RCRA Inspection Report

1) Inspector and Author of Report

Kayla Acosta, Physical Scientist
RCRA Enforcement Section
Chemical Safety and Land Enforcement Branch
Enforcement and Compliance Assurance Division
U.S. Environmental Protection Agency, Region 4
61 Forsyth Street, S.W. (404) 562-8451
Atlanta, Georgia 30303 acosta.kayla@epa.gov

2) Facility Information

The Sherwin Williams Company
90 Carson Road
Birmingham, Alabama 35215
EPA ID No: ALD078964970

3) Responsible Officials

Michael Steward, EHS Manager
Michael.Steward@sherwin.com

4) Inspection Participants

Kayla Acosta, US EPA
Marlon McMillian, ADEM
Michael Steward, Sherwin Williams
Travis Nelson, Sherwin Williams

5) Date of Inspection

November 03, 2021

6) Applicable Regulations

Resource Conservation and Recovery Act (RCRA) Sections 3002 (42 U.S. Code–Annotated U.S.C.A. 6925 and 6927), 40 Code of Federal Regulation (C.F.R.), Parts 260 270, 273, 278, & 279. Alabama Hazardous Waste Management and Minimization Act of 1978 (AHWMMA), Ala. Code §§ 22-30-1 et seq. 40 Code of Federal Regulation (C.F.R.), Parts 260 - 270, 273 & 279, and Rules 335-14-1 to 335-14-17 of the ADEM Admin. Code.

Pursuant to ADEM Admin. Code r. 335-14-3-.01(7) [40 C.F.R. § 262.17], a generator of 1,000 kilograms or greater of hazardous waste in a calendar month is a Large Quantity Generator

(LQG) and may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status, as required by Section 22-30-12(b) of the AHWMMA, Ala. Code § 22-30-12(b) [Section 3005 of RCRA, 42 U.S.C. § 6925], provided that the generator complies with the conditions listed in ADEM Admin. Code r. 335-14-3-.01(7) [40 C.F.R. § 262.17] (hereinafter referred to as the "LQG Permit Exemption").

Pursuant to ADEM Admin. Code r. 335-14-3-.01(5)(a) [40 C.F.R. § 262.15(a)], a generator may accumulate as much as 55 gallons of hazardous waste in containers at or near the point of generation where wastes initially accumulate, which is under the control of the operator of the process generating the waste, without a permit or without having interim status, as required by Section 22-30-12(b) of the AHWMMA, Ala. Code § 22-30-12(b) [Section 3005 of RCRA, 42 U.S.C. § 6925], and without complying with ADEM Admin. Code r. 335-14-3-.03(5)(a) [40 C.F.R. § 262.17(a)], provided that the generator complies with the satellite accumulation area (SAA) conditions listed in ADEM Admin. Code r. 335-14-3-.01(5)(a) [40 C.F.R. § 262.15(a)] (hereinafter referred to as the "SAA Permit Exemption").

Pursuant to ADEM Admin. Code r. 335-14-3-.03(5)(a)1. (ii) [40 C.F.R. § 262.17(a)(2)], which incorporates ADEM Admin. Code r. 335-14-6-.28 [40 C.F.R. Part 265, Subpart BB], and is a condition of the LQG Permit Exemption, a generator accumulating hazardous waste in tanks must comply with the RCRA Subpart BB Organic Air Emission Standards for Equipment Leaks, including, but not limited to, the recordkeeping requirements of ADEM Admin. Code r. 335-14-6-.28 [40 C.F.R. § 265.1064].

Pursuant to ADEM Admin. Code r. 335-14-3-.03(5)(a)1. (ii) [40 C.F.R. § 262.17(a)(2)], which incorporates ADEM Admin. Code r. 335-14-6-.29 [40 C.F.R. Part 265, Subpart CC], and is a condition of the LQG Permit Exemption, a generator accumulating hazardous waste in tanks must comply with the RCRA Subpart CC Organic Air Emission Standards for Tanks, Surface Impoundments, and Containers, including, but not limited to, the recordkeeping requirements of ADEM Admin. Code r. 335-14-6-.29 [40 C.F.R. § 265.1090].

7) Purpose of Inspection

The purpose of this inspection was to conduct a compliance evaluation inspection to determine The Sherwin Williams Company's (Sherwin Williams) compliance with the applicable requirements of RCRA and the corresponding ADEM regulations.

