RCRA Inspection Report

1) Inspector and Author of Report

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U.S. Environmental Protection Agency (USEPA), Region 4
Enforcement and Compliance Assurance Division
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2) Facility Information

Safety-Kleen Systems, Inc.
3700 La Grange Rd.
Smithfield, Kentucky 40068

EPA ID#: KYD053348108

NAICS #: 562211 – Hazardous Waste Treatment and Disposal

3) Responsible Officials

Todd Walsburger
Operations Manager and Temporary General Manager
todd.walsburger@safety-kleen.com

4) Inspection Participants

Todd Walsburger, Safety-Kleen Systems, Inc.

David Remley, Kentucky Department for Environmental Protection (KYDEP)
Adam Fritsch, KYDEP
Scott Gerstner, KYDEP
Kayla Acosta, USEPA

5) Date of Inspection

June 05, 2024, at 9:00 AM – 6:15 PM

6) Applicable Regulations[1]

Resource Conservation and Recovery Act (RCRA) Sections 3002 (42 U.S. Code – Annotated U.S.C.A. 6925 and 6927), and 40 Code of Federal Regulation (C.F.R.) Parts 260 - 270, 273, 278, & 279; Kentucky Revised Statutes Title XVIII, Chapter 224, Subchapter 46-Hazardous Waste et seq. (2006), and Title 401 of the Kentucky Administrative Regulations (K.A.R.) Chapters 30 through 38, 43 and 44 (2006); and Hazardous Waste Permit No. KYD053348108.

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 401 KAR 39:005, Section 1 [40 C.F.R. § 260.10], a large quantity generator of hazardous waste (LQG) is a generator who generates greater than or equal to 1,000 kilograms (2,200 pounds) of non-acute hazardous waste in a calendar month.

Pursuant to 401 KAR 39:080, Section 1(1) [40 C.F.R. § 262.15(a)], a generator may accumulate as much as 55 gallons of non-acute hazardous waste in containers at or near any point of generation where wastes initially accumulate, which is under the control of the operator of the process generating the waste, without a permit or without having interim status, as required by KRS § 224.46-520 [Section 3005 of RCRA, 42 U.S.C. § 6925], and without complying with 401 KAR 39:080, Section 1(1) [40 C.F.R. § 262.16(b) or § 262.17(a)], except as required in 401 KAR 39:080 [40 C.F.R. § 262.15(a)(7) and (8)], provided that the generator complies with the satellite accumulation area conditions listed in KAR 39:080, Section 1(1) [40 C.F.R. § 262.15(a)] (hereinafter referred to as the "SAA Permit Exemption").

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

Pursuant to 401 KAR 39:080, Section 3(1) [40 C.F.R. § 273.9], a large quantity handler of universal waste (LQHUW) is a universal waste handler who accumulates 5,000 kilograms or more total of universal waste (batteries, pesticides, mercury-containing equipment, lamps, or aerosol cans, calculated collectively) at any time.

7) Purpose of Inspection

The purpose of this inspection was to conduct an unannounced compliance evaluation inspection to determine Safety-Kleen System, Inc.'s compliance with the conditions of its RCRA Hazardous Waste Facility Operating Permit No. KYD053348108, the applicable requirements of RCRA, and the corresponding Kentucky regulations. This was an EPA lead inspection.

8) Facility Description

Safety-Kleen Systems, Inc. is a provider of environmental services, oil-refining, and cleaning solutions. The company began operations in the 1960's and was later acquired by Clean Harbors, Inc. in December 2012. Safety-Kleen Systems, Inc. (known hereinafter as "SKS" or "the facility") located in Smithfield, Kentucky specializes in fuel blending, which is then sent to other facilities to burn for energy recovery. Scrap metal is sold to re-smelters for railroad rail manufacturing.

Both hazardous and non-hazardous wastes are received at the facility in bulk tankers or in containers and are either used for scrap metal washing or is used for fuel blending. Bulk tanker-truckloads are sampled, analyzed, off-loaded in tanker bays, and pumped into storage tanks to await use as "metal wash" for cleaning metal shreds and/or blending into fuel. Containerized wastes are received and processed with new labeling and bar coded. The containers are then stored in permitted container storage areas while being sampled and analyzed. After analysis,

waste is categorized from a scale of 1 to 5 (1 being liquid waste and 5 being solid waste). Waste under categories 1-3 (mostly liquid) are initially sampled and processed into the Automated Drum Decanting System (ADDS). Waste in categories 4-5 (mostly solids) are sent to the shredder. The shredder is currently out of service.

SKS began operations in 1969 and occupy 104 acres, with 14 acres consisting of active operations. The facility employs 49 workers and operates four 12-hour shifts 24 hours a day, seven days a week. The facility is equipped with 24-hour security and a perimeter fence with signage throughout states “Danger Unauthorized Personnel Keep Out” (Photo 1).

SKS first notified of its regulated waste activities on March 01, 1990, as a LQG of hazardous waste. The facility’s most recent notification was on December 13, 2023, as an LQG, importer of hazardous waste, large quantity handler of universal waste, used oil transporter, and used oil processor. SKS generates the following waste codes:

D001, D002, D003, D004, D007, D008, D009, D018, D020, D022, D028, D039, D040
F001, F002, F003, F005
K048, K049, K086

SKS was issued a Hazardous Waste Management Permit (Permit No. KYD053348108) on October 30, 1999, for treatment and storage of hazardous waste. The facility is working on their permit renewal with KYDEP and has been operating with the 1999 permit which expired on October 31, 2009. The maximum storage capacity and treatment allowances are illustrated below.

Container Storage Area Name	Maximum Storage Capacity (gallons)	Equivalent Number of 55-gallons Drums	Volume of Secondary Containers (gallons)
#1	63,690	1,158	23,472
#2A	74,250	1,350	7,790
#2B	74,250	1,350	7,790
#3	37,125	675	7,790
#4	37,125	675	7,790
#5	37,125	675	7,790
#6	37,125	675	7,790
Truck Station No.2 (Area 6200)	19,800	360	2,577
Truck Station No.7 (Area 6700)	20,900	380	5,468
Truck Station No.8 (Area 6800)	19,800	360	12,804
Truck Station No.6 (Area 6600)	55,000	1000	5,517
Truck Station No.1 (Area 6100)	19,800	360	7,498

Miscellaneous Unit Name	Design Capacity (gal./hr.)	Process Description
Automatic Drum Decant System	3,000	Decanting of Sludge/Liquids from Containers
Shredding System	2,400	Shredding of Containers and Contents
Squeezer System	800	Metal/Solid/Liquid Separation Process

9) Previous Inspection History

KYDEP has conducted RCRA CEIs at the subject facility twice a month since before 2019. The last CEI with a violation was on December 14, 2023, with KYDEP finding one violation for an open container in a Satellite Accumulation Area (SAA).

10) Opening Conference

On June 05, 2024, EPA inspector Kayla Acosta, accompanied by KYDEP inspectors David Remley, Adam Fritsch, and Scott Gerstner arrived at SKS at approximately 9:00 AM. Todd Walsburger, Operations Manager and Temporary General Manager immediately received the inspectors. Mr. Walsburger and the inspectors gathered in a conference room to conduct an opening conference. The inspectors introduced themselves, showed their credentials to Mr. Walsburger, and explained the purpose of the visit.

