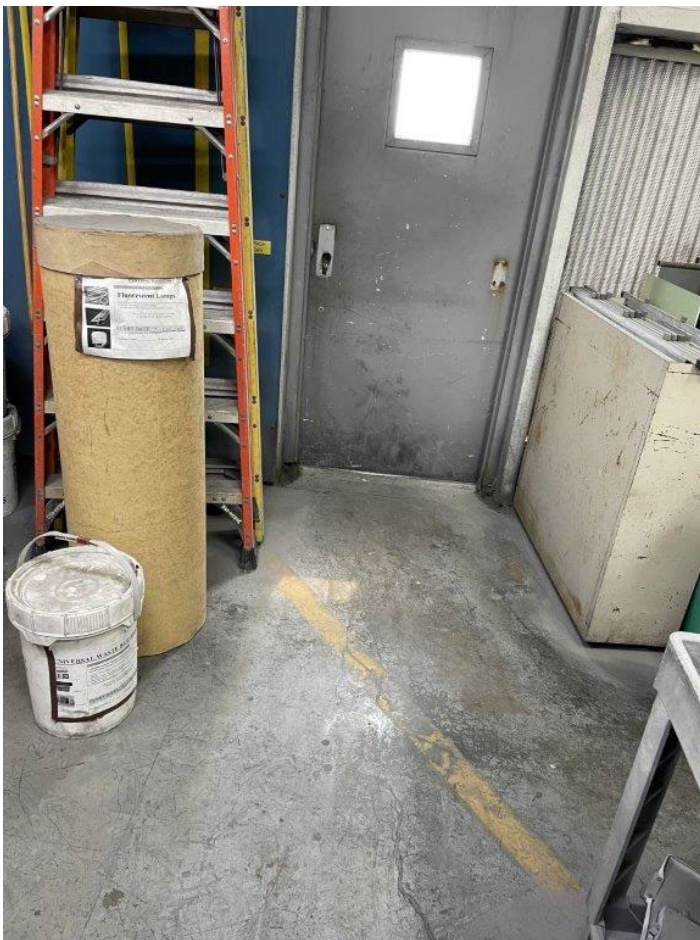
COMPLIANCE EVALUATION INSPECTION PHOTOGRAPHS

June 26, 2024

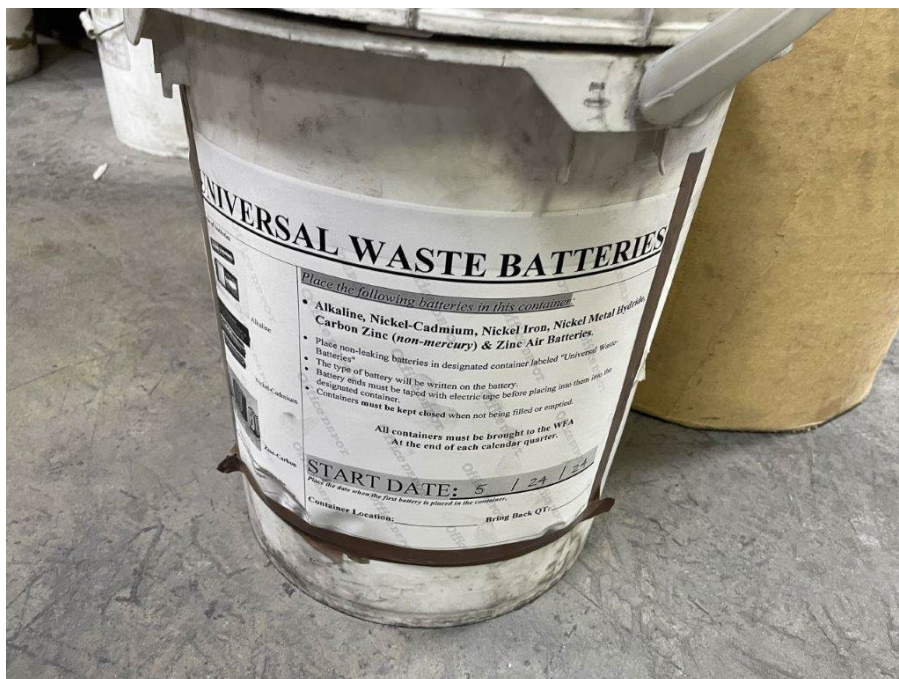
Photographs taken by Century Aluminum Staff



Photograph 1: SA-1, Two unlabeled Used Oil Containers.



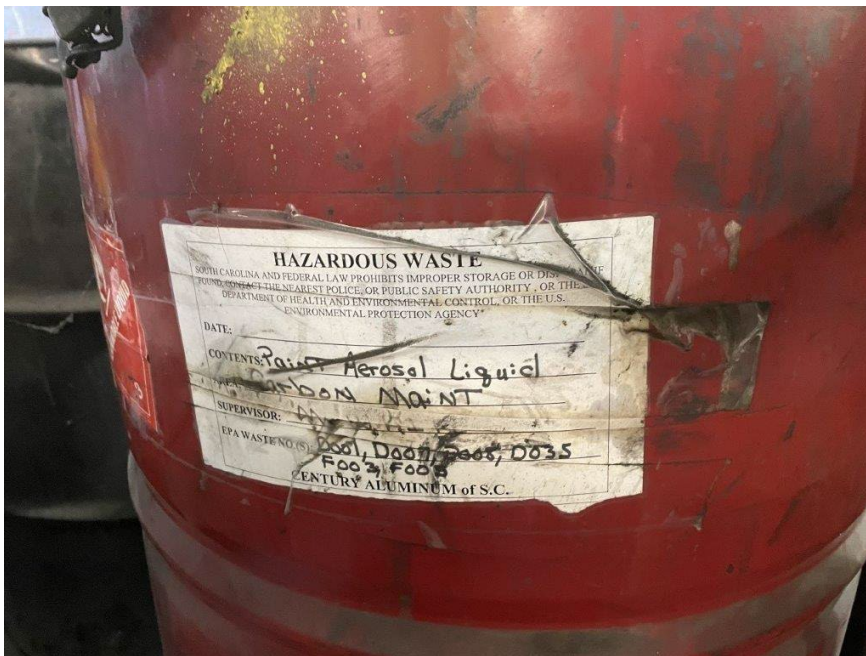
Photograph 2: SA-1A, 4-Foot UW Lamp Container and 5-gallon UW Battery Container.



Photograph 3: Label on the UW Battery Container.



Photograph 4: Label on the UW Lamp Container.



Photograph 5: SA-2, Building 270, Aerosol Puncturing SAA container.



Photograph 6: SA-2, Building 270, Aerosol Puncturing SAA container, after closing the lid.



Photograph 7: SA-2, Building 270, Top of the Aerosol Puncturing SAA container.



Photograph 8: UW Containers, 5-foot UW Lamp Container is not labeled.



Photograph 9: SA-2A, UW Battery Containers, Containers Labeled and Dated.



Photograph 10: SA-2A, Two 4-foot UW Lamp Containers near oily rag containers.



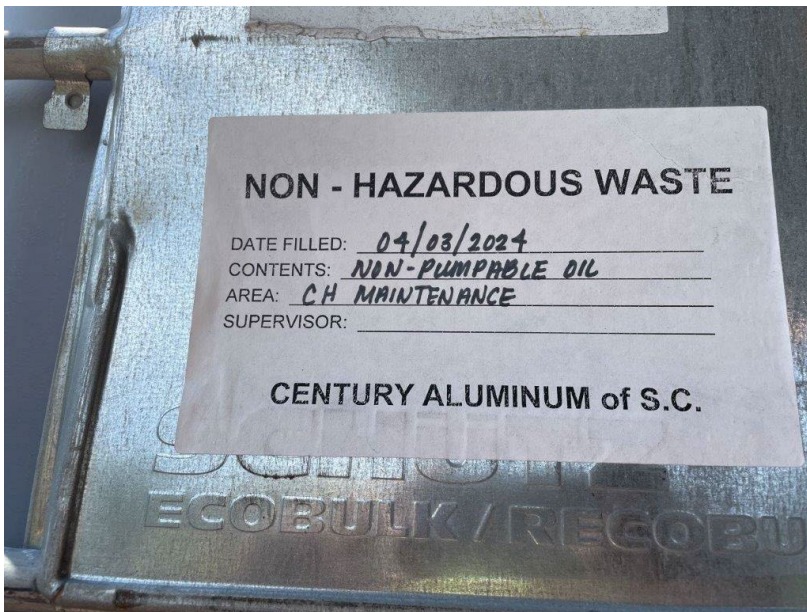
Photograph 11: Building 139, Pile of Bath Salts Material and Supersacks of Crushed Bath Material Containing Cryolite. Maintenance issues are visible with the roof and clear liquid is covering a significant portion, approximately half, of the visible floor.



Photograph 12: Building 139, Second view of the pile of Bath Salts Material and Supersacks of Crushed Bath Material Containing Cryolite. More super sacks are visible along the rear of the building to the left.



Photograph 13: CAA, Three 300-gallon tote-tanks of Non-Pumpable Oil Material.



Photograph 14: Label on a non-pumpable oil container.



Photograph 15: Used oil release in the CAA area.



Photograph 16: 4-Foot UW Lamp containers that are closed and labeled but not dated.



Photograph 17: Two 5,000-gallon used oil tanks that are labeled as used oil.



Photograph 18: Used oil container for pump operations that is not closed or labeled.



Photograph 19: Used oil draining device.



