RCRA Inspection Report

1) Inspector and Author of Report

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2) Facility Information

TAV Holdings, Inc.
3311 Empire Boulevard
Atlanta, Fulton County, Georgia 30354

GAD033537663

3) Responsible Official

Brent Fairchild
Environmental Health & Safety Director

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bfairchild@tavholdingsinc.com

4) Inspection Participants

Brent Fairchild, TAV Holdings, Inc.
Steve Pointer, TAV Holdings, Inc.
Geoffrey Gay, Arcadis
Katie Gregory, McGuire Woods Consulting
Kevin Simmons, EPA, Region 4
Daniel McCay, EPA, Region 4
Maria Arevalo Gonzalez, EPA Region 4
Mark Anthony Relon, EPA, Region 4
William Kappler, EPA, Region 4

5) Date of Inspection

January 19, 2023

6) Applicable Authority

Sections 7003(a) and 3007 of the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. §§ 6973(a) and 6927; RCRA 7003 Administrative Order, Docket No.: RCRA-04-2022-2101, issued January 10, 2022 (hereinafter, "RCRA 7003 Order").

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(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 12-8-66 of the GHWMA, Ga. Code Ann. § 12-8-66, [Section 3005 of RCRA, 42 U.S.C. § 6925], and without complying with Ga. Comp. R. and Regs. 391-3-11-.08(1), [40 C.F.R. § 262.16(b) or §262.17(a)], except as required in Ga. Comp. R. and Regs. 391-3-11-.08(1), [40 C.F.R. § 262.15(a)(7) and (8)], provided that the generator complies with the satellite accumulation area conditions listed in Ga. Comp. R. and Regs. 391-3-11-.08(1), [40 C.F.R. § 262.15(a)] (hereinafter referred to as the "SAA Permit Exemption").

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [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 12-8-66 of the GHWMA, Ga. Code Ann. § 12-8-66 [Section 3005 of RCRA, 42 U.S.C. § 6925], provided that the generator complies with the conditions listed in Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.17] (hereinafter referred to as the "LQG Permit Exemption").

7) Purpose of Inspection

The purpose of this inspection was for the EPA, Region 4, to conduct an unannounced focused compliance inspection (FCI) and sampling oversight to further evaluate TAV Holdings, Inc. (hereinafter, "TAV" or the "facility") compliance status with the applicable requirements set forth in the EPA's RCRA 7003 Order. The FCI included sampling conducted by the EPA, Region 4 Laboratory Services & Applied Science Division (LSASD). The reports of the sampling activities and analyses are in Attachment 1 and Attachment 2.

8) Facility Description

TAV is located at 3311 Empire Boulevard, S.W., Atlanta, Fulton County, Georgia. TAV's operation includes, at a minimum; offices and warehouse storage at 3311 Empire Boulevard, SW; the northern portion of the parking lot at 3325 Empire Boulevard, SW; the Keebler Complex (3 buildings, the White Building, the Process Building and the Keebler Building) at 111 Hollow Tree Lane; the Fabrication Shop at 3405 Empire Boulevard, SW; and the laydown yard and stockpile at 3320 Empire Boulevard, SW (hereinafter, "the TAV Facility"). TAV stores processed auto shredder residue (ASR) material in large piles. The largest of pile is located at 3320 Empire Boulevard, and ASR material is also in the rear of the Keebler Complex near Keebler West and Keebler North.

9) Previous Inspection History

TAV was last inspected by EPA on November 1, 2022, for compliance during an announced FCI and sampling oversight. Samples were collected for characterization of waste generated from a pilot test run of the Falling Velocity Separator (FVS) prior to Ball Mill No. 1, and of waste filter cake generated from the filter press stored inside the Keebler Building.

Georgia Environmental Protection Division (GAEPD) and/or EPA have conducted five (5) previous site visits or RCRA Inspections at the subject Facility within the last year, including: 1) an October 6, 2021 RCRA Compliance Evaluation Inspection (CEI); 2) an October 20, 2021 RCRA Case Development Inspection Evaluation (CDIE), which included waste, sediment, and surface water sampling; 3) a December 6, 2021 site visit with Occupational Safety and Health Administration (OSHA) inspectors; 4) a January 28, 2022 Focused Compliance Inspection (FCI); and 5) a June 22, 2022 FCI.

10) <u>Opening Conference</u>

On January 19, 2023, EPA inspectors William Kappler, Mark Anthony Relon and Maria Arevalo Gonzalez accompanied by LSASD project leader and sampler Kevin Simmons, and sampler Daniel McCay arrived at TAV at approximately 8:45 a.m. The EPA inspectors (inspectors) were greeted by Casey Miller, TAV Engineer. Casey Miller indicated Brent Fairchild was not at the TAV Facility, but he would contact Brent Fairchild. Casey Miller indicated that he contacted Brent Fairchild at about 9:18 a.m. and that he would arrive soon.

The inspectors and LSASD waited for Brent Fairchild to arrive and began to organize the sampling event across the street from the 111 Hollow Tree Lane Parking Lot. While organizing the sampling event, the inspectors observed ASR material on Empire Boulevard. The inspectors observed ASR material on the road between 3320 Empire Boulevard and the 111 Hollow Tree Lane and the 3311 Empire Boulevard parcels. The ASR material was observed on the east side of the road adjacent to the curb and sidewalk. The inspectors observed TAV was using a street sweeper to sweep the ASR material to the side of the road next to the curb. The inspectors did not observe a response by TAV to remove the ASR material off the road. The release of ASR material extended from the 3320 Empire Boulevard south gate entrance (Photographs 5 and 6) down the hill to the north (Photographs 1, 2, 4 through 11 and 13) and to the MARTA bus stop #178 near South Industrial Park (Photograph 14). The inspectors observed stormwater from a rain event carried the ASR material approximately several hundred feet along the curb on the road to a storm drain at the corner of South Industrial Park, near the MARTA bus stop. The inspectors also observed ASR material on the ground along the edge of the driveway to 3311 Empire Boulevard (Photographs 3 and 12).

Brent Fairchild arrived at the facility at 9:40 a.m. and received the inspectors for an opening conference. The inspectors introduced themselves, showed their credentials and explained the unannounced visit was to sample areas outside and inside the facility boundary. The inspectors explained that EPA would split samples with TAV for those areas inside the facility boundary.

The inspectors explained they observed ASR material released to the road and asked if the ASR Pile at 3320 Empire Boulevard was being processed. Brent Fairchild indicted that the ASR material released to the road was from an all-terrain forklift transporting scrap hoppers and construction materials from 3320 Empire Boulevard to the Keebler Complex. The inspectors asked Brent Fairchild to respond to the release of ASR material and to remove it from the road.

The inspectors described the anticipated use of a digital camera to take photographs and explained the Small Business Regulatory Enforcement Fairness Act's classification of a "small

business" and 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 inspectors also discussed the company's ability, pursuant to 40 C.F.R. § 2.203, to assert a business confidentiality claim for information provided to the EPA. TAV asserted a business confidentiality claim.

Brent Fairchild indicated the Ball Mills and other recycling processes were not operating, but the facility process water and wastewater processes were operating. The inspection participants discussed health and safety protocols and the required personal protective equipment prior to the sampling of areas outside and inside the facility boundary. Steve Pointer, TAV Safety and Training Manager (TAV representative) escorted the inspectors during the sampling of inside the facility boundary. Katie Gregory and Geoffrey Gay arrived at TAV on or about 10:20 a.m. Geoffrey Gay also joined the inspectors during the sampling inside the facility boundary.

11) Inspection Observations and Sampling

LSASD collected a total of eleven samples from ten locations inside and outside the facility boundary. Samples were not collected from the Jig Pad and the Keebler Lake/Gravity Wall areas, due to inaccessibility and time. Samples were collected from outside the facility boundary along Empire Boulevard (road and MARTA bus stop), in the wooded area behind TAV (Woods Behind Keebler North/Bunkers Outfall Number 3) later determined as an on-site sample and in the unnamed tributary. Samples were collected from inside the facility boundary at the ASR pile (Keebler West ASR Storage Area), the surface impoundment near the ASR pile (stormwater pond at 3320 Empire Boulevard), rip rap area below (Outfall Number 2 Sediment Basin at NW Corner Rip Rap), the retaining wall above Outfall number 3 (Keebler North Concrete Culvert Behind Bunkers at Outfall Number 3), the waste holding tank (Wastewater Treatment Area at Base of Tank) and the wastewater treatment area (Wastewater Treatment Area).

Empire Boulevard - TAV13

LSASD collected a water sample of runoff from a rain event from the east side of the road along the curb and sidewalk on Empire Boulevard adjacent to TAV's 3320 Empire Boulevard location. The inspectors did not observe vehicles passing on the road during the sampling event. This was an off-site location and split samples were not collected.

