

RCRA Inspection Report

1) Inspector and Author of Report

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U.S. Environmental Protection Agency, Region 4
61 Forsyth Street, S.W.
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2) Facility Information

TVA Watts Bar Nuclear Plant
6868-B Watts Bar Highway
Spring City, Tennessee 37381
Rhea County

EPA ID: TN2640030035
NAICS: 221113 - Nuclear Electric Power Generation

3) Responsible Official

Anthony L. Williams
WBN Site Vice President
TVA Watts Bar Nuclear Plant
P.O. Box 2000, ADM 1V-WBN
Spring City, Tennessee 37381-2000
alwilliams12@tva.gov

4) Inspection Participants

Jennifer Grubb, TVA Watts Bar Nuclear Plant
Jerri Dolan, TVA Watts Bar Nuclear Plant
Gary Schafer, TDEC
Harry McCann, TDEC
Paula Whiting, U.S. Environmental Protection Agency, Region 4

5) Date and Time of Inspection

May 8, 2024, at 9:00 a.m. EDT

6) Applicable Regulations¹

Resource Conservation and Recovery Act (RCRA) Sections 3002, 3005 and 3007 (42 U.S.C. §§ 6922, 6925 and 6927), and the regulations promulgated pursuant thereto at 40 Code of Federal Regulations (C.F.R.) Parts 260-270, 273 and 279.

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.

Tennessee Hazardous Waste Management Act of 1977, Tennessee Code Annotated (Tenn. Code Ann.) § 68-212-101 et seq., and Chapter 0400-12-01 of the Rules and Regulations of the State of Tennessee (Tenn. Comp. R. & Regs.)

Pursuant to Tenn. Comp. R. & Regs. 0400-12-01-.03(1)(g) [40 C.F.R. § 262.16)], SQG may accumulate hazardous waste on-site for 180 days or less without a permit or without having interim status, as required by Section 68-212-108 of the THWMA, Tenn. Code Ann. § 68-212-108 [Section 3005 of RCRA, 42 U.S.C. § 6925], provided that the generator complies with the conditions listed in Tenn. Comp. R. & Regs. 0400-12-01-.03(1)(g) [40 C.F.R. § 262.16] (hereinafter referred to as the “SQG Permit Exemption”).

Pursuant to Tenn. Comp. R. & Regs. 0400-12-01-.03(1)(f)1. [40 C.F.R. § 262.15(a)], a generator may accumulate as much as 55 gallons of non-acute hazardous waste and/or either one quart of liquid acute hazardous waste at or near the point of generation where wastes initially accumulate, which is under the control of the operator of the process generating the waste, without a permit or without having interim status, as required by Section 68-212-108 of the THWMA, Tenn. Code Ann. § 68-212-108 [Section 3005 of RCRA, 42 U.S.C. § 6925], provided that the generator complies with the satellite accumulation area (SAA) conditions listed in Tenn. Comp. R. & Regs. 0400-12-01-.03(1)(f)1. [40 C.F.R. § 262.15(a)] (hereinafter referred to as the “SAA Permit Exemption”).

Pursuant to Tenn. Comp. R. & Regs. 0400-12-01-.12(1)(i) [40 C.F.R. § 273.9], a “Small Quantity Handler of Universal Waste” (SQHUW) is a Universal Waste handler who does not accumulate 5,000 kilograms or more of Universal Waste (batteries, pesticides, mercury-containing equipment, or lamps, calculated collectively) at any time.

7) Purpose of Inspection

The purpose of the inspection was to conduct an unannounced RCRA compliance evaluation inspection (CEI) to determine the compliance of TVA Watts Bar Nuclear Plant, EPA ID Number: TN2640030035 with the applicable regulations. This was an EPA lead inspection.

8) Facility Description

The Watts Bar Nuclear Plant is a Tennessee Valley Authority (TVA) nuclear reactor pair used for electric power generation. The plant is located on 1,700 acres on the northern end of the Chickamauga Reservoir near Spring City, in East Tennessee. Each unit produces about 1,150 megawatts of electricity—enough to service 650,000 homes—without creating any carbon emissions.

The plant, construction began in 1973, has two Westinghouse pressurized water reactor units: Unit 1, completed in 1996, and Unit 2, completed in 2015. Unit 1 has a winter net dependable

generating capacity of 1,167 megawatts. Unit 2 has a capacity of 1,165 megawatts. Unit 2 is the first new power reactor to enter service in the 21st century in the nation.