Photograph 20: Two 55-gallon containers of oil debris.



Photograph 21: Label on 55-gallon container of oily debris.



Photograph 22: Containers of Oil & Grease debris.



Photograph 23: Containers of Oil & Grease debris.



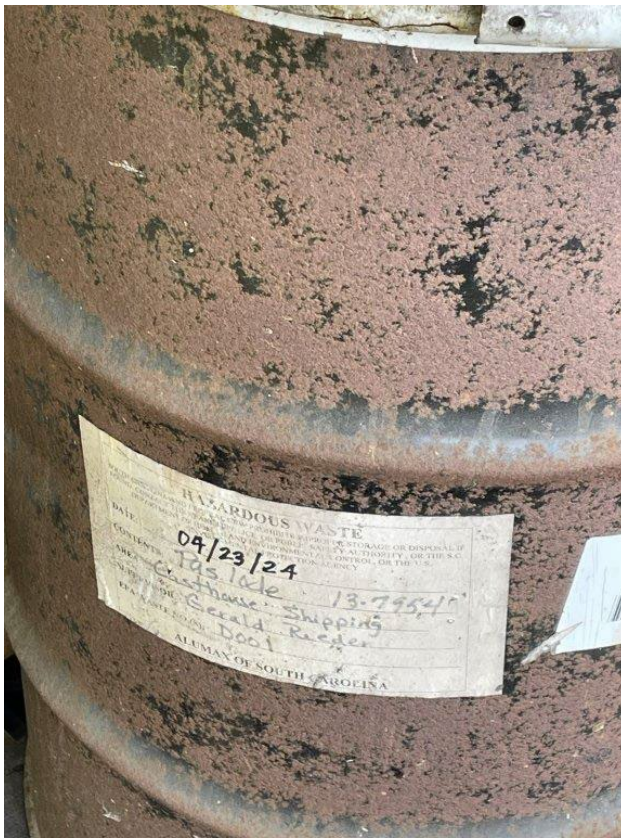
Photograph 24: Damaged container of oil & grease debris.



Photograph 25: Oil and grease debris drum that is significantly bulging at the top of the container.



Photograph 26: 30-gallon Metal hazardous waste container that has a significant amount of rusted area.



Photograph 27: Label on the 30-gallon HW container.



Photograph 28: 55-gallon HW Container of broken lamps that requires a hazard marking.



Photograph 29: Connex container for UW. Three UW lamp containers are not fully closed.



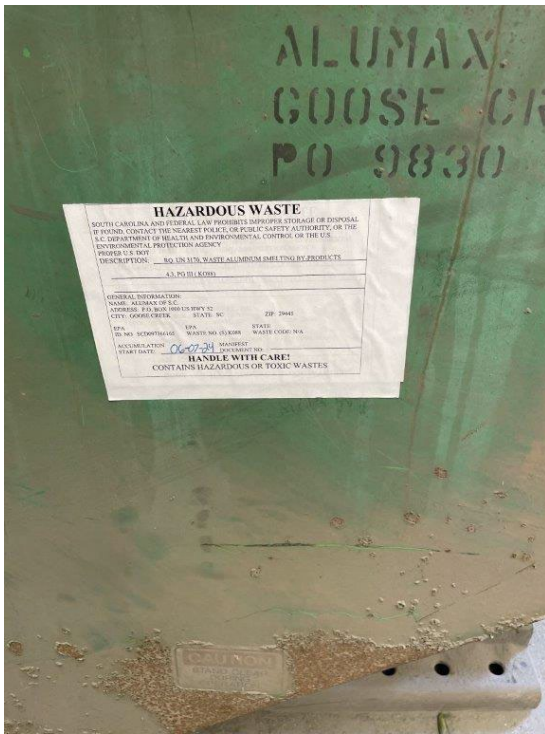
Photograph 30: Connex container for UW. Three UW lamp containers are not fully closed.



Photograph 31: Building 138 interior.



Photograph 32: Building 138, Pot repair and cleaning area.



Photograph 35: Corrected hazardous waste label on the SAA Dust Collector. No hazard indicator is on the container.



Photograph 36: Small hole in the wall of Building 138 and loose siding near the building's foundation. A small release of K088 hazardous waste is shown.



Photograph 37: Building 138, loose siding with a small release of K088 hazardous waste.



Photograph 38: Roll-up vehicle door on Building 138 will not close due to a build-up of K088 hazardous waste at the sides of the door.



Photograph 39: HW Roll-off container of K088 Hazardous waste. The containers are closed, labeled And marked but are over 200 yards away from the Building 138 CAA.



Photograph 40: SA-19D HW SAA Container

Attachment B
February 5, 2004, PE Certification of the Containment Building



PE CERTIFICATION

SPL CONTAINMENT AT BUILDING 138

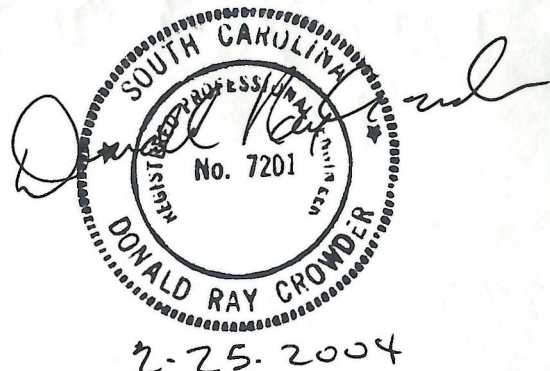
CAPITAL PROJECT MH00-140 provided decontamination areas at Building 138, Pot Relining, for the removal of spent pot lining (SPL) from personnel and equipment prior to leaving the existing RCRA containment building (demolition area). Specifically included were:

- Construction of a building addition (approximately 40' x 25') to allow removal of Spent Pot Lining (SPL) from mobile equipment prior to this equipment exiting the demolition area of Building 138.
- Construction of work platforms inside the new addition to facilitate the cleaning of the equipment.
- Construction of a new room adjacent to the demolition area to allow personnel to put on and remove PPE outside the demolition area.

Visual observations of the building, including the new additions, were made during the pot demolition process February 3 - 5, 2004. No visible emissions were observed. This is to certify that the building, based on these field observations, complies with containment building design and standards specified in 40 CFR 265.1101.

Donald R. Crowder
Project Manager
PE 7201

Certification Date: 5 February 2004



Attachment C
Crushed Bath Safety Data Sheet

Safety Data Sheet (SDS)
CENTURY ALUMINUM OF KENTUCKY LLC
P.O. BOX 500
HAWESVILLE, KY 42348
CRUSHED BATH

Print Date: 5/10/2015
Issue Date: 1/5/2011

Section 1: Product And Company Information

CENTURY ALUMINUM OF KENTUCKY LLC

Contact:

P.O. BOX 500

Emergency Phone: (270) 927-6921

HAWESVILLE, KY 42348

Information Phone: (270) 627-6921

Trade Name: CRUSHED BATH

Synonym:

Product Family: MIXTURE

Recommended Uses Process by-product to be recycled

Section 2: Hazard Identification

GHS CLASSIFICATION Non-Hazardous

Health Hazards:	N/G	1
Flammability:	N/G	1
Reactivity:	N/G	1
Personal Protection:		

☐ Chronic

Physical Stat ☐ Not Given ☐ Solid ☐ Gas ☐ Liquid ☐ Other

Appearance: Grayish-White Solid

Odor Slight Musty Odor

Route of Entry ☒ Ingestion ☒ Skin/Eye Contact ☐ Skin Absorption ☒ Inhalation ☐ N/A

Potential Health Effects:

Toxic: ☐ Yes ☒ No ☐ Unknown ☐ Not Given

Corrosive: ☐ Yes ☒ No ☐ Unknown ☐ Not Given

Reproductive Toxin ☐ Yes ☒ No ☐ Unknown ☐ Not Given

Carcinogen: ☐ Yes ☒ No ☐ Unknown ☐ Not Given

Irritant: ☒ Yes ☐ No ☐ Unknown ☐ Not Given

Sensitize: ☐ Yes ☒ No ☐ Unknown ☐ Not Given

Irritating to: ☒ Skin ☒ Eyes ☐ Mucous Membranes ☒ Respiratory Tract Other:

Other Target Organs: None

Section 3: COMPOSITION/INFORMATION ON INGREDIENTS

CHEMICAL COMPONENT	TLV	PEL	MEASURE	RANGE	%MIN	%MIX	CAS#
aluminum oxide		5.00	mg/m3	Y	2.50	4.00	1344281
calcium fluoride				Y	5.50	8.00	7789755
crvolute	2.50		mg/m3	Y	84.50	89.50	15096523
iron				Y	0.00	0.01	7439896
lithium fluoride				Y	2.50	3.50	7789244
silicon	5.00	5.00	mg/m3	Y	0.00	0.03	7440213

Section 4: FIRST AID MEASURES

Inhalation: Remove to fresh air. Seek medical attention.

Ingestion: Not given.

Safety Data Sheet (SDS)
CENTURY ALUMINUM OF KENTUCKY LLC
P.O. BOX 500
HAWESVILLE, KY 42348
CRUSHED BATH

Print Date: 5/10/2015
Issue Date: 1/5/2011

Skin Contact: Wash skin with soap and water.

Eye Contact: Flush eyes with water. Seek medical attention.

Section 5: FIRE FIGHTING MEASURES

Flash Point: N/A **Ignition Temperature:** N/A
Flammable Range: Lower Limit: N/G % Upper Limit: N/G %
Extinguish Media: N/A
Special Precautions: Reactions can release acetylene gas.