The sample is referred to as TAV13. The sample is described as runoff from the ASR pile into Empire Boulevard, active runoff due to rain. The sample was analyzed for total metals and PCBs. The total antimony concentration was found at 16 ug/L and lead at 250 ug/L. Table 1 below summarizes each analyte for TAV13 which is above the regional screening levels (RSLs) for the maximum contaminant levels (MCLs) for antimony and lead.

Table 1: TAV13 Sample Results

Analyte	Total Metals	UTS	MCL
Antimony	16 ug/L		6 ug/L
Lead	250 ug/L	690 ug/L	15 ug/L

TC – Toxicity Characteristics
UTS – Universal Treatment Standard

The inspectors observed ASR material on the east side of the road from the 3320 Empire Boulevard south gate entrance and observed stormwater from a rain event carried ASR material north down the hill several hundred feet to the MARTA bus stop #178 near South Industrial Park (Photograph 13). The inspectors also observed ASR material on the ground along the edge of the driveway to 3311 Empire Boulevard (Photographs 3 and 12).

Pursuant to Paragraph 82 of the RCRA 7003 Order, Respondents must "immediately cease all activities (including operations, business practices, and material management, including commingling, mixing, and receipt and transfer of ASR waste) that may result in the release of solid and/or hazardous waste into the environment, including, but not limited to, ceasing the placement of ASR waste, intermediates from the processing of ASR waste, materials resulting from the processing of ASR waste, wastewaters and/or process waters, sludge, and/or any other wastes, directly onto the ground, including onto asphalt, concrete, or other surfaces."

MARTA Bus Stop #178 - TAV05

The sample is referred to as TAV05. LSASD collected a sediment sample at the top of the curb upstream of the stormwater drain at this location on Empire Boulevard. The sample is described as a top thin layer of clay with sand. The sample was collected at a depth of approximately two inches. This was an off-site location and split samples were not collected. This sample is referred to as TAV05. The sample was analyzed for total metals and PCBs. The total lead was found at 570 mg/kg which is above the RSL for the residential soils at 400 mg/kg. The PCB for Aroclor 1610 was found at 1.7 mg/kg which is above the RSL for residential soils at 0.41 mg/kg.

The inspectors observed ASR material on the ground next to the curb at the MARTA bus stop #178 near South Industrial Park. The bus stop is approximately one quarter mile north from the ASR material observed on the road near the 3320 Empire Boulevard south gate entrance (Photograph 14). The inspectors observed some vehicles passing on the road during the sampling event.

Woods Behind Keebler North/Bunkers Outfall Number 3 - TAV04

LSASD collected a sample in a ditch from the base of the hill at Outfall Number 3 behind the Keebler North/Bunkers. LSASD collected a sample in a two-feet radius at a depth of two-inches. This sample was collected as an off-site location and split samples were not collected. After collecting this sample, the inspectors were notified by TAV that it believed the area LSASD sampled was inside the facility boundary.

The sample is referred to as TAV04. The sample is described as sediment in a runoff/discharge ditch from the base of hill at the bunkers. The sample was analyzed for total metals and PCBs. The total antimony concentration was found at 47 mg/kg, arsenic at 9.9 mg/kg, cadmium at 21 mg/kg, cobalt at 48 mg/kg, copper at 9800 mg/kg and lead at 2900 mg/kg. Table 2 below summarizes each analyte for TAV04 which is above the RSLs for the industrial soils for antimony, arsenic, cadmium, cobalt, copper, and lead.

Table 2: TAV04 Sample Results

Analyte	Total Metals	RSL Industrial Soil
Antimony	47 mg/kg	47 mg/kg
Arsenic	9.9 mg/kg	3 mg/kg
Cadmium	21 mg/kg	10 mg/kg
Cobalt	48 mg/kg	35 mg/kg
Copper	9800 mg/kg	4700 mg/kg
Lead	2900 mg/kg	800 mg/kg

Woods Behind Keebler North/Bunkers Outfall Number 3 - TAV04D

LSASD returned to collect a duplicate sample from this location as TAV04D. LSASD collected a sample in a ditch from the base of the hill at Outfall Number 3 behind the Keebler North/Bunkers. LSASD collected a sample in a two-feet radius at a depth of two-inches. TAV04D is a duplicate sample of TAV04. This was an on-site location and split samples were collected.

The sample is referred to as TAV04D. The sample is described as sediment in a runoff/discharge ditch from the base of hill at the bunkers. The sample was analyzed for total metals and PCBs. The total antimony concentration was found at 49 mg/kg, cadmium at 24 mg/kg, cobalt at 42 mg/kg, copper at 11000 mg/kg and lead at 2500 mg/kg. Table 3 below summarizes each analyte for TAV04D which is above the RSLs for the industrial soils for antimony, cadmium, cobalt, copper and lead.

Table 3: TAV04D Sample Results

Analyte	Total Metals	RSL Industrial Soil
Antimony	49 mg/kg	47 mg/kg
Cadmium	24 mg/kg	10 mg/kg
Cobalt	42 mg/kg	35 mg/kg
Copper	11000 mg/kg	4700 mg/kg
Lead	2500 mg/kg	800 mg/kg

The inspectors observed a washout containing ASR material released from the hill Outfall pipe (Outfall Number 3) to ground surfaces at approximately 10 to 15 feet from the Outfall (Photographs 16, 18, 19, 20 and 54). The inspectors followed the path of the washout and observed ASR material on the ground at a distance from the Outfall of approximately 30-45 feet (Photograph 17). The inspectors continued to follow the path of the washout and observed ASR material on the ground at a distance from the Outfall of approximately 90-105 feet (Photographs 21 and 22). The inspectors reached the edge of the woods next to the silt fence and observed the ASR material reached the earthen access path at a distance from the Outfall of approximately 150-180 feet (Photographs 15, 24, 52 and 53).

Pursuant to Paragraph 82 of the RCRA 7003 Order, Respondents must "immediately cease all activities (including operations, business practices, and material management, including commingling, mixing, and receipt and transfer of ASR waste) that may result in the release of solid and/or hazardous waste into the environment, including, but not

limited to, ceasing the placement of ASR waste, intermediates from the processing of ASR waste, materials resulting from the processing of ASR waste, wastewaters and/or process waters, sludge, and/or any other wastes, directly onto the ground, including onto asphalt, concrete, or other surfaces."

Unnamed Tributary - TAV06

The sample is referred to as TAV06. The sample is described as sandy sediment from unnamed tributary at point where ditch enters the stream. The sample was analyzed for total metals and PCBs. This was an off-site location and split samples were not collected. This sample is referred to as TAV06. The sample was analyzed for total metals and PCBs. The analytes for total metal and PCB analytes were not found at or above the RSLs for residential soils.

The inspectors observed a path that appeared to be washed out depressing the vegetation and the grassy area to the unnamed tributary (Photographs 23 and 25).

Keebler North Concrete Culvert Behind Bunkers at Outfall Number 3 - TAV09

LSASD collected a sample from the concrete culvert area behind the bunkers at Outfall Number 3. This was an on-site location and split samples were collected.

The sample is referred to as TAV09. The sample is described as dark fine sediment. The sample was analyzed for total metals and PCBs. The total antimony concentration was found at 50 mg/kg, cadmium at 16 mg/kg, cobalt at 45 mg/kg, copper at 9300 mg/kg and lead at 2500 mg/kg. The PCB Aroclor 1016 was found at 5800 O ug/kg. Table 4 below summarizes each analyte for TAV09 which is above the RSLs for the industrial soils for antimony, cadmium, cobalt, copper, lead and PCB Aroclor 1016.

Table 4: TAV09 Sample Results

Analyte	Total Metals	RSL Industrial Soil
Antimony	50 mg/kg	47 mg/kg
Cadmium	16 mg/kg	10 mg/kg
Cobalt	45 mg/kg	35 mg/kg
Copper	9300 mg/kg	4700 mg/kg
Lead	2500 mg/kg	800 mg/kg
Analyte	PCBs	RSL Industrial Soil
Aroclor 1016	5.8 O mg/kg	5.1 mg/kg

O/I-5 –Mixture of Aroclors in sample; Aroclors reported

The inspectors observed ASR material accumulating on top of the Bunker block wall, in the concrete conveyance and on the ground mixed with soil next to the concrete conveyance. The inspectors observed water next to a drain that is released to the wooded area through the outfall pipe (Photographs 47 through 51).