8) Previous Inspection History

The last RCRA CEI was conducted by ADEM on 01/21/2016 when the facility was previously owned by Valspar Coatings, under different ownership. The following six (6) violations were identified:

- 40 CFR 273.B - Standards for Universal Waste Management: Standards for Small Quantity Handlers (SQHUW): SQHUW management of universal waste lamps to prevent release: A small quantity handler of universal waste must contain any lamp in containers or packages that are structurally sound, adequate to prevent breakage, and compatible with the contents of the lamps. Such containers and packages must remain closed and must lack evidence of leakage, spillage or damage that could cause leakage under reasonably foreseeable conditions.

- ADEM Admin. Code r. 335-14-3-.04(1)(e) – A generator who transports or offers hazardous waste for transport must have program to reduce volume and toxicity.
- 40 CFR 265.B - Interim Status Standards for Owners and Operators of HW TSDs: General Facility Standards: An owner/operator must record inspections in an inspection log or summary.
- 40 CFR 265.J - Interim Status Standards for Owners and Operators of HW TSDs: Tank Systems: An owner/operator must inspect at least once each operating day above ground portions of tank system.
- 40 CFR 262.C - Standards Applicable to Generators of HW: Pre-Transport Requirements Applicable to Small and Large Quantity Generators: Each container on-site is marked with the words "Hazardous Waste".
- 40 CFR 262.C - Standards Applicable to Generators of HW: Pre-Transport Requirements Applicable to Small and Large Quantity Generators.

9) Facility Description

Sherwin Williams purchased the facility from Valspar Coatings in 2016 and began operations under Sherwin Williams in 2018. The Sherwin Williams property is roughly 17 acres total and is comprised of Building A, Building B, Building C, a 90-Day Central Accumulation Area (CAA), Tank Farm, Maintenance Shop, Resin Building, and a QA/ QC Lab. The facility operates 24/7 on weekdays. The facility currently has 120 employees.

Sherwin Williams first notified as a Large Quantity Generator (LQG) of hazardous waste in 2018. The facility submitted their most recent notification in July 2021. Hazardous wastes identified in the report include: D001, D002, D018, D023, D024, D025, D026, D035, F003, and F005. The facility also generates universal wastes such as spent fluorescent bulbs. Sherwin Williams operates under the NAICS Code: 32551 – Paint and Coating Manufacturing.

Sherwin Williams manufactures resin, solvent, and water-based coatings for packaging products in the food and beverage packaging industry. Hazardous wastes consist primarily of paint-contaminated debris and still bottoms (D001, D035, F003, F005), spent solvent wash (D001, F003), and ink cartridges (D001). Sherwin Williams' operations include small batch and large batch processes of manufacturing coatings that include mixing raw materials and packaging finished products into 5-gallon containers, 55-gallon drums, totes, and bulk wagon loads. The QA/QC lab tests raw materials and coating blends.

10) Opening Conference

On November 03, 2021, EPA inspector Kayla Acosta accompanied by ADEM inspector Marlon McMillian, arrived at Sherwin Williams at approximately 9:15 a.m. Mr. Travis Nelson, Plant Manager and Mr. Michael Stewart, EHS Manager received the inspectors. The inspectors introduced themselves, showed their credentials, and explained the purpose of the visit. The inspectors described the anticipated use of a digital camera during the inspection, and discussed the company's ability, pursuant to 40 C.F.R. §2.203, to assert a business confidentiality claim for information submitted to the EPA. The company did not assert a business confidentiality claim.

Facility representatives provided an overview of the facility's history and current operations during the opening conference. The company does not appear to meet the Small Business

Regulatory Enforcement Fairness Act's classification of a "small business," which is generally set by the Small Business Administration using the business' SIC/NAICS code and annual receipts or number of employees. Therefore, the EPA inspectors did not provide a copy of the agency's information sheet for small businesses, which can be found at https://www.epa.gov/sites/production/files/2017-06/documents/smallbusinessinfo.pdf.

The inspection participants also discussed health and safety protocols and required personal protective equipment before Mr. Nelson and Mr. Stewart led the inspectors on a tour of the Facility operations.