TVA Watts Bar Nuclear Plant employs 2,365 employees and contractors with two employees handling hazardous waste. The facility operates 24 hours a day, seven days per week.

TVA Watts Bar Nuclear Plant's most recent Hazardous Waste Generator Notification (EPA Form 8700-12) dated March 20, 2023, characterized the facility as a Small Quantity Generator (SQG) of hazardous waste. TVA Watts Bar Nuclear Plant may generate hazardous waste streams, spent aerosol cans, used solvent, used oil, universal lamps and batteries, paint waste and other wastes. The hazardous waste may be designated the following EPA Waste Codes D001, D002, D003, D004, D005, D006, D007, D008, D009, D011, D018, D019, D028, D035, D039, D040, F003, F005, P042, and U002.

9) Previous Inspection History

This facility was last inspected on September 21, 2021, by Tennessee Department of Environment and Conservation (TDEC). No deficiencies were noted.

10) Findings

On May 8, 2024, EPA inspector Paula Whiting, accompanied by Tennessee Department of Environment and Conservation (TDEC) inspectors Gary Schafer and Harry McCann arrived at TVA Watts Bar Nuclear Plant at approximately 9:00 a.m. EDT. The inspectors signed in at the front window and were escorted to a conference room. Mrs. Jerri Dolan, Senior Environmental Scientist, received the inspectors and escorted them to the security station for check-in. The inspectors were required to provide driver's licenses and social security numbers to obtain visitor's passes. In addition, the inspectors were required to remove shoes, hats, jackets, and bags to be scanned by the attending security officer.

Ms. Jennifer Grubb, Environmental Scientist later met the inspectors at the security office of the Protective Area and escorted them into the facility. The inspectors introduced themselves, showed their credentials to the representative, and explained the purpose of the visit.

The inspectors described the anticipated use of a digital camera 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 the EPA. The facility did not assert a business confidentiality claim.

Ms. Grubb 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 the facility representative led the inspectors on a tour of the facility operations. Below is a description of the observations made during the inspection.

11) Inspection Observations

10.1 Radiological Controlled Area

The inspectors were not able to access the radiological controlled area due to limited security clearance. However, Ms. Grubb explained that this area contained the radiological contaminated mixed waste of peel away paint and chips. At the time of the inspection, Ms. Grubb stated that a 55-gallon container of mixed waste had been stored on site over 270 days. The facility did not have a mixed waste disposal vendor to send the container, and the radiological department was not releasing the container for disposal.

Ms. Grubb provided photographs of the container via email on May 9th (Pictures 1-2). As the follow up, the EPA inspector requested the radiological half-life of the isotope. Ms. Grubb provided on May 14th via email the radiological count analysis for the mixed waste container. The document stated that the isotope Cobalt-60 has a half-life of 1,930 days and the container contents became a mixed waste on March 30, 2016. This puts the isotope half-life on July 12, 2021. However, on May 13, 2024, when the mixed waste was analyzed, the result determined that the contents were still contaminated, and thus not ready to be released to the central accumulation area (CAA) as hazardous waste.

10.2 Painter Clean Up SAA

The inspectors started the inspection inside the Protective Area where security clearance and visitor passes are required. The Painter Clean Up area is outside of the main facility and is a shared paint storage room for the facility employees and contractors. The inspectors observed an SAA with a 55-gallon container of used paint, a 55-gallon container of used thinner, a 55-gallon container of used paint stripper, and a 55-gallon container of used solvent rags (Pictures 3, 5-8). The containers were observed closed and labeled but did not have hazard indicators on the containers.

Pursuant to Tenn. Comp. R. & Regs. 0400-12-01-.03(1)(f)1.(v) [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.

The inspectors observed a shelving unit with used paint containers and brushes. The technician

explained that storing empty paint containers in this area and allowing them to dry was the standard practice. However, the inspectors observed that several discarded containers were not empty and allowed to dry (Pictures 4, 9-11). These discarded containers held a two-part epoxy paint. The inspectors also observed some containers disposed of in the trash can that were not empty and were releasing their contents into the trash. The technician stated that these containers were generated by the contractor, Williams Specialty Energy Solutions.

Pursuant to Tenn. Comp. R. & Regs. 0400-12-01-.03(1)(b) [40 C.F.R. § 262.11], a person who generates a solid waste, as defined in Tenn. Comp. R. & Regs. 0400-12-01-.02(1)(b) (2021) [40 C.F.R. § 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 articulated in Tenn. Comp. R. & Regs. 0400-12-01-.03(1)(b) [40 C.F.R. § 262.11].