The inspectors described the anticipated use of equipment (iPad) during the inspection and provided a request for records. The EPA inspector explained that the Small Business Regulatory Enforcement Fairness Act's classification of a "small business" is generally set by the Small Business Administration using the business' SIC/NAICS code and annual receipts or number of employees. A copy of the EPA's information sheet for small businesses can be found at https://www.epa.gov/sites/production/files/2017-06/documents/smallbusinessinfo.pdf. The EPA inspector also discussed the company's ability, pursuant to 40 C.F.R. § 2.203, to assert a business confidentiality claim for information submitted to EPA. The company did not assert a business confidentiality claim.

Mr. Walsburger provided an overview of the facility's history and current operations during the opening conference. The inspection participants also discussed health and safety protocols and required personal protective equipment before Mr. Walsburger led the inspectors on a tour of the facility operations.

11) Inspection Observations

Tanker Storage Area:

This area is used to store tankers and box trucks carrying waste that are either waiting to unload waste or waiting to load waste to ship offsite (Photo 2). This area is covered under the RCRA permit as a solid waste management unit (SWMU). It was noted that a few tankers did

not appear to be empty and did not have labeling on them (Photos 3-5): Tanker #50022T, 41527, 320409, and 223315.

Pursuant to Permit Condition VI.B.2—Land Disposal Prohibitions and Treatment Standards. The storage of hazardous wastes restricted from land disposal under 401 KAR Chapter 37 is prohibited unless the requirements of 401 KAR Chapter 37 are met.

Pursuant to [40 C.F.R. § 268.50(a)(2)(i)], except as provided in this section, the storage of hazardous wastes restricted from land disposal under subpart C of this part of RCRA section 3004 is prohibited, unless the following conditions are met: (2) an owner/operator of a hazardous waste treatment, storage, or disposal facility stores such wastes in tanks, containers, or containment buildings solely for the purpose of the accumulation of such quantities of hazardous waste as necessary to facilitate proper recovery, treatment, or disposal and (1) each container is clearly marked to identify its contents and with:

(A) The words "Hazardous Waste";

(B) The applicable EPA hazardous waste number(s) (EPA hazardous waste codes) in subparts C and D of part 261 of this chapter; or use a nationally recognized electronic system, such as bar coding, to identify the EPA hazardous waste number(s);

(C) 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 CFR 1910.1200; or a chemical hazard label consistent with the National Fire Protection Association code 704); and

(D) The date each period of accumulation begins.

<u>L3 Bay:</u>

The L3 Bay is covered under the RCRA permit as a SWMU and is used for box trucks to unload containers of waste. No hazardous waste was observed in this area.

<u>PCB Warehouse:</u>

This warehouse is used for PCB storage only. No hazardous waste was observed in this area.

<u>Lower Dock – Container Storage Area:</u>

Containers stored in this permitted container storage area appeared to be in good condition. Containers were closed, properly labeled, marked with an indication of the hazard of the contents, and dated with an accumulation start date. The oldest date observed was July 03, 2023. Adequate aisle space was also observed (Photos 6-7). The inspectors did observe what

appeared to be a leak coming from a container of waste (Photo 8). The facility representatives immediately placed absorbents around the area and began addressing the container that was leaking.

D-Tank Farm:

The D-tank farm is covered under the RCRA permit and stores seven (7) 7,500-gallon aboveground storage tanks (Photos 9-10). The tanks are situated on concrete secondary containment which appeared to be in good condition and free of visible cracks. All the tanks were labeled "Hazardous Waste" and marked with an indication of the hazard of the contents. Tank system equipment such as pumps, valves, and flanges appeared to be tagged to identify each piece of equipment pursuant to Subpart BB Air Emission Standards for Equipment Leaks. However, approximately three tags appeared illegible (Photo 11).

Pursuant to Permit Condition VII.C.—General Standards. The Permittee shall comply with the applicable requirements of 401 KAR 34:275 (40 CFR 264, Subpart AA), 401 KAR 34:280 (40 CFR 264, Subpart BB), and 40 CFR 264 Subpart CC (pursuant to the variance identified in condition VII.A.3.a.).

Pursuant to 401 KAR 39:090, Section 1 [40 C.F.R § 264.1050(d)], each piece of equipment to which this subpart applies shall be marked in such a manner that it can be distinguished readily from other pieces of equipment.

In front of tank 5104 the inspectors noticed an open 5-gallon bucket of an unknown liquid and a faded hazardous waste label on it (Photos 12-13). The facility representatives closed the bucket with a lid but could not determine the contents of the liquid.

Pursuant to 401 KAR 39:080, Section 1(1) [40 C.F.R. § 262.11], a person who generates a solid waste, as defined in 40 CFR 261.2, must make an accurate determination as to whether that waste is a hazardous waste in order to ensure wastes are properly managed according to applicable RCRA regulations.

Stainless Rundown Tank Farm:

This tank farm has been out of service for over 30 years. No hazardous waste was observed in this area.

Production Laboratory:

The control room for all tank farms is located in this area. SKS monitors tank levels and transfers between tanks on their computers (Photos 14-15). No hazardous waste was observed in this area.

L4 Bay:

The L4 Bay is covered under the RCRA permit as an SWMU and is used to store 55-gallon containers of waste generated from cleaning out the heels of tanker trucks. Adequate aisle space was observed for hazardous waste being stored in this area. All containers were closed,

labeled with the words “Hazardous Waste”, marked with an indication of the hazard of the contents, and labeled with an accumulation start date (Photos 16-17). No containers were observed to have been accumulating for over a year.

S-Dike Tank Farm:

The S-Dike tank farm is covered under the RCRA permit and consists of fourteen aboveground storage tanks which vary in size from 8,000 gallons to 15,000 gallons (Photo 18). The tanks are situated inside of concrete secondary containment. All the tanks were labeled “Hazardous Waste” and marked with an indication of the hazard of the contents. At the time of the inspection the tank farm was undergoing maintenance which included pressure washing and re-coating of the secondary containment.

V-Dike Tank Farm:

The V-Dike tank farm is covered under the RCRA permit and consists of five aboveground storage tanks situated on concrete secondary containment, which was free of visible cracks or signs of damage. Two of the tanks are 20,000-gallons in design capacity and three tanks are 15,000 gallons (Photos 19-20). All the tanks were labeled “Hazardous Waste” and marked with an indication of the hazard of the contents. Tank system equipment such as pumps, valves, and flanges appeared to be tagged to identify each piece of equipment pursuant to Subpart BB Air Emission Standards for Equipment Leaks.

Maintenance Building:

The facility maintenance building stores non-hazardous shredded material and debris. Facilities also use this building for aerosol can crushing. The inspectors observed a closed parts washer (Photo 21) and one 55-gallon SAA container for the collection of residual liquid from spent aerosol cans after being punctured. The container had an aerosol can puncture device attached to it (Photo 22). The container was closed, labeled “Hazardous Waste”, and marked with an indication of the hazard of the contents.

Tanker Tunnel:

The Tanker Tunnel is covered under the RCRA permit as a SWMU and is used to unload liquids for fuel blending to designated tanks and load fuel onto tanker trucks from the tank farms that are ready to be shipped offsite for fuel burning (Photo 23). The tanker tunnel consists of four bays. Bays 1 and 2 are used to unload liquids from tankers while bays 3 and 4 are used to load liquid fuel that is ready to be shipped offsite. The tank tunnel is equipped with secondary containment sumps which are inspected daily and emptied if liquid is accumulating. Pumps and piping connections were marked with tags to identify each piece of equipment pursuant to Subpart BB Air Emission Standards for Equipment Leaks. The inspectors observed that several tags on equipment belonging to bays 1 and 2 were illegible (Photos 24-25).

Pursuant to Permit Condition VII.C.—General Standards. The Permittee shall comply with the applicable requirements of 401 KAR 34:275 (40 CFR 264, Subpart AA), 401 KAR 34:280 (40 CFR 264, Subpart BB), and 40 CFR 264 Subpart CC (pursuant to the variance identified in condition VII.A.3.a.).