Section 6: ACCIDENTAL RELEASE MEASURES

Spill: Any material should be recovered.
Waste Disposal Method: Recycle
SECTION VIII - SPECIAL PROTECTION INFORMATION
Respiratory Protection (Specify Type):
See Note. NIOSH/MSHA approved respiratory protection as required.
Ventilation:
See Note. Local exhaust recommended if PEL's are exceeded.
Protective gloves: Yes **Eye Protection:** Yes

Section 7: HANDLING AND STORAGE

No special handling required as shipped; however, if dust is generated during handling, hazardous

Section 8: EXPOSURE CONTROL AND PERSONAL PROTECTION

Personal Protective Equipment:
Respiratory Requirements: NIOSH/MSHA Approved
Gloves Requirements: Required-Type Not Specified
Eye Protection: Required-Type Not Specified
Ventilation Requirements: Local exhaust recommended if PEL's are
Other Requirements: None

Section 9: PHYSICAL AND CHEMICAL PROPERTIES

Vapor Density: N/G	Air: ☐ Lighter ☐ Same ☐ Heavier ☒ Not Given ☐ N/A
Specific Gravity: 1.6	Water: ☐ Lighter ☐ Same ☒ Heavier ☐ Not Given ☐ N/A
Highest Vapor Pressure: N/G	
Boiling Point: N/A	Melting Point: N/A
Appearance: Grayish-White Solid	Odor: Slight Musty Odor
Water Soluble/Miscible?: ☐ Yes ☐ No ☐ Slightly ☒ Not Given	PH:

Section 10 STABILITY AND REACTIVITY

Incompatible Materials: Reaction with acids results in release of HF. Bath, water, and aluminum carbide will form acetylene gas.

Safety Data Sheet (SDS)
CENTURY ALUMINUM OF KENTUCKY LLC
P.O. BOX 500
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CRUSHED BATH

Print Date: 5/10/2015
Issue Date: 1/5/2011

Section 11 TOXICOLOGICAL INFORMATION

Route of Entry:

☒ Ingestion ☒ Skin/Eye Contact ☐ Skin Absorption ☒ Inhalation ☐ N/A

Section 12 ECOLOGICAL INFORMATION (non-mandatory)

N/A

Section 13 DISPOSAL CONSIDERATION (non-mandatory)

Recycle if possible. Dispose of waste in accordance with federal, state, or local regulations.

Section 14 TRANSPORT INFORMATION (non-mandatory)

TDGR: Not regulated CFR 49: Not regulated. IMO: Not regulated. ICAO: Not regulated. IATA: Not regulated.

Section 15 REGULATORY INFORMATION (non-mandatory)

Section 16 OTHER INFORMATION

Attachment D
Waste Bath Solid Waste Determination

Print date: 7/18/2024
Revision: 2
Revision Date: 2013 October 3

Attachment E
Safety Data Sheet for Cryolite

Chemical Safety Data Sheet MSDS / SDS

cryolite

Revision Date:2024-06-22 Revision Number:1

SECTION 1: Identification of the substance/mixture and of the company/undertaking

Product identifier

Product name : cryolite
CBnumber : CB1300372
CAS : 15096-52-3
EINECS Number : 239-148-8
Synonyms : CRYOLITE,synthetic cryolite

Relevant identified uses of the substance or mixture and uses advised against

Relevant identified uses : For R&D use only. Not for medicinal, household or other use.
Uses advised against : none

Company Identification

Company : Chemicalbook
Address : Building 1, Huihuang International, Shangdi 10th Street, Haidian District, Beijing
Telephone : 400-158-6606

SECTION 2: Hazards identification

GHS Label elements, including precautionary statements

Symbol(GHS)



Signal word

Danger

Precautionary statements

P260 Do not breathe dust/fume/gas/mist/vapours/spray.
P264 Wash hands thoroughly after handling.
P264 Wash skin thoroughly after handling.
P270 Do not eat, drink or smoke when using this product.
P304+P340 IF INHALED: Remove victim to fresh air and Keep at rest in a position comfortable for breathing.

Hazard statements

H332 Harmful if inhaled
H372 Causes damage to organs through prolonged or repeated exposure
H411 Toxic to aquatic life with long lasting effects

SECTION 3: Composition/information on ingredients

Substance

Product name	: cryolite
Synonyms	: CRYOLITE, synthetic cryolite
CAS	: 15096-52-3
EC number	: 239-148-8
MF	: AlF_6Na_3
MW	: 209.94

SECTION 4: First aid measures

Description of first aid measures

General advice

Consult a physician. Show this safety data sheet to the doctor in attendance.

If inhaled

If breathed in, move person into fresh air. If not breathing, give artificial respiration. Consult a physician.

In case of skin contact

Wash off with soap and plenty of water. Take victim immediately to hospital. Consult a physician.

In case of eye contact

Flush eyes with water as a precaution.

If swallowed

Never give anything by mouth to an unconscious person. Rinse mouth with water. Consult a physician.

Most important symptoms and effects, both acute and delayed

The most important known symptoms and effects are described in the labelling (see section 2.2) and/or in section 11

Indication of any immediate medical attention and special treatment needed

No data available

SECTION 5: Firefighting measures

Extinguishing media

Suitable extinguishing media

Use water spray, alcohol-resistant foam, dry chemical or carbon dioxide.

Special hazards arising from the substance or mixture

Hydrogen fluoride, Sodium oxides, Aluminum oxide

Advice for firefighters

Wear self-contained breathing apparatus for firefighting if necessary.

Further information

No data available

SECTION 6: Accidental release measures

Personal precautions, protective equipment and emergency procedures

Use personal protective equipment. Avoid dust formation. Avoid breathing vapours, mist or gas. Ensure adequate ventilation. Evacuate personnel to safe areas. Avoid breathing dust.

For personal protection see section 8.

Environmental precautions

Prevent further leakage or spillage if safe to do so. Do not let product enter drains. Discharge into the environment must be avoided.

Methods and materials for containment and cleaning up

Pick up and arrange disposal without creating dust. Sweep up and shovel. Keep in suitable, closed containers for disposal.

Reference to other sections

For disposal see section 13.

SECTION 7: Handling and storage

Precautions for safe handling

Avoid contact with skin and eyes. Avoid formation of dust and aerosols. Provide appropriate exhaust ventilation at places where dust is formed.

For precautions see section 2.2.

Conditions for safe storage, including any incompatibilities

Keep container tightly closed in a dry and well-ventilated place. Store in cool place.

Specific end use(s)

Apart from the uses mentioned in section 1.2 no other specific uses are stipulated

SECTION 8: Exposure controls/personal protection

control parameter

Hazard composition and occupational exposure limits

Does not contain substances with occupational exposure limits.

Exposure controls

Appropriate engineering controls

Handle in accordance with good industrial hygiene and safety practice. Wash hands before breaks and at the end of workday.

Eye/face protection

Face shield and safety glasses Use equipment for eye protection tested and approved under appropriate government standards such as NIOSH (US) or EN 166(EU).

Skin protection

Handle with gloves. Gloves must be inspected prior to use. Use proper glove removal technique (without touching glove's outer surface) to avoid skin contact with this product. Dispose of contaminated gloves after use in accordance with applicable laws and good laboratory practices. Wash and dry hands.

The selected protective gloves have to satisfy the specifications of Regulation (EU) 2016/425 and the standard EN 374 derived from it.

Body Protection

Complete suit protecting against chemicals, The type of protective equipment must be selected according to the concentration and amount of the dangerous substance at the specific workplace.

Respiratory protection

Where risk assessment shows air-purifying respirators are appropriate use a full- face particle respirator type N99 (US) or type P2 (EN 143) respirator cartridges as a backup to engineering controls. If the respirator is the sole means of protection, use a full-face supplied air respirator. Use respirators and components tested and approved under appropriate government standards such as NIOSH (US) or CEN (EU).

Control of environmental exposure

Prevent further leakage or spillage if safe to do so. Do not let product enter drains. Discharge into the environment must be avoided.

SECTION 9: Physical and chemical properties

Information on basic physicochemical properties

Appearance	beige solid
Odour	No data available
Odour Threshold	No data available
pH	No data available
Melting point/freezing point	1012
Initial boiling point and boiling range	decomp
Flash point	Not applicable
Evaporation rate	No data available
Flammability (solid, gas)	No data available
Upper/lower flammability or explosive limits	No data available
Vapour pressure	No data available
Vapour density	No data available
Relative density	No data available
Water solubility	No data available
Partition coefficient: n-octanol/water	No data available
Autoignition temperature	No data available
Decomposition temperature	No data available
Viscosity	No data available
Explosive properties	No data available

Oxidizing properties	No data available
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Other safety information

No data available

SECTION 10: Stability and reactivity

Reactivity

No data available

Chemical stability

Stable under recommended storage conditions.

Possibility of hazardous reactions

No data available

Conditions to avoid

No data available

Incompatible materials

Strong oxidizing agents Strong bases

Hazardous decomposition products

Hazardous decomposition products formed under fire conditions. - Hydrogen fluoride, Sodium oxides, Aluminum oxide

Other decomposition products - No data available In the event of fire: see section 5

SECTION 11: Toxicological information

Information on toxicological effects

Acute toxicity

LD50 Oral - Rat - > 5.000 mg/kg

Remarks: Gastrointestinal: Changes in structure or function of salivary glands. Skin and Appendages: Other: Hair.

