

RCRA Inspection Report

1) Inspector and Author of Report

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Enforcement and Compliance Assurance Division
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2) Facility Information

Biogen U.S. Limited Partnership (Biogen)
5000 Davis Drive
RTP, North Carolina 27709
EPA ID No.: NCR000005355

3) Responsible Officials

Hanna S. Gamache, Sr. Associate I, EHS
Phone: (919) 993 – 1972 Email: hanna.gamache@Biogen.com

4) Inspection Participants

Hanna S. Gamache	Biogen
Peter Self	Biogen
Cole Bingham	Veolia
James Bascom	Veolia
Valerie Pferdeort	Biogen
Damaris Vera Bravo	Biogen
Jennifer Zhang	Biogen
Christina Hobbs	Biogen
Heather Goldman	Eastern Unit Supervisor NCDEQ
Daniel Girdner	Environmental Senior Specialist NCDEQ
Alan Newman	US EPA Region 4

5) Date of Inspection

February 4, 2021, 8:30 a.m. – 6:00 p.m.

6) Applicable Regulations

Resource Conservation and Recovery Act (RCRA) Sections 3002 (42 U.S. Code – Annotated U.S.C.A. 6925 and 6927), Title 15A of the North Carolina Administrative Code (NCAC), Chapter 13; and 40 Code of Federal Regulation (C.F.R.), Parts 260 - 270, 273, 278, & 279.

7) **Purpose of Inspection**

The purpose of this inspection was to conduct an announced Resource Conservation and Recovery Act (RCRA) compliance evaluation inspection (CEI) to determine Biogen's compliance with the applicable RCRA regulations. This was an EPA lead inspection.

8) **Previous Inspection History**

NCDEQ has conducted one RCRA CEI at the subject facility in 2016 and found no violations.

9) **Facility Description**

Biogen develops, manufactures, and markets a diverse product line of biopharmaceuticals. Biogen began operating in February 1997 in a 752,000 square foot facility. Biogen employs approximately 1,200 full time employees [approximately 500 work on-site and the remainder are currently working remotely]. The facility is on a 176 acres site in Wake county. The facility operates 7 days a week and 365 days per year. The site primarily is comprised of six buildings and a parking deck. Bulk intermediate manufacturing and warehousing take place in Buildings 21, 22, 23, and 25. Building 24 provides quality testing, additional laboratory space and administrative offices. Building 26 contains the various administrative groups. There is a security guard at the entrance to the facility.

Biogen most recently notified of their hazardous waste activity on February 26, 2020, as part of the biennial report. This notification identified the facility as a large quantity generator of hazardous waste, which they have been since 2016, and as a large quantity handler of universal waste. The primary NAICS code for Biogen is 325414 – biological product manufacturing. According to the notification, Biogen generates the waste with the following waste codes: D001-D003, D005, D007-D011, D021, D022, D024, D028, D035, D038, F001-F003, F005, P030, P105, U002, U003, U037, U044, U057, U077, U117, U123, U135, U144, U154, U159, U161, U188, U196, U197, U213, U218, U219, U220, and U236. Hazardous Waste Streams and Waste Codes generated on-site based on hazardous waste manifests include the following:

Lab wastes, HPLC spent solvents	Waste Flammable Liquids (WFL), Toxic	D001, D035, F003, F005
Lab wastes, HPLC, salts and isopropanol managed as HW	WFL, Waste corrosive liquids (WCL)	D001, D002
Lab wastes, Acids	Waste Corrosive Liquid	D002
Lab wastes, Acid/TMB/DMSO	Waste Corrosive; Ignitable Liquid	D001, D002
Lab wastes, discarded chemicals, off spec., container residues.	Lab packs,	D001, D002, D003; U003 and other waste codes as determined
Small Scale Manufacturing (SSM) wastes, isopropanol, managed as HW	Ignitable Liquid, WFL	D001
Waste Sodium Hydroxide Solutions; Waste Tyrosine and	WCL	D002