Pursuant to Paragraph 82 of the RCRA 7003 Order, Respondents must "immediately cease all activities (including operations, business practices, and material management,

including commingling, mixing, and receipt and transfer of ASR waste) that may result in the release of solid and/or hazardous waste into the environment, including, but not limited to, ceasing the placement of ASR waste, intermediates from the processing of ASR waste, materials resulting from the processing of ASR waste, wastewaters and/or process waters, sludge, and/or any other wastes, directly onto the ground, including onto asphalt, concrete, or other surfaces."

Keebler West ASR Storage Area - TAV01

LSASD collected a sample of ASR material from the pile. This was an on-site location and split samples were collected.

The sample is referred to as TAV01. The waste sample is described as dark soil ASR material from the ASR pile. The sample was analyzed for total metals and PCBs. The total antimony concentration was found at 54 J, O mg/kg, cadmium at 17 mg/kg, copper at 14000 mg/kg and lead at 2900 mg/kg. The PCB Aroclor 1016 was found at 8200 O ug/kg. Table 5 below summarizes each analyte for TAV01 which is above the RSLs for the industrial soils for antimony, cadmium, copper, lead and PCB Aroclor 1016.

Table 5: TAV01 Sample Results

Analyte	Total Metals	RSL Industrial Soil
Antimony	54 J, O mg/kg	47 mg/kg
Cadmium	17 mg/kg	10 mg/kg
Copper	14000 mg/kg	4700 mg/kg
Lead	2900 mg/kg	800 mg/kg
Analyte	PCBs	RSL Industrial Soil
Aroclor 1016	8.2 O mg/kg	5.1 mg/kg

J - The identification of the analyte is acceptable; the reported value is an estimate
QM-1 - Matrix Spike Recovery less than method control limits
O/I-5 – mixture of Aroclors in sample; Aroclors reported

TAV notified the EPA on September 19, 2022, in their weekly report "TAV has cleared the Keebler material pile, in compliance with the parties' target date of Thursday, September 15, 2022, and is now beginning remediation efforts to clear any remaining material that was inaccessible."

During the opening conference Brent Fairchild indicated the Keebler West ASR Pile was being reduced/repositioned by an expert operator using a Front-End Loader and the ASR material piles outside the Keebler West ASR Storage Area were being consolidated into a complete pile. Brent Fairchild indicated, by consolidating the piles, an access road was created.

The inspectors observed areas of the Keebler West ASR Storage Area were cleared of ASR material. The inspectors observed the exposed asphalt from the original parking lot appeared worn, cracked and in disrepair (Photograph 31). The inspectors observed ASR material continued to be accumulated in the Keebler West ASR Storage Area and on the ground in piles in the Keebler North Area (Photographs 30 and 32).

Pursuant to Paragraph 82 of the RCRA 7003 Order, Respondents must "immediately cease all activities (including operations, business practices, and material management, including commingling, mixing, and receipt and transfer of ASR waste) that may result in the release of solid and/or hazardous waste into the environment, including, but not limited to, ceasing the placement of ASR waste, intermediates from the processing of ASR waste, materials resulting from the processing of ASR waste, wastewaters and/or process waters, sludge, and/or any other wastes, directly onto the ground, including onto asphalt, concrete, or other surfaces."

Outfall Number 2 Sediment Basin at NW Corner Rip Rap - TAV10
LSASD collected a sample of ASR material approximately halfway down the rip rap. LSASD collected a sample at a depth of two inches. This was an on-site location and split samples were collected.

The sample is referred to as TAV10. The sample is described as sediment from run-off of the ASR pile. The sample was analyzed for total metals and PCBs. The total antimony concentration was found at 49 mg/kg, cadmium at 22 mg/kg, copper at 11000 mg/kg and lead at 3100 mg/kg. Table 6 below summarizes each analyte for TAV10 which is above the RSLs for the industrial soils for antimony, cadmium, copper and lead.

Table 6: TAV10 Sample Results

Analyte	Total Metals	RSL Industrial Soil
Antimony	49 mg/kg	47 mg/kg
Cadmium	22 mg/kg	10 mg/kg
Copper	11000 mg/kg	4700 mg/kg
Lead	3100 mg/kg	800 mg/kg

The inspectors observed a release(s) of ASR material along the length of the rip rap. The rip rap continues downhill to the earthen access path and to the unnamed tributary (Photographs 26, 27, 28 and 29).

Pursuant to Paragraph 82 of the RCRA 7003 Order, Respondents must "immediately cease all activities (including operations, business practices, and material management, including commingling, mixing, and receipt and transfer of ASR waste) that may result in the release of solid and/or hazardous waste into the environment, including, but not limited to, ceasing the placement of ASR waste, intermediates from the processing of ASR waste, materials resulting from the processing of ASR waste, wastewaters and/or process waters, sludge, and/or any other wastes, directly onto the ground, including onto asphalt, concrete, or other surfaces."

Wastewater Treatment Area at Base of Tank - TAV03
LSASD collected a sample at the base of the holding tank at a depth of two inches. This was an on-site location and split samples were collected.

The sample is referred to as TAV03. The sample is described as a waste sample of wastewater sludge. The sample was analyzed for total metals and PCBs. The total copper concentration was

found at 6100 mg/kg and lead at 1800 mg/kg. Table 7 below summarizes each analyte for TAV03 which is above the RSLs for the industrial soils for copper and lead.

Table 7: TAV03 Sample Results

Analyte	Total Metals	RSL Industrial Soil
Copper	6100 mg/kg	4700 mg/kg
Lead	1800 mg/kg	800 mg/kg

Access to the tanks and to the area in general were in a similar state found during the previous FCI on November 1, 2022.

TAV manages process water, wastewater and ASR sludge on the floor in the wastewater treatment area (WWT). It is comingled on the ground where it is exposed to stormwater. The comingled waste migrates downgradient to the Jig Pad Area. The inspectors observed several inches of wastewater and ASR solids and sludge mixed throughout this area (Photographs 34, 35 and 36).

Pursuant to Paragraph 82 of the RCRA 7003 Order, Respondents must "immediately cease all activities (including operations, business practices, and material management, including commingling, mixing, and receipt and transfer of ASR waste) that may result in the release of solid and/or hazardous waste into the environment, including, but not limited to, ceasing the placement of ASR waste, intermediates from the processing of ASR waste, materials resulting from the processing of ASR waste, wastewaters and/or process waters, sludge, and/or any other wastes, directly onto the ground, including onto asphalt, concrete, or other surfaces."

Wastewater Treatment Area - TAV02

LSASD collected a sample of water in the wastewater treatment area. This was an on-site location and split samples were collected.

The sample is referred to as TAV02. The sample is described as muddy water. The sample was analyzed for total metals and PCBs. The total antimony concentration was found at 400 ug/L, arsenic at 17 ug/L, cadmium at 7.6 ug/L, chromium at 110 ug/L, copper at 4600 ug/L and lead at 1200 ug/L. Table 8 below summarizes each analyte for TAV02 which is above the RSLs for the MCLs for antimony, arsenic, cadmium, chromium, copper and lead. The lead concentration is above the UTS and could be subject to the RCRA land disposal restrictions if disposed to the land.

Table 8: TAV02 Sample Results

Analyte	Total Metals	UTS	MCL
Antimony	400 ug/L	1.9 mg/L	6 ug/L
Arsenic	17 ug/L	1.4 mg/L	10 ug/L
Cadmium	7.6 ug/L	0.69 mg/L	5 ug/L
Chromium	110 ug/L	2.77 mg/L	100 ug/L
Copper	4600 ug/L		1300 ug/L

Lead	1200 ug/L	0.69 mg/L	15 ug/L

Access to the tanks and to the area in general were in a similar state found during the previous FCI on November 1, 2022.

TAV manages process water, wastewater, and ASR sludge on the floor in the wastewater treatment area (WWT). It is comingled on the ground where it is exposed to stormwater. The comingled waste migrates downgradient to the Jig Pad Area. The inspectors observed several inches of wastewater and ASR solids and sludge mixed throughout this area (Photographs 34, 35 and 36).

Stormwater Pond at 3320 Empire Boulevard - TAV12

LSASD collected a water sample from the stormwater pond located on 3320 Empire Boulevard behind the ASR pile. This was an on-site location and split samples were collected.

The sample is referred to as TAV12. The sample is described as storm water, muddy with some floating vegetative matter. The sample was analyzed for total metals and PCBs. The total antimony concentration was found at 15 ug/L and lead at 30 ug/L. Table 9 below summarizes each analyte for TAV12 which is above the RSLs for the MCLs for antimony and lead.

Table 9: TAV12 Sample Results

Analyte	Total Metals	MCL
Antimony	15 ug/L	6 ug/L
Lead	30 ug/L	15 ug/L

The inspectors observed the surface water in the pond appeared muddy with some floating vegetative matter (Photograph 55).

