REPORT OF RCRA COMPLIANCE EVALUATION INSPECTION

At

VALMONT INDUSTRIES, INC.
28800 Ida Street
Valley, NE 68064
402-830-7004

EPA ID Number: NED007267214

On

September 10, 2024

By

U.S. ENVIRONMENTAL PROTECTION AGENCY
Region 7
Enforcement and Compliance Assurance Division

1.0 INTRODUCTION

At the request of the Enforcement and Compliance Assurance Division (ECAD), I conducted a Resource Conservation and Recovery Act (RCRA) compliance evaluation inspection (CEI) at Valmont Industries, Inc. (Valmont) located in Valley, Nebraska, on September 10, 2024. The CEI was conducted under the authority of Section 3007(a) of RCRA, as amended. During the inspection, I collected the information and data necessary to determine compliance with the applicable regulatory and statutory requirements. This inspection report and attachments represent the results of the CEI.

2.0 PARTICIPANTS

Valmont:
- Jeremy Mayrose, Facility Manager (3 years with the company)
- Quentin Taylor, Site Safety Manager (2 years with company)
- Austen Neill, Environmental Technician (2 months with company)
- Kathy King, Environmental Manager (10 months with facility) – video conference only

EPA:
- Mark Holcomb, Civil Investigator/Inspector (SEE) - Lead Inspector
- Brett Anderson, Environmental Specialist, Nebraska Department of Environment and Energy (NDEE)

3.0 INSPECTION PROCEDURES

On September 10, 2024, Mr. Anderson and I arrived unannounced at the facility's main entrance at about 0930 hours. Initially, we conducted a visual reconnaissance of the facility searching for

areas of concern observable from the adjacent public roadways and parking lots. We identified no environmental issues or concerns during this preliminary examination. We entered the facility through the main entrance. At the front security desk, I introduced myself and asked for Kathy King, Environmental Manager, who was listed as the site contact on the EPA site verification form. I was told that Ms. King was not available and that Mr. Jeremy Mayrose, the Facility Manager, would be contacted. We were introduced to Mr. Mayrose, and he escorted us to a conference room. There we met Mr. Quentin Taylor, the Site Safety Manager. Mr. Taylor told us that the items of personal protective equipment required for our visual inspection at this facility were protective boots, eye protection, a safety vest, helmet, and hearing protection in some areas.

At the opening conference, I presented my EPA ID and credentials to Mr. Mayrose. I next explained the purpose and procedures of the inspection. I then presented Mr. Mayrose with a copy of RCRA Section 3007(a), which provides inspection authority. I explained my need to collect accurate information and presented them with a copy of Title 18 U.S. Code, Sections 1001 and 1002. They were made aware of their confidentiality rights, and I informed them that a Confidentiality Notice would be provided at the end of the inspection to make a confidentiality claim if they so desired. Mr. Mayrose and Mr. Taylor acted as the official facility representatives during the opening conference, visual inspection, and during the exit conference phase. Ms. King was available via a video conference call during the exit conference.

The CEI consisted of a discussion of facility operations, waste generation, and waste management; a visual inspection of active waste generation and management areas; and a review of waste management records and documents.

Mr. Anderson and I conducted a visual inspection of the following areas:

- Building 551 Haz Waste Shed
- Building 551 Shop
- Haz Waste Yard
- Building 533- Coatings
- Building 513- Chemical Processing Centrifuge
- Building 529- Maintenance
- Building 531- Mobile Maintenance Coating

See Attachment #1 for the aerial/map views and facility diagrams. Document photocopies and photographs were collected as inspection documentation (see Attachments #1-15 and Photos 1-18). The photo log is included as Attachment #2. Information collected during the inspection was documented on an Entry/Exit checklist and a hazardous waste compliance checklist. I reviewed documents including the following: Safety Data Sheets (SDS), manifests, invoices, three-year eManifest report, 2023 biennial report, waste stream reports, contingency plan, staff training documents, and inspection checklists. I followed the inspection procedures detailed in the RCRA CEI Standard Operating Procedure 2321.01E unless noted otherwise. Any authorized Federal regulatory citations noted in this report are as adopted by reference in the authorized Nebraska regulations.