11) Findings

Building A:
Building A is a two-story building where products are mixed and packaged. Building A also has a shipping and receiving warehouse. The first floor is for small batch mixing and the second floor is for large batch mixing and raw material storage. The inspectors observed the following hazardous wastes on the first floor in satellite accumulation areas (SAAs):

- One (1) 55-gallon drum designated for paint-contaminated debris which was empty but missing a hazardous waste label on it. A hazardous waste label was immediately affixed to the hazardous waste container.
- Three (3) 55-gallon drums of paint contaminated debris in different SAAs, closed, labeled "Hazardous Waste", and marked with an indication of hazard. (Photo #1)
- One (1) 55-gallon drum of "Dirty Thinner", closed, labeled "Hazardous Waste", and marked with an indication of hazard.

No hazardous waste was observed on the second floor of Building A.

Building B:
Building B is also a two-story building with raw material being stored on the second floor. Building B also has blending, filling, and sampling operations for small batch and large batch products. Building B is also connected to the Resin building. The inspectors observed the following hazardous wastes on the first floor in SAAs:

- One (1) 55-gallon drum of paint-contaminated debris. Closed, labeled "Hazardous Waste", and marked with an indication of hazard.
- One (1) 55-gallon drum of Aluminum Dirty Thinner. Closed, labeled "Hazardous Waste", and marked with an indication of hazard.
- One (1) 55-gallon drum of waste rags and filters. Closed, labeled "Hazardous Waste", and marked with an indication of hazard.

No hazardous waste was observed on the second floor of Building B.

Building C:
Building C is primarily used for small batch operations and is connected to Building A. The first floor is used for raw material storage while production operations occur on the second floor. The inspectors observed the following hazardous wastes:

- Three (3) 55-gallon drums of paint-contaminated debris, each generated from separate

washes of different pieces of machinery. The containers were closed, labeled, dated, and marked with an indication of hazard. The containers were on a pallet to be sent to the 90-day central accumulation area. (Photo #2)

No other hazardous wastes were observed in Building C.

Central Accumulation Area (CAA):
The CAA is located next to Building C under a corrugated roof and on top of a concrete floor with a secondary containment sump. The concrete floor appeared to be in good condition with no signs of cracks. There were six (6) rows of hazardous waste drums and totes. The aisle space was a bit narrow for the first two rows and was quickly addressed after the inspection with photos sent to the inspectors via email. There were approximately 298 55-gallon drums and three (3) 250-gallon totes of hazardous waste. The oldest dated container was 09/08/2021 which below the 90-day storage limit. All containers of hazardous waste were in good condition, closed, dated, labeled with the words "Hazardous Waste", and marked with an indication of hazard. (Photos #3 and #4).

Solvent Reclamation Unit:
The solvent reclamation unit is located next to the facility's tank farm and next to the loading and unloading area for the tank farm, surrounded by concrete berms and on a concrete pad (Photo #5). The solvent reclamation unit is connected to a 200-gallon storage tank for clean and recovered solvent and a 750-gallon storage tank for hazardous waste still bottoms (Photo #6). The still bottom tank was labeled "Hazardous Waste Tank Sludge" and marked with an indication of hazard. The solvent reclamation unit generates about four (4) 55-gallon drums a day of still bottoms after a reclamation cycle which are then moved to the CAA. The inspectors observed:

- Four (4) 55-gallon drums of solvent still bottoms, closed, labeled "Hazardous Waste", marked with an indication of hazard, and dated 11/3/2021. (Photo #7)

The ancillary equipment (flanges, pumps, valves, end caps, etc.) on tank lines used to transfer hazardous waste within the solvent reclamation unit and hazardous waste sludge tank appeared to be tightly sealed and in good condition with no missing equipment. The ancillary equipment was marked/ tagged as required by Subpart BB. The tags however were illegible due to dirt/ dust. (Photo #8)

Pursuant to ADEM Admin. Code r. 335-14-6-.28 [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.

This was corrected and photos of the tags were submitted to the inspectors on the day of the inspection. (Photo #9)

Tank Farm:
The tank farm is divided into two sections, both in concrete secondary containment that holds 110% of the largest tank in the containment. The concrete secondary containment for each section appeared in good condition with no visible cracks or leaks. In total there are twenty (20)

product storage tanks and one (1) 12,000-gallon hazardous waste storage tank labeled as Tank 58. The capacity for the secondary containment for the hazardous waste storage tank is 14,025-gallons.

Tank 58 was labeled "Hazardous Waste" "Dirty Thinner" and marked with an indication of hazard. The tank appeared in good condition. At the time of the inspection the tank had a last emptied date of 09/04/2019. (Photo #10, #11, and #12) Mr. Nelson stated that the date posted was not the most current emptied date and that the tank is emptied on a monthly basis. Manifest records for the dirty thinner waste and tracking logs for tank levels were provided to show evidence that the tank is being emptied on a monthly basis. The facility is in the process of changing the signage for the last emptied date in order to have the date updated each time the tank is emptied.