Keebler West Area Behind Keebler Plant Building

The inspectors walked the alley way behind the Keebler Plant Building toward the northwest corner to conduct sampling at the Outfall Number 2 Sediment Basin at the NW Corner Rip Rap (Photograph 33).

Keebler Plant Building Filter Press Area

The inspectors observed filter cake generated from the filter press. The filter cake was accumulating on the floor under the filter press comingled with wastewater and sludge. The inspectors also observed the area next to the filter press contained wastewater and sludge accumulating on the concrete floor (Photographs 37, 38 and 40).

Keebler Plant Building Filter Cake Pile/Alley Way Area

The inspectors observed several inches of wastewater and sludge accumulating on the concrete floor in the alley way next to the filter cake storage area (Photograph 39).

Keebler Plant Building Filter Cake Pile

The inspectors observed wastewater and sludge accumulating on the concrete floor next to the Filter Cake Pile (Photographs 41 through 46).

3320 Empire Boulevard ASR Pile

The inspectors observed a white colored pile on top of and next to the ASR Pile (Photographs 56 and 57). TAV indicated during a post FCI discussion that it was an ASR organics/lights material with a bigger particle size. The inspectors observed two 275-gallon totes with product labels and the words "sulfuric acid 93% metal cleaner" (UN1830) accumulating on the ground near the ASR pile.

In the event Respondents ship any materials off site prior to approval of the work plan(s) required by Paragraph 84, Respondents shall comply with all applicable legal requirements, including, but not limited to, hazardous waste determinations, RCRA's manifest requirements, and land disposal restrictions, and shall provide documentation to the EPA of such shipment(s) within three (3) business days prior to such shipment. Such documentation shall include a description of the material, any characterization/waste determination of the material, the amount, the transporter, and the destination facility. Within two (2) business days following such shipment, Respondents shall submit to the EPA any relevant shipping document (manifest, bill of lading, etc.) pertaining to such shipment(s).

12) Closing Conference

The inspectors conducted a closing conference with Brent Fairchild, Steven Pointer and Geoffrey Gay. During this meeting, the inspectors stated their preliminary conclusions of the inspection.

13) Sampling Overview

The LSASD Sampling Investigation Final Report dated March 24, 2023 - Attachment 1
The LSASD Sampling Investigation Final Report dated April 24, 2023 - Attachment 2

14) List of Appendices

Appendix 1 – Photograph Log:
Photos taken on: January 19, 2023
Photos taken by: William Kappler
Samsung Camera (Model WB250F)
EPA Property Tag# S75917

15) Signed

ARACELI CHAVEZ Digitally signed by ARACELI CHAVEZ
Date: 2023.05.19 14:58:33 -04'00'

for Mark Anthony Relon
Environmental Engineer

Date

WILLIAM KAPPLER Digitally signed by WILLIAM KAPPLER
Date: 2023.05.19 16:36:00 -04'00'

William Kappler
Physical Scientist

Date

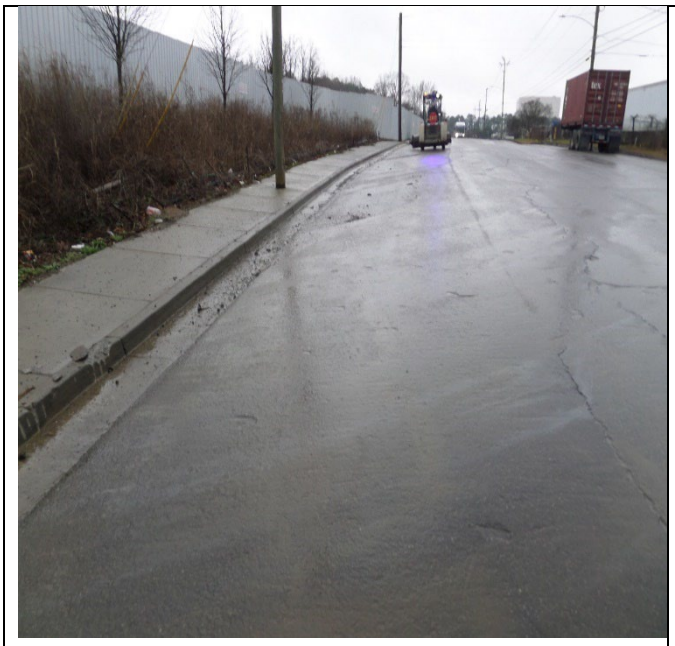
Concurrence

ARACELI CHAVEZ Digitally signed by ARACELI CHAVEZ
Date: 2023.05.19 16:52:54 -04'00'

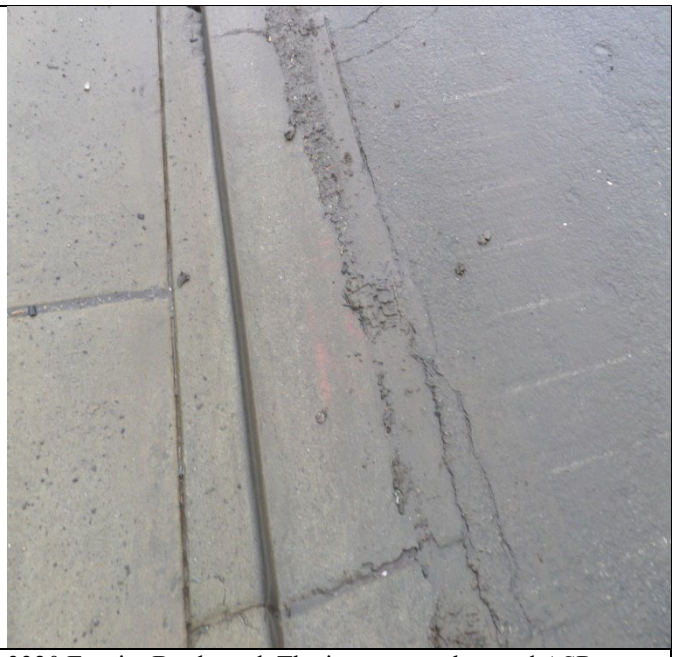
Araceli B. Chavez
Chief
RCRA Enforcement Section

Date

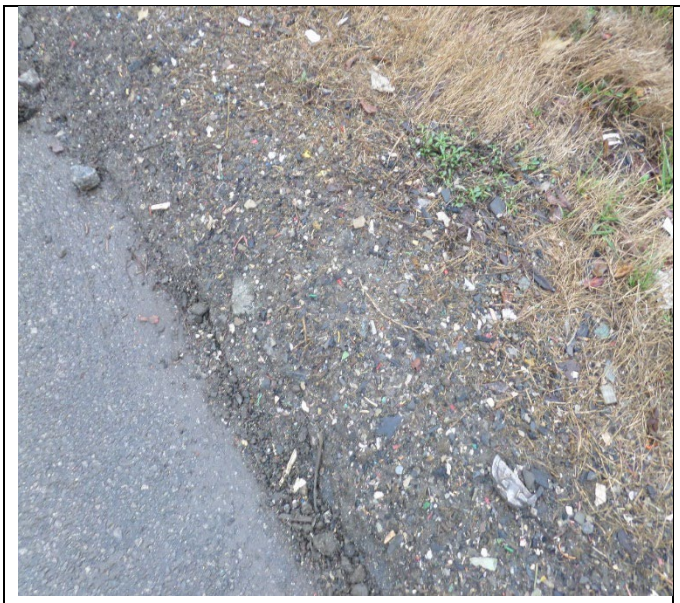
Appendix 1- TAV Holdings, Inc.
RCRA CEI Photographs



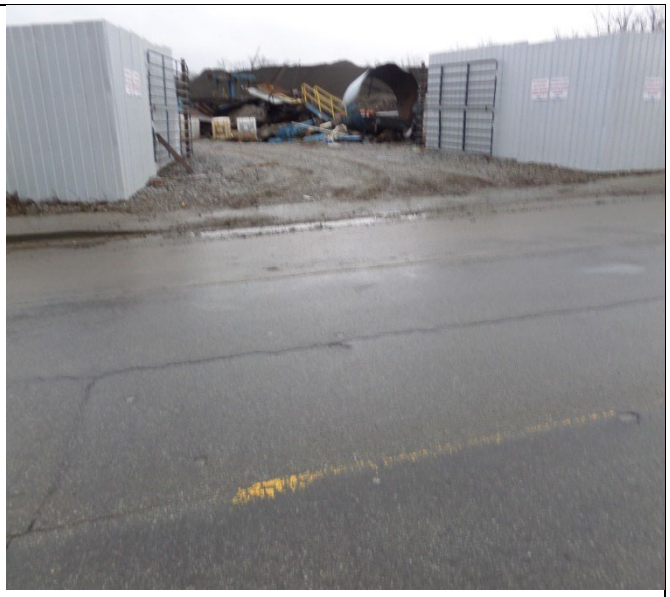
3320 Empire Boulevard. The inspectors observed ASR material on the east side of the road and north down the hill Photograph 1 taken at 9:30 a.m.