At the conclusion of the inspection, I summarized my findings and recommendations with Mr. Mayrose, Mr. Taylor, and Ms. King. I provided Mr. Mayrose with a Receipt for Documents (see Attachment #3), a Confidentiality Notice (see Attachment #4), and a Notice of Preliminary

Findings (NOPF) form, which he signed as an acknowledgment of receipt. No claim of confidential business information was made by Mr. Mayrose.

I provided inspection and compliance assistance documents to Mr. Mayrose, which included the following:

- *RCRA Section 3007(a) (EPA Handout)*
- *Title 18 U.S. Code, Sections 1001 and 1002 (EPA Handout)*
- *Confidentiality Notice (yellow page of the completed carbonless transfer set)*
- *Notice Regarding Proprietary/Confidential Business Information Submitted to or Collected by EPA In Connection with Inspections (EPA Handout)*
- *Receipt for Documents and Samples (yellow page of the completed carbonless transfer set)*
- *NOPF with Instructions for Responding on the back of the form (yellow page of the completed carbonless transfer set)*

4.0 FINDINGS AND OBSERVATIONS

4.1 Facility Information and Operations

Valmont is a manufacturer of lighting and traffic structures, communication towers, utility structures, and agricultural center pivot irrigation equipment. Valmont is a publicly traded company with over 11,000 employees worldwide in 21 countries and $4.2B in sales in FY2023, with their corporate headquarters in Omaha, Nebraska. The Valley, Nebraska facility started operations in 1941 and is located on 365 acres with 40 buildings (see Attachment #1 for a facility map). They operate with about 1,000 employees, 24 hours per day (three shifts), Monday-Sunday. Mr. Mayrose stated that there have been no major changes in the last few years. He stated that they had one reportable spill of 150 gallons of hydraulic oil on August 13, 2024 (see Attachment #15), but no fires, or other activations of their emergency plan since their last EPA RCRA inspection in 2014. Operations conducted at the Valley, Nebraska facility includes metal fabrication (forming, cutting, welding, etc.), metal finishing (galvanizing, painting, rust proofing, etc.), assembly, and shipping.

Overview of the galvanizing process: Mr. Mayrose explained that hot dip galvanizing on steel products is one of the facilities major processes and generates several waste streams. The galvanizing process consists of multiple tanks, about 60 feet by eight feet wide and eight feet deep. The tanks consist of caustic tanks containing a sodium hydroxide (an aid in removal of oil), a cold water rinse tank (rinse aids in the removal of the caustic solution), pickling tanks of sulfuric acid (removal of scale and oxides), and cold water rinse tanks (removal of residue pickling solution), a flux tank of hot ammonium chloride (removal of oxides and impurities), and galvanizing tanks of hot zinc and ammonium oxide.

4.2 RCRA Status

Valmont had been previously inspected for RCRA compliance on December 10, 2019, by the NDEE. During the December 2019 NDEE inspection, Valmont was cited for:

1. Failure to keep records of any test results, waste analyses, or other information used to

make a hazardous waste determination (Title 128, Chapter 4, 005.03C as referenced by Chapter 10, 001.05).
2. Failure to properly label or mark universal waste (Title 128, Chapter 25, 013).
3. Failure to demonstrate the length of time that universal waste has been accumulated from the date it becomes a waste (Title 128, Chapter 25, 014.03).
4. Failure to clearly mark or label aboveground tanks with a volume of 25 gallons or greater holding used oil with the words "Used Oil" (Title 128, Chapter 7, 009.04A3).
5. Failure to inspect areas where containers of hazardous waste are stored at least weekly (Title 128, Chapter 10, 004.01A4).
6. Failure to include all required content in the contingency plan (Title 128, Chapter 18, 003 as referenced by Chapter 10, 004.01H).
7. Failure to provide personnel training in hazardous waste management procedures (Title 128, Chapter 19, 001.02 as referenced by Chapter 10, 004.01H).

According to RCRAInfo, Valmont had most recently notified as a large quantity generator (LQG) on February 8, 2024. I verified the facility address and the site contact information with Mr. Mayrose on the EPA RCRA Notification Acknowledgement Verification Report (see Attachment #5) with no changes made. Based on the review of recent uniform hazardous waste manifests, I determined that Valmont routinely generates D001, D002, D003, D005, D006, D007, D008, D035, F002, F003, F005, U122, U134, and U140 hazardous waste. I determined the facility generates hazardous waste at the LQG level (greater than 1000 kg or 2,200 pounds per month) and I inspected the facility as an LQG. In addition, I inspected the facility as a small quantity handler of universal waste and as a generator of used oil.