Pursuant to 401 KAR 39:090, Section 1 [40 C.F.R § 264.1050(d)], each piece of equipment to which this subpart applies shall be marked in such a manner that it can be distinguished readily from other pieces of equipment.

The inspectors observed two 55-gallon SAA containers of hazardous waste (one for bays 1 and 2 and one for bays 3 and 4) used for any liquids that may spill from the transfer of fuel during loading and unloading. The inspectors also observed one 5-gallon SAA container of hazardous waste used for any leaks from the hoses. All containers were closed, labeled "Hazardous Waste", and marked with an indication of the hazard of the contents (Photos 26-28).

PV-Dike Tank Farm:

The PV-dike tank farm is covered under the RCRA permit and consists of two 15,000-gallon aboveground storage tanks (Photo 29) situated in concrete secondary containment, which was free of visible cracks or signs of damage. All the tanks were labeled "Hazardous Waste" and marked with an indication of the hazard of the contents. Tank system equipment such as pumps, valves, and flanges appeared to be tagged to identify each piece of equipment pursuant to Subpart BB Air Emission Standards for Equipment Leaks.

Todd Building:

This building is used for facility maintenance and stores building equipment. The inspectors observed one 30-gallon container of used lamps. The container was closed, labeled "Universal Waste", and dated 06/17/2023 (Photo 30).

Main Warehouse:

The main warehouse consists of two permitted container storage areas (Container Storage Area A and Container Storage Area B), and three permitted miscellaneous units (the Shredder Unit, the ADDS, and the Hydro Pulper). The concrete floor in all of these areas inside of the warehouse appeared to have undergone repair to fill in cracks and gaps and appeared to have an impervious coating.

CONTAINER STORAGE AREA B:

Incoming shipments of hazardous waste, non-hazardous waste, and universal waste are offloaded into one of two container storage areas in the Main Warehouse. Each shipment of waste is inspected to ensure that the wastes onsite matches what is on the shipping documents. The facility conducts fingerprint screening and analysis to determine if the wastes match approved waste profiles and to determine if the waste can be processed into the ADDS or the shredder unit. The containers are re-labeled with accumulation start dates and barcodes to track the waste.

There are 20 designated rows available for storing wastes (B-1 through B-20). The inspectors observed adequate aisle space and all of the containers were closed. Containers of hazardous waste were labeled "Hazardous Waste", marked with an indication of the hazard of the contents, and dated with an accumulation start date (Photos 31-32). The oldest date observed was 11/30/2023.

CONTAINER STORAGE AREA A:

There are 18 designated rows available for storing wastes in Container Storage Area A (A-1 through A-18) (Photos 33-34). The inspectors observed some stacking issues with double-stacked containers where some stacked containers appeared to be crushing cubic yard cardboard boxes underneath (Photo 35) while some containers were not stacked properly on top of another container which could cause instability and lead to a spill (Photo 36).

Pursuant to Permit Condition II.I.4—Management of Containers. The Permittee shall manage and inspect the containers in accordance with 401 KAR 34:180, Sections 4 and 5 (effective 3-12-97) and according to the container management system, and container layout and configuration delineated in Attachment D (Process Information). Containers will not be stacked more than two (2) high. Only stable containers and containers with no physical damage may be stacked. The Permittee shall maintain at a minimum, two (2) feet of aisle space between rows of containers in the container storage areas.

The facility representatives immediately began using a forklift to re-stack the containers and make sure they were stable.

The inspectors observed several containers labeled "Universal Waste" that were labeled with indication of hazards of the contents for flammable liquids with descriptions of waste that are not recognized as universal wastes in the state of Kentucky or in the federal regulations for universal waste under 40 C.F.R. Part 273. These containers were shipped from Clean Harbors La Porte, LLC (EPA ID TXD982290140) located in La Porte, Texas. These wastes are listed below (Photos 36-39):

Container Size	**Label**	**Waste Description**	**Clean Harbors Waste Tracking #**	**Photo #**
55-gallon	Universal Waste	Enamel, paint, and solvent	A00FYQXN	36
55-gallon	Universal Waste	Acetone, barium	A00FUWKF	37
55-gallon	Universal Waste	Acetone	A00FMPZ3	38
55-gallon	Universal Waste	High BTU Sludge/ Solids	A00G0DJF	39

The inspectors observed additional containers that were labeled "Universal Waste" that are not recognized as universal wastes in the state of Kentucky or in the federal regulations for universal waste under 40 C.F.R. Part 273 included the following waste tracking numbers: A00G0DJJ, A00G0DJT, A00FTZ2V, A00G0DJ6, and A00FWBUD.

Pursuant to Permit Condition VI.B.2—Land Disposal Prohibitions and Treatment Standards. The storage of hazardous wastes restricted from land disposal under 401 KAR Chapter 37 is prohibited unless the requirements of 401 KAR Chapter 37 are met.

Pursuant to [40 C.F.R. § 268.50(a)(2)(i)], except as provided in this section, the storage of hazardous wastes restricted from land disposal under subpart C of this part of RCRA section 3004 is prohibited, unless the following conditions are met: (2) an owner/operator of a hazardous waste treatment, storage, or disposal facility stores such wastes in tanks, containers, or containment buildings solely for the purpose of the accumulation of such quantities of hazardous waste as necessary to facilitate proper recovery, treatment, or disposal and (1) each container is clearly marked to identify its contents and with:

(A) The words "Hazardous Waste";

(B) The applicable EPA hazardous waste number(s) (EPA hazardous waste codes) in subparts C and D of part 261 of this chapter; or use a nationally recognized electronic system, such as bar coding, to identify the EPA hazardous waste number(s);

(C) 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 CFR 1910.1200; or a chemical hazard label consistent with the National Fire Protection Association code 704); and

(D) The date each period of accumulation begins.

SHREDDER UNIT:

Solid wastes and their containers (category 4-5 wastes) are processed in the permitted shredder system which also consists of a hydro-pulper and a shaker for drying (Photos 40-41). Waste solids that can be incinerated as dry fuel are seperated from solids that cannot be incinerated as fuel. The dry fuel solids are placed into a hydro-pulper and blended with solvents to become more viscous. Wet material goes to a squeezer-dehydrator which removes remaining liquids through high compression. The dry fuel is then containerized and shipped offsite to be burned for energy recovery. Processed solids that are not dry fuel are containerized and disposed of at permitted landfills or sent for incineration. The liquids generated from the shredder unit are pumped to holding tanks for hazardous waste fuel blending. At the time of the inspection, the shredder unit was not operating.

ADDS UNIT:

Waste containers that are categorized as 1-3 waste (more liquid than solid) are transported into the ADDS (Photo 42), which is purged with nitrogen. The bottom of the container is sheared off

to allow the contents to fall into the hydro-pulper to be blended with solvents. Containers are crushed by the squeezer-dehydrator. The crushed container and the sheared-off portions are then dropped into the shredder. Metal shreds are removed by a magnetic seperator from the ADDS to a portable hopper which is moved to the shredder unit. The shredded metals are then placed into the hydro-pulper to undergo a metal washing with solvent to remove any remaining waste. The clean shreds are then placed into a shaker as a drying technique and then placed into a hopper to be transported to a larger trailer to be sent for recyling.

Both the AADS unit and the Shredder System are vented to a regenerative thermal oxidizer (RTO) in order to meet the RCRA organic air emission standards for subpart BB and CC.