Skin corrosion/irritation

No data available

Serious eye damage/eye irritation

No data available

Respiratory or skin sensitisation

No data available

Germ cell mutagenicity

No data available

Carcinogenicity

IARC: No component of this product present at levels greater than or equal to 0.1% is identified as probable, possible or confirmed human

carcinogen by IARC.

Reproductive toxicity

No data available

Specific target organ toxicity - single exposure

No data available

Specific target organ toxicity - repeated exposure

Causes damage to organs through prolonged or repeated exposure.

Aspiration hazard

No data available

Additional Information

RTECS: Not available

SECTION 12: Ecological information

Toxicity

Toxicity to fish

LC50 - Oncorhynchus mykiss (rainbow trout) - 42,5 mg/l - 96,0 h

Toxicity to daphnia and other aquatic invertebrates

EC50 - Daphnia magna (Water flea) - > 100 mg/l - 48 h

Persistence and degradability

No data available

Bioaccumulative potential

No data available

Mobility in soil

No data available

Results of PBT and vPvB assessment

This substance/mixture contains no components considered to be either persistent, bioaccumulative and toxic (PBT), or very persistent and very bioaccumulative (vPvB) at levels of 0.1% or higher.

Other adverse effects

Toxic to aquatic life with long lasting effects.

SECTION 13: Disposal considerations

Waste treatment methods

Product

Offer surplus and non-recyclable solutions to a licensed disposal company. Dissolve or mix the material with a combustible solvent and burn in a chemical incinerator equipped with an afterburner and scrubber. Waste material must be disposed of in accordance with the Directive on

waste 2008/98/EC as well as other national and local regulations. Leave chemicals in original containers. No mixing with other waste. Handle uncleaned containers like the product itself.

Incompatibilities

Incompatible with strong acids such as sulfuric, strong oxidizers, hydrogen fluoride.

Waste Disposal

In accordance with 40CFR 165 recommendations for the disposal of pesticides and pesticide containers. Must be disposed properly by following package label directions or by contacting your local or federal environmental control agency, or by contacting your regional EPA office.

Contaminated packaging

Dispose of as unused product.

SECTION 14: Transport information

UN number

ADR/RID: 3077 IMDG: 3077 IATA: 3077

UN proper shipping name

ADR/RID: ENVIRONMENTALLY HAZARDOUS SUBSTANCE, SOLID, N.O.S. (Cryolite) IMDG: ENVIRONMENTALLY HAZARDOUS SUBSTANCE, SOLID, N.O.S. (Cryolite)

IATA: Environmentally hazardous substance, solid, n.o.s. (Cryolite)

Transport hazard class(es)

ADR/RID: 9 IMDG: 9 IATA: 9

Packaging group

ADR/RID: III IMDG: III IATA: III

Environmental hazards

ADR/RID: yes IMDG Marine pollutant: yes IATA: yes

Special precautions for user

Further information

EHS-Mark required (ADR 2.2.9.1.10, IMDG code 2.10.3) for single packagings and combination packagings containing inner packagings with Dangerous Goods > 5L for liquids or > 5kg for solids.

SECTION 15: Regulatory information

Safety, health and environmental regulations/legislation specific for the substance or mixture

Regulations on the Safety Management of Hazardous Chemicals

China Catalog of Hazardous chemicals 2015:Not Listed. website: <https://www.mem.gov.cn/>

Measures for Environmental Management of New Chemical Substances

Chinese Chemical Inventory of Existing Chemical Substances (China IECSC):Listed. website: <https://www.mee.gov.cn/>

EC Inventory:Listed.

European Inventory of Existing Commercial Chemical Substances (EINECS):Listed. website: <https://echa.europa.eu/>

Korea Existing Chemicals List (KECL):Listed. website: <http://ncis.nier.go.kr>

New Zealand Inventory of Chemicals (NZIoC):Listed. website: <https://www.epa.govt.nz/>

Philippines Inventory of Chemicals and Chemical Substances (PICCS):Listed. website: <https://emb.gov.ph/>

United States Toxic Substances Control Act (TSCA) Inventory:Listed. website: <https://www.epa.gov/>

Vietnam National Chemical Inventory:Listed. website: <https://chemicaldata.gov.vn/>

SECTION 16: Other information

Abbreviations and acronyms

ADR: European Agreement concerning the International Carriage of Dangerous Goods by Road

CAS: Chemical Abstracts Service

EC50: Effective Concentration 50%

IATA: International Air Transportation Association

IMDG: International Maritime Dangerous Goods

LC50: Lethal Concentration 50%

LD50: Lethal Dose 50%

RID: Regulation concerning the International Carriage of Dangerous Goods by Rail

STEL: Short term exposure limit

TWA: Time Weighted Average

References

【1】CAMEO Chemicals, website: <http://cameochemicals.noaa.gov/search/simple>

【2】ChemIDplus, website: <http://chem.sis.nlm.nih.gov/chemidplus/chemidlite.jsp>

【3】ECHA - European Chemicals Agency, website: <https://echa.europa.eu/>

【4】eChemPortal - The Global Portal to Information on Chemical Substances by OECD, website:

http://www.echemportal.org/echemportal/index?pageID=0&request_locale=en

【5】ERG - Emergency Response Guidebook by U.S. Department of Transportation, website: <http://www.phmsa.dot.gov/hazmat/library/erg>

【6】Germany GESTIS-database on hazard substance, website: <http://www.dguv.de/ifa/gestis/gestis-stoffdatenbank/index-2.jsp>

【7】HSDB - Hazardous Substances Data Bank, website: <https://toxnet.nlm.nih.gov/newtoxnet/hsdb.htm>

【8】IARC - International Agency for Research on Cancer, website: <http://www.iarc.fr/>

【9】IPCS - The International Chemical Safety Cards (ICSC), website: <http://www.ilo.org/dyn/icsc/showcard.home>

【10】Sigma-Aldrich, website: <https://www.sigmaaldrich.com/>

Disclaimer:

The information in this MSDS is only applicable to the specified product, unless otherwise specified, it is not applicable to the mixture of this product and other substances. This MSDS only provides information on the safety of the product for those who have received the appropriate professional training for the user of the product. Users of this MSDS must make independent judgments on the applicability of this SDS. The authors of this MSDS will not be held responsible for any harm caused by the use of this MSDS.

Attachment F
Weekly inspection sheets (for three months) for the Building 138 CAA

SPENT POTLINING CONTAINMENT BUILDING INSPECTION
(BLDG 138)
HAZARDOUS/RESTRICTED WASTE MANAGEMENT

Date & Time Inspected:

4-6-22

Day of Week:

wed

Period:

4

A. GENERATION/SHIPPING

1. How many pots were dug this week?

Pots

2. How many container loads of SPL-Carbon were shipped?

7 Containers

B. BUILDING 138 HAZARDOUS WASTE 90 DAY STORAGE AREA

Yes No N/A

1. Any SPL Carbon containers in storage? If yes SPL Carbon Quantity 23 cy

☒

☐

☐

*Remember to document container ID during last quarterly inspection

2. Shipping containers in good condition, free from leaks, closed & labeled?

☒

☐

☐

3. Only hazardous waste containers in 90 day area?

☒

☐

☐

4. Do all containers have start dates? Oldest shipping container Date: _____

☒

☐

☐

5. Containers located in designated 90 day area?

☒

☐

☐

6. Proper isle space between full containers?

☒

☐

☐

7. All containers stored <90 days? Date will reach 90 days: _____

☒

☐

☐

C. BUILDING 138 HOUSEKEEPING

1. After building cleanouts is the dig area clean of SPL material?

☒

☐

☐

2. SPL debris & vacuum containers labeled, closed & in good condition?

☒

☐

☐

3. Bunker curtain closed & in good condition? SPL Insulation quantity _____ cy

☒

☐

☐

4. Pulled pots waiting to be dug are marked with pot number and pull date?

☒

☐

☐

5. No visible SPL on outside storage pad?

☐

☒

☐

6. Mobile equipment/trailers/containers clean of SPL residue?

☐

☒

☐

7. Area outside of containment free of material tracking?

☐

☒

☐

8. Last room cleanout date? NA

☐

☐

☐

9. DC discharge hopper closed, labeled & free of leaks? Hopper Date? 4-21-23

☒

☐

☐

10. DC free of visible leaks and no material spillage on the pad under the DC?

☒

☐

☐

D. BUILDING 138 STRUCTURAL INTEGRITY

1. Floor in dig area free of cracks & gaps that could lead to a release?

☒

☐

☐

2. Building roof & walls free of damage?

☐

☒

☐

E. CAST HOUSE HAZARDOUS WASTE 90 DAY STORAGE AREA

1. Any hazardous waste containers in storage?

☐

☒

☐

*Remember to document container ID during last quarterly inspection

2. Only hazardous waste containers in 90 day area?

☐

☐

☒

3. All containers stored < 90 days?

☐

☐

☒

4. Shipping containers in good condition, free from leaks, closed & labeled?

☐

☐

☒

5. Proper isle space between full containers?

☐

☐

☒

F. WASTE FLUID AREA 90 DAY STORAGE AREA

1. Any hazardous waste containers in storage?

☐

☒

☐

2. All containers stored < 90 days?

☐

☐

☒

3. Containers in good condition, no leaks, clean, and properly closed?

☐

☐

☒

4. Containers properly labeled and dated?

☐

☐

☒

5. Secondary containment free from damage?

☐

☐

☒

6. Proper aisle spacing around containers?

☐

☐

☒

7. Emergency communications system available/operable?

☒

☐

☐

8. Firefighting equipment available/operable?

☒

☐

☐

G. PCB BALLASTS/CAPACITORS

1. Any PCB waste containers in storage?

☐

☒

☐

2. Containers are in good condition, non-leaking, contained, labeled and dated?

☐

☐

☒

3. All containers stored <270 days? Date will reach 270 days: _____

☐

☐

☒

H. BAKE STACK PLENUM AREA 90 DAY STORAGE AREA

Yes No N/A

1. Any hazardous waste containers in storage?
2. Containers in good condition, no leaks, clean, and properly closed?
3. Containers properly labeled and dated?
4. All containers stored <90 days?
5. Proper aisle spacing around containers?
6. Emergency communications system available/operable?
7. Firefighting equipment available/operable?