4.3 Facility Waste Streams and Management

Mr. Mayrose stated that the following are waste streams generated at Valmont:

Ferrous Sulfate Salt Crystals - Valmont generated 887 tons (during the first 9 months of 2024) of ferrous sulfate salt crystals as a non-hazardous byproduct of the steel galvanizing process. This waste was previously referred to as spent acid recovery system (ARS) crystals. Onsite, the spent acid solution is processed in a centrifuge in Building 513 that is used to generate the crystalline form of the ferrous sulfate salt byproduct. The ferrous sulfate salt crystals are initially collected in 4,000 pounds bags and transferred to three-cubic yard hoppers. The ferrous sulfate salt crystals are sold to SEM Minerals (Quincy, Illinois) for use as product and feed supplement. In Building 513, I observed the chemical processing centrifuge with a full 4000-pound bag of blue-green ferrous sulfate salt crystals, as well as a half dozen full three cubic-yard hoppers of ferrous sulfate salt crystals (see Photos 14-15).

Ferrous Sulfate Filters (previously referred to as ARS Filters) - Valmont generated 747 pounds of this waste in 2023 as a part of the steel galvanizing process. The filters are used to remove impurities from the spent acid. The filters had been determined to be D002, D006, D007, D008 characteristic hazardous waste (based on process and product knowledge) and were listed on the manifests as "UN3244 Waste Solids Containing Corrosive Liquids (Sulfuric Acid)." They are transported by Univar Solutions (Omaha, Nebraska) to AES Environmental (Calvert City, KY) for H141 management (storage, bulking, and/or transfer). In Building 533 Coatings, I

observed one blue poly 55-gallon hazardous waste satellite accumulation drum (see Photo 13). The drum was 2/3 full, closed, in good condition, and labeled with the words "Acid Waste" and "Hazardous Waste." There was no obvious damage or leaks.

Waste Paint and Related Materials - Valmont generates about 1,000-2,000 pounds per month of waste paint and solvent from the painting operations. The waste paint and related materials had been determined to be D001, D005, D035, F002, F003, F005 hazardous waste based on process and product knowledge. See Attachments #7 for a sample Manifest from April 3, 2024, and Attachment #8 for two sample paint SDS. Onsite, the waste paint drums are stored in the Haz Waste Yard and transported approximately monthly by Univar Solutions (Omaha, Nebraska) to Systech Environmental Corp (Fredonia, Kansas) for H141 management (storage, bulking, and/or transfer). At the Haz Waste Yard, I observed two full 55-gallon less than 90-day accumulation drums (hazardous waste storage) of waste paint (see Photo 12). The drums were closed, in good condition, labeled with the words "Hazadous Waste," and marked with an accumulation start date of less than 90-days.

Caustic and Acid Tank Sludge - Valmont generates a variable amount of caustic and acid tank sludge, typically from tank cleanouts. Acid tanks are cleaned on an as needed basis, usually around every three years. This sludge had been determined to be non-hazardous based on product and process knowledge as well as periodic analytical testing. The facility reports that the most recent tank clean out was performed on May 26, 2024, by Environmental Works (Kansas City, Missouri) and was for 1,500 pounds.

Waste Corrosive Liquid Acidic (Sulfuric Acid, Lead) - Valmont generates a variable amount of waste corrosive liquid from the galvanizing process. Ms. King stated that this waste was not typically from tank cleanouts. It is collected in poly 55-gallon drums. A manifest from March 8, 2024, indicates that 475 pounds of this waste had been determined to be D002, D006, D007, and D008 and was transported by Univar Solutions (Omaha, Nebraska) to Tradebe Treatment (East Chicago, Indiana) for H141 management (storage, bulking, and/or transfer). At the time of the inspection, I did not observe any waste corrosive liquid onsite.

Isocyanate Epoxy/Resin - Valmont generated 1,767 pounds of this waste isocyanate epoxy/ resin in 2023 (2023 Biennial Report) as a part of the manufacturing process. This waste had been determined to be a D001 characteristic hazardous waste based on process and product knowledge. The eManifest indicated one shipment of three drums on May 26, 2023, by Univar Solutions (Omaha, Nebraska) to AES Environmental (Calvert City, KY) for H132 management (landfill with prior treatment or stabilization). At the time of the inspection, I did not observe any isocyanate epoxy/resin onsite.