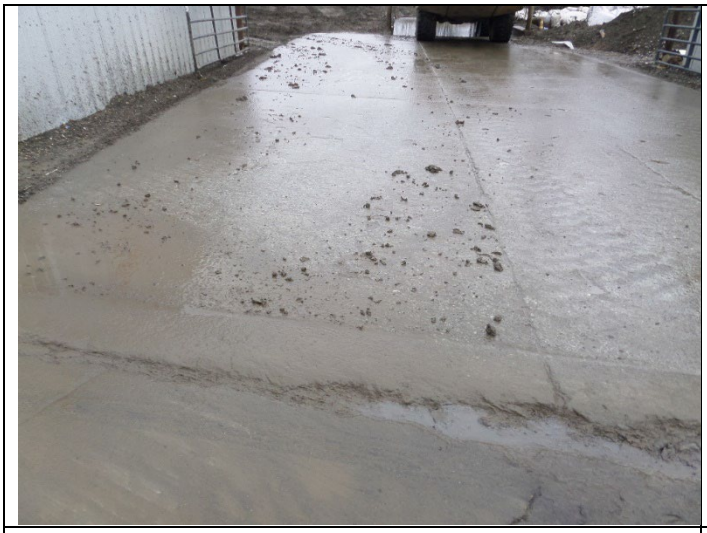
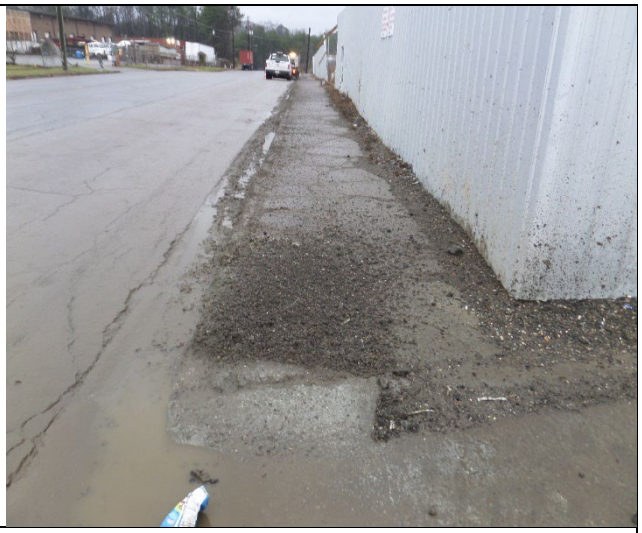
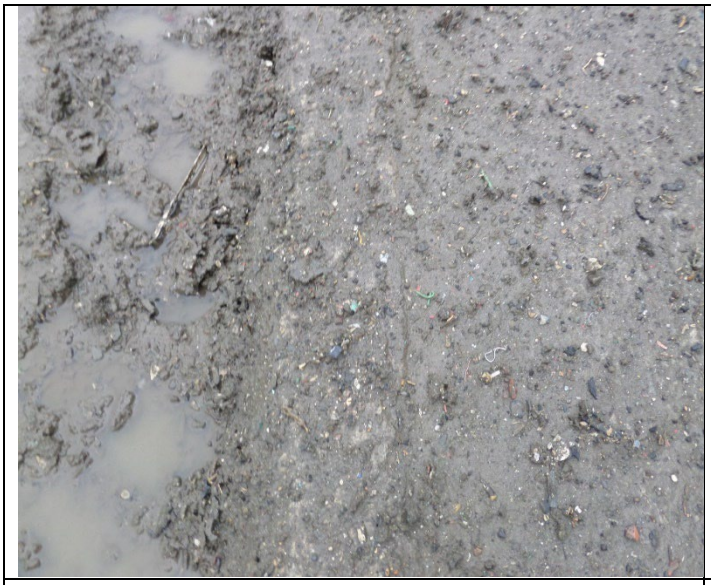
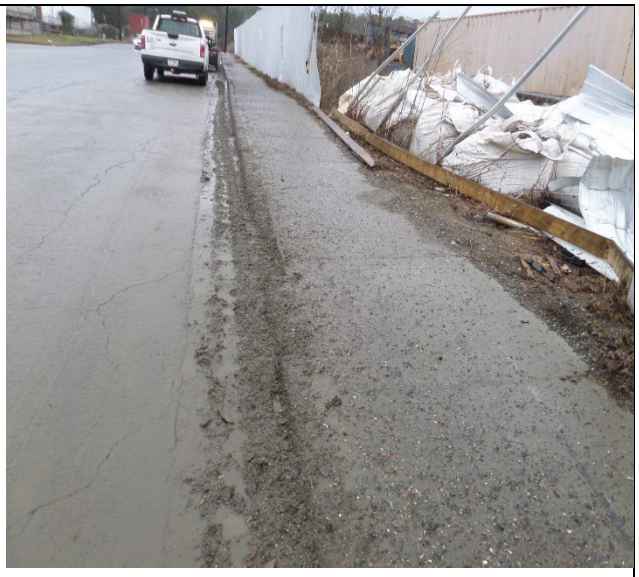
3320 Empire Boulevard. The inspectors observed ASR material on the east side of the road and north down the hill. Photograph 2 taken at 9:30 a.m.

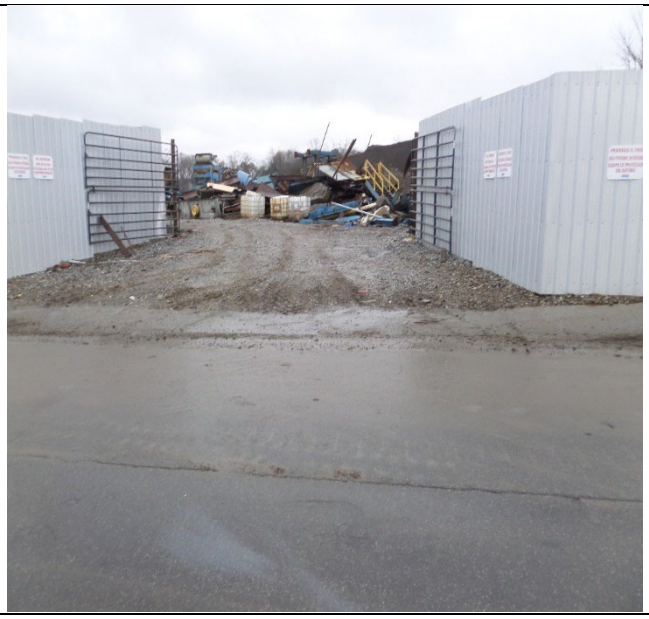
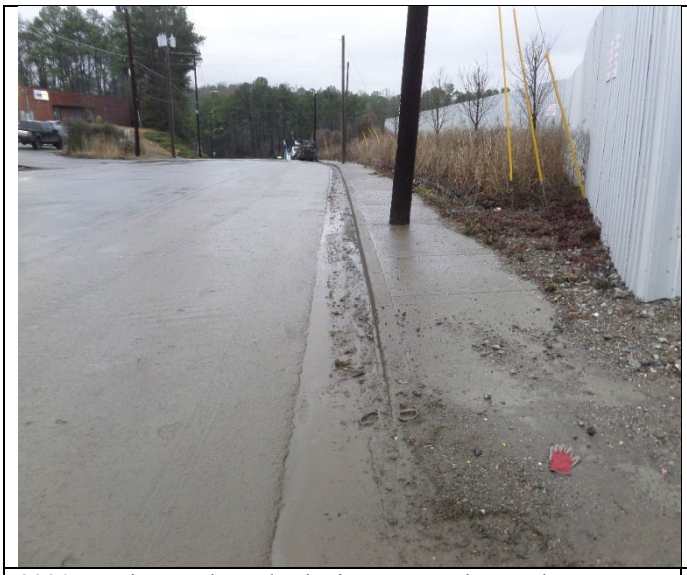
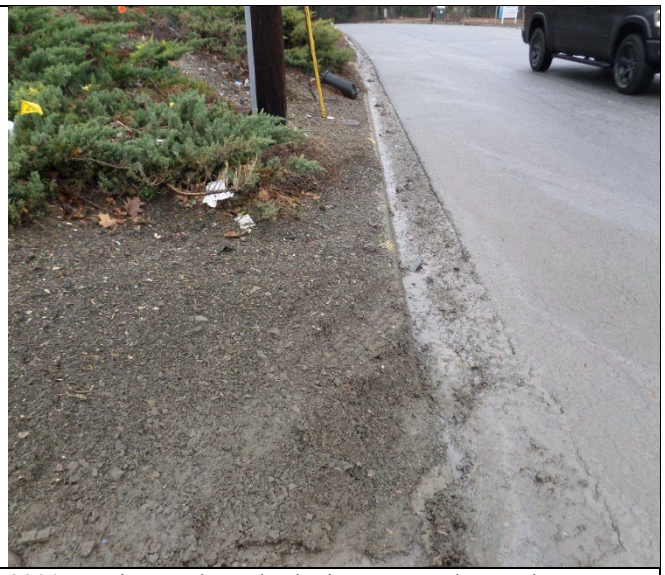