Near the ADDS and hydro-pulper, the inspectors observed one 55-gallon container of alcohols, water, MEK, and toluene (Photo 43). The container was closed, labeled "Hazardous Waste", marked with an indication of the hazard of the contents, and dated 05/20/2024.

The inspectors also observed near the hydro-pulper four (4) 6,000-gallon sized hoppers which contained clean-up material (Photos 44-46). The hoppers contained hazardous waste labels on them, were labeled flammable, and were labeled with an accumulation start date of 06/05/2024. The hoppers were not securely closed with a fitted lid. Lids that were on the hoppers were warped and damaged.

Pursuant to Permit Condition II.I.4—Management of Containers. The Permittee shall manage and inspect the containers in accordance with 401 KAR 34:180, Sections 4 and 5 (effective 3-12-97) and according to the container management system, and container layout and configuration delineated in Attachment D (Process Information). Containers will not be stacked more than two (2) high. Only stable containers and containers with no physical damage maybe stacked. The Permittee shall maintain at a minimum, two(2) feet of aisle space between rows of containers in the container storage areas.

Pursuant to 401 KAR 39:090, Section 1 [40 C.F.R. § 264.173(a)], a container holding hazardous waste must always be closed during storage, except when it is necessary to add or remove waste.

<u>QC Laboratory:</u>

The QC laboratory is used to conduct fingerprint analysis of incoming waste to make sure the wastes match the associated waste profiles. Laboratory samples are retained for 60 days and then sent to the main warehouse for processing into the ADDS and shredder unit. The inspectors observed the following wastes:

- One (1) 5-gallon container of universal waste batteries. The container was closed, labeled "Universal Waste – Batteries", and dated 04/10/2024 (Photo 47).

- One (1) quart-size glass container of hazardous waste KF bath reagent (Photo 48) in an SAA. The container was closed, labeled "Hazardous Waste", and marked with an indication of the hazard of the contents.

- One (1) 5-gallon container of hazardous waste PPE (Photo 49) in an SAA. The container was closed, labeled “Hazardous Waste”, and marked with an indication of the hazard of the contents.
- One (1) 1-gallon glass container of hazardous waste flammables (Photo 50). The container was closed, labeled “Hazardous Waste”, marked with an indication of the hazard of the contents, and dated 06/04/2024.

- One (1) 5-gallon container of hazardous waste paper and plastic (Photo 51) in an SAA. The container was closed, labeled “Hazardous Waste”, and marked with an indication of the hazard of the contents.

- One (1) 5-gallon container of hazardous ICAP waste (Photo 52) in an SAA. The container was closed, labeled “Hazardous Waste”, and marked with an indication of the hazard of the contents.

NF Tank Farm:

The NF tank farm consists of 14 aboveground storage tanks, all with a design capacity of 18,500 gallons. The tanks are situated inside of concrete secondary containment, which appeared to have an impervious coating. All the tanks were labeled “Hazardous Waste” and marked with an indication of the hazard of the contents. Tank system equipment such as pumps, valves, and flanges appeared to be tagged to identify each piece of equipment pursuant to Subpart BB Air Emission Standards for Equipment Leaks. At the time of the inspection, this tank farm was out of service and undergoing routine maintenance (Photo 53).

12) Records Review

Contingency Plan and Quick Reference Guide (QRG):

The actions that facility personnel should take in response to an emergency are described in the facility’s contingency plan, which was last updated on 05/30/2024.

The plan describes actions facility personnel must take in response to fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water at the facility. The plan describes arrangements agreed to with the local police department, fire department, other emergency response teams, emergency response contractors, equipment suppliers, local hospitals or the Local Emergency Planning Committee. The plan lists the names and emergency telephone numbers for persons identified as emergency coordinators.

The plan includes a list of all emergency equipment at the facility. The list includes fire extinguishing systems, spill control equipment, communications and alarm systems, and decontamination equipment. The list appears to be up to date. The plan includes the location and a physical description of each item on the list, and a brief outline of its capabilities. The plan includes an evacuation plan for personnel. This plan describes signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes.

Records of the contingency plan being submitted to the local emergency response were available for review and sent to New Castle Fire and Rescue and Baptist Health on 10/12/2023.

The facility did not have a quick reference guide which is required for a LQG of hazardous waste.

Pursuant to 401 KAR 39:080, Section 1(1) [40 C.F.R. § 262.17(a)(6)], which incorporates 401 KAR 39:080, Section 1(1) [40 C.F.R. § 262.262(b)], and is a condition of the LQG Permit Exemption, 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 quick reference guide must include the elements described in 40 C.F.R. § 262.262(b)(1-8).

Training Records:

The inspectors reviewed facility job descriptions and employee names that were provided for facility technician III, lab chemist III, and facility operations manager II. Each description included the requisite skill, education, or other qualifications, and duties of facility personnel assigned to that position.

SKS provided a written description of the type and amount of both introductory and continuing training to be given to each person filling the positions listed above. The inspectors reviewed records of employee hazardous waste training completed in 2024.

Waste Manifest and Land Disposal Restriction (LDR) Records:

The inspectors reviewed available hazardous waste manifest records and land disposal restriction forms for inbound and outbound shipments of hazardous waste sent since 2021. No issues were noted with paper manifests; however, there were several manifests that had not been uploaded to the e-manifest system as of 06/04/2024 within 30 days of the date of delivery. The following manifests had not been uploaded to e-manifest: 013244072FLE, 015517447FLE, 016328472FLE, 013733786FLE, 008505664SKS, 017220939FLE, 017220821FLE, 017220795FLE, 017220930FLE, 017220814FLE, 017220869FLE, 017220953FLE, 017220989FLE, 017221001FLE, 017221018FLE, 017369458FLE, 008302958FLE, 008302993FLE008876432FLE, 008876818FLE, 008876838FLE, 00937939FLE, 009937947FLE, 009937954FLE, 013244072FLE, 013733786FLE, 017220795FLE, 017220814FLE, 017220821FLE, 017220869FLE, 017220930FLE, 017220939FLE, 017220953FLE.

Pursuant to 401 KAR 39:090, Section 1 [40 C.F.R. § 264.71(a)(2)(v)(B)], beginning on June 30, 2021, the requirement to submit the top copy (Page 1) of the paper manifest and any paper continuation sheet to the e-Manifest system for purposes of data entry and processing may be met by the owner or operator only by transmitting to the EPA system an image file of Page 1 of the manifest and any continuation sheet, or by transmitting to the EPA system both a data file and the image file corresponding to Page 1 of the manifest and any continuation sheet, within 30 days of the date of delivery. Submissions of copies to the e-Manifest system

shall be made to the electronic mail/submission address specified at the e-Manifest program website's directory of services.

Facility representatives were provided a list of manifest tracking numbers for paper manifests that have not been uploaded to e-manifest for over 30 days. The facility representatives stated they would be working with their corporate office to follow up and make sure paper manifests are uploaded to the e-manifest system within 30 days of delivery.

Daily Inspections:

All tank farms and tank systems, tank ancillary equipment, secondary containment, permitted container storage areas, the ADDS, Shredder Unit, and Squeezer are inspected daily. The inspection record includes the name of the inspector, date and time of inspection, and any comments related to those areas inspected. Inspections include checking for cracks or deterioration in containment system and signs of leaks or corrosion on tanks and containers holding hazardous waste, and container labeling and closure requirements. Records of inspections are available for review for over three years. No issues were noted.

Weekly Inspections:

Container storage areas are inspected weekly. The inspection record includes the name of the inspector, date and time of inspection, and any comments related to those areas inspected. Inspections include checking for cracks or deterioration in containment system and signs of leaks or corrosion on containers holding hazardous waste, and container labeling. Records of inspections are available for review for over three years. No issues were noted.