Sodium Hydroxide solution		
Waste Ethanolamine	WCL	D002
Waste Acetic Acid; Waste HCL	WCL	D002

10) **Opening Conference**

On February 4, 2021, EPA inspector Alan Newman, accompanied by NCDEQ inspectors Daniel Girdner and Heather Goldman, arrived at Biogen at approximately 8:30 a.m. Facility representatives, Hanna Gamache (Biogen) and Cole Bingham (Veolia), immediately received the inspectors. The representatives and inspectors were joined by Peter Self (Biogen) for the opening conference via phone. The inspectors introduced themselves, showed their credentials to Facility representative, and explained the purpose of the visit. The inspectors described the anticipated use of equipment (digital camera) during the inspection and provided a request for records. The inspectors discussed the company's ability, pursuant to 40 C.F.R. §2.203, to assert a business confidentiality claim for information submitted to the EPA. The company did not assert a business confidentiality claim. The inspection participants also discussed health and safety protocols and required personal protective equipment before a Facility representative led the inspectors on a tour of the Facility operations.

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

11) **Findings**

- Building 26

Biogen was storing universal waste in the top floor, "the penthouse", of Building 26. There were two boxes of CFLs, one box of metal halide lamps, and one cylinder storing 4-foot universal waste lamps. One box of CFLs was dated 2/3/2021 and labeled as universal waste CFL "bulbs." Facility representatives corrected the label from "bulbs" to "lamps" (Photos 1-2). Each container was closed and labeled with an accumulation start date within the last year. The oldest was dated 9/1/2020.

Pursuant to 15A NCAC 13A .0119(b)] [40 C.F.R. § 273.14(e)], a SQHUV must label or mark each lamp or container of lamps clearly with one of the following phrases: "Universal Waste-Lamp(s)," or "Waste Lamp(s)," or "Used Lamps."

- Building 24 Room 24104 - Electrical

Biogen was storing universal waste lamps in one 4-foot cylinder that was in good condition, closed, and dated 1/23/2021. There was one box of HID universal waste lamps dated 1/2/2021, one box of mixed universal waste lamps dated 1/2/2021, and one box of CFL universal waste lamps dated 1/11/2021. Each

of these containers was closed and in good condition (Photo 3). The box of HID universal waste lamps was labeled as waste “bulbs.”

Pursuant to 15A NCAC 13A .0119(b)] [40 C.F.R. § 273.14(e)], a SQHUW must label or mark each lamp or container of lamps clearly with one of the following phrases: “Universal Waste-Lamp(s),” or “Waste Lamp(s),” or “Used Lamps.”

- Room 24105A – Chem Waste Storage

Biogen was storing approximately 215 gallons of waste in 17 containers ranging from 100 ml to 55-gallons in the Central Accumulation Area in Room 24105A. Each of the containers was labeled, dated, closed, and in good condition (Photos 4-7). The oldest accumulation start date for hazardous waste containers was 12/17/2021. The oldest date for universal waste containers was 4/14/2020. This room was supported by a grated floor. There was dirt and debris on the floor visible through the grate. Biogen had not cleaned this floor area in some time. The inspection team recommended that the floor be cleaned on a regular basis or as needed.

- Room 24160 AD Lab

Biogen was operating twenty-two HPLCs in Room 24160 AD Lab. Each HPLC was attached to a 5-gallon accumulation container affixed with a manifold of six ports on the cap. Each of the satellite accumulation areas (SAAs) were in good condition and labeled. Twelve of twenty-two SAA containers had at least one port open (Photos 8-17). There was waste on the outside of one container (Photo 17).

