

RCRA Compliance Evaluation Inspection Report

1) **Inspector and Author of Report**

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2) **Facility Information**

Ascend Performance Materials Operations LLC
3000 Old Chemstrand Road
Cantonment, Florida 32533
EPA ID No.: FLD071951966

County: Escambia
Latitude: 30° 35' 44.5073"
Longitude: 87° 15' 21.6951"

Primary NAICS: 325220–Artificial and Synthetic Fibers and Filaments Manufacturing
SIC Code: 2823–Cellulosic Manmade Fibers

3) **Responsible Official**

Dean A. Rossi
Senior Environmental Site Safety Manager
Ascend Performance Materials Operations LLC
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drossi@ascendmaterials.com

4) **Inspection Participants**

Parvez Mallick, U.S. EPA, Region 4
Monica Hardin, Florida Department of Environmental Protection (FDEP)
Ethan Salley, FDEP
Carol Menton, FDEP
Dean Rossi, Ascend Performance Materials Operations LLC
Debbie Grissett, Ascend Performance Materials Operations LLC

5) **Dates of Inspection**

March 3, 2022 9:00 a.m.

6) **Applicable Regulations**

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.

Florida Statutes (F.S.) Chapter 403.702 et seq., and the regulations promulgated pursuant thereto and set forth at the Florida Administrative Code (Fla. Admin. Code Ann. r.), Chapters 62-710, 62-730 and 62-750.

As the State's authorized hazardous waste program operates in lieu of the federal RCRA program, the citations of those authorized provisions alleged herein will be to the authorized State program; however, for ease of reference, the federal citations will follow in brackets.

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.17], a large quantity generator (LQG) may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status, as required by Section 403.722 of the Florida Statutes, Fla. Stat. § 403.722 [Section 3005 of RCRA, 42 U.S.C. § 6925], provided that the generator complies with the conditions listed in Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.17] (hereinafter referred to as the LQG Permit Exemption).

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(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 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 403.722 of the Florida Statutes, Fla. Stat. § 403.722 [Section 3005 of RCRA, 42 U.S.C. § 6925], and without complying with Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.16(b) or §262.17(a)], except as required in Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.15(a)(7) and (8)], provided that the generator complies with the satellite accumulation area conditions listed in Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.15(a)] (hereinafter referred to as the SAA Permit Exemption).

7) **Purpose of Compliance Evaluation Inspection**

On March 3, 2022, Monica Hardin, Ethan Salley, and Carol Menton of Florida Department of Environmental Protection (FDEP), and Parvez Mallick of the EPA, conducted a routine compliance evaluation inspection of Ascend Performance Materials Operations LLC, Ascend Pensacola Plant (Ascend or the facility) to determine the facility's compliance with state and federal hazardous waste regulations. This was an EPA lead inspection. After a 'hot alarm' was over, the inspectors proceeded to security gate and were taken to another security area where badges were issued. The inspectors reviewed the site safety video and completed the required safety test. APM was represented by Mr. Dean Rossi, Ms. Debbie Grissett, and Ms. Lynn Crear of Ascend Performance Materials Operations LLC. Upon entering the facility, the inspectors

introduced themselves, showed their credentials and explained the purpose of the visit and a description of the facility's process was discussed. The inspectors described the anticipated use of digital camera during the inspection. The inspectors briefly discussed the company's ability, pursuant to 40 C.F.R. § 2.203, to assert a business confidentiality claim for information submitted to the EPA. The company did not assert a business confidentiality claim. The facility was provided a list of records for review. The inspection participants also discussed health and safety protocols and required personal protective equipment before Mr. Rossi led the inspectors on a tour of the facility operations. The onsite inspection commenced late at the hazardous waste tanks after 11 a.m.

8) Facility Description

The Ascend Performance Materials Operations LLC is located in Escambia County at 3000 Old Chemstrand Road, Cantonment, Florida. The plant has been in operation since 1953, and at different times was formerly known as Chemstrand, Monsanto, and Solutia. The active portion of the Cantonment facility occupies 500 acres of the 1900 acres owned by Ascend at the site. Ascend currently has 900 employees, and approximately 380 contracted employees on site. The facility operates 24 hours a day, seven days a week.