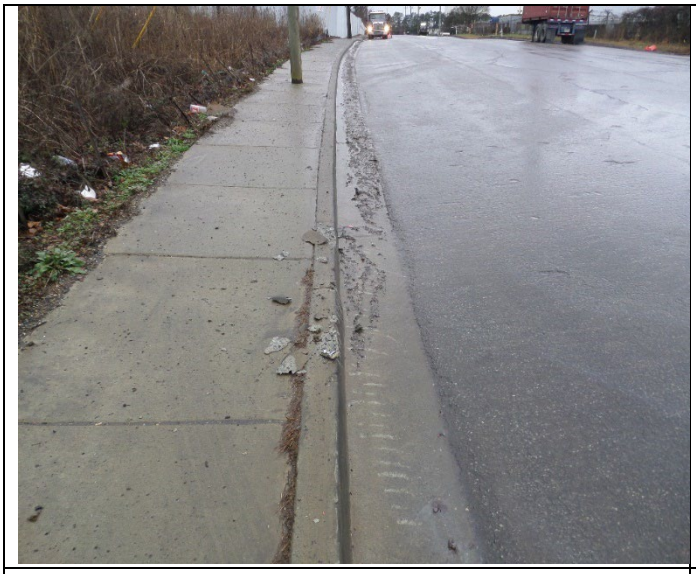
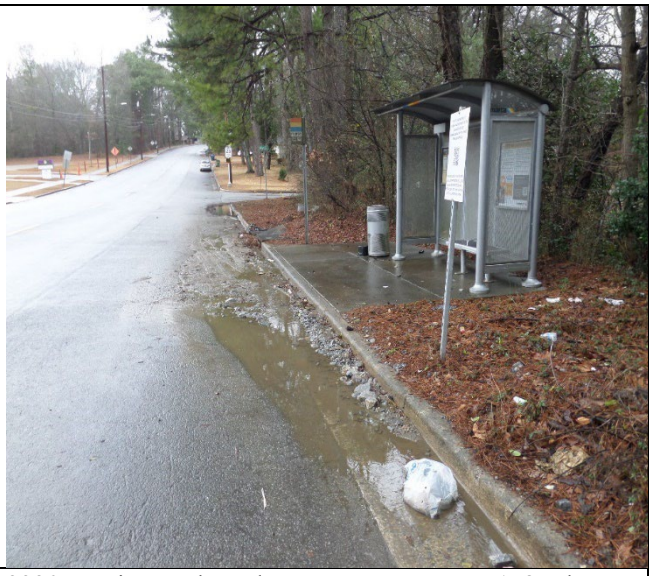
3320 Empire Boulevard. The inspectors observed ASR material on the ground along the edge of the driveway to 3311 Empire Boulevard. Photograph 3 taken at 9:30 a.m.

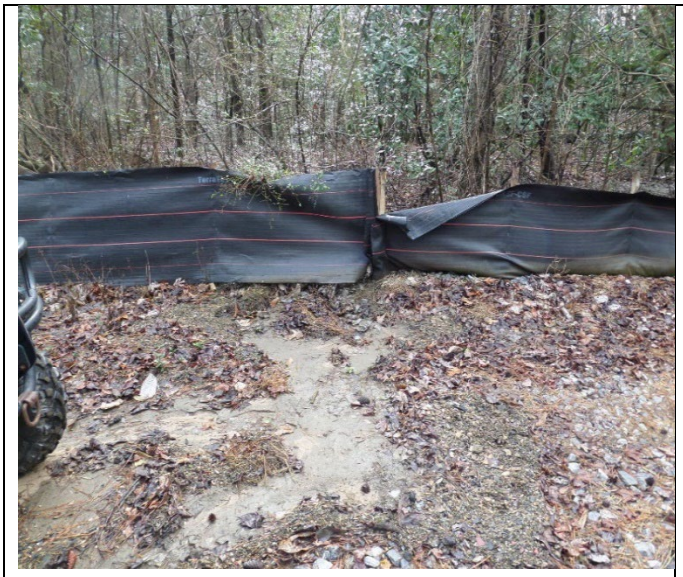
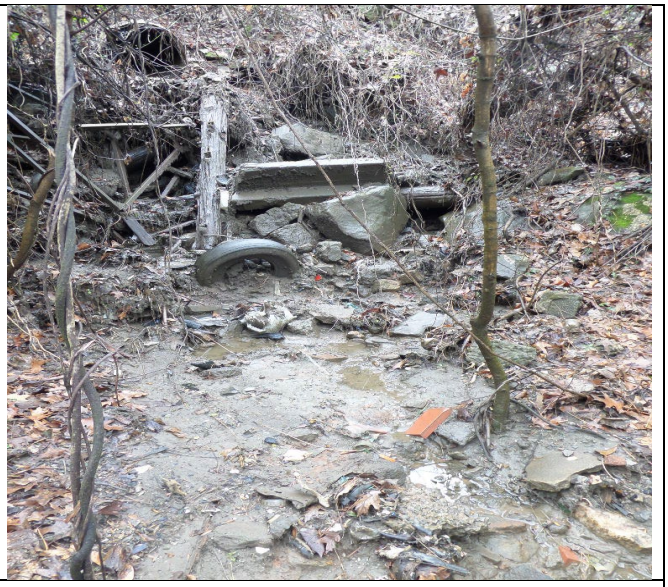


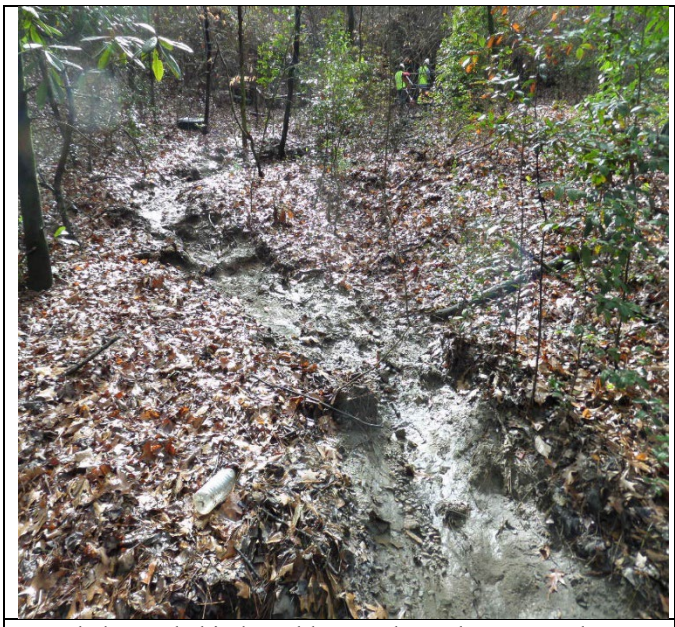
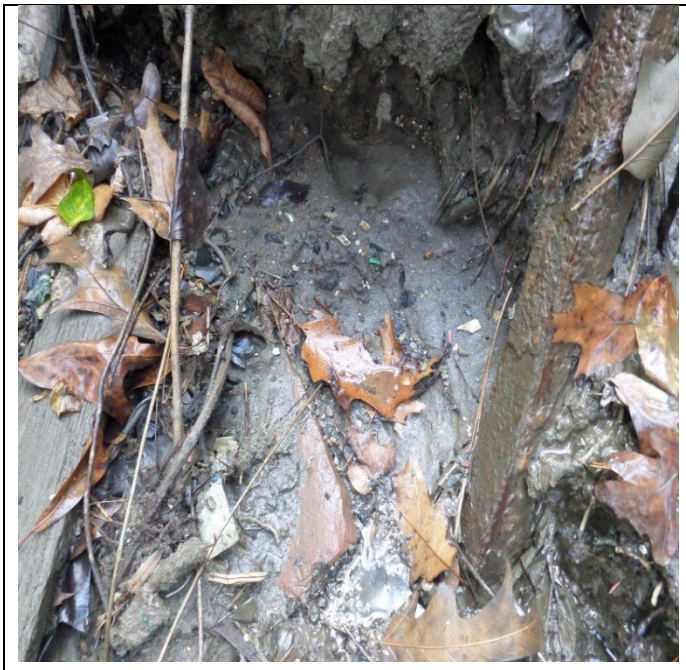
3320 Empire Boulevard. The inspectors observed ASR material on the east side of the road and north down the hill. Photograph 4 taken at 9:30 a.m.