Pursuant to 15A NCAC 13A .0107(a) [40 C.F.R. § 262.15(a)], a generator may accumulate as much as 55 gallons of non-acute hazardous waste in containers at or near the point of generation where wastes initially accumulate, which is under the control of the operator of the process generating the waste, without a permit or without having interim status, as required by 130A-294(c) and (g) of the NCSWML, N.C.G.S. § 130A-294(c) and (g) [Section 3005 of RCRA, 42 U.S.C. § 6925], and without complying with 15A NCAC 13A .0107(a) [40 C.F.R. § 262.16(b) or §262.17(a)], except as required in 15A NCAC 13A .0107(a) [40 C.F.R. § 262.15(a)(7) and (8)], provided that the generator complies with the satellite accumulation area conditions listed in 15A NCAC 13A .0107(a) [40 C.F.R. § 262.15(a)] (hereinafter referred to as the “SAA Permit Exemption”).

Pursuant to 15A NCAC 13A .0107(a) [40 C.F.R. § 262.15(a)(4)], which is a condition of the SAA Permit Exemption, a generator is required to keep containers of hazardous waste closed at all times during accumulation, except when adding, removing, or consolidating waste; or when temporary venting of a container is necessary for the proper operation of equipment, or to prevent dangerous situations, such as build-up of extreme pressure.

There was one 4-liter rough pump container labeled as “Oil waste” (Photo 18). Containers of used oil are required to be labeled as “Used Oil.”

Pursuant to 15A NCAC 13A .0118(c) [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”.

- Room 24165

Biogen was operating two HPLCs SAAs in this room. These containers were in good condition, closed, and labeled.

- Room 24169 - AD Bio-Assay

Biogen was storing HCL/TMB/DMSO/Sulfuric acid waste in a one-gallon red flip top container in a designated SAA area (Photo 19). This container was not labeled as hazardous waste. These containers should have included an indication of corrosive hazard. Also, Biogen was storing tetra-methyl-benzene/di-methyl sulfoxide tips in a similar 1-gallon red flip top container in this waste bin.

Pursuant to 15A NCAC 13A .0107(a) [40 C.F.R. § 262.15(a)(5)], which is a condition of the SAA Permit Exemption, a generator is required to mark or label its containers (i) with the words “Hazardous Waste” and (ii) with an indication of the hazards of the contents.

- Room 24260 Bio Reactor Laboratory

Biogen was storing methyl ethyl ketone hazardous waste in a 4-liter plastic container with a drain funnel attached at the top opening (Photo 20-21). This container was in good condition, closed, and marked as flammable liquid.

- Rooms 24270, 24280, 24470, 24448, and the Pilot Lab

Biogen was operating the TB cell culture laboratory (Room 24270), the TD purification laboratory (Room 24280), the stability storage and sample control laboratory (Room 24470), the general testing laboratory (Room 24448) and the Pilot Laboratory. There was no waste in these laboratories on the day of the inspection.

- Room 24230 – Equipment Lab

Biogen was operating four HPLCs in Room 24230 on the day of the inspection. Each of the HPLCs was attached to a 5-gallon SAA container (Photo 22). These containers were in good condition and labeled. Three of these 5-gallon SAA containers were open on the day of the inspection.

Pursuant to 15A NCAC 13A .0107(a) [40 C.F.R. § 262.15(a)(4)], which is a condition of the SAA Permit Exemption, a generator is required to keep containers of hazardous waste closed at all times during accumulation, except when adding, removing, or consolidating waste; or when temporary venting of a container is necessary for the proper operation of equipment, or to prevent dangerous situations, such as build-up of extreme pressure.

- Room 24490 – Bio-Assay Laboratory

Biogen was operating four HPLCs in Room 24490. Each of these HPLC's was attached to a 5-gallon SAA container. These containers were in good condition and labeled. Three of these 5-gallon SAA containers were open on the day of the inspection. Biogen was operating one, 1-liter SAA beaker storing MECH (Photos 23-24). This SAA beaker was open and was not labeled with an indication of the hazard.

There were three small boxes of universal waste lamps stored next to the beaker. These boxes were in good condition, closed, and labeled.