Monthly Inspections:

Security fencing, warning signs, communication systems, and emergency equipment are inspected on a monthly basis. The inspection record includes the name of the inspector, date and time of inspection, and any comments related to those areas inspected. No issues were noted.

Tank Records:

Daily tank inspections, annual roof inspections, and tank design and installation certifications were available for review. No issues were noted.

Waste Analysis Plan and Waste Determination Records:

The facility maintains its waste analysis plan in the facility operating record which was available for review. Waste determinations and waste profiles were also available for review.

Annual Reports:

Annual reports for the last three years were available for review.

Financial Records:

The facility provided its most current Certificate of Liability Insurance issued by great American Insurance Company (expires on 11/01/2024) and Certificate of Insurance for Closure and/ or Post-Closure Care and/ or Corrective Action with the annual inflation increase.

13) Closing Conference

The inspectors conducted the exit meeting with Todd Walsburger. During this meeting, the inspectors stated their preliminary conclusions of the inspection. The inspectors requested the facility complete a QRG for the contingency plan and submit documentation showing the QRG has been submitted to the local authorities. The inspectors also requested that the facility re-label containers of hazardous waste that were labeled as universal wastes and to secure proper lids for the four 6,000-gallon hoppers that contained hazardous waste in the Main Warehouse.

14) Summary of Observations

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

Pursuant to 401 KAR 39:080, Section 1(1) [40 C.F.R. § 262.11], a person who generates a solid waste, as defined in 40 CFR 261.2, must make an accurate determination as to whether that waste is a hazardous waste in order to ensure wastes are properly managed according to applicable RCRA regulations.

- In front of tank 5104 the inspectors noticed an open 5-gallon bucket of an unknown liquid and a faded hazardous waste label on it (Photos 12-13). The facility representatives closed the bucket with a lid but could not determine the contents of the liquid.

Pursuant to 401 KAR 39:080, Section 1(1) [40 C.F.R. § 262.17(a)(6)], which incorporates 401 KAR 39:080, Section 1(1) [40 C.F.R. § 262.262(b)], and is a condition of the LQG Permit Exemption, 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 quick reference guide must include the elements described in 40 C.F.R. § 262.262(b)(1-8).

- The facility did not have a quick reference guide which is required for a LQG of hazardous waste.

Pursuant to Permit Condition II.I.4—Management of Containers. The Permittee shall manage and inspect the containers in accordance with 401 KAR 34:180, Sections 4 and 5 (effective 3-12-97) and according to the container management system, and container layout and configuration delineated in Attachment D (Process Information). Containers will not be stacked more than two (2) high. Only stable containers and containers with no physical damage may be stacked. The Permittee shall maintain at a minimum, two (2) feet of aisle space between rows of containers in the container storage areas.

- The inspectors observed some stacking issues with double-stacked containers where some stacked containers appeared to be crushing cubic yard cardboard boxes underneath (Photo 35) while some containers were not stacked properly on top of another container which could cause instability and lead to a spill (Photo 36).

- The facility representatives immediately began using a forklift to re-stack the containers and make sure they were stable.

Pursuant to 401 KAR 39:090, Section 1 [40 C.F.R. § 264.173(a)], a container holding hazardous waste must always be closed during storage, except when it is necessary to add or remove waste.

- Four (4) hoppers 6,000-gallon sized hoppers which contained clean-up material (Photos 44-46) were not securely closed with a fitted lid. Lids that were on the hoppers were warped and damaged.

Pursuant to Permit Condition VI.B.2—Land Disposal Prohibitions and Treatment Standards. The storage of hazardous wastes restricted from land disposal under 401 KAR Chapter 37 is prohibited unless the requirements of 401 KAR Chapter 37 are met.

Pursuant to [40 C.F.R. § 268.50(a)(2)(i)], except as provided in this section, the storage of hazardous wastes restricted from land disposal under subpart C of this part of RCRA section 3004 is prohibited, unless the following conditions are met: (2) an owner/operator of a hazardous waste treatment, storage, or disposal facility stores such wastes in tanks, containers, or containment buildings solely for the purpose of the accumulation of such quantities of hazardous waste as necessary to facilitate proper recovery, treatment, or disposal and (1) each container is clearly marked to identify its contents and with:

(A) The words "Hazardous Waste";

(B) The applicable EPA hazardous waste number(s) (EPA hazardous waste codes) in subparts C and D of part 261 of this chapter; or use a nationally recognized electronic system, such as bar coding, to identify the EPA hazardous waste number(s);

(C) 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 CFR 1910.1200; or a chemical hazard label consistent with the National Fire Protection Association code 704); and

(D) The date each period of accumulation begins.

- Several tankers in the tanker storage area did not appear to be empty and did not have labeling on them (Photos 3-5): Tanker #50022T, 41527, 320409, and 223315.

- The inspectors observed several containers labeled "Universal Waste" that were labeled with indication of hazards of the contents for flammable liquids with descriptions of waste that are not recognized as universal wastes in the state of Kentucky or in the federal regulations for universal waste under 40 C.F.R. Part 273.

Pursuant to 401 KAR 39:090, Section 1 [40 C.F.R. § 264.71(a)(2)(v)(B)], beginning on June 30, 2021, the requirement to submit the top copy (Page 1) of the paper manifest and any paper continuation sheet to the e-Manifest system for purposes of data entry and processing may be met by the owner or operator only by transmitting to the EPA system an image file of Page 1 of the manifest and any continuation sheet, or by transmitting to the EPA system both a data file and the image file corresponding to Page 1 of the manifest and any continuation sheet, within 30 days of the date of delivery. Submissions of copies to the e-Manifest system shall be made to the electronic mail/submission address specified at the e-Manifest program website's directory of services.

- Several paper manifests were not uploaded to the e-manifest system within 30 days of delivery.

- Facility representatives were provided a list of manifest tracking numbers for paper manifests that have not been uploaded to e-manifest for over 30 days. The facility representatives stated they would be working with their corporate office to follow up and make sure paper manifests are uploaded to the e-manifest system within 30 days of delivery.

Pursuant to Permit Condition VII.C.—General Standards. The Permittee shall comply with the applicable requirements of 401 KAR 34:275 (40 CFR 264, Subpart AA), 401 KAR 34:280 (40 CFR 264, Subpart BB), and 40 CFR 264 Subpart CC (pursuant to the variance identified in condition VII.A.3.a.).

Pursuant to 401 KAR 39:090, Section 1 [40 C.F.R § 264.1050(d)], each piece of equipment to which this subpart applies shall be marked in such a manner that it can be distinguished readily from other pieces of equipment.

- Subpart BB tags were illegible on some tank equipment in the D-tank farm and on tank ancillary equipment belonging to bays 1 and 2 in the Tanker Tunnel (Photos 24-25).