Spent Aerosol Cans - Valmont generates about 400 empty or partially empty aerosol cans per month in the facilities production processes. The aerosol cans are punctured, and any remaining contents drained into a drum labeled as waste paint and determined to be hazardous based on product and process knowledge. The empty cans are collected as scrap metal. Inside of the shop in Building 551, I observed a black 55-gallon hazardous waste satellite accumulation drum (1/10 full) of waste paint from emptied aerosol cans, with an aerosol can puncturing mechanism on the top. The drum was in good conditiona and labeled with the words "Hazadous Waste." To its left

was is a yellow 55-gallon drum (full) of empty aerosol cans pending transfer to a scrap metal container (see Photo 5). Inside the Mainteannce Shop in Building 529, I observed a 55-gallon hazardous waste satellite accumulation drum of spent aerosol cans (pending transfer to aerosol can puncturing unit in other building) (see Photo 17). The drum was ½ full, closed, in good condition, and labeled with the words "Hazadous Waste."

Pasloads - Valmont generates less than 65 pounds of Pasload fuel cell cartridges per year. Mr. Mayrose stated that they have recently significantly decreased or discontinued the use of these. The Pasload cartridges are used as a power source for portable nail guns and contain butylene. The facility had determined them to be D001 and D003 characteristic hazardous waste based on product knowledge. The most recent eManifest was dated March 8, 2023, for 65 pounds. Onsite they are stored in a 55-gallon steel drum satellite accumulation container and transported by Univar Industries (Omaha, NE) to AES Environmental (Calvert City, KY). Inside the shop of Building 551, I observed a 55-gallon satellite accumulation drum of Pasload (see Photo 7). The drum was 2/3 full, closed, in good condition, and labeled with the words "Hazardous Waste."

Universal Wastes Lamps and Ballasts - Valmont generates about 100 pounds per year of spent fluorescent lamps and ballasts from re-lamping activities. The spent lamps and non-polychlorinated biphenyls (PCB) ballasts are generated as part of their conversion to LED process. The spent lamps and ballasts are sent to A-Tec (Des Moines, Iowa) for recycling. In the Haz Waste Shed (Building 551), I observed a fiber protective tube of spent 4-foot fluorescent lamps (all green tips) about 1/3 full (about 30 lamps). The top of the protective tube was closed and the lamps were in good condition. The protective tube was labeled with the words "Universal Waste Lamps" and marked with an accumulation start date of 7/11/2024 (less than one year). Next the the protective tube, I observed a cardboard box of spent 8-foot fluorescent lamps (all green tips) contained only two lamps. The top of the cardboard box was partially tucked in on one side only, but not full closed and secured. The lamps were in good condition. The cardboard box was labeled with the "Universal Waste Lamps" and marked with an accumulation start date of 5/10/2024 (less than one year). I also observed a 40-gallon blue poly drum that was about ½ full of spent non-PCB ballasts. The drum was in good condition and labeled with the words "Universal Waste Ballast" and marked with an accumulation start date of 7/29/24 (less than one year) (see Photos 1-4).

- **NOPF 3: Failure to store two 8ft. universal waste lamps in a closed container, as required in Title 128, Ch 25, 012.04A [40 CFR 273.13(d)(i)]**

Used Oil and Oily Water - Valmont generates about 800-900 gallons annually of used oil from maintenance operations from their Mobile Maintenance area. The used oil from their shop is pumped into the oily water tank. They have two 4,800-gallon aboveground tanks of "Oily Water" that is collected plantwide from milling tubing coolant pits. They generate about 41,000 pounds of oily water every two months or about 246,000 pounds per year. These tanks are pumped every two months by Valicor and transported to the Valmont facility in Kansas City, Missouri, for oil recovery and subsequent disposal. Ms. King stated that all facility drains that may accumulate oil are routed to the Oily Water Tanks in Building 551 Shop. Only drains that are free of any potential wastes may flow to the City's Publicly Owned Treatment Works. Ms. King stated that they conduct periodic analytic testing with Toxicity Characteristic Leaching

Procedure of the tank's contents and have determined the contents to be a non-hazardous oil and water mix (see Attachment #14 for a wastewater analyse waste profile). During the visual inspection of the shop in Building 551, I observed the two 4,800-gallon above ground tanks of non-hazardous oil water mixture. The tanks were ¼ full, in good condition and labeled with the words "Used Oily Water" (see Photo 8), which includes the required "Used Oil" wording. In Building 531, Mobile Maintenance Coating area, I observed a red unlabeled 55-gallon drum of used oil. The drum was about 1/3 full and in good condition with no obvious damage or leaks observed. I did not observe a "Used Oil" label on the drum (see Photo 18).