Ascend Pensacola Plant manufactures various chemicals and products, including adipic acid, nylon fibers and resins, hexamethylene diamine and maleic anhydride. The raw materials used in the manufacturing operations include cyclohexane, phenol, adiponitrile and ammonia. This includes several raw materials barge, train and truck offloading and storage operations; chemical process plants which make chemical feedstocks, intermediates, and nylon resins; a yarn plant which makes finished yarn products; and boilers and a cogeneration unit which provide process steam and plant electricity. Ascend also operates a maleic anhydride facility, which is owned by Huntsman Petrochemical Corporation. Ascend currently has 900 employees, and approximately 380 contracted employees on site and the facility operates 24 hours a day, seven days a week.

Ascend has notified the Florida Department of Environmental Protection (FDEP) as a large quantity generator, small quantity handler of universal waste, and as a treatment, storage, and disposal facility for post-closure care of hazardous waste surface impoundments and HWSA Corrective Action Permit. The permit # HF001-0066245 was reissued on May 10, 2009 and will expire on April 26, 2024.

Hazardous wastes generated at the facility include, but are not limited to, waste flammable liquids – benzene, phenol (D001, F003, D018, and U188), hazardous waste solids – cadmium (D006), solvent, solvent filters, lab pack materials, isopropyl alcohol, isopropanol, methanol, potassium cyanide, dichloromethane, sodium hydroxide, cyanides, mercury, discarded chemicals, and acute empty waste containers.

On February 16, 2022, the Title V air operation permit no. 0330040-071-AV, was renewed under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210 and 62-213. The air permit will expire on February 16, 2027. Air emission sources at Ascend include five boilers, a hydrogen generating plant, an adipic acid process and six adipic dryers, eight vaporizers, a cogeneration plant, a cyclohexane oxidation process, hexamethylene diamine synthesis and finishing and stripper distillation column, a maleic anhydride plant, nylon polymerization operations, a nitric acid plant, storage tanks, and

fugitive emissions.

Wastewater treatment prior to injection consists of equalization and pH adjustment. The process sewer has an in-line pH neutralization control to raise the pH of the normally low pH wastewaters using liquid anhydrous ammonia. The neutralized wastewater is pumped to an attenuation tank where it can be retreated through the pH neutralization system via an emergency tank, if requires. The wastewater then flows into five aboveground injection storage tanks from the attenuation tank. Four of the injection storage tanks are 1-million gallon and one a 6-million gallon capacity.

Ascend is permitted to operate three Class 1 underground injection control (UIC) wells to dispose of pretreated, non-hazardous, industrial wastewaters under permit. Injected wastewaters include all process wastewaters, including the laboratory and utility operations, and any potentially contaminated storm water and cooling water blowdown. Additional temporary wastewaters being injected are liquids and landfill leachate resulting from closure of the UIC feed pond. The UIC feed pond is undergoing closure under the FDEP RCRA Part B post-closure permit.

9) **Previous Inspection History**

On August 10, 2020, FDEP conducted a RCRA CEI at the facility and one RCRA deficiency was discovered.

10) **Inspection Findings**

Hazardous waste is primarily generated during the phenol to ketone process, laboratory practices, and plant/equipment maintenance and painting. Ascend uses satellite accumulation areas (SAAs) for the initial accumulation of hazardous waste, universal, and non-regulated wastes throughout the facility and manages one less than 90-day central accumulation area and two less than 90-day hazardous waste tanks. The inspectors visited the following areas during the inspection: hazardous waste tanks, the 90-day storage area, maintenance areas, chemistry laboratory, and solid waste management unit (SWMU) 27.

Hazardous Waste Tanks-P2K Tanks

The inspection proceeded to the less than 90-day hazardous waste tanks. The facility maintains two eight feet high, sixteen feet in diameter, 6,000-gallon hazardous waste tanks for the processing of phenol to ketone which generates characteristic wastes. One tank is described as the “PK2 lights;” this tank was marked “Hazardous Waste”, EPA waste codes (D001 and D018), a flammable DOT Class 3 label, and an accumulation start date of February 10 2022 (Photograph #1). The other tank was described as “PK2 Process Water;” this tank was marked “Hazardous Waste”, EPA waste codes D018, a flammable DOT Class 3 label, and an accumulation start date of February 11, 2022 (Photograph #2). The tanks are within a secondary containment that appeared sealed and in good condition. The inspectors observed emergency and manual shut-off valve options available in the process and loading areas and an automatic shut-off level installed on the tanks. The hazardous waste tanks are emptied about every 70 days. Both tanks were not marked with a “Toxic” indication of the hazards of the contents.