☐	☒	☐
☐	☐	☒
☐	☐	☒
☐	☐	☒
☐	☐	☒
☒	☐	☐
☒	☐	☐

Weather Condition: (Clear or Raining)

#	Deficiency Comments	Corrective Action	Completion Date
1.			
2.			
3.			
4.			
5.			
6.			

Rating:

S = Satisfactory

U = Unsatisfactory

Inspector's Signature:



*If last Inspection of the quarter (Last inspection in March, June, September, and December) Mark Container ID Numbers in the Table Below

138 SPL Container IDs	Cast House SPL Container IDs

STOP if hazardous waste containers are not completely closed	STOP if truck traffic in cast house area is congested
STOP if crack, leaks or holes are identified in the containment building	STOP if relining traffic in 138 area is congested
STOP if there is not enough isle space between containers	STOP if waste fluid area traffic is congested from traffic to the waste fluid area or to building 139
STOP if hazardous waste containers are not properly labeled	STOP if hazardous waste not properly contained.
STOP if hazardous waste containers are not stored in the correct location	STOP if hazardous waste containers are stored >90 days or if PCB containers stored >270 days
STOP if SPL found outside of the containment building or outside of shipment containers	STOP if SPL found leaking from the 138 dust collector or on the pad under the 138 dust collector

SPENT POTLINING CONTAINMENT BUILDING INSPECTION
(BLDG 138)
HAZARDOUS/RESTRICTED WASTE MANAGEMENT

Date & Time Inspected: 2-15-23 Day of Week: Wed Period: 2

A. GENERATION/SHIPPING

1. How many pots were dug this week? 0 Pots
2. How many container loads of SPL-Carbon were shipped? 0 Containers

B. BUILDING 138 HAZARDOUS WASTE 90 DAY STORAGE AREA

Yes No N/A

1. Any SPL Carbon containers in storage? If yes SPL Carbon Quantity _____ cy ☐ ☒ ☐
*Remember to document container ID during last quarterly inspection
2. Shipping containers in good condition, free from leaks, closed & labeled? ☐ ☐ ☒
3. Only hazardous waste containers in 90 day area? ☐ ☒ ☐
4. Do all containers have start dates? Oldest shipping container Date: _____ ☐ ☐ ☒
5. Containers located in designated 90 day area? ☐ ☐ ☒
6. Proper isle space between full containers? ☐ ☐ ☒
7. All containers stored <90 days? Date will reach 90 days: _____ ☐ ☐ ☒

C. BUILDING 138 HOUSEKEEPING

1. After building cleanouts is the dig area clean of SPL material? ☐ ☒ ☐
2. SPL debris & vacuum containers labeled, closed & in good condition? ☒ ☐ ☐
3. Bunker curtain closed & in good condition? SPL Insulation quantity _____ cy ☒ ☐ ☐
4. Pulled pots waiting to be dug are marked with pot number and pull date? ☒ ☐ ☐
5. No visible SPL on outside storage pad? ☒ ☐ ☐
6. Mobile equipment/trailers/containers clean of SPL residue? ☒ ☐ ☐
7. Area outside of containment free of material tracking? ☐ ☒ ☐
8. Last room cleanout date? NA ☐ ☐ ☐
9. DC discharge hopper closed, labeled & free of leaks? Hopper Date? 1-10-23 ☒ ☐ ☐
10. DC free of visible leaks and no material spillage on the pad under the DC? ☒ ☐ ☐

D. BUILDING 138 STRUCTURAL INTEGRITY

1. Floor in dig area free of cracks & gaps that could lead to a release? ☐ ☒ ☐
2. Building roof & walls free of damage? ☐ ☒ ☐

E. CAST HOUSE HAZARDOUS WASTE 90 DAY STORAGE AREA

1. Any hazardous waste containers in storage? ☐ ☒ ☐
*Remember to document container ID during last quarterly inspection
2. Only hazardous waste containers in 90 day area? ☐ ☐ ☒
3. All containers stored < 90 days? ☐ ☐ ☒
4. Shipping containers in good condition, free from leaks, closed & labeled? ☐ ☐ ☒
5. Proper isle space between full containers? ☐ ☐ ☒

F. WASTE FLUID AREA 90 DAY STORAGE AREA

1. Any hazardous waste containers in storage? ☒ ☐ ☐
2. All containers stored < 90 days? ☒ ☐ ☐
3. Containers in good condition, no leaks, clean, and properly closed? ☒ ☐ ☐
4. Containers properly labeled and dated? ☒ ☐ ☐
5. Secondary containment free from damage? ☒ ☐ ☐
6. Proper aisle spacing around containers? ☒ ☐ ☐
7. Emergency communications system available/operable? ☒ ☐ ☐
8. Firefighting equipment available/operable? ☒ ☐ ☐

G. PCB BALLASTS/CAPACITORS

1. Any PCB waste containers in storage? ☐ ☒ ☐
2. Containers are in good condition, non-leaking, contained, labeled and dated? ☐ ☐ ☒
3. All containers stored <270 days? Date will reach 270 days: _____ ☐ ☐ ☒

H. BAKE STACK PLENUM AREA 90 DAY STORAGE AREA

Yes No N/A

1. Any hazardous waste containers in storage?
2. Containers in good condition, no leaks, clean, and properly closed?
3. Containers properly labeled and dated?
4. All containers stored <90 days?
5. Proper aisle spacing around containers?
6. Emergency communications system available/operable?
7. Firefighting equipment available/operable?

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Weather Condition: Clear or Raining)

#	Deficiency Comments	Corrective Action	Completion Date
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Rating:

S = Satisfactory

U = Unsatisfactory

Inspector's Signature: 

*If last Inspection of the quarter (Last inspection in March, June, September, and December) Mark Container ID Numbers in the Table Below

138 SPL Container IDs	Cast House SPL Container IDs

STOP if hazardous waste containers are not completely closed	STOP if truck traffic in cast house area is congested
STOP if crack, leaks or holes are identified in the containment building	STOP if relining traffic in 138 area is congested
STOP if there is not enough isle space between containers	STOP if waste fluid area traffic is congested from traffic to the waste fluid area or to building 139
STOP if hazardous waste containers are not properly labeled	STOP if hazardous waste not properly contained.
STOP if hazardous waste containers are not stored in the correct location	STOP if hazardous waste containers are stored >90 days or if PCB containers stored >270 days
STOP if SPL found outside of the containment building or outside of shipment containers	STOP if SPL found leaking from the 138 dust collector or on the pad under the 138 dust collector

SPENT POTLINING CONTAINMENT BUILDING INSPECTION
(BLDG 138)
HAZARDOUS/RESTRICTED WASTE MANAGEMENT

Date & Time Inspected: 2-22-2023 Day of Week: Wed Period: 2

A. GENERATION/SHIPPING

1. How many pots were dug this week?
2. How many container loads of SPL-Carbon were shipped? 00 Pots Containers

B. BUILDING 138 HAZARDOUS WASTE 90 DAY STORAGE AREA

- | | Yes | No | N/A |
|--|-------------------------------------|--------------------------|--------------------------|
| 1. Any SPL Carbon containers in storage? If yes SPL Carbon Quantity <u>4</u> cy
*Remember to document container ID during last quarterly inspection | ☒ | ☐ | ☐ |
| 2. Shipping containers in good condition, free from leaks, closed & labeled? | ☒ | ☐ | ☐ |
| 3. Only hazardous waste containers in 90 day area? | ☒ | ☐ | ☐ |
| 4. Do all containers have start dates? Oldest shipping container Date: <u>2-16-23</u> | ☒ | ☐ | ☐ |
| 5. Containers located in designated 90-day area? | ☒ | ☐ | ☐ |
| 6. Proper isle space between full containers? | ☒ | ☐ | ☐ |
| 7. All containers stored <90 days? Date will reach 90 days: <u>5-17-2023</u> | ☒ | ☐ | ☐ |

C. BUILDING 138 HOUSEKEEPING

- | | Yes | No | N/A |
|---|-------------------------------------|-------------------------------------|--------------------------|
| 1. After building cleanouts is the dig area clean of SPL material? | ☐ | ☒ | ☐ |
| 2. SPL debris & vacuum containers labeled, closed & in good condition? | ☒ | ☐ | ☐ |
| 3. Bunker curtain closed & in good condition? SPL Insulation quantity _____ cy | ☒ | ☐ | ☐ |
| 4. Pulled pots waiting to be dug are marked with pot number and pull date? | ☒ | ☐ | ☐ |
| 5. No visible SPL on outside storage pad? | ☐ | ☒ | ☐ |
| 6. Mobile equipment/trailers/containers clean of SPL residue? | ☐ | ☒ | ☐ |
| 7. Area outside of containment free of material tracking? | ☐ | ☒ | ☐ |
| 8. Last room cleanout date? <u>NA</u> | ☐ | ☒ | ☐ |
| 9. DC discharge hopper closed, labeled & free of leaks? Hopper Date? <u>1-19-23</u> | ☒ | ☐ | ☐ |
| 10. DC free of visible leaks and no material spillage on the pad under the DC? | ☒ | ☐ | ☐ |