Pursuant to 15A NCAC 13A .0107(a) [40 C.F.R. § 262.15(a)(4)], which is a condition of the SAA Permit Exemption, a generator is required to keep containers of hazardous waste closed at all times during accumulation, except when adding, removing, or consolidating waste; or when temporary venting of a container is necessary for the proper operation of equipment, or to prevent dangerous situations, such as build-up of extreme pressure.

Pursuant to 15A NCAC 13A .0107(a) [40 C.F.R. § 262.15(a)(5)], which is a condition of the SAA Permit Exemption, a generator is required to mark or label its containers (ii) with an indication of the hazards of the contents.

Across the laboratory, Biogen was accumulating waste in three 4-liter bottles with eco funnels: one for mixed bases, one for mixed acids, and one for flammables (Photo 25). Under the same laboratory hood was one, 1-gallon red flip top safety canister storing flammable hazardous waste. These containers were in good condition, closed, and labeled on the day of the inspection.

- Building 20
 - ❖ Room 20204 and Room 20240

Biogen was not storing any waste in Room 20204 on the day of the inspection. Biogen was operating five HPLCs in Room 20240. Each of these HPLCs was attached to a 5-gallon SAA container. These containers were in good condition and labeled. Three of these 5-gallon SAA containers were open on the day of the inspection. Biogen was also accumulating one, 1-quart container of used oil. This container was in good condition and labeled.

Pursuant to 15A NCAC 13A .0107(a) [40 C.F.R. § 262.15(a)(4)], which is a condition of the SAA Permit Exemption, a generator is required to keep containers of hazardous waste closed at all times during accumulation, except when adding, removing, or consolidating waste; or when temporary venting of a container is necessary for the proper operation of equipment, or to prevent dangerous situations, such as build-up of extreme pressure.

- Building 22
 - ❖ Room 2101 - Maintenance

Biogen was storing one, blue 5-gallon container of used oil. This container was not labeled with the words “Used Oil” on the day of the inspection (Photos 26-27). Facility personnel added the words Used Oil to the container during the inspection.

Pursuant to 15A NCAC 13A .0118(c) [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.”

- Room 2200 – Mechanical Room

Biogen operates a sand blast machine to clean off metal parts and accumulates waste in a 35-gallon container in Room 2200. The most recent shipment of waste from this process was tested using a TCLP test. The results indicated that the waste was non-hazardous.

- Room 2104 - Integrity testing

Biogen was accumulating one, 55-gallon metal container of hazardous waste isopropyl alcohol in a SAA with a yellow funnel attached to the bung hole in room 2104 (Photo 28). This container was labeled as a hazardous waste and flammable liquid. There were also two, red 5-gallon accumulation SAA cans (D001) (Photo 28). These containers were in good condition, closed, and labeled.

- Room 3113 Media Prep Airlock CAA

The inspection team noted four 55-gallon poly containers in Room 3113 Media Prep Airlock on the day of the inspection (Photo 29). One container was labeled as sodium selenite but was empty. The other three containers were not empty and contained insulin with Hydrochloric acid, Tyrosine and Sodium Hydroxide, and Ethanolamine respectively. Biogen was managing these containers as SAAs. However, since these containers were not at the point of generation and the volume of waste was greater than 55-gallons it was not eligible to be managed as an SAA and should have been managed as a CAA. Additionally, there were no accumulation start dates on the three containers storing waste nor were there any indications of the hazard. Biogen employees that transfer waste to a CAA should be trained.

Pursuant to 15A NCAC 13A .0107(a) [40 C.F.R. § 262.17(a)(5)(i)(B) and (C)], which is a condition of the LQG Permit Exemption, a generator must mark or label its containers with the following: an indication of the hazards of the contents; and the date upon which each period of accumulation begins clearly visible for inspection on each container.

The inspection team toured Rooms 1206, 1301, 1418, and 1608. There was no waste in these rooms. It was noted that waste in these rooms would not be at or near the generation point of the process generating the waste. Biogen should ensure that if there is waste stored in these rooms, appropriate waste management rules are followed.