Pursuant to Tenn. Comp. R. & Regs. 0400-12-01-.03(1)(g)2.(vii) [40 C.F.R. § 262.16(b)(7)], which incorporates Tenn. Comp. R. & Regs. 0400-12-01-.10 [40 C.F.R. Part 268], and is a condition of the SQG Permit Exemption, a generator is required to comply with land disposal restrictions (LDR) for hazardous waste.

10.3 Second Chemistry Lab

The inspectors returned to the main facility and entered the Second Chemistry Lab. At the time, the lab was unoccupied, but had a SAA container underneath the fumehood. The inspectors observed a one-liter bottle of waste hexanol. The container was closed and labeled. The inspectors also observed a green sharps container sitting on the front counter (Pictures 13-14). At the time, the container held ampules with a pinkish liquid inside. No labeling was found on the container. Ms. Grubb contacted the lab personnel who confirmed that the discarded ampules were dissolved oxygen CHEMets test kits.

10.4 Main Turbine Oil Tank

Ms. Grubb continued touring the inspectors around the main facility. The inspectors observed a 55-gallon container of used oil on an absorbent pad beside the main turbine oil tank (Picture 15). The container was closed and labeled.

10.5 Storage Room for Used Oil Pads, Drums, Batteries

Ms. Grubb then took the inspectors to the used oil storage room. The inspectors observed two 55-gallon containers of used oil on secondary containment pallets (Pictures 16-18). The containers were labeled and closed. The container with the yellow topped funnel had used oil on the top of the container, and inside the funnel. The used oil container had been overfilled, and oil had flowed out of the full funnel onto the top of the container into the secondary containment.

Pursuant to Tenn. Comp. R. & Regs. 0400-12-01-.11(3)(c)4. [40 C.F.R. § 279.22(d)], upon detection of a release of used oil to the environment, the facility must clean up and manage properly the released used oil and other materials.

10.6 Watts Bar Medical

The Watts Bar Medical clinic is an outpatient clinic that provides over the counter pharmaceuticals and general first aid. No prescription medicines were kept on site. The inspectors did observe one 5-gallon container of non-creditable hazardous waste pharmaceuticals that was closed, labeled, and dated June 13, 2023 (Pictures 19-20). The staff included a doctor, nurse practitioner, and a medical technician.

This clinic is regulated under 40 C.F.R. 266 Subpart P - Hazardous Waste Pharmaceuticals. The inspectors inquired about how the pharmacy notified under Subpart P, how the waste pharmaceuticals were determined to be hazardous, how the waste pharmaceuticals were disposed of and/or reverse distributed, the training the pharmacy employees received to manage the waste pharmaceuticals. Mr. Schafer reviewed the clinic records and observed that the facility did provide notification to TDEC using the Site Identification Form (EPA Form 8700-12) that they were operating as a healthcare facility under Subpart P and there was a record of the current 8700-12 stored at the facility. In addition, all manifests and land disposal requirement forms were provided by Ms. Grubb at the time of the inspection for review.

10.7 Firing Range

The remaining inspection was conducted outside the Protective Area. Previously, the firing range had a SAA onsite, but the facility removed the 55-gallon SAA container permanently (Picture 21). The firing range currently uses Breakthrough Clean Technologies® Bio-Synthetic All-In-One (CLP) environmentally friendly gun cleaner (Picture 22). No hazardous waste was observed in this area.

10.8 Blast Shop Painter Clean Up

The SAA was located outside the shop in an attached shed. The inspectors observed a 55-gallon SAA container of waste solvent/thinner, a 55-gallon SAA container of solid paint waste and a 55-gallon SAA container of used thinner rags (Pictures 23-24). The SAA containers were closed and labeled. A spill kit was observed in the shed.

Inside the paint shop was a blast media booth (Picture 25). Ms. Grubb stated that the spent media was non-hazardous and was disposed of at the Rhea County Landfill. In addition, the spent media waste profile was on file with TDEC and certified to be sent to the landfill. The inspectors then went inside the paint booth and observed painting was in progress. Paint filters were observed in the ceiling vents. The inspectors inquired if the spent paint filters had been tested recently and Ms. Grubb said they had not. The spent paint booth filters need to have a hazardous waste determination due to the changes in paint product.

Pursuant to Tenn. Comp. R. & Regs. 0400-12-01-.03(1)(b) [40 C.F.R. § 262.11], a person who generates a solid waste, as defined in Tenn. Comp. R. & Regs. 0400-12-01-.02(1)(b) (2021) [40 C.F.R. § 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 articulated in Tenn. Comp. R. & Regs. 0400-12-01-.03(1)(b) [40 C.F.R. § 262.11].