D. BUILDING 138 STRUCTURAL INTEGRITY

- | | Yes | No | N/A |
|--|-------------------------------------|-------------------------------------|--------------------------|
| 1. Floor in dig area free of cracks & gaps that could lead to a release? | ☒ | ☒ | ☐ |
| 2. Building roof & walls free of damage? | ☐ | ☒ | ☐ |

E. CAST HOUSE HAZARDOUS WASTE 90 DAY STORAGE AREA

- | | Yes | No | N/A |
|--|--------------------------|-------------------------------------|-------------------------------------|
| 1. Any hazardous waste containers in storage?
*Remember to document container ID during last quarterly inspection | ☐ | ☒ | ☐ |
| 2. Only hazardous waste containers in 90 day area? | ☐ | ☐ | ☒ |
| 3. All containers stored < 90 days? | ☐ | ☐ | ☒ |
| 4. Shipping containers in good condition, free from leaks, closed & labeled? | ☐ | ☐ | ☒ |
| 5. Proper isle space between full containers? | ☐ | ☐ | ☒ |

F. WASTE FLUID AREA 90 DAY STORAGE AREA

- | | Yes | No | N/A |
|--|-------------------------------------|--------------------------|--------------------------|
| 1. Any hazardous waste containers in storage? | ☒ | ☐ | ☐ |
| 2. All containers stored < 90 days? | ☒ | ☐ | ☐ |
| 3. Containers in good condition, no leaks, clean, and properly closed? | ☒ | ☐ | ☐ |
| 4. Containers properly labeled and dated? | ☒ | ☐ | ☐ |
| 5. Secondary containment free from damage? | ☒ | ☐ | ☐ |
| 6. Proper aisle spacing around containers? | ☒ | ☐ | ☐ |
| 7. Emergency communications system available/operable? | ☒ | ☐ | ☐ |
| 8. Firefighting equipment available/operable? | ☒ | ☐ | ☐ |

G. PCB BALLASTS/CAPACITORS

- | | Yes | No | N/A |
|---|--------------------------|-------------------------------------|-------------------------------------|
| 1. Any PCB waste containers in storage? | ☐ | ☒ | ☐ |
| 2. Containers are in good condition, non-leaking, contained, labeled and dated? | ☐ | ☐ | ☒ |
| 3. All containers stored <270 days? Date will reach 270 days: _____ | ☐ | ☐ | ☒ |

H. BAKE STACK PLENUM AREA 90 DAY STORAGE AREA

Yes No N/A

1. Any hazardous waste containers in storage?
2. Containers in good condition, no leaks, clean, and properly closed?
3. Containers properly labeled and dated?
4. All containers stored <90 days?
5. Proper aisle spacing around containers?
6. Emergency communications system available/operable?
7. Firefighting equipment available/operable?

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Weather Condition: (Clear or Raining)

#	Deficiency Comments	Corrective Action	Completion Date
1.			
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6.			

Rating:

S = Satisfactory

U = Unsatisfactory

Inspector's Signature: 

*If last Inspection of the quarter (Last inspection in March, June, September, and December) Mark Container ID Numbers in the Table Below

138 SPL Container IDs	Cast House SPL Container IDs

STOP if hazardous waste containers are not completely closed	STOP if truck traffic in cast house area is congested
STOP if crack, leaks or holes are identified in the containment building	STOP if relining traffic in 138 area is congested
STOP if there is not enough aisle space between containers	STOP if waste fluid area traffic is congested from traffic to the waste fluid area or to building 139
STOP if hazardous waste containers are not properly labeled	STOP if hazardous waste not properly contained.
STOP if hazardous waste containers are not stored in the correct location	STOP if hazardous waste containers are stored >90 days or if PCB containers stored >270 days
STOP if SPL found outside of the containment building or outside of shipment containers	STOP if SPL found leaking from the 138 dust collector or on the pad under the 138 dust collector

SPENT POTLINING CONTAINMENT BUILDING INSPECTION
(BLDG 138)
HAZARDOUS/RESTRICTED WASTE MANAGEMENT

Date & Time Inspected: 03/06/2024 Day of Week: WED. Period:

A. GENERATION/SHIPPING

1. How many pots were dug this week? 11 Pots
2. How many container loads of SPL-Carbon were shipped? 11 Containers

B. BUILDING 138 HAZARDOUS WASTE 90 DAY STORAGE AREA

- | | Yes | No | N/A |
|---|-------------------------------------|-------------------------------------|--------------------------|
| 1. Any SPL Carbon containers in storage? If yes SPL Carbon Quantity <u>11</u> cy
*Remember to document container ID during last quarterly inspection | ☒ | ☐ | ☐ |
| 2. Shipping containers in good condition, free from leaks, closed & labeled? | ☒ | ☐ | ☐ |
| 3. Only hazardous waste containers in 90 day area? | ☒ | ☒ | ☐ |
| 4. Do all containers have start dates? Oldest shipping container Date: <u>2/15/24</u> | ☒ | ☐ | ☐ |
| 5. Containers located in designated 90 day area? | ☒ | ☐ | ☐ |
| 6. Proper isle space between full containers? | ☒ | ☐ | ☐ |
| 7. All containers stored <90 days? Date will reach 90 days: <u>5/15/24</u> | ☒ | ☐ | ☐ |

C. BUILDING 138 HOUSEKEEPING

- | | Yes | No | N/A |
|--|-------------------------------------|-------------------------------------|-------------------------------------|
| 1. After building cleanouts is the dig area clean of SPL material? | ☐ | ☐ | ☒ |
| 2. SPL debris & vacuum containers labeled, closed & in good condition? | ☒ | ☐ | ☐ |
| 3. Bunker curtain closed & in good condition? SPL Insulation quantity <u> </u> cy | ☒ | ☐ | ☐ |
| 4. Pulled pots waiting to be dug are marked with pot number and pull date? | ☒ | ☐ | ☐ |
| 5. No visible SPL on outside storage pad? | ☒ | ☐ | ☐ |
| 6. Mobile equipment/trailers/containers clean of SPL residue? | ☐ | ☒ | ☐ |
| 7. Area outside of containment free of material tracking? | ☐ | ☒ | ☐ |
| 8. Last room cleanout date? <u> </u> | ☐ | ☒ | ☒ |
| 9. DC discharge hopper closed, labeled & free of leaks? Hopper Date? <u> </u> | ☒ | ☒ | ☐ |
| 10. DC free of visible leaks and no material spillage on the pad under the DC? | ☒ | ☐ | ☐ |

D. BUILDING 138 STRUCTURAL INTEGRITY

- | | Yes | No | N/A |
|--|-------------------------------------|--------------------------|--------------------------|
| 1. Floor in dig area free of cracks & gaps that could lead to a release? | ☒ | ☐ | ☐ |
| 2. Building roof & walls free of damage? | ☒ | ☐ | ☐ |

E. CAST HOUSE HAZARDOUS WASTE 90 DAY STORAGE AREA

- | | Yes | No | N/A |
|--|--------------------------|-------------------------------------|-------------------------------------|
| 1. Any hazardous waste containers in storage?
*Remember to document container ID during last quarterly inspection | ☐ | ☒ | ☐ |
| 2. Only hazardous waste containers in 90 day area? | ☐ | ☐ | ☒ |
| 3. All containers stored < 90 days? | ☐ | ☐ | ☒ |
| 4. Shipping containers in good condition, free from leaks, closed & labeled? | ☐ | ☐ | ☒ |
| 5. Proper isle space between full containers? | ☐ | ☐ | ☒ |

F. WASTE FLUID AREA 90 DAY STORAGE AREA

- | | Yes | No | N/A |
|--|-------------------------------------|--------------------------|--------------------------|
| 1. Any hazardous waste containers in storage? | ☒ | ☐ | ☐ |
| 2. All containers stored < 90 days? | ☒ | ☐ | ☐ |
| 3. Containers in good condition, no leaks, clean, and properly closed? | ☒ | ☐ | ☐ |
| 4. Containers properly labeled and dated? | ☒ | ☐ | ☐ |
| 5. Secondary containment free from damage? | ☒ | ☐ | ☐ |
| 6. Proper aisle spacing around containers? | ☒ | ☐ | ☐ |
| 7. Emergency communications system available/operable? | ☒ | ☐ | ☐ |
| 8. Firefighting equipment available/operable? | ☒ | ☐ | ☐ |

G. PCB BALLASTS/CAPACITORS

- | | Yes | No | N/A |
|---|--------------------------|-------------------------------------|-------------------------------------|
| 1. Any PCB waste containers in storage? | ☐ | ☒ | ☒ |
| 2. Containers are in good condition, non-leaking, contained, labeled and dated? | ☐ | ☐ | ☒ |
| 3. All containers stored <270 days? Date will reach 270 days: <u> </u> | ☐ | ☐ | ☒ |

H. BAKE STACK PLENUM AREA 90 DAY STORAGE AREA

Yes No N/A

1. Any hazardous waste containers in storage?
2. Containers in good condition, no leaks, clean, and properly closed?
3. Containers properly labeled and dated?
4. All containers stored <90 days?
5. Proper aisle spacing around containers?
6. Emergency communications system available/operable?
7. Firefighting equipment available/operable?