- Waste Shed 29A

Biogen stores approximately 800 gallons of hazardous waste, universal waste, and non-hazardous waste in approximately 40 containers in waste shed 29A (Photos 30-31). These containers were in good condition, closed, and labeled with an accumulation start dates. The oldest accumulation start date for hazardous waste containers was 12/23/2020. The oldest accumulation start date for universal waste containers was 4/14/2020.

There was one 30-gallon container of phosphoric acid dated 2/1/2021. This container was not labeled with an indication of hazard (Photo 31).

Pursuant to 15A NCAC 13A .0107(a) [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 containers with the following: an indication of the hazards of the contents.

- Old Hazardous Waste Building

Biogen was storing one, 55-gallon container of used oil that was labeled and in good condition.

- Solid Waste Building – (Non-Haz Cage)

Biogen was storing multiple universal waste containers in this area on the day of the inspection:

Size	Date	Comments
2-foot box	5/20/2019	In storage for greater than one year
8-foot	5/20/2020	
3-foot	7/15/2020	
Box	7/1/2020	
Box	6/10/2020	
2-foot Box	5/20/2019	In storage for greater than one year
Box - open	5/15/2020	Open container
Box	2/1/2020	In storage for greater than one year
Box	5/25/2020	
Box - Open	6/1/2020	Open container
U-lamps	7/10/2020	
U-lamps	5/1/2020	

There was a total of 12 boxes storing universal waste lamps. Two of these boxes were open and three of these boxes were dated more than one year (Photos 32-34). These wastes were shipped off-site under manifest number 001088473 on 2/19/2021.

Pursuant 15A NCAC 13A .0119(b) [40 C.F.R. § 273.13(d)], a SQHUW must manage universal waste lamps in a way that prevents releases of any universal waste or component of a universal waste to the environment.

Pursuant to 15A NCAC 13A .0119(b) [40 C.F.R. § 273.15(a) and (c)], a SQHUW may accumulate universal waste no longer than one year and must be able to demonstrate the length of time that the universal waste has accumulated from the date that it became a waste or was received.

- **Records Review**

The inspection team reviewed the following records: CAA weekly inspection records from 2018-2021, hazardous waste manifests February 2018 through January 2021, universal waste shipping documents, land disposal restriction forms, training records, the contingency plan, the waste minimization plan, biennial report, and notification for hazardous waste activity.

There was one area of concern during the record review concerning the contingency plan - The facility's contingency plan was last revised on May 22, 2018. There were several sections in the contingency plan

that listed who would take the lead for emergency situations. Hanna Gamache was listed as the Primary Emergency Coordinator, but also as the Secondary Emergency Coordinator in other sections, with some overlap with other associates with expertise in manufacturing or utilities areas where hazardous waste was not anticipated to be the primary fire risk. The inspection team recommends that the primary emergency coordinator be consistently clear.

There was one additional area for recommendation regarding the CAA inspections. Currently the forms allow for recording the time of the inspection although it is not always recorded. This is not a requirement in North Carolina. The inspection team recommends that additional information be included on the form to assist with compliance and completeness:

1. The oldest accumulation start date,
2. The number of containers,
3. Include a line for not only the name of the inspector but also their signature,
4. Adding “am/pm” to the area on the form where the time is recorded,
5. Ensure that the area being inspected is recorded on the form and use the names used by plant personnel such as Haz Shed, Solvent Room, etc...