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.17(a)(5)(i)(B)], which is a condition of the LQG Permit Exemption, a generator must mark or label containers

with the following: (B) 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 C.F.R. 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 C.F.R. 1910.1200; or a chemical hazard label consistent with the National Fire Protection Association code 704).

The inspectors observed two separate SAAs in the tanks area. One 55-gallon SAA container was marked "Hazardous Waste" for spent aerosol cans (Photograph #3) and immediately adjacent, there was one 55-gallon container marked "Used Oil Filters" (Photograph #4). The facility representative stated that the aerosol cans are punctured prior to metal recycling at the maintenance area. In another area, there was one 55-gallon container of phenol contaminated debris marked "Hazardous Waste" and a 55-gallon container marked "Non-hazardous Waste."

90-Day Waste Storage Area (Building 733A)

The 90-day waste storage area is outdoors, covered, gated, locked, and contains a secondary containment structure. The storage area is sloped, paved, and drained to a concrete sump. The sump is pumped out as needed and the contents are taken to the onsite wastewater treatment plant. The area is equipped with an eyewash/shower station and is surrounded by locked chain-linked fence with informational signs.

At the time of inspection, the storage area contained twenty 55-gallon, one 30-gallon, and twelve 5-gallon containers of solvent waste, solvent filters, liquid NOS, and aqueous solution (Photographs #5-6). All the containers were closed, marked "Hazardous Waste" and an accumulation start date. The oldest accumulation start date observed was January 26, 2022. The inspectors observed that eight containers were not marked with an indication of the hazards of the contents.

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.17(a)(5)(i)(B)], which is a condition of the LQG Permit Exemption, a generator must mark or label its containers with the following: (B) 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 C.F.R. 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 C.F.R. 1910.1200; or a chemical hazard label consistent with the National Fire Protection Association code 704).

Building 710 (Maintenance Area)

Building 710 maintenance area was used to house the garage, paint shops, sign shops, and the sheet metal shop. The garage and shops were operated and maintained by contractors inside Building 710. The facility representative stated that recently the paint booth was removed, and the building is undergoing re-construction and changes. Most of the shops have been closed and shop work is conducted off-site or contracted out. Inside the building, the inspectors observed a container of hazardous unpunctured aerosol cans. The container had a "Hazardous Waste" sign placard set on the top of the container and was not marked with an indication of the hazards of the contents (Photograph #7).

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.15(a)(5)(i-ii)], which is a condition of the SAA Permit Exemption, a generator must mark or label its containers with the following: (A) the words “Hazardous Waste,” (B) 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 C.F.R. 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 C.F.R. 1910.1200; or a chemical hazard label consistent with the National Fire Protection Association code 704).

There is a SAA outside of this building on a covered loading dock area. The following waste containers were observed during the inspection:

- One closed 55-gallon container of “Hazardous Waste” paint removal waste (D008) (Photograph #8);
- One closed 55-gallon container of “Hazardous Waste” unpunctured aerosol cans (D003);
- One closed 55-gallon container of “Hazardous Waste” liquid waste from punctured aerosol cans (D001, D007, D008, D035, F003 and F005). *It appears that the facility is bringing in SAA aerosol containers to puncture and store the liquid waste in the 55-gallon container. The 55-gallon container was not marked with an accumulation start date and no weekly inspection records;*
- One closed 55-gallon container of “Hazardous Waste” paint waste (D001, D007, D009, D035, F003, and F005);
- One closed 55-gallon container of “Hazardous Waste” pesticide residue waste (D001 and D003);
- One closed 55-gallon of non-hazardous spent silicon oil;
- One closed 55-gallon container of non-hazardous empty propane bottles;
- One 55-gallon container of hazardous spent blast media.

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.17(a)(5)(i)(C)], which is a condition of the LQG Permit Exemption, a generator must mark or label its containers with the following: (C) the date upon which each period of accumulation begins clearly visible for inspection on each container.

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(3), generators of hazardous waste who accumulate hazardous waste on-site under 40 C.F.R. § 262.16, and § 262.17 [as adopted in subsection 62-730.160(1), F.A.C.], shall maintain written documentation of the inspections required under 40 C.F.R. Part 265 [as adopted in subsection 62-730.180(2), F.A.C.], and 40 C.F.R. § 262.16 and § 262.17 [as adopted in subsection 62-730.160(1), F.A.C.]. The generator shall keep the written documentation of the inspections under this section for at least three years from the date of the inspection. At a minimum, this documentation shall include the date and time of the inspection, the legibly printed name of the inspector, the number of containers, the condition of the containers, a notation of the observations made, and the date and nature of any repairs or other remedial actions.