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Weather Condition: ~~(Clear or Raining)~~ **SR**

#	Deficiency Comments	Corrective Action	Completion Date
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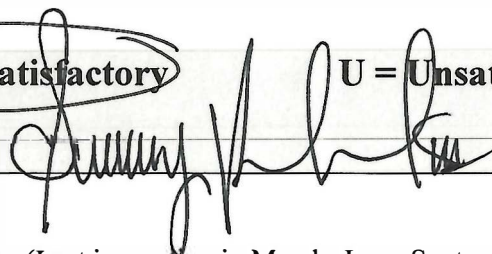
- 1.
- 2.
- 3.
- 4.
- 5.
- 6.

Rating:

S = Satisfactory

U = Unsatisfactory

Inspector's Signature:



*If last Inspection of the quarter (Last inspection in March, June, September, and December) Mark Container ID Numbers in the Table Below

138 SPL Container IDs	Cast House SPL Container IDs

STOP if hazardous waste containers are not completely closed	STOP if truck traffic in cast house area is congested
STOP if crack, leaks or holes are identified in the containment building	STOP if relining traffic in 138 area is congested
STOP if there is not enough isle space between containers	STOP if waste fluid area traffic is congested from traffic to the waste fluid area or to building 139
STOP if hazardous waste containers are not properly labeled	STOP if hazardous waste not properly contained.
STOP if hazardous waste containers are not stored in the correct location	STOP if hazardous waste containers are stored >90 days or if PCB containers stored >270 days
STOP if SPL found outside of the containment building or outside of shipment containers	STOP if SPL found leaking from the 138 dust collector or on the pad under the 138 dust collector

SPENT POTLINING CONTAINMENT BUILDING INSPECTION
(BLDG 138)
HAZARDOUS/RESTRICTED WASTE MANAGEMENT

Date & Time Inspected:

03/13/2024

Day of Week:

WED.

Period:

3

A. GENERATION/SHIPPING

1. How many pots were dug this week? 1 Pots
2. How many container loads of SPL-Carbon were shipped? Containers

B. BUILDING 138 HAZARDOUS WASTE 90 DAY STORAGE AREA

Yes No N/A

1. Any SPL Carbon containers in storage? If yes SPL Carbon Quantity 11 cy ☒ ☐ ☐
*Remember to document container ID during last quarterly inspection
2. Shipping containers in good condition, free from leaks, closed & labeled? ☒ ☐ ☐
3. Only hazardous waste containers in 90 day area? ☐ ☒ ☐
4. Do all containers have start dates? Oldest shipping container Date: 2/15/24 ☒ ☐ ☐
5. Containers located in designated 90 day area? ☒ ☐ ☐
6. Proper isle space between full containers? ☒ ☐ ☐
7. All containers stored <90 days? Date will reach 90 days: 5/15/24 ☒ ☐ ☐

C. BUILDING 138 HOUSEKEEPING

1. After building cleanouts is the dig area clean of SPL material? ☐ ☐ ☒
2. SPL debris & vacuum containers labeled, closed & in good condition? ☒ ☐ ☐
3. Bunker curtain closed & in good condition? SPL Insulation quantity _____ cy ☒ ☐ ☐
4. Pulled pots waiting to be dug are marked with pot number and pull date? ☒ ☐ ☐
5. No visible SPL on outside storage pad? ☒ ☐ ☐
6. Mobile equipment/trailers/containers clean of SPL residue? ☐ ☒ ☐
7. Area outside of containment free of material tracking? ☐ ☒ ☐
8. Last room cleanout date? _____ ☐ ☒ ☒
9. DC discharge hopper closed, labeled & free of leaks? Hopper Date? _____ ☐ ☒ ☐
10. DC free of visible leaks and no material spillage on the pad under the DC? ☒ ☐ ☐

D. BUILDING 138 STRUCTURAL INTEGRITY

1. Floor in dig area free of cracks & gaps that could lead to a release? ☒ ☐ ☐
2. Building roof & walls free of damage? ☒ ☐ ☐

E. CAST HOUSE HAZARDOUS WASTE 90 DAY STORAGE AREA

1. Any hazardous waste containers in storage? ☐ ☒ ☐
*Remember to document container ID during last quarterly inspection
2. Only hazardous waste containers in 90 day area? ☐ ☐ ☒
3. All containers stored < 90 days? ☐ ☐ ☒
4. Shipping containers in good condition, free from leaks, closed & labeled? ☐ ☐ ☒
5. Proper isle space between full containers? ☐ ☐ ☒

F. WASTE FLUID AREA 90 DAY STORAGE AREA

1. Any hazardous waste containers in storage? ☒ ☐ ☐
2. All containers stored < 90 days? ☒ ☐ ☐
3. Containers in good condition, no leaks, clean, and properly closed? ☒ ☐ ☐
4. Containers properly labeled and dated? ☒ ☐ ☐
5. Secondary containment free from damage? ☒ ☐ ☐
6. Proper aisle spacing around containers? ☒ ☐ ☐
7. Emergency communications system available/operable? ☒ ☐ ☐
8. Firefighting equipment available/operable? ☒ ☐ ☐

G. PCB BALLASTS/CAPACITORS

1. Any PCB waste containers in storage? ☐ ☒ ☐
2. Containers are in good condition, non-leaking, contained, labeled and dated? ☐ ☐ ☒
3. All containers stored <270 days? Date will reach 270 days: _____ ☐ ☐ ☒

H. BAKE STACK PLENUM AREA 90 DAY STORAGE AREA

Yes No N/A

1. Any hazardous waste containers in storage?
2. Containers in good condition, no leaks, clean, and properly closed?
3. Containers properly labeled and dated?
4. All containers stored <90 days?
5. Proper aisle spacing around containers?
6. Emergency communications system available/operable?
7. Firefighting equipment available/operable?

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Weather Condition: (Clear or Raining)

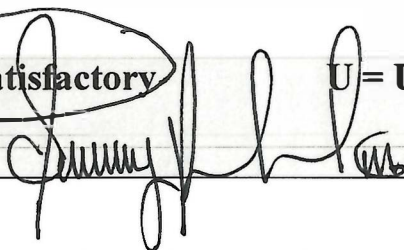
#	Deficiency Comments	Corrective Action	Completion Date
1.			
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6.			

Rating:

S = Satisfactory

U = Unsatisfactory

Inspector's Signature:



*If last Inspection of the quarter (Last inspection in March, June, September, and December) Mark Container ID Numbers in the Table Below

138 SPL Container IDs	Cast House SPL Container IDs

STOP if hazardous waste containers are not completely closed	STOP if truck traffic in cast house area is congested
STOP if crack, leaks or holes are identified in the containment building	STOP if relining traffic in 138 area is congested
STOP if there is not enough isle space between containers	STOP if waste fluid area traffic is congested from traffic to the waste fluid area or to building 139
STOP if hazardous waste containers are not properly labeled	STOP if hazardous waste not properly contained.
STOP if hazardous waste containers are not stored in the correct location	STOP if hazardous waste containers are stored >90 days or if PCB containers stored >270 days
STOP if SPL found outside of the containment building or outside of shipment containers	STOP if SPL found leaking from the 138 dust collector or on the pad under the 138 dust collector

SPENT POTLINING CONTAINMENT BUILDING INSPECTION
(BLDG 138)
HAZARDOUS/RESTRICTED WASTE MANAGEMENT

Date & Time Inspected: 3/20/2024 Day of Week: WED. Period: 3

A. GENERATION/SHIPPING

1. How many pots were dug this week? 1 Pots
2. How many container loads of SPL-Carbon were shipped? 0 Containers

B. BUILDING 138 HAZARDOUS WASTE 90 DAY STORAGE AREA

- | | Yes | No | N/A |
|---|-------------------------------------|-------------------------------------|--------------------------|
| 1. Any SPL Carbon containers in storage? If yes SPL Carbon Quantity <u>11</u> cy
*Remember to document container ID during last quarterly inspection | ☒ | ☐ | ☐ |
| 2. Shipping containers in good condition, free from leaks, closed & labeled? | ☒ | ☐ | ☐ |
| 3. Only hazardous waste containers in 90 day area? | ☒ | ☒ | ☐ |
| 4. Do all containers have start dates? Oldest shipping container Date: <u>2-15-2024</u> | ☒ | ☐ | ☐ |
| 5. Containers located in designated 90 day area? | ☒ | ☐ | ☐ |
| 6. Proper isle space between full containers? | ☒ | ☐ | ☐ |
| 7. All containers stored <90 days? Date will reach 90 days: <u>5-15-24</u> | ☒ | ☐ | ☐ |