15) <u>List of Attachments</u>

Attachment 1 – Photo Log:

16) **Signed**

KAYLA ACOSTA

Digitally signed by KAYLA ACOSTA
Date: 2024.08.12 14:04:14 -04'00'

Kayla Acosta
Physical Scientist

17) **Concurrence**

ALAN NEWMAN

Digitally signed by ALAN NEWMAN
Date: 2024.08.12 14:30:00 -04'00'

Alan R. Newman
Acting Chief
RCRA Enforcement Section

Attachment 1 – Photo Log

[53] Photos taken on: June 05, 2024
Photos taken by: Kayla Acosta
Photos taken with: iPad
EPA Property Tag: SS8386

Photo 1	IMG-20240605173530353023454 35.jpg
06/05/2024 05:35 PM (ET)	Photographer: Kayla Acosta
Security fence and signage.	38.43268481, -85.23227276

Photo 2	IMG-20240605094931493132757 49.jpg
06/05/2024 09:49 AM (ET)	Photographer: Kayla Acosta
Tanker storage area	38.4332021, -85.23176688

Photo 03	IMG-20240605095645564522939 13.jpg
06/05/2024 09:56 AM (ET)	Photographer: Kayla Acosta
Tanker# 223315 with no waste label and not empty.	38.4334738, -85.23152284

Photo 04	IMG-20240605095737573723068 58.jpg
06/05/2024 09:57 AM (ET)	Photographer: Kayla Acosta
Tanker# 50022T with no waste label and not empty.	38.43348312, -85.23151397

Photo 05	IMG-20240605100421421242951 1.jpg
06/05/2024 10:04 AM (ET)	Photographer: Kayla Acosta
Tanker# 320409 with no waste label and not empty.	38.43348312, -85.23151397

Photo 06	IMG-20240605101115111153092642.jpg
06/05/2024 10:11 AM (ET)	Photographer: Kayla Acosta
Lower Dock	38.43348311, -85.23151407

Photo 07	IMG-20240605102144214433237O6.jpg
06/05/2024 10:21 AM (ET)	Photographer: Kayla Acosta
Lower Dock	38.43348312, -85.23151397

Photo 08	IMG-20240605101645164542521 89.jpg
06/05/2024 10:16 AM (ET)	Photographer: Kayla Acosta
Lower Dock – Leaking container.	38.43348312, -85.23151396

Photo 09	IMG-20240605102741274191032.jpg
06/05/2024 10:27 AM (ET)	Photographer: Kayla Acosta
D-Tank Farm	38.43348311, -85.23151396

Photo 10	IMG-20240605103350335035014809 32.jpg
06/05/2024 10:33 AM (ET)	Photographer: Kayla Acosta
D-Tank Farm	38.43348311, -85.23151397

Photo 11	IMG-20240605103051305124298886.jpg
06/05/2024 10:30 AM (ET)	Photographer: Kayla Acosta
D-Tank Farm. Illegible tags on tank equipment.	38.43348313, -85.23151395

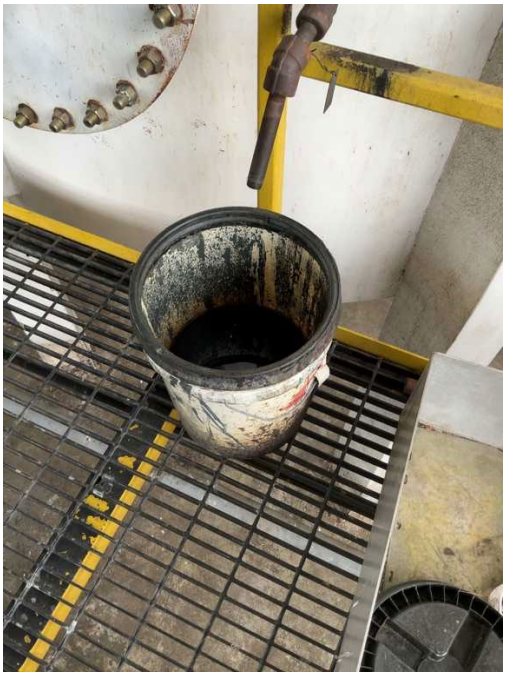

Photo 12	IMG-20240605102829282930616O2.jpg
06/05/2024 10:28 AM (ET)	Photographer: Kayla Acosta
D-Tank Farm – Unknown liquid in 5-gallon bucket.	38.43348311, -85.23151396

Photo 13	IMG-20240605102927292733296 58.jpg
06/05/2024 10:29 AM (ET)	Photographer: Kayla Acosta
D-Tank Farm – Unknown liquid in 5-gallon bucket.	38.43314364, -85.23181949

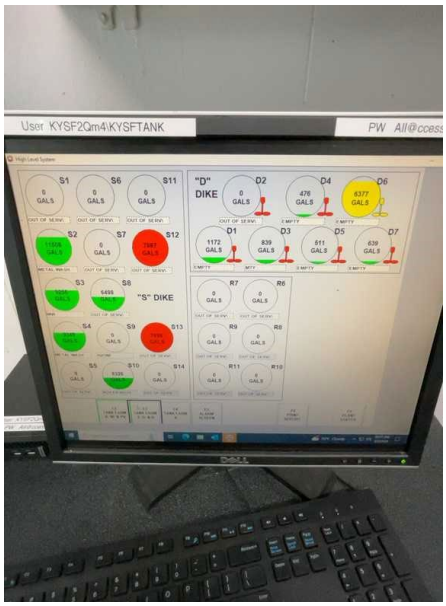

Photo 14	IMG-20240605103707377134134 2.jpg
06/05/2024 10:37 AM (ET)	Photographer: Kayla Acosta
Production Laboratory	38.43348434, -85.23151361

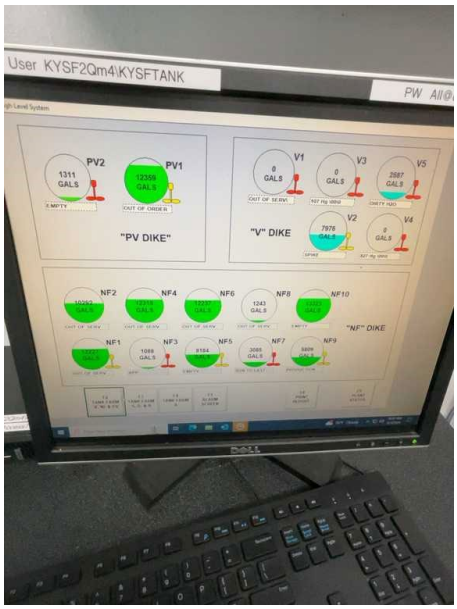

Photo 15	IMG-20240605103748374813156 43.jpg
06/05/2024 10:37 AM (ET)	Photographer: Kayla Acosta
Production Laboratory	38.43348399, -85.23151371

Photo 16	IMG-20240605104049404913670 87.jpg
06/05/2024 10:40 AM (ET)	Photographer: Kayla Acosta
L4 Bay	38.43375494, -85.23110525

Photo 17	IMG-20240605104200420167834 8.jpg
06/05/2024 10:42 AM (ET)	Photographer: Kayla Acosta
L4 Bay	38.43375547, -85.23110543

Photo 18	IMG-20240605104348434814095 64.jpg
06/05/2024 10:43 AM (ET)	Photographer: Kayla Acosta
S Dike Tank Farm	38.43376011, -85.23109848

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Photo 19	IMG-20240605105108518126529 3.jpg
06/05/2024 10:51 AM (ET)	Photographer: Kayla Acosta
V-Dike Tank Farm	38.43348421, -85.23151404

Photo 20	IMG-20240605105319531911129 60.jpg
06/05/2024 10:53 AM (ET)	Photographer: Kayla Acosta
V Dike Tank Farm	38.4337526, -85.23110974

Photo 21	IMG-20240605105544554413363 52.jpg
06/05/2024 10:55 AM (ET)	Photographer: Kayla Acosta
Maintenance Building—Parts washer.	38.43400193, -85.23073571

Photo 22	IMG-20240605105602562144129 1.jpg
06/05/2024 10:56 AM (ET)	Photographer: Kayla Acosta
Maintenance Building—55-gallon hazardous waste container for used aerosol cans.	38.43400194, -85.23073567