	
3320 Empire Boulevard. The inspectors observed the release of ASR material was from the 3320 Empire Boulevard south gate entrance. Photograph 5 taken at 9:30 a.m.	3320 Empire Boulevard. The inspectors observed the release of ASR material was from the 3320 Empire Boulevard south gate entrance. Photograph 6 taken at 9:30 a.m.
	
3320 Empire Boulevard. The inspectors observed ASR material on the east side of the road and north down the hill. Photograph 7 taken at 9:30 a.m.	3320 Empire Boulevard. The inspectors observed ASR material on the east side of the road and north down the hill. Photograph 8 taken at 9:30 a.m.

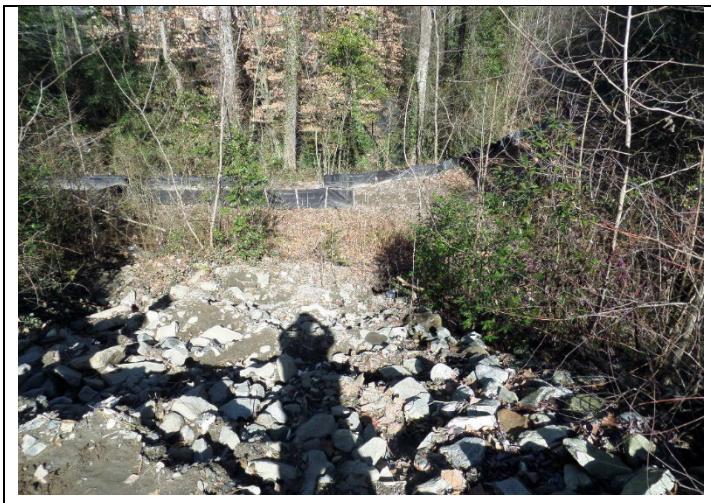
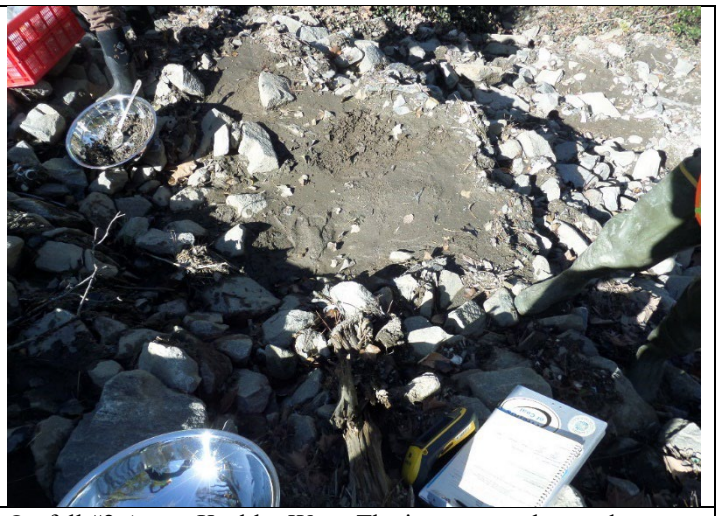
	
3320 Empire Boulevard. The inspectors observed ASR material on the east side of the road and north down the hill. Photograph 9 taken at 9:30 a.m.	3320 Empire Boulevard. The inspectors observed ASR material on the east side of the road and north down the hill. Photograph 10 taken at 9:30 a.m.
	
3320 Empire Boulevard. The inspectors observed ASR material on the east side of the road and north down the hill. Photograph 11 taken at 9:30 a.m.	3320 Empire Boulevard. The inspectors observed ASR material on the ground along the edge of the driveway to 3311 Empire Boulevard. Photograph 12 taken at 9:38 a.m.

	
3320 Empire Boulevard. The inspectors observed ASR material on the east side of the road and north down the hill. Photograph 13 taken at 10:29 a.m.	3320 Empire Boulevard. MARTA Bus Stop #178. The inspectors observed ASR material on the east side of the road and north down the hill to the MARTA bus stop #178 near South Industrial Park. Photograph 14 taken at 10:50 a.m.

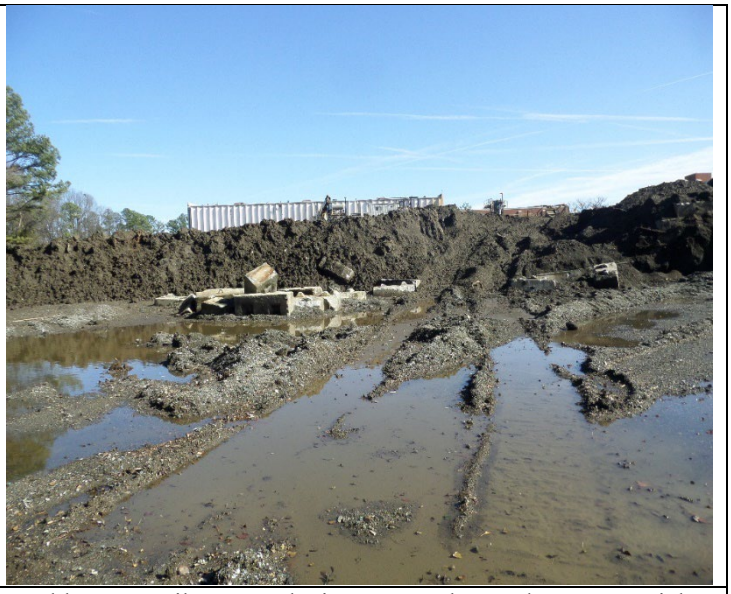
	
Access Path Next to Wooded Area Behind Keebler North Bunker Area. The inspectors observed a washout containing ASR material flowing from Outfall #3 pipe to the earthen access path. Distance from Outfall #3 pipe approximately 150-180 feet. Photograph 15 taken at 11:09 a.m.	Wooded Area Behind Keebler North Bunker Area. The inspectors observed a washout containing ASR material flowing from the outfall #3 pipe to ground surfaces. See outfall pipe in top left corner of photograph. Photograph 16 taken at 11:17 a.m.