Building 702

Building 702 is a garage designated for vehicle maintenance and minor repairs. The following waste containers were observed during the inspection:

- A 35-gallon parts washer inside Building 702 (Photograph #9). The parts washer waste is removed quarterly by Clean Harbors as non-hazardous;
- There was a used oil filter drain cone connected to 55-gallon overpack container of used oil. The container was marked “Waste Oil” (Photograph #9). The inspectors informed the facility that the waste oil container must be marked with the words “Used Oil”;
- One closed 55-gallon container of “Hazardous Waste” unpunctured aerosol cans (D003).

Pursuant to Fla. Admin. Code Ann. r. 62-710.210(2) [40 C.F.R. § 279.22(c)(1)], containers and aboveground tanks used to store used oil at generator facilities must be labeled or marked clearly with the words “Used Oil.”

Building 707 (Laboratory)

The analytical lab conducts quality control testing and research & development activity. The lab manager, Mr. Patrick O’Neal indicated that approximately 1,000 analyses are conducted each day. The following waste containers were observed during the inspection:

- One closed 55-gallon container of bis-hexamethylene triamine, hexamethylene diamine (BHMT) waste (D002). The container was marked “Hazardous Waste” and an indication of the hazards of the contents (Photograph #10);
- One five 5-gallon container marked “Hazardous Waste” contained carbon disulfide waste vials (D001, D018, and F005);
- One five 5-gallon container marked “Hazardous Waste” contained chromatographic waste vials (D001, D018, U188, F002, and F003);
- One five 5-gallon container marked “Hazardous Waste” contained contaminated lab debris (D018, F003, U009, and U188);
- One 2-gallon container marked “Hazardous Waste” contained maleic anhydride waste (U147);
- One five 5-gallon container marked “Hazardous Waste” contained waste metal acidic (D002, D007, D009, and D011); and
- Two 1-gallon containers marked “Hazardous Waste” contained total kjeldahl-nitrogen (TKN) waste; and
- Along an outdoor wall, there was a closed 55-gallon container of solvent waste (Photograph #11) marked “Hazardous Waste” (D001, D018, D024, and F003).

Solid Waste Management Unit 27 (SWMU 27)

The FDEP under the RCRA subtitle C has issued a corrective action permit to Ascend to perform work at the Solid Waste Management Units (SWMUs) and the Areas of Concerns (AOCs). SWMU 27 area known as ‘Landfill H’ is a closed/capped landfill area that runs perpendicular to the Escambia River. The facility conducts ongoing erosion monitoring for encroachment into the river and recently had some puddling occurring on the cap. The cap appeared recently mowed/maintained with no apparent pooling at the time of inspection. The area along the riverbank had wire fencing falling and the inspectors observed no signs of trespassing from the river. The monitoring wells observed appeared locked and in good condition (Photograph #12).

Record Review

The following records were requested electronically for offsite review: waste manifests, LDR records, job descriptions, training records, weekly inspections, contingency plan, specific waste profiles, and Subpart BB and CC requirements: LDAR records, tank inspections, tanks certification, and monthly leak summary reports. On March 15, 2022, Ascend provided FDEP

and the EPA records requested during the inspection.

Hazardous waste manifests were reviewed from October 2020 to November 2021. According to the reviewed manifests, Suttles Truck Leasing (ALD095704011), Clean Harbors (MAD039322250), Robbie D. Woods (ALD067138891), and Tri State Motors (MOD095038998) were the registered hazardous waste transporters. The designated facilities were Clean Harbors (TXD055141378, ARD069748192, UTD981552177), Safety-Kleen (KYD053348108), Eco Services (LAD003151234), and Spring Grove Resource Recovery (OHD000816629).

Several manifests in 2021 were noted with dates exceeding exception reporting requirements. The following manifest numbers were observed with the designated facility signature date beyond 45 days: 015859027FLE, 013226117FLE, 013226120FLE, 013226126FLE, 013226129FLE, 016325515FLE, 016360193FLE, and 016286363FLE. Exception reporting requirements were discussed with Ascend during the August 2020 FDEP inspection closing interview. This is an area of concern. Ascend must follow-up with the owner or operator of the designated facility and submit an Exception Report to the EPA Regional Administrator if the facility has not received a copy of the manifest with the handwritten signature of the owner or operator of the designated facility within 45 days of the date the waste was accepted by the initial transporter.