Documentation of Biogen’s training was provided subsequent to the inspection:

Personnel	Title & HW Duties	Last RCRA Training	Last DOT Training
Peter Self, Biogen	EHS Director, hazardous waste management, training, emergency coordinator	2/4/21	n/a
Hanna Gamache, Biogen	EHS Sr. Associate; oversight of HW handling, shipping, inspections, and reporting, emergency coordinator, signing manifest	5/28/20	5/28/20
James Bascom, Veolia	Hazardous Waste Technician, handling, inspections, manifesting	Biogen 4/30/20, Veolia 2/19/20	4/4/19
Cole Bingham, Veolia	Hazardous Waste Technician, handling, inspections, manifesting	Biogen 4/30/20, Veolia 2/19/20	5/5/20
Nick Perry, Veolia	Hazardous Waste Technician, handling, inspections, manifesting	Biogen 4/30/20, Veolia 2/19/20	4/3/19
Clint McSherry, Veolia (substitute if required)	Hazardous Waste Technician, handling, inspections	Biogen 4/30/20, Veolia 2/19/20	4/3/19

12) Closing Conference

The inspectors conducted the exit meeting at approximately 5:00 p.m. with Biogen and Veolia personnel. During this meeting, the inspectors stated their preliminary conclusions of the inspection. Biogen agreed to provide training records via email subsequent to the meeting. On February 24, 2021, Peter Self provided a response to the inspection including records in an email to Alan Newman, Daniel Girdner, and Heather Goldman. The response addressed each of the items noted in this report and documented compliance.

13) Inspection Findings

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

Pursuant to 15A NCAC 13A .0107(a) [40 C.F.R. § 262.15(a)(4)], which is a condition of the SAA Permit Exemption, a generator is required to keep containers of hazardous waste closed at all times during accumulation, except when adding, removing, or consolidating waste; or when temporary venting of a container is necessary for the proper operation of equipment, or to prevent dangerous situations, such as build-up of extreme pressure.

Pursuant to 15A NCAC 13A .0107(a) [40 C.F.R. § 262.15(a)(5)], which is a condition of the SAA Permit Exemption, a generator is required to mark or label its containers (i) with the words “Hazardous Waste” and (ii) with an indication of the hazards of the contents.

Pursuant to 15A NCAC 13A .0107(a) [40 C.F.R. § 262.17(a)(5)(i)(B) and (C)], which is a condition of the LQG Permit Exemption, a generator must mark or label its containers with the following: an indication of the hazards of the contents; and the date upon which each period of accumulation begins clearly visible for inspection on each container.

Pursuant 15A NCAC 13A .0119(b) [40 C.F.R. § 273.13(d)], a SQHUW must manage universal waste lamps in a way that prevents releases of any universal waste or component of a universal waste to the environment.

Pursuant to 15A NCAC 13A .0119(b)] [40 C.F.R. § 273.14(e)], a SQHUW must label or mark each lamp or container of lamps clearly with one of the following phrases: “Universal Waste-Lamp(s),” or “Waste Lamp(s),” or “Used Lamps.”

Pursuant to 15A NCAC 13A .0119(b) [40 C.F.R. § 273.15(a) and (c)], a SQHUW may accumulate universal waste no longer than one year and must be able to demonstrate the length of time that the universal waste has accumulated from the date that it became a waste or was received.

Pursuant to 15A NCAC 13A .0118(c) [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.”

14) **List of Appendices**

Appendix 1 – Photo Log:

34 Photos taken on: February 4, 2021

Photos taken by: Alan Newman

Photos taken with: Olympus Tough TG-820 Digital Camera

EPA Property Tag: S75926

And Daniel Girdner with

Camera: iPhone (Apple)

Model: iPhone 7

Serial Number: F72YW2X3HG6W

15) **Signed**

ALAN NEWMAN

Digitally signed by ALAN
NEWMAN
Date: 2021.04.19 09:12:35
-04'00'

Alan Newman
Environmental Engineer

Date

Concurrence

ARACELI
CHAVEZ

Digitally signed by
ARACELI CHAVEZ
Date: 2021.04.19
08:51:55 -04'00'

Araceli B. Chavez
Chief
RCRA Enforcement Section

Date

Photographs

Photos taken by Alan Newman
Photos taken on February 4, 2021
Camera: Olympus Tough
Model: TG-820 D33235
Serial Number: BCG510929
Photos taken by Alan Newman

And by Daniel Girdner with
Camera: iPhone (Apple)
Model: iPhone 7
Serial Number: F72YW2X3HG6W F17CG9KFPLJM



Photo 1: Building 2026 - universal waste lamps storage.