The ancillary equipment (flanges, pumps, valves, end caps, etc.) on tank lines used to transfer hazardous waste within the solvent reclamation unit and hazardous waste sludge tank appeared to be tightly sealed and in good condition with no missing equipment. The ancillary equipment was marked/ tagged as required by Subpart BB. The tags however were illegible due to dirt/ dust. (Photo #13)

Pursuant to ADEM Admin. Code r. 335-14-6-.28 [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.

This was corrected and photos of the tags were submitted to the inspectors on the day of the inspection.

As required by Subpart CC, no visible cracks, holes, or gaps between the tank roof's edge and tank walls were observed. All openings appeared secured and in their closed positions. Tags were observed in place on latched manway hatch.

Maintenance Shop:
The maintenance shop is for parts storage and the welding area. Equipment maintenance and repair is conducted in this area. No hazardous waste is generated, and no hazardous waste was observed in the maintenance shop.

Resin Building:
The Resin building is a three-story building primarily used for water and solvent based products. The third floor of the building is where the reactor is stored for production of resin products. The inspectors observed the following hazardous wastes in a SAA on the third floor:

- One (1) 55-gallon drum of water rubbish (solvent-contaminated water), closed, labeled "Hazardous Waste", and marked with an indication of hazard.

The inspectors observed the following hazardous wastes in SAAs on the first floor:

- One (1) 55-gallon drum of paint-contaminated solids, closed, labeled "Hazardous Waste", and marked with an indication of hazard
- One (1) 55-gallon drum of water rubbish (solvent-contaminated water), closed, labeled

"Hazardous Waste", and marked with an indication of hazard

No hazardous waste was observed on the second floor of the Resin Building.

Universal Waste:
The universal waste storage area is located on the first floor of Building C near the stairs. There were approximately 10 spent fluorescent lamp containers in the area. The containers were closed, labeled, dated and in good condition. No areas of concern were noted in this area.

Universal waste is stored in an enclosed room in Building C. The inspectors observed the following universal waste (Photo 14):

- Ten (10) cardboard boxes with spent fluorescent lamps, closed, labeled "Universal Waste" Lamps, and dated. 04/19/2021 was the oldest date.

No hazardous waste was observed in this area.

QA/QC Lab:
The QA/QC lab or quality control laboratory is used to sample and test raw materials and products to ensure they are up to standard. There are eight (8) SAAs in the QA/QC laboratory. The inspectors observed the following hazardous wastes:

- Two (2) 5-gallon containers of dirty thinner containing aluminum, closed, marked with an indication of hazard but missing a "Hazardous Waste" label.
- Six (6) 5-gallon containers of hazardous waste solids, closed, labeled "Hazardous Waste", but missing a marking for an indication of hazard.

Pursuant to ADEM Admin. Code r 335-14-3.01(5)(a)5 [40 CFR 262.15(a)(5)], a generator must mark or label its container with the following: (i) The words "Hazardous Waste" and (ii) An indication of the hazards of the contents (examples include, but are not limited to, the applicable hazardous waste characteristic(s) (i.e., ignitable, corrosive, reactive, toxic); hazard communication consistent with the Department of Transportation requirements at 49 CFR part 172 subpart E (labeling) or subpart F (placarding); a hazard statement or pictogram consistent with the Occupational Safety and Health Administration Hazard Communication Standard at 29 CFR 1910.1200; or a chemical hazard label consistent with the National Fire Protection Association code 704).

The hazardous waste labels were added to the two containers that were missing it during the inspection. New hazardous waste labels that included an indication of hazard were placed on the six containers missing an indication of hazard during the inspection. (Photos #15 and #16)

Records Review

Disposal Records:
Hazardous waste manifests were available for review going back to 2018. Original generator signed copy and final signed copy of manifests along with Land Disposal Restriction notifications were available for review. Five hazardous waste shipping manifests were missing

the final signed copy:

Manifest Tracking No.	015324772FLE
Manifest Tracking No.	015325126FLE
Manifest Tracking No.	014618815FLE
Manifest Tracking No.	014618796FLE
Manifest Tracking No.	022919755JJK

Pursuant to ADEM Admin. Code. r 335-14-3-.02(3) [40 CFR 262.40(a)], A generator must keep a copy of each manifest signed in accordance with § 262.23(a) for three years or until he receives a signed copy from the designated facility which received the waste. This signed copy must be retained as a record for at least three years from the date the waste was accepted by the initial transporter.