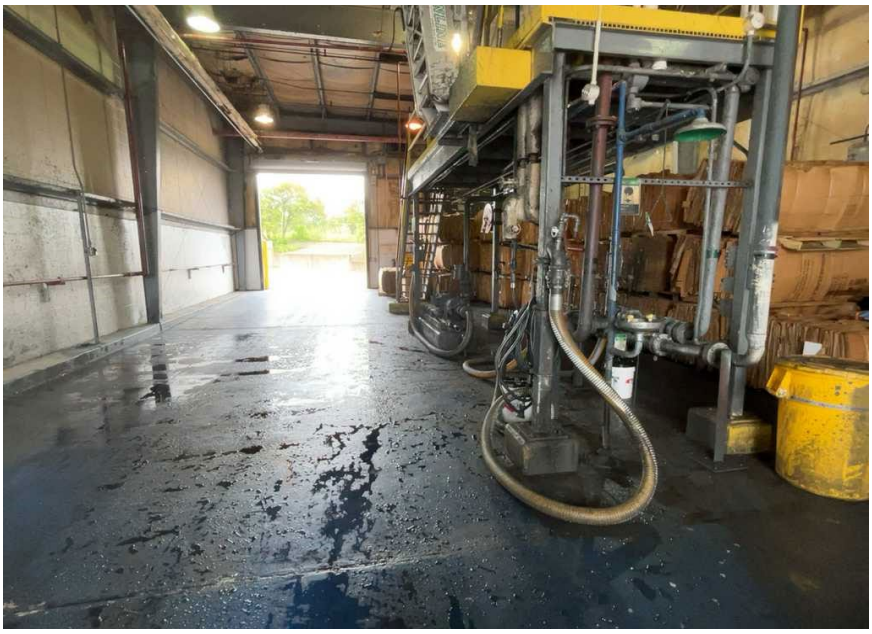

Photo 23	IMG-20240605110852852167710 3.jpg
06/05/2024 11:08 AM (ET)	Photographer: Kayla Acosta
Tanker Tunnel	38.43400192, -85.23073577

Photo 24	IMG-20240605110826826158477 9.jpg
06/05/2024 11:08 AM (ET)	Photographer: Kayla Acosta
Tanker Tunnel	38.43400191, -85.23073577

Photo 25	IMG-20240605111101111599792.jpg
06/05/2024 11:11 AM (ET)	Photographer: Kayla Acosta
Tanker Tunnel	38.43400177, -85.23073573

Photo 26	IMG-20240605111028102815385 66.jpg
06/05/2024 11:10 AM (ET)	Photographer: Kayla Acosta
Tanker Tunnel—55-gallon container of hazardous waste used for spills from the transfer of fuel during loading and unloading.	38.43400028, -85.23073534

Photo 27	IMG-20240605110619619153508l.jpg
06/05/2024 11:06 AM (ET)	Photographer: Kayla Acosta
Tanker Tunnel—55-gallon container of hazardous waste used for spills from the transfer of fuel during loading and unloading.	38.43378773, -85.23105704

Photo 28	IMG-20240605110744744157206l.jpg
06/05/2024 11:07 AM (ET)	Photographer: Kayla Acosta
Tanker Tunnel—5 gallon container for hose leaks.	38.43400167, -85.23073613

Photo 29	IMG-20240605111919181918104378.jpg
06/05/2024 11:19 AM (ET)	Photographer: Kayla Acosta
PV Dike tank farm	38.43459865, -85.23091998

Photo 30	IMG-20240605112852285227788863.jpg
06/05/2024 11:28 AM (ET)	Photographer: Kayla Acosta
Todd Building--30-gallon container of universal waste used lamps.	38.43400052, -85.23073552

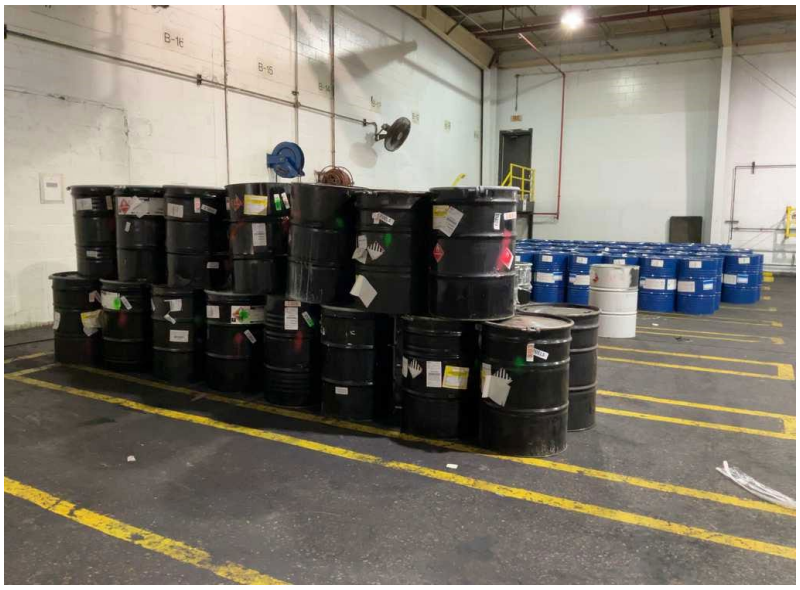

Photo 31	IMG-20240605115123512321654 61.jpg
06/05/2024 11:51 AM (ET)	Photographer: Kayla Acosta
Main Warehouse—Container Storage Area B	38.43489875, -85.23099972

Photo 32	IMG-20240605115156515623260 19.jpg
06/05/2024 11:51 AM (ET)	Photographer: Kayla Acosta
Main Warehouse—Container Storage Area B	38.43497471, -85.2309645

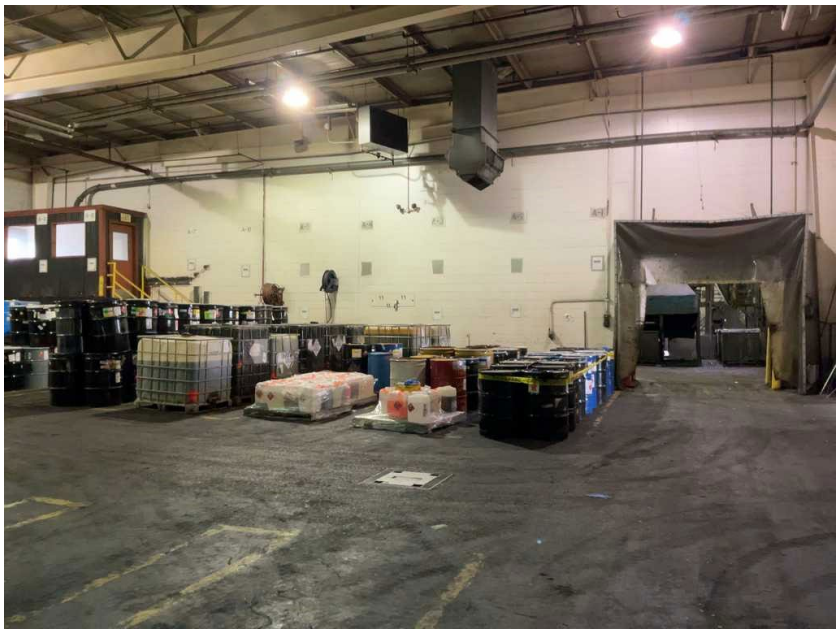

Photo 33	IMG-20240605120125125223616 9.jpg
06/05/2024 12:01 PM (ET)	Photographer: Kayla Acosta
Main Warehouse—Container Storage Area A	38.43485961, -85.23102031