10.9 Hut 24

Hut 24 is the less than 180-day hazardous waste central accumulation area (CAA) (Pictures 27-29). The inspectors observed the following:

- **Area of Concern:** The 180-day CAA did not have signs for “No Smoking”, “Danger” and marked as “Hazardous Waste.”
- The 180-day CAA did not have the name and phone number of the emergency coordinator posted where the hazardous waste was being generated or stored.

Pursuant to Tenn. Comp. R. & Regs. 0400-12-01-.03(1)(g)2.(ix)(II) [40 C.F.R. § 262.16(b)(9)(ii)] which is a condition of the SQG Permit Exemption, a generator is required to post next to telephones, or in areas directly involved in the generation and accumulation of hazardous waste, the name and phone number of the emergency coordinator, the location of fire extinguishers and spill control material, and the phone number of the fire department (unless the facility has a direct alarm).

- One 55-gallon container of used paint, closed, labeled, and dated April 23, 2024 (Pictures 30-31);
- One 5-gallon container of burnishing compound, closed, labeled, and dated April 4, 2024;
- One 7.5-gallon container of burnishing compound, closed, labeled, and dated February 26, 2024;
- Five 4-foot cartons of universal waste lamps (Picture 32);
- Six cardboard boxes of universal waste lamps;
- Six 4-foot fiberboard boxes of universal waste lamps; and
- One box of universal waste mercury lamps was not closed and secured, not labeled, and not dated (Picture 33).

Pursuant to Tenn. Comp. R. & Regs. 0400-12-01-.12(2)(f)1 [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 Tenn. Comp. R. & Regs. 0400-12-01-.12(2)(d)4. [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 Tenn. Comp. R. & Regs. 0400-12-01-.12(2)(e)5. [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.”

- Eight 55-gallon containers of used EHC fluid being disposed of as used oil, closed and dated November 12, 2023;
- One box of spent lead acid batteries, covered with clear plastic and dated September 1, 2023 (Pictures 36-37); and
- A pallet with one 5-gallon container of universal waste Ni-Cad batteries, closed, labeled, and dated January 13, 2024; one 7.5-gallon container of universal waste batteries, closed, labeled, and dated March 30, 2023, and one cardboard box of universal waste Ni-Cad batteries, closed, labeled, and dated August 2, 2023 (Picture 35).

At the time of the inspection, the 7.5-gallon container exceeded the one-year storage date for universal waste. In addition, the inspectors observed several batteries were not contained, not labeled, and not dated. On May 17, 2024, Ms. Grubb emailed and provided the manifest to the inspectors that all universal waste at the facility during the inspection had been shipped.

Pursuant to Tenn. Comp. R. & Regs. 0400-12-01-.12(2)(f)1 [40 C.F.R. § 273.15(a) and (c)], a SQHUW may accumulate universal waste no longer than one year and must to 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 Tenn. Comp. R. & Regs. 0400-12-01-.12(2)(d)4. [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 Tenn. Comp. R. & Regs. 0400-12-01-.12(2)(e)5. [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.”

- Expired products pending evaluation for reuse and/or disposal (Pictures 39, 44);
- Multiple full 55-gallon containers of used oil (Pictures 38, 40, 41, 42, 45, 46);
- Multiple empty 55-gallon containers empty and/or pending use;
- Multiple 55-gallon containers of used oils pads and rags waiting to be crushed in the compactor and put into the empty 55-gallon containers;
- A SAA with one 55-gallon container of spent aerosol cans (Picture 43), and one 55-gallon container of non-hazardous waste broken glass;

- Two drum compacters, and an oil filter crusher (Pictures 47-48);
- Used oil filters waiting to be crushed (Picture 49); and
- A break area created inside the CAA by staging the yellow clamshells to block off the area (Picture 50).

The inspectors expressed concern that a break area with refrigerator, microwave, chairs, table, and a blind spot mirror were set up in the hazardous waste storage area (Picture 50). Due to the nature of the waste generated and handled, personnel should not be allowed to establish break areas in or around hazardous waste storage areas.