Photo 4: Room 24105A – Chem Waste Storage.



Photo 2: Building 2026 - universal waste lamps storage.



Photo 5: Room 24105A – Chem Waste Storage.



Photo 3: Room 24104 - Electrical – Universal Waste storage.



Photo 6: Room 24105A – Chem Waste Storage.



Photo 7: Room 24105A – Chem Waste Storage.



Photo 10: Room 24160.



Photo 8: Room 24160.



Photo 11: Room 24160.



Photo 9: Room 24160.



Photo 12: Room 24160.



Photo 13: Room 24160.



Photo 14: Room 24160.



Photo 15: Room 24160.



Photo 16: Room 24160.



Photo 17: Room 24160.



Photo 20: Room 24260.



Photo 18: Room 24160.

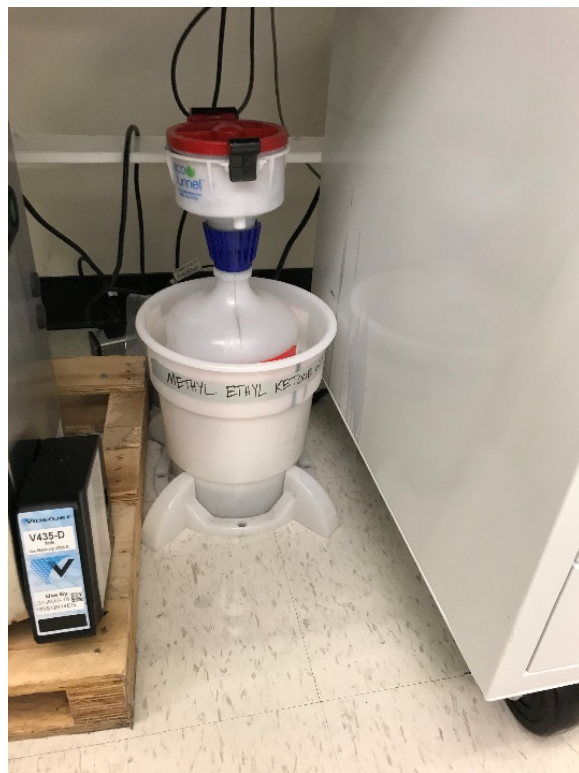


Photo 21: Room 24260.



Photo 19: Room 24169.

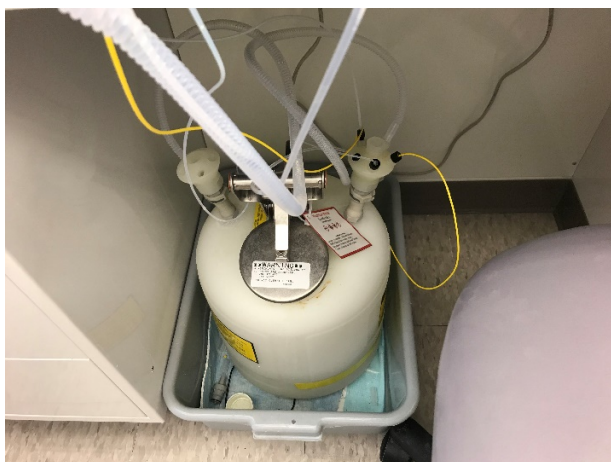


Photo 22: Room 24230.



Photo 25: Room 24490.



Photo 23: Room 24490.



Photo 26: Room 2101.