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.42(a)], and is a condition of the LQG Permit Exemption, (1) a generator of 1,000 kilograms or greater of hazardous waste in a calendar month, or greater than 1 kg of acute hazardous waste listed in § 261.31 or §261.33(e) in a calendar month, who does not receive a copy of the manifest with the handwritten signature of the owner or operator of the designated facility within 35 days of the date the waste was accepted by the initial transporter must contact the transporter and/or the owner or operator of the designated facility to determine the status of the hazardous waste; (2) a generator of 1,000 kilograms or greater of hazardous waste in a calendar month, or greater than 1 kg of acute hazardous waste listed in § 261.31 or § 261.33(e) in a calendar month, must submit an Exception Report to the EPA Regional Administrator for the Region in which the generator is located if he has not received a copy of the manifest with the handwritten signature of the owner or operator of the designated facility within 45 days of the date the waste was accepted by the initial transporter. The Exception Report must include: (i) a legible copy of the manifest for which the generator does not have confirmation of delivery; (ii) a cover letter signed by the generator or his authorized representative explaining the efforts taken to locate the hazardous waste and the results of those efforts.

Universal waste manifests were provided indicating the facility shipped universal waste offsite in August and December of 2020 and March and April of 2021. Used oil and used oil filters records were provided indicating, Safety-Kleen Systems Inc. (TXR000081205, TXD077603371) and Clean Harbors (MAD039322250, TND982141392) transport and recycle Ascend's used oil and used oil filters.

Job descriptions (Exhibit 13: RCRA Facility Training Job Titles) were provided for specific positions throughout the facility related to RCRA duties. The job descriptions did not include the name of the employee filling the position, or a description of the type and amount of training required relevant to the RCRA position. A LQG must maintain the job title for each position at

the facility related to hazardous waste management, and the name of the employee filling the position. In addition, Ascend must maintain a written description of the type and amount of both introductory and continuing training that will be given to each person filling a RCRA position.

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.17(a)(7)(iv)(A) and (C)], and is a condition of the LQG Permit Exemption, the large quantity generator must maintain the following documents and records at the facility: (A) the job title for each position at the facility related to hazardous waste management, and the name of the employee filling each job and (C) the large quantity generator must maintain a written description of the type and amount of both introductory and continuing training that will be given to each person filling a position listed under paragraph 262.17(a)(7)(iv)(A) of this section.

The facility provided a copy of their contingency plan (CP) including Exhibits 1-15, that was last updated in January 2022. It appears that the CP describe actions facility personnel will take in response to fires, explosions, or unplanned sudden/non-sudden release of hazardous waste to the less than 90-day central accumulation area (Building 733A) and the two P2K hazardous waste tanks. The CP doesn't include how the facility personnel will response to fires, explosions, or unplanned sudden/non-sudden release of hazardous wastes in the SAAs of the facility. In addition, the CP does not appear to include when the contingency plan was last shared with the identified emergency response teams in Exhibit 8; emergency coordinator's training requirements in accordance with 40 C.F.R. § 262.264; list of all emergency equipment at the facility including the location, a physical description of each item, and a brief outline of its capabilities each listed item (Exhibit 9); evacuation plan did not provide evacuation routes of the facility (Exhibit 11).

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.17(a)(6)(a), (c), (e) and (f)], which incorporates Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.261], and is a condition of the LQG Permit Exemption, a contingency plan must include the following: (a) The contingency plan must describe the actions facility personnel must take to comply with §§ 262.260 and 262.265 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; (c) The plan must describe arrangements agreed to with the local police department, fire department, other emergency response teams, emergency response contractors, equipment suppliers, local hospitals or, if applicable, the Local Emergency Planning Committee, pursuant to § 262.256; (e) The plan must include a list of all emergency equipment at the facility (such as fire extinguishing systems, spill control equipment, communications and alarm systems (internal and external), and decontamination equipment), where this equipment is required. This list must be kept up to date. In addition, the plan must include the location and a physical description of each item on the list, and a brief outline of its capabilities; (f) The plan must include an evacuation plan for generator personnel where there is a possibility that evacuation could be necessary. This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes (in cases where the primary routes could be blocked by releases of hazardous waste or fires).