UPDATE: The final signed copy of the five hazardous waste manifests were submitted to the inspectors via email.

Contingency Plan:
The actions that facility personnel should take in response to an emergency are described in the facility's Hazardous Waste Contingency Plan. It includes a list of emergency coordinators and contact information. Equipment list and capabilities addressed include fire response, spill response, and communication. The location of fire control equipment was included in the plan and identified on an evacuation map of the facility. The map also included the location of the CAA but was missing the other hazardous waste SAAs and generation points throughout the facility. The contingency plan was missing a Quick Reference Guide (QRG).

Pursuant to ADEM Admin. Code r. 334-14-3-.14(10)(b) [40 CFR 262.262(b)], a large quantity generator that first becomes subject to these provisions after May 30, 2017 or a large quantity generator that is otherwise amending its contingency plan must at that time submit a quick reference guide of the contingency plan to the local emergency responders identified at paragraph (a) of this section or, as appropriate, the Local Emergency Planning Committee. The quick reference guide must include the following elements: (1) The types/names of hazardous wastes in layman's terms and the associated hazard associated with each hazardous waste present at any one time (e.g., toxic paint wastes, spent ignitable solvent, corrosive acid); (2) The estimated maximum amount of each hazardous waste that may be present at any one time; (3) The identification of any hazardous wastes where exposure would require unique or special treatment by medical or hospital staff; (4) A map of the facility showing where hazardous wastes are generated, accumulated and treated and routes for accessing these wastes; (5) A street map of the facility in relation to surrounding businesses, schools and residential areas to understand how best to get to the facility and also evacuate citizens and workers; (6) The locations of water supply (e.g., fire hydrant and its flow rate); (7) The identification of on-site notification systems (e.g., a fire alarm that rings off site, smoke alarms); and (8) The name of the emergency coordinator(s) and 7/24-hour emergency telephone number(s) or, in the case of a facility where an emergency coordinator is continuously on duty, the emergency telephone number for the emergency coordinator.

Pursuant to ADEM Admin. Code r. 334-14-3-.14(10)(c) [40 CFR 262.262(c)], Generators must update, if necessary, their quick reference guides, whenever the contingency plan is amended and submit these documents to the local emergency responders identified at paragraph (a) of this section or, as appropriate, the Local Emergency Planning Committee.

UPDATE: The QRG with updated site maps was submitted to the inspectors via email along with proof that copies of the Contingency Plan with the QRG were submitted to emergency responders, including Center Point Fire Department on 11/09/2021.

Employee training / annual training and position descriptions:
Training records for online hazardous waste training and position descriptions were available for review and are current for 2021. Records were reviewed for Michael Steward and Willie Barber.

Weekly Inspections:
Weekly container inspections were reviewed for the past three years. Inspectors appeared to be conducted on a weekly basis and documented all the required inspection elements.

Daily Tank Inspections:
Daily tank inspections were available for review for the past three years; however, there were several missed inspections during September and October of 2021. All other months and years had daily tank inspections documented.

Pursuant to ADEM Admin. Code r. 335-14-6-.10(6) [40 CFR 265.195(g)] *Inspections*, the owner or operator must document in the operating record of the facility an inspection of those items in paragraphs (a) and (b) of this section.

Quarterly Inspections:
Quarterly Air Monitoring Records for the hazardous waste tank and solvent reclamation unit along with associated ancillary equipment were available for review. Last inspection was conducted on 09/27/2021.

Waste Minimization Plan:
A copy of the facility's waste reduction plan was available for review.

12) Closing Conference

An exit meeting was held at the end of the inspection with Sherwin Williams staff to discuss preliminary conclusions and to go over the findings.

13) Inspection Findings

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

Pursuant to ADEM Admin. Code r 335-14-3.01(5)(a)5 [40 CFR 262.15(a)(5)], a generator must mark or label its container with the following: (i) The words "Hazardous Waste" and

(ii) An indication of the hazards of the contents (examples include, but are not limited to, the applicable hazardous waste characteristic(s) (i.e., ignitable, corrosive, reactive, toxic); hazard communication consistent with the Department of Transportation requirements at 49 CFR part 172 subpart E (labeling) or subpart F (placarding); a hazard statement or pictogram consistent with the Occupational Safety and Health Administration Hazard Communication Standard at 29 CFR 1910.1200; or a chemical hazard label consistent with the National Fire Protection Association code 704).