Photo 34	IMG-20240605120149149200373 2.jpg
06/05/2024 12:01 PM (ET)	Photographer: Kayla Acosta
Main Warehouse—Container Storage Area A	38.43487793, -85.23101884

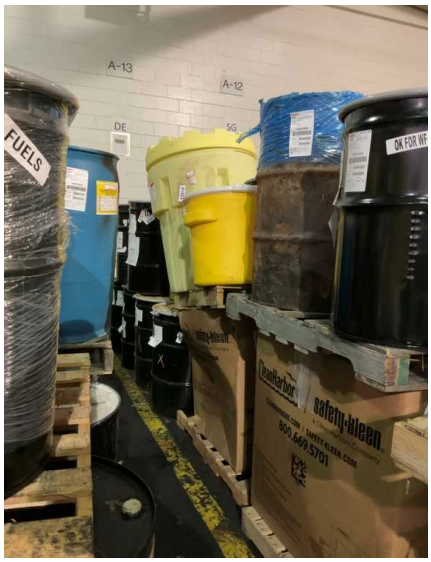

Photo 35	IMG-20240605120523523217300 9.jpg
06/05/2024 12:05 PM (ET)	Photographer: Kayla Acosta
Main Warehouse—Container Storage Area A. Cubic yard box crushed from heavy containers on top of it.	38.43477622, -85.23107914

Photo 35	IMG-20240605120556556206121 1.jpg
06/05/2024 12:05 PM (ET)	Photographer: Kayla Acosta
Main Warehouse—Container Storage Area A. Poorly stacked containers.	38.43477628, -85.2310791

Photo 36	IMG-20240605121059105919548 53.jpg
06/05/2024 12:10 PM (ET)	Photographer: Kayla Acosta
Main Warehouse—Container Storage Area A. Possible hazardous wastes labeled as universal wastes.	38.43477656, -85.23107921

Photo 37	IMG-20240605121119111920536 17.jpg
06/05/2024 12:11 PM (ET)	Photographer: Kayla Acosta
Main Warehouse—Container Storage Area A. Possible hazardous wastes labeled as universal wastes.	38.43441274, -85.23091791

Photo 38	IMG-20240605121140114011401799728.jpg
06/05/2024 12:11 PM (ET)	Photographer: Kayla Acosta
Main Warehouse—Container Storage Area A. Possible hazardous wastes labeled as universal wastes.	38.43477894, -85.23108027

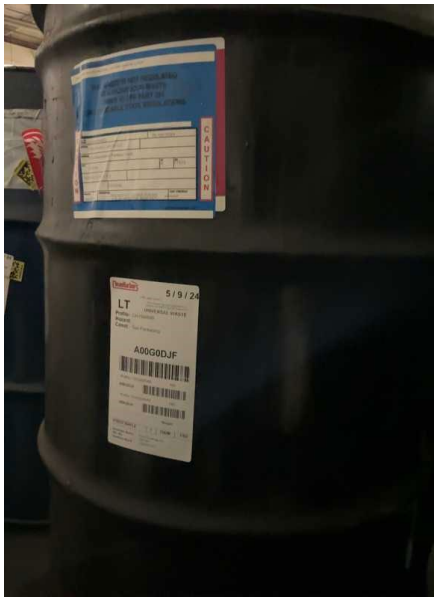

Photo 39	IMG-20240605121520152012017233306.jpg
06/05/2024 12:15 PM (ET)	Photographer: Kayla Acosta
Main Warehouse—Container Storage Area A. Possible hazardous wastes labeled as universal wastes.	38.43477629, -85.23107909

Photo 40	IMG-20240605122139213921392550241.jpg
06/05/2024 12:21 PM (ET)	Photographer: Kayla Acosta
Main Warehouse—Shredder Unit and Shaker	38.43488558, -85.2310153

Photo 41	IMG-20240605122912291229122355733.jpg
06/05/2024 12:29 PM (ET)	Photographer: Kayla Acosta
Main Warehouse—Hydro-pulper	38.43486216, -85.23101646

Photo 42	IMG-20240605122938293824251 69.jpg
06/05/2024 12:29 PM (ET)	Photographer: Kayla Acosta
Main Warehouse—ADDS	38.43489346, -85.2310108

Photo 43	IMG-20240605123046304621029 01.jpg
06/05/2024 12:30 PM (ET)	Photographer: Kayla Acosta
Main Warehouse—ADDS. 55-gallon hazardous waste container for alcohol, water, MEK, and toluene.	38.43477546, -85.2310796

Photo 44	IMG-20240605123331333122040 47.jpg
06/05/2024 12:33 PM (ET)	Photographer: Kayla Acosta
Main Warehouse—6,0000-gallon hopper of hazardous waste with warped and damaged lid (not securely closed).	38.43497148, -85.23097935

Photo 45	IMG-20240605123852385225 22791 64.jpg
06/05/2024 12:38 PM (ET)	Photographer: Kayla Acosta
Main Warehouse—6,0000-gallon hopper of hazardous waste with warped and damaged lid (not securely closed).	38.43489766, -85.23100905

Photo 46	IMG-20240605124000400187058 2.jpg
06/05/2024 12:40 PM (ET)	Photographer: Kayla Acosta
Main Warehouse—6,0000-gallon hopper of hazardous waste with warped and damaged lid (not securely closed).	38.43487691, -85.23102055

Photo 47	IMG-20240605124548454811193 85.jpg
06/05/2024 12:45 PM (ET)	Photographer: Kayla Acosta
QC Laboratory—universal waste batteries.	38.43449259, -85.23152322

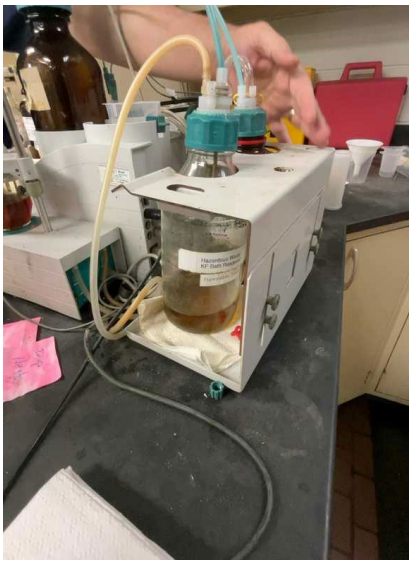

Photo 48	IMG-20240605125002502128057 2.jpg
06/05/2024 12:50 PM (ET)	Photographer: Kayla Acosta
QC Laboratory— Quart-size glass container of hazardous waste KF bath reagent	38.43440583, -85.23146801

Photo 49	IMG-20240605125121511211325964.jpg
06/05/2024 12:51 PM (ET)	Photographer: Kayla Acosta
QC Laboratory—5-gallon container of hazardous waste PPE.	38.43440461, -85.23146944

Photo 50	IMG-20240605125618561812490001.jpg
06/05/2024 12:56 PM (ET)	Photographer: Kayla Acosta
QC Laboratory—1-gallon glass container of hazardous waste flammables.	38.43442469, -85.23147566

Photo 51	IMG-20240605125811581121177765.jpg
06/05/2024 12:58 PM (ET)	Photographer: Kayla Acosta
QC Laboratory—5-gallon container of hazardous waste paper and plastic.	38.43441945, -85.23147531

Photo 52	IMG-20240605130250250192933 2.jpg
06/05/2024 01:02 PM (ET)	Photographer: Kayla Acosta
QC Laboratory—5-gallon container of ICAP waste.	38.43444765, -85.23148139

Photo 53	IMG-20240605132648264836629 91.jpg
06/05/2024 01:26 PM (ET)	Photographer: Kayla Acosta
NF Tank Farm	38.43424594, -85.23136993