- **NOPF 2: Failure to label one red 55-gallon drum of used oil in Bldg 531 Mobile Maintenance Coating with the words "Used Oil," as required in Title 128, Ch 7, 009.04A3 [40 CFR 279.22(c)(1)]**

Near the Oily Water Tanks, also in Building 551, I observed a plastic container (bottom section of a large plastic tote with the top removed) that contained an unknown sludge substance (brown dried powder like) (see Photo 9). I asked Mr. Neill if a hazardous waste determination had been conducted on the unknown sludge substance. Mr. Neill stated "No." Mr. Neill stated that the unknown sludge substance was pending disposal, and he was not sure of its contents.

- **NOPF 1: Failure to conduct a hazardous waste determination on the unknown sludge in the cut-off tote in Bldg 551 Shop, as required in Title 128, Ch 4, 002.00 [40 CFR 262.11(a)]**

Post inspection, Ms. King stated that the empty tote bottom that had been left out in the rain/dirt/wind for some time and it filled up with mud and dirt that had dried. It was pending cleaning and disposal.

Solvent Contaminated Shop Rags -Valmont generates a small amount of solvent contaminated shop towels during their painting process. The towels had been determined to be a D001 and D005 hazardous waste based on product and process knowledge. I did not see any manifests for this waste in the last three years. During the visual inspection of the shop in Building 551, I observed a black 55-gallon hazardous waste satellite accumulation drum of solvent contaminated soiled shop towels (see photo 6). The drum was closed, in good condition, and labeled with the words "Hazardous Waste."

Haz Yard Combo - Valmont generates about one 20-cubic yard roll-off per month of this waste. The facility had determined it to be non-hazardous based on product and process knowledge as well as analytic testing. The waste is collected in hoppers and transferred to a larger 20 cubic yard roll off in Haz Waste Yard. It is transported monthly by Waste Management to Pheasant Point Landfill (Bennington, Nebraska). Ms. King stated they call this waste stream the haz waste combo. During the visual inspection of the Hazardous Waste Yard, I observed one 20-cubic yard roll-off of haz waste combo (see Photo 11). The roll-off was full, closed, and in good condition.

General Trash - Valmont Industries generates about 68 cubic-yards generated per month from general business and plant operations. General trash is collected in six and eight cubic-yard dumpsters located in several locations around the plant (see Photo 16). Trash is collected weekly

by Waste Management and disposed of in the local landfill. See Attachment #9 for an August 2024 invoice.

4.4 Other Areas Reviewed

Outside Facility Perimeter - We conducted a limited inspection of the outside perimeter of the facility and observed no hazardous waste storage tanks or containers except as noted above. The facility had a security fence surrounding the permitter and a 24/7 onsite security. See the aerial and map views in Attachment #1.

Central Accumulation Areas (CAA) - The primary CAA was in their Hazardous Waste Yard area. The waste stream sections above describe the contents in detail. They accumulate both non-hazardous waste as well as hazardous waste. During the visual inspection, I observed two 55-gallon drums of waste paint and solvent (Photo 12). The drums were closed, in good condition, labeled with the words "Hazardous Waste," and dated less than 90-days. There were no-smoking signs, adequate spill kits, and fire control equipment. The staff communicate with company issued cell phones. See Photos 10-12. I also reviewed several months of CAA Weekly Inspection forms (see Attachment #12 for a completed sample form) with no issues noted. The weekly inspections of CAA and all areas in which they store hazardous waste appeared to be complete.