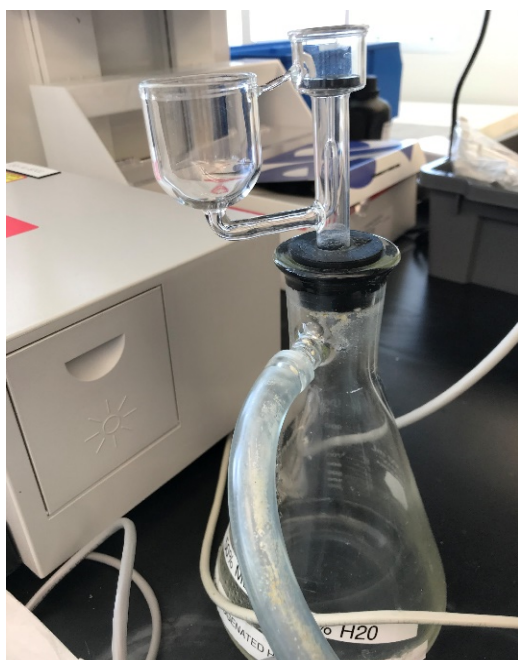


Photo 24: Room 24490.

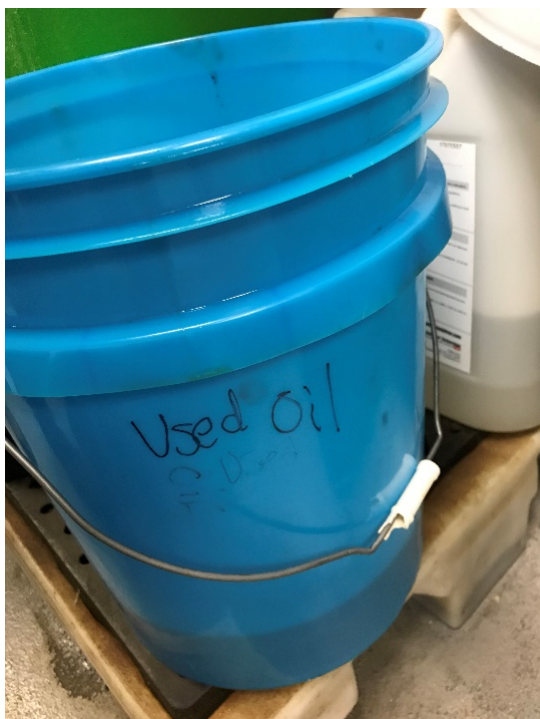


Photo 27: Room 2101.



Photo 29: Room 3113.



Photo 28: Room 2104.

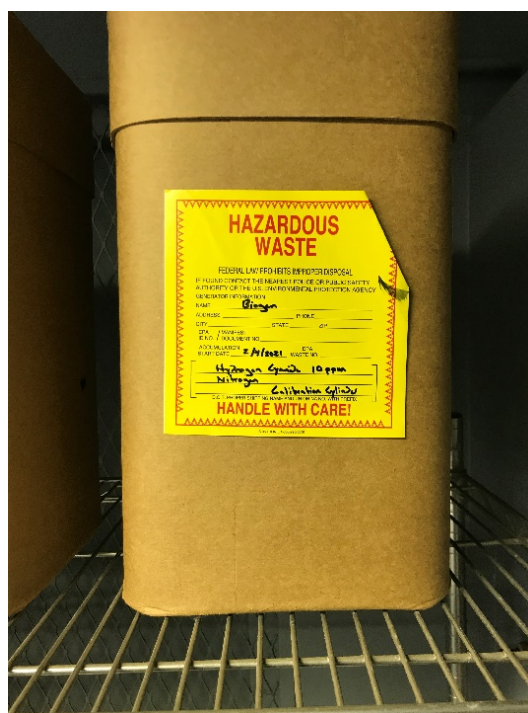


Photo 30: Waste Shed 29A.



Photo 31: Waste Shed 29A.



Photo 33: Non-Haz Cage.



Photo 32: Non-Haz Cage .



Photo 34: Non-Haz Cage.