C. BUILDING 138 HOUSEKEEPING

- | | Yes | No | N/A |
|--|-------------------------------------|-------------------------------------|-------------------------------------|
| 1. After building cleanouts is the dig area clean of SPL material? | ☒ | ☐ | ☒ |
| 2. SPL debris & vacuum containers labeled, closed & in good condition? | ☒ | ☐ | ☐ |
| 3. Bunker curtain closed & in good condition? SPL Insulation quantity <u> </u> cy | ☒ | ☐ | ☐ |
| 4. Pulled pots waiting to be dug are marked with pot number and pull date? | ☒ | ☐ | ☐ |
| 5. No visible SPL on outside storage pad? | ☒ | ☐ | ☐ |
| 6. Mobile equipment/trailers/containers clean of SPL residue? | ☒ | ☒ | ☐ |
| 7. Area outside of containment free of material tracking? | ☒ | ☒ | ☐ |
| 8. Last room cleanout date? <u>NA</u> | ☐ | ☒ | ☒ |
| 9. DC discharge hopper closed, labeled & free of leaks? Hopper Date? <u>4-17-24</u> | ☒ | ☒ | ☐ |
| 10. DC free of visible leaks and no material spillage on the pad under the DC? | ☒ | ☐ | ☐ |

D. BUILDING 138 STRUCTURAL INTEGRITY

- | | Yes | No | N/A |
|--|-------------------------------------|--------------------------|--------------------------|
| 1. Floor in dig area free of cracks & gaps that could lead to a release? | ☒ | ☐ | ☐ |
| 2. Building roof & walls free of damage? | ☒ | ☐ | ☐ |

E. CAST HOUSE HAZARDOUS WASTE 90 DAY STORAGE AREA

- | | Yes | No | N/A |
|--|--------------------------|-------------------------------------|-------------------------------------|
| 1. Any hazardous waste containers in storage?
*Remember to document container ID during last quarterly inspection | ☐ | ☒ | ☐ |
| 2. Only hazardous waste containers in 90 day area? | ☐ | ☐ | ☒ |
| 3. All containers stored < 90 days? | ☐ | ☐ | ☒ |
| 4. Shipping containers in good condition, free from leaks, closed & labeled? | ☐ | ☐ | ☒ |
| 5. Proper isle space between full containers? | ☐ | ☐ | ☒ |

F. WASTE FLUID AREA 90 DAY STORAGE AREA

- | | Yes | No | N/A |
|--|-------------------------------------|--------------------------|--------------------------|
| 1. Any hazardous waste containers in storage? | ☒ | ☐ | ☐ |
| 2. All containers stored < 90 days? | ☒ | ☐ | ☐ |
| 3. Containers in good condition, no leaks, clean, and properly closed? | ☒ | ☐ | ☐ |
| 4. Containers properly labeled and dated? | ☒ | ☐ | ☐ |
| 5. Secondary containment free from damage? | ☒ | ☐ | ☐ |
| 6. Proper aisle spacing around containers? | ☒ | ☐ | ☐ |
| 7. Emergency communications system available/operable? | ☒ | ☐ | ☐ |
| 8. Firefighting equipment available/operable? | ☒ | ☐ | ☐ |

G. PCB BALLASTS/CAPACITORS

- | | Yes | No | N/A |
|---|--------------------------|-------------------------------------|-------------------------------------|
| 1. Any PCB waste containers in storage? | ☐ | ☒ | ☐ |
| 2. Containers are in good condition, non-leaking, contained, labeled and dated? | ☐ | ☐ | ☒ |
| 3. All containers stored <270 days? Date will reach 270 days: <u>NA</u> | ☐ | ☐ | ☒ |

H. BAKE STACK PLENUM AREA 90 DAY STORAGE AREA

Yes No N/A

1. Any hazardous waste containers in storage?
2. Containers in good condition, no leaks, clean, and properly closed?
3. Containers properly labeled and dated?
4. All containers stored <90 days?
5. Proper aisle spacing around containers?
6. Emergency communications system available/operable?
7. Firefighting equipment available/operable?

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Weather Condition: (Clear) Raining

#	Deficiency Comments	Corrective Action	Completion Date
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4.			
5.			
6.			

Rating:

S = Satisfactory

U = Unsatisfactory

Inspector's Signature:

Sammy Richardson III SAMMY RICHARDSON III

*If last Inspection of the quarter (Last inspection in March, June, September, and December) Mark Container ID Numbers in the Table Below

138 SPL Container IDs	Cast House SPL Container IDs

STOP if hazardous waste containers are not completely closed	STOP if truck traffic in cast house area is congested
STOP if crack, leaks or holes are identified in the containment building	STOP if relining traffic in 138 area is congested
STOP if there is not enough isle space between containers	STOP if waste fluid area traffic is congested from traffic to the waste fluid area or to building 139
STOP if hazardous waste containers are not properly labeled	STOP if hazardous waste not properly contained.
STOP if hazardous waste containers are not stored in the correct location	STOP if hazardous waste containers are stored >90 days or if PCB containers stored >270 days
STOP if SPL found outside of the containment building or outside of shipment containers	STOP if SPL found leaking from the 138 dust collector or on the pad under the 138 dust collector

SPENT POTLINING CONTAINMENT BUILDING INSPECTION
(BLDG 138)
HAZARDOUS/RESTRICTED WASTE MANAGEMENT

Date & Time Inspected: 03/27/2024 Day of Week: WED. Period: 3

A. GENERATION/SHIPPING

1. How many pots were dug this week? 2 Pots
2. How many container loads of SPL-Carbon were shipped? 1 Containers

B. BUILDING 138 HAZARDOUS WASTE 90 DAY STORAGE AREA

Yes No N/A

1. Any SPL Carbon containers in storage? If yes SPL Carbon Quantity _____ cy ☐ ☐ ☐
*Remember to document container ID during last quarterly inspection
2. Shipping containers in good condition, free from leaks, closed & labeled? ☒ ☐ ☐
3. Only hazardous waste containers in 90 day area? ☒ ☐ ☐
4. Do all containers have start dates? Oldest shipping container Date: 2-15-2024 ☒ ☐ ☐
5. Containers located in designated 90 day area? ☒ ☐ ☐
6. Proper isle space between full containers? ☒ ☐ ☐
7. All containers stored <90 days? Date will reach 90 days: 5-15-24 ☒ ☐ ☐

C. BUILDING 138 HOUSEKEEPING

1. After building cleanouts is the dig area clean of SPL material? ☐ ☒ ☐
2. SPL debris & vacuum containers labeled, closed & in good condition? ☒ ☐ ☐
3. Bunker curtain closed & in good condition? SPL Insulation quantity _____ cy ☒ ☐ ☐
4. Pulled pots waiting to be dug are marked with pot number and pull date? ☒ ☐ ☐
5. No visible SPL on outside storage pad? ☒ ☐ ☐
6. Mobile equipment/trailers/containers clean of SPL residue? ☒ ☐ ☐
7. Area outside of containment free of material tracking? ☒ ☐ ☐
8. Last room cleanout date? 4/1 ☒ ☐ ☐
9. DC discharge hopper closed, labeled & free of leaks? Hopper Date? 4-17-24 ☒ ☐ ☐
10. DC free of visible leaks and no material spillage on the pad under the DC? ☒ ☐ ☐

D. BUILDING 138 STRUCTURAL INTEGRITY

1. Floor in dig area free of cracks & gaps that could lead to a release? ☒ ☐ ☐
2. Building roof & walls free of damage? ☒ ☐ ☐

E. CAST HOUSE HAZARDOUS WASTE 90 DAY STORAGE AREA

1. Any hazardous waste containers in storage? ☐ ☒ ☐
*Remember to document container ID during last quarterly inspection
2. Only hazardous waste containers in 90 day area? ☐ ☐ ☒
3. All containers stored < 90 days? ☐ ☐ ☒
4. Shipping containers in good condition, free from leaks, closed & labeled? ☐ ☐ ☒
5. Proper isle space between full containers? ☐ ☐ ☒

F. WASTE FLUID AREA 90 DAY STORAGE AREA

1. Any hazardous waste containers in storage? ☐ ☒ ☐
2. All containers stored < 90 days? ☐ ☐ ☒
3. Containers in good condition, no leaks, clean, and properly closed? ☐ ☐ ☒
4. Containers properly labeled and dated? ☐ ☐ ☒
5. Secondary containment free from damage? ☒ ☐ ☒
6. Proper aisle spacing around containers? ☐ ☐ ☒
7. Emergency communications system available/operable? ☒ ☐ ☐
8. Firefighting equipment available/operable? ☒ ☐ ☐

G. PCB BALLASTS/CAPACITORS

1. Any PCB waste containers in storage? ☐ ☒ ☐
2. Containers are in good condition, non-leaking, contained, labeled and dated? ☐ ☐ ☒
3. All containers stored <270 days? Date will reach 270 days: _____ ☐ ☐ ☒

H. BAKE STACK PLENUM AREA 90 DAY STORAGE AREA

Yes No N/A

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1. Any hazardous waste containers in storage?
2. Containers in good condition, no leaks, clean, and properly closed?
3. Containers properly labeled and dated?
4. All containers stored <90 days?
5. Proper aisle spacing around containers?
6. Emergency communications system available/operable?
7. Firefighting equipment available/operable?

☐	☒	☐
☐	☐	☒
☐	☐	☒
☐	☐	☒
☐	☐	☒
☒	☐	☐
☒	☐	☐

Weather Condition: (Clear or Raining)

#	Deficiency Comments	Corrective Action	Completion Date
1.			
2.			
3.			
4.			
5.			
6.			

Rating:

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STOP if hazardous waste containers are not stored in the correct location	STOP if hazardous waste containers are stored >90 days or if PCB containers stored >270 days
STOP if SPL found outside of the containment building or outside of shipment containers	STOP if SPL found leaking from the 138 dust collector or on the pad under the 138 dust collector