Pursuant to ADEM Admin. Code. r 335-14-3-.02(3) [40 CFR 262.40(a)], A generator must keep a copy of each manifest signed in accordance with § 262.23(a) for three years or until he receives a signed copy from the designated facility which received the waste. This signed copy must be retained as a record for at least three years from the date the waste was accepted by the initial transporter.

Pursuant to ADEM Admin. Code r. 334-14-3-.14(10)(b) [40 CFR 262.262(b)], a large quantity generator that first becomes subject to these provisions after May 30, 2017 or a large quantity generator that is otherwise amending its contingency plan must at that time submit a quick reference guide of the contingency plan to the local emergency responders identified at paragraph (a) of this section or, as appropriate, the Local Emergency Planning Committee. The quick reference guide must include the following elements: (1) The types/names of hazardous wastes in layman's terms and the associated hazard associated with each hazardous waste present at any one time (e.g., toxic paint wastes, spent ignitable solvent, corrosive acid); (2) The estimated maximum amount of each hazardous waste that may be present at any one time; (3) The identification of any hazardous wastes where exposure would require unique or special treatment by medical or hospital staff; (4) A map of the facility showing where hazardous wastes are generated, accumulated and treated and routes for accessing these wastes; (5) A street map of the facility in relation to surrounding businesses, schools and residential areas to understand how best to get to the facility and also evacuate citizens and workers; (6) The locations of water supply (e.g., fire hydrant and its flow rate); (7) The identification of on-site notification systems (e.g., a fire alarm that rings off site, smoke alarms); and (8) The name of the emergency coordinator(s) and 7/24-hour emergency telephone number(s) or, in the case of a facility where an emergency coordinator is continuously on duty, the emergency telephone number for the emergency coordinator.

Pursuant to ADEM Admin. Code r. 334-14-3-.14(10)(c) [40 CFR 262.262(c)], Generators must update, if necessary, their quick reference guides, whenever the contingency plan is amended and submit these documents to the local emergency responders identified at paragraph (a) of this section or, as appropriate, the Local Emergency Planning Committee.

Pursuant to ADEM Admin. Code r. 335-14-6-.28 [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.

Pursuant to ADEM Admin. Code r. 335-14-6-.10(6) [40 CFR 265.195(g)] *Inspections*, the owner or operator must document in the operating record of the facility an inspection of

those items in paragraphs (a) and (b) of this section.

14) List of Appendices

Appendix 1 – Photo Log:
{16} Photos taken on: [11/03/2021]
Photos taken by: Kayla Acosta
Photos taken with: Olympus Tough Digital Camera
EPA Property Tag: S75903

15) Signed

KAYLA ACOSTA

Digitally signed by KAYLA ACOSTA
Date: 2022.01.04 09:06:05 -05'00'

Kayla Acosta — Date
Enforcement and Compliance Specialist

Concurrence

ARACELI CHAVEZ

Digitally signed by ARACELI CHAVEZ
Date: 2022.01.04 11:54:58 -05'00'

Araceli Chavez — Date
Chief
RCRA Enforcement Section

Photo 1: One (1) 55-gallon drum of paint contaminated debris in different, closed, labeled “Hazardous Waste”, and marked with an indication of hazard.

Photo 2: Three (3) 55-gallon drums of paint-contaminated debris generated from three different washes of machinery. The containers were closed, labeled, dated, and marked with an indication of hazard. The containers were on a pallet to be sent to the 90-day central accumulation area.

Photo 3: 90-Day CAA

Photo 4: 90-Day CAA with more aisle space in between rows.

Photo 5: Solvent Reclamation Unit.

Photo 6: 750-gallon storage tank for hazardous waste still bottoms labeled “Hazardous Waste Tank Sludge” and marked with an indication of hazard.

Photo 7: Four (4) 55-gallon drums of solvent still bottoms, closed, labeled “Hazardous Waste”, marked with an indication of hazard, and dated 11/3/2021.

Photo 8: The ancillary equipment on the solvent reclamation unit and still bottoms tank were marked/ tagged as required by Subpart BB. The tags however were illegible due to dirt/ dust.

Photo 9: Illegible tags were cleaned, and photos of the tags were submitted to the inspectors on the day of the inspection.