In addition, the inspectors observed that a number of used oil containers, used oil pad and debris containers, and empty containers filled the entire CAA. In the previous hazardous waste inspection conducted by TDEC, the area was well kept and organized. The technician that oversaw the CAA at that time has retired. However, during this inspection, the area was chaotic and full, the aisle space was very narrow and made it difficult to observe the used oil containers. No one was actively compacting and/or consolidating the used oil pads and debris, nor were they crushing the used oil filters being stored in the area. The technician on staff during the inspection, quietly left the building using the rear door and did not speak to the inspectors. Instead, he went and sat in his personal vehicle until the inspectors left. Ms. Grubb stated often when the CAA became too full, she herself had to compact and consolidate the used oil pads and debris to reduce the inventory prior to pick up.

12) Records Review

The inspectors requested the training records, the weekly inspection records, the waste minimization plans, annual reports, the 2021-2024 hazardous, non-hazardous, and used oil manifests. The generator status notification (EPA Form 8700-12) was last updated March 20, 2023.

The inspectors requested the training records for the employees handling hazardous waste. Training records for Jennifer Grubb and Mr. Dale Clark were reviewed. Computer based training modules for RCRA DOT that covered hazardous waste, universal waste, and pharmaceutical wastes.

The weekly inspections for the 180-day CAA were reviewed. Mr. Schafer observed that the signed designated facility to the generator forms were missing for 2022. Ms. Grubb emailed the forms to the inspectors the next day.

The Hazardous Waste Reduction Plan was reviewed. Mr. Schafer observed that special waste approvals for the Cooling Tower Resin Cleanout dated July 1, 2024, and Waste Sandblast Media dated July 1, 2024, were due for renewal.

The 2021-2023 annual reports were reviewed for SQG. However, in 2021, Watts Bar paid fees as a LQG. Mr. Schafer advised that Ms. Grubb contact TDEC to have this overpayment credited.

Hazardous and non-hazardous manifests were reviewed for 2021-2024. Hazardous wastes were shipped to Chemical Waste Management Emelle (EPA ID ALD000622464) in Emelle, AL. The land disposal restriction forms were reviewed.

13) Summary

The inspectors conducted an exit meeting with Ms. Grubb. During this meeting, TDEC presented the preliminary results of the inspection. TVA Watts Bar Nuclear Plant was inspected as a SQG of hazardous waste.

14) List of Attachments

Attachment A – Photo Log: TVA Watts Bar Nuclear Plant

15) Signed

**PAULA
WHITING**

Digitally signed by
PAULA WHITING
Date: 2024.07.17
12:08:45 -04'00'

Paula A. Whiting
Environmental Engineer

14) Concurrence

**ALAN
NEWMAN**

Digitally signed by
ALAN NEWMAN
Date: 2024.07.17
14:28:43 -04'00'

Alan R. Newman
Acting Chief
RCRA Enforcement Section

ATTACHMENT A

TVA WATTS BAR NUCLEAR PLANT

DAYTON, TENNESSEE

COMPLIANCE EVALUATION INSPECTION PHOTOGRAPHS

MAY 8, 2024

**Photos taken by Paula A. Whiting
Camera Type: Olympus Tough
Serial Number: SC7374**



Picture 1 – Mixed Waste container



Picture 2 – Mixed Waste container (top)



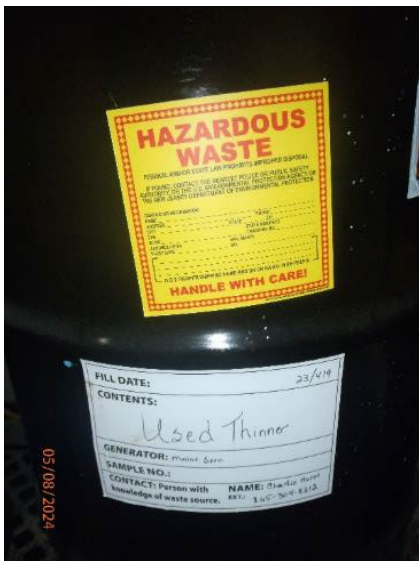
Picture 3 – Painter Cleanup SAA



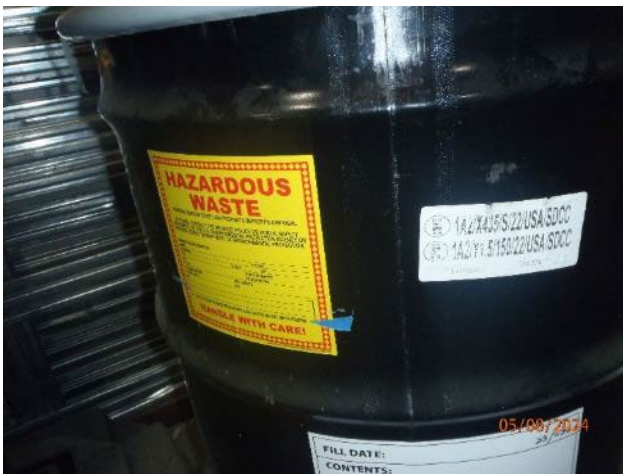
Picture 4 – Painter Cleanup SAA trash w/discard HW paint containers