Preparedness and Prevention - The facility has numerous fire extinguishers, spill kits, and eye wash stations. Mr. Mayrose provided a copy of the facility's Contingency Plan. The plan appeared to be comprehensive and contain all the required components (see Attachment #11), Mr. Mayrose that they generally email updated versions of their emergency plan to the local emergency responders and NDEE. He said that also typically have an annual meeting with their local emergency providers and share and discuss the contingency plan. Mr. Mayrose provided the attendance list from their most recent meeting in 2023 (see Attachment #13), which included members from Valley Fire, Valley Police, Valley City Mayor, and City Council. Mr. Mayrose stated that their local fire department generally visits this facility and does a walk-through annually and several employees are also members of the local volunteer fire department. Mr. Mayrose and Mr. Taylor stated that they assisted with minor revisions of their contingency plan but were unaware if the most recent update had been shared with local emergency providers or NDEE.

- **NOPF 4: Failure to provide most recent updated version of the Contingency Plan to local emergency responders and NDEE, as required in Title 128, Ch 18, 004.02 [40 CFR 262.261 Subpart M] [RECINDED]**

Post inspection, on 9/18/2024, 10/2/2024, and 10/4/2024, I had phone calls with Ms. King to discuss additional questions. Ms. King clarified that the most recent contingency plan (emergency action plan) actually was the one that had been shared with local emergency responders and the NDEE, and that a newest version they had been working on internally only contained minor corrections and was not needed or planned to be disseminated to outside agencies as she explained in a 9/19/2024 email: "*This plan [the most recent version of the emergency action plan] is available to all employees on demand via SharePoint, and hard copies are kept in production areas where computer access may be limited. Recent changes made were*

minor and related to cleaning up verbiage and updating broken hyperlinks and secondary phone numbers. No changes in high level first response contact information occurred that would have required notification of our local emergency response agencies, as Quentin Taylor is our first point of contact as Campus EHSS manager and safety officer."

Based on this clarifying information, NOPF 4 was rescinded.

Personnel Training - Mr. Mayrose stated that all staff with hazardous and universal waste handling responsibilities receive both initial and annual training. He provided documentation of their staff training (see Attachment #10 for their training certificates). He also provided written job descriptions that indicate which staff and job codes have hazardous waste handling responsibilities and that indicate the requirement for both initial and annual hazardous waste handling training.

Uniform Hazardous Waste Manifests and Land Disposal Restrictions (LDR) - I reviewed about a dozen paper copies of Manifests and LDR over the previous three years. No issues were noted.

5.0 SUMMARY OF FINDINGS

- **NOPF 1: Failure to conduct a hazardous waste determination on the unknown sludge in the cut-off tote in Bldg 551 Shop, as required in Title 128, Ch 4, 002.00 [40 CFR 262.11(a)]**

- **NOPF 2: Failure to label one 55-gallon red drum of used oil in Bldg 531 Mobile Maintenance Coating with the words "Used Oil," as required in Title 128, Ch 7, 009.04A3 [40 CFR 279.22(c)(1)]**

- **NOPF 3: Failure to store two 8ft. universal waste lamps in a closed container, as required in Title 128, Ch 25, 012.04A [40 CFR 273.13(d)(i)]**

- **NOPF 4: [RECINDED]**

Other than the items specifically noted in this narrative, I observed no additional issues or potential findings. However, further EPA review may change or add to my findings.

MARK HOLCOMB (Affiliate) Digitally signed by MARK HOLCOMB (Affiliate) Date: 2024.10.20 15:33:11 -05'00'

Mark Holcomb
Civil Investigator, SEE

AMBER WHISNANT Digitally signed by AMBER WHISNANT Date: 2025.02.04 21:33:33 -06'00'

Amber Whisnant
RCRA Section Chief, ECAD/Chemical Branch

Attachments:

1) Facility Aerial Map Views and Diagrams (5 pages)
2) Photo Log (15 photos and 18 pages)
3) Receipt for Documents (1 page)
4) Confidentiality Notice (l page)
5) EPA RCRA Notification Acknowledgement/Verification Report (1 page)
6) NOPF (1 page)
7) Manifest - April 3, 2024 (2 pages)
8) SDS - Paints (25 pages)
9) Invoice - General Trash (3 pages)
10) Staff Training Certificates (9 pages)
11) Contingency Plan/Emergency Action Plan (28 pages)
12) CAA Weekly Inspection Checklist List (2 pages)
13) First Responder Meeting Attendance List (1 page)
14) Oily Water Analytics (2 pages)
15) 2024 Oil Spill Info (7 pages)