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.17(a)(6)], which incorporates Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.256], and is a condition of the LQG Permit Exemption, (a)(2) a LQG must attempt to make

arrangements with the local emergency committee (police department, fire department, other emergency response teams, and emergency response contractors) to familiarize with the layout of the facility, the properties of the hazardous waste handled at the facility and associated hazards, and types of injuries or illnesses which could result from fires, explosions, or releases at the facility; (b) a LQG shall maintain records documenting the arrangements with the local fire department as well as any other organization necessary to respond to an emergency. This documentation must include documentation in the operating record that either confirms such arrangements actively exist or, in cases where no arrangements exist, confirms that attempts to make such arrangements were made.

The second page of the CP is the Quick Reference Guide (QRG). The QRG provided is a list with quick links to pages and exhibits within the contingency plan. The intent of the QRG is to provide emergency responders with a concise, informative, and usable document in the initial stages of an emergency and should be a stand-alone document or a designated section within the contingency plan. Exhibit 10 did not include hazardous waste and associated hazards in SAAs, Exhibit 4 did not have a map of the facility showing where hazardous wastes are generated and accumulated, and routes for accessing these wastes, a street map of the facility in relation to surrounding businesses, schools, and residential areas.

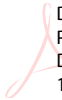
Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.17(a)(6)(a)(1-5)], which incorporates Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.262(b)], and is a condition of the LQG Permit Exemption, a large quantity generator that first becomes subject to these provisions after May 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 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 and accumulated, 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.

The facility must update the CP and QRG to adequately address all requirements per 40 C.F.R. §§ 262.261 and 262.262 and provide it to FDEP for review.

The following Subpart BB and CC records were reviewed: Leak Detection and Repair (LDAR) records, daily tank inspection records (December 31, 2020-January 1, 2022), hazardous waste tanks' certification (dated February 2012), and monthly leak summary reports. No RCRA deficiencies were noted with Subpart BB and CC records.

11) Closing Conference

A closing conference was conducted at the conclusion of the inspection. Mr. Dean Rossi participated in the closing conference. The observations made during the inspection were discussed and the inspection was concluded. Ascend was inspected as a large quantity generator of hazardous waste.

12) **Signed**
PARVEZ
MALLICK  Digitally signed by
PARVEZ MALLICK
Date: 2022.05.12
15:35:18 -04'00'

Parvez Mallick
Inspector and Author of Report

Date

13) **Concurrence and Approval**
ARACELI
CHAVEZ  Digitally signed by
ARACELI CHAVEZ
Date: 2022.05.12
16:15:29 -04'00'

Araceli B. Chavez
Chief
RCRA Enforcement Section

Date

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Compliance Evaluation Inspection photographs were taken by Parvez Mallick of EPA

Canon PowerShot SD980 IS - EPA Property Number S75319



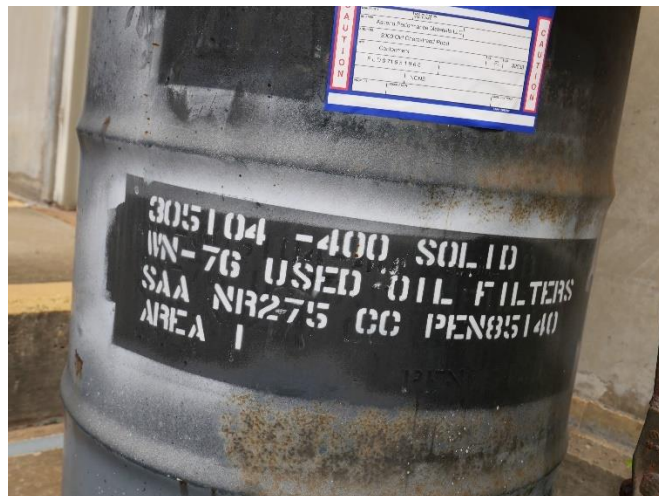
Photograph #1 – Hazardous waste Tank “PK2 lights” dated 2/10/22.



Photograph #2 – Hazardous waste Tank “PK2 Process Water” dated 2/9/22.



Photograph #3 – 55-gallon container of aerosol cans container in the tank area.



Photograph #4 – 55-gallon container of used oil filters in the tank area.



Photograph #5 – Building 733A - 90-day hazardous waste storage area.



Photograph #6 – Building 733A - 90-day hazardous waste storage area.



Photograph #7 – Building 710, a 55-gallon container aerosol cans.



Photograph #8 – Building 710, a 55-gallon paint removal waste.



Photograph #9 – Building 702 - one 35-gallon parts washer and a 55-gallon container of “Waste Oil.”



Photograph #10 – Building 702 – one 55-gallon container of BHMT.



Photograph #11 – Building



Photograph #12 – SWMU 27 well.