Picture 5 – Painter Cleanup SAA used paint label



Picture 6 – Painter Cleanup SAA used thinner label



Picture 7 – Painter Cleanup SAA used paint stripper label



Picture 8 – Painter Cleanup SAA used solvent rags label



Picture 9 – Painter Cleanup SAA discarded epoxy paint in trash can



Picture 10 – Painter Cleanup SAA epoxy paint allowed to dry



Picture 11 – Painter Cleanup SAA discarded epoxy paint cans in trash can



Picture 12 – Secondary Chemistry Lab SAA



Picture 13 – Secondary Chemistry Lab Chemets syringes for dissolved oxygen



Picture 14 – Secondary Chemistry Lab Chemets syringes

for dissolved oxygen



Picture 15 – Main Turbine Oil Tank used oil container



Picture 16 – Storage Room for Used Oil Pads, Drums & Batteries used oil containers



Picture 17 – Storage Room for Used Oil Pads, Drums & Batteries used oil container overfill spill



Picture 18 – Storage Room for Used Oil Pads, Drums & Batteries used oil container overfill in funnel



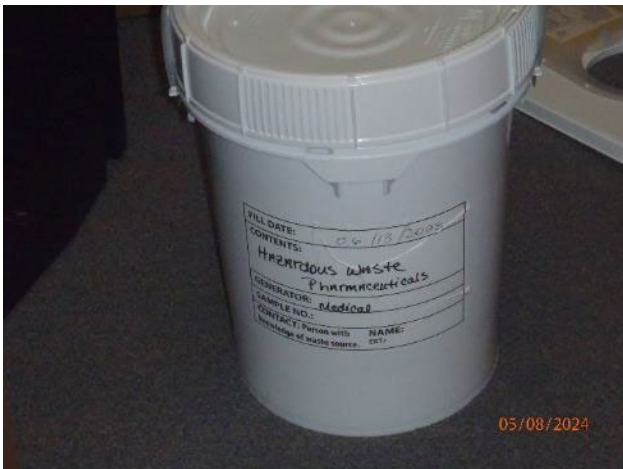
Picture 21 – Firing Range



Picture 19 – Watts Bar Medical HW Pharmaceutical SAA



Picture 22 – Firing Range gun cleaner



Picture 20 – Watts Bar Medical HW Pharmaceutical SAA



Picture 23 – Blast Shop Painter Cleanup SAA



Picture 24 – Blast Shop Painter Cleanup SAA



Picture 27 – Hut 24 CAA



Picture 25 – Blast Shop Painter Cleanup Sand media blaster



Picture 28 – Hut 24 CAA



Picture 26 – Blast Shop Painter Cleanup paint booth filters



Picture 29 – Hut 24 CAA



Picture 30 – Hut 24 CAA hazardous waste storage



Picture 33 – Hut 24 CAA UW container not secured



Picture 31 – Hut 24 CAA hazardous waste storage



Picture 34 – Hut 24 CAA used oil



Picture 32 – Hut 24 CAA universal waste



Picture 35 – Hut 24 CAA UW batteries



Picture 36 – Hut 24 CAA lead acid batteries



Picture 39 – Hut 24 CAA expired products pending evaluation



Picture 37 – Hut 24 CAA lead acid batteries



Picture 40 – Hut 24 CAA used oil and used oil debris



Picture 38 – Hut 24 CAA used oil and used oil debris



Picture 41 – Hut 24 CAA used oil and used oil debris



Picture 42 – Hut 24 CAA used oil debris



Picture 44 – Hut 24 CAA expired products pending evaluation



Picture 43 – Hut 24 CAA spent aerosol can SAA



Picture 45 – Hut 24 CAA used oil and used oil debris



Picture 46 – Hut 24 CAA used oil and used oil debris



Picture 47 – Hut 24 CAA compactor and can crusher



Picture 50 – Hut 24 CAA compactor



Picture 48 – Hut 24 CAA compactor and crusher



Picture 51 – Hut 24 Man Cave



Picture 49 – Hut 24 CAA used oil filters