Photo 10: Tank 58 12,000-gallons, was labeled “Hazardous Waste” “Dirty Thinner” and marked with an indication of hazard.

Photo 11: Incorrect last emptied date based on facility representatives and tank volume and shipment documents provided.

Photo 12: Tank 58 Label below the yellow Hazardous Waste label.

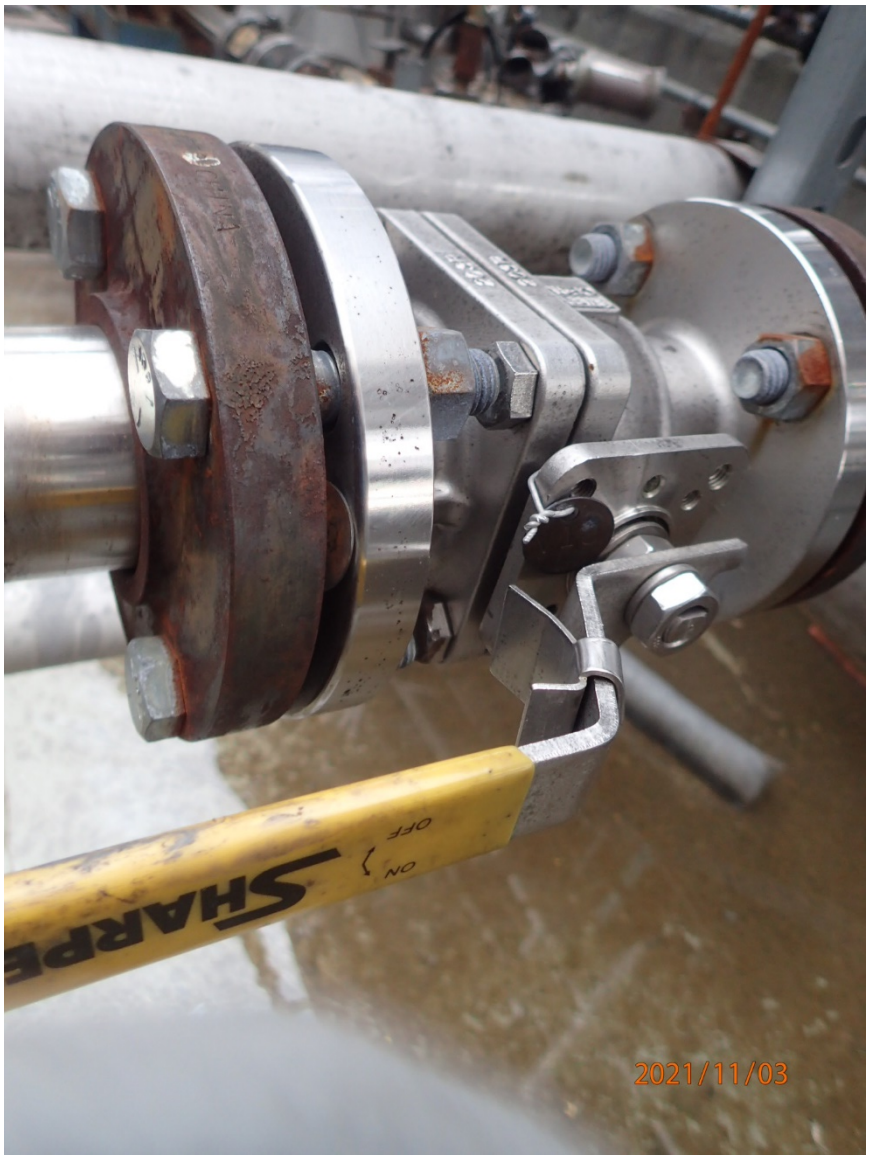

Photo 13: The ancillary equipment was marked/ tagged as required by Subpart BB. The tags however were illegible due to dirt/ dust.

Photo 14: Universal Waste Fluorescent Lamps.

Photo 15: Six (6) 5-gallon containers of hazardous waste solids, closed, labeled “Hazardous Waste”, but missing a marking for an indication of hazard. New hazardous waste labels that included an indication of hazard were placed on the six containers missing an indication of hazard during the inspection.

Photo 16: Two (2) 5-gallon containers of dirty thinner containing aluminum, closed, marked with an indication of hazard but missing a “Hazardous Waste” label. The hazardous waste labels were added to the two containers that were missing it during the inspection.