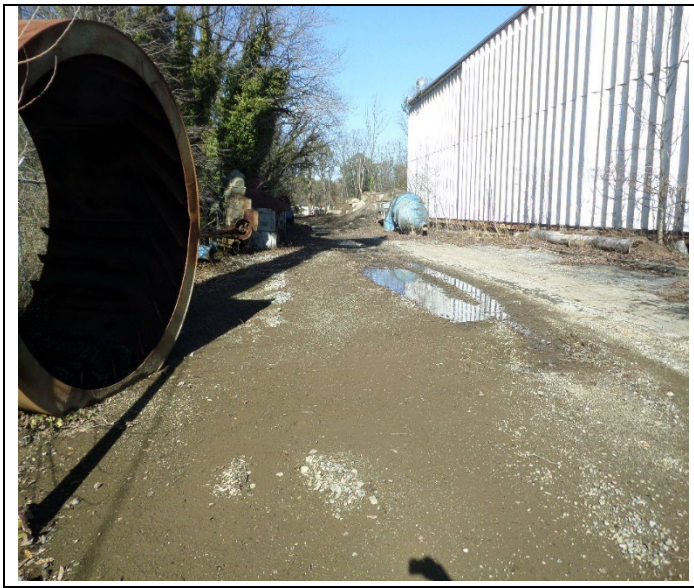
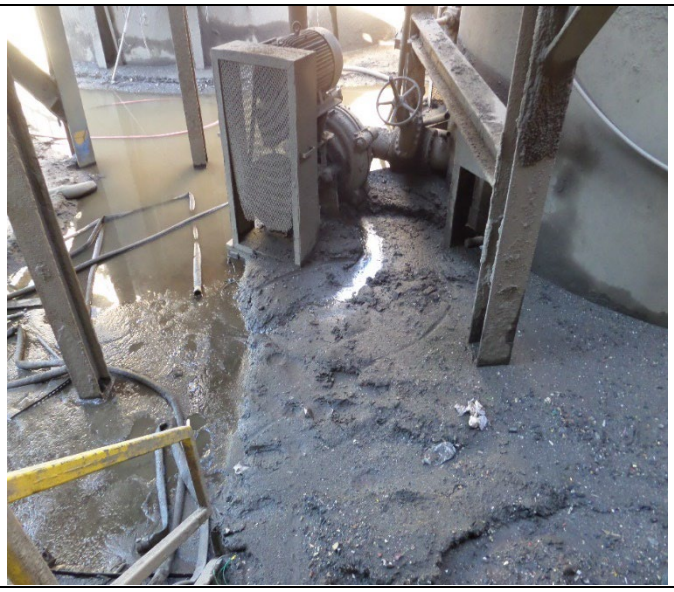
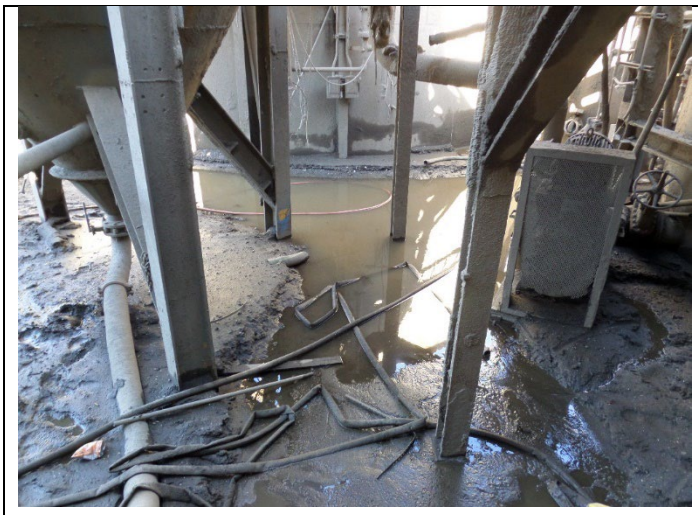
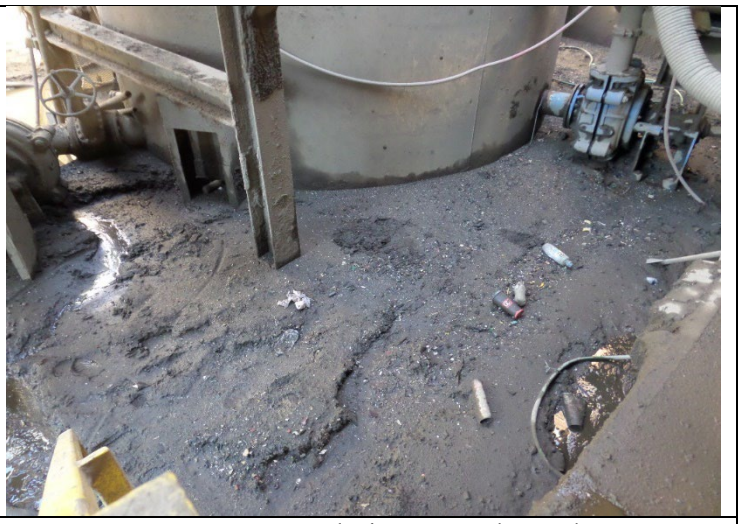
	
Wooded Area behind Keebler North Bunker Area. The inspectors observed a washout containing ASR material flowing from outfall #3 pipe to the earthen access path. Distance from Outfall #3 pipe is approximately 30-45 feet. Photograph 17 taken at 11:19 a.m.	Wooded Area Behind Keebler North Bunker Area. The inspectors observed a washout containing ASR material near the Outfall #3 pipe. Close-up of washout observed in photograph 16. Photograph 18 taken at 11:21 a.m.
	
Wooded Area behind Keebler North Bunker Area. The inspectors observed a washout containing ASR material near the Outfall #3 pipe. Close-up of washout observed in photograph 16. Photograph 19 taken at 11:21 a.m.	Wooded Area behind Keebler North Bunker Area. The inspectors observed a washout containing ASR material near the Outfall #3 pipe. Close-up of washout observed in photograph 16. Photograph 20 taken at 11:21 a.m.

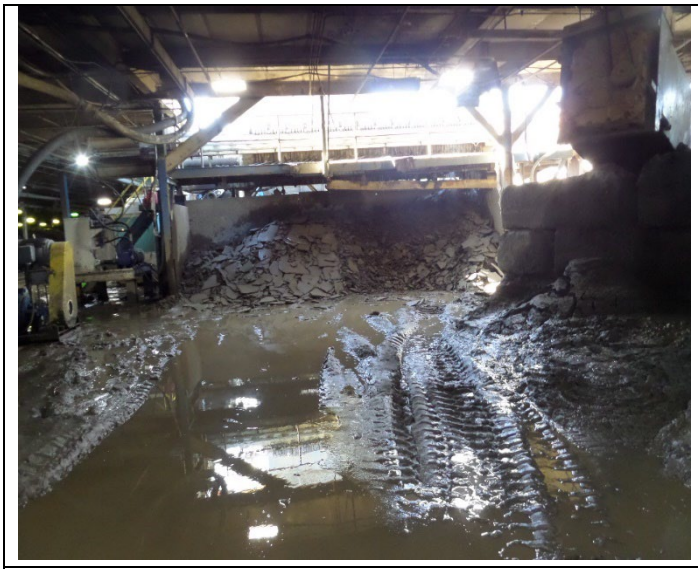
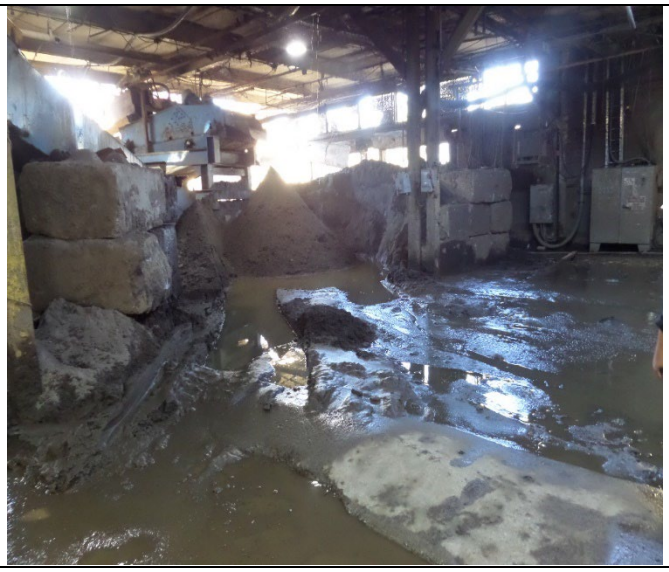
	
Wooded Area behind Keebler North Bunker Area. The inspectors observed a washout containing ASR material flowing from outfall #3 pipe downhill to the earthen access path. Distance from Outfall #3 pipe approximately 90-105 feet. Photograph 21 taken at 11:28 a.m.	Wooded Area behind Keebler North Bunker Area. The inspectors observed a washout containing ASR material flowing from outfall #3 pipe downhill to the earthen access path. Distance from Outfall #3 pipe approximately 90-105 feet. General impression of Photograph 21. Photograph 22 taken at 11:30 a.m.
	
Unnamed Tributary Next to Access Path. The inspectors observed a path that appeared to be washed out depressing the vegetation and the grassy area to the unnamed tributary. Photograph 23 taken at 11:35 a.m.	Access Path Next to Wooded Area between Keebler North and Unnamed Tributary. The inspectors observed washout of ASR material on the earthen access path. Distance from Outfall #3 pipe approximately 150-180 feet. Photograph 24 taken at 11:44 a.m.

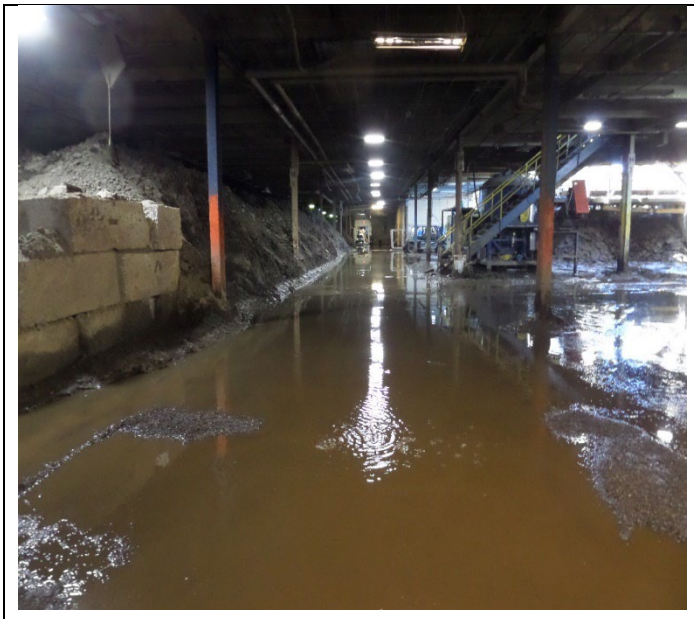
	
Grassy Area Next to Unnamed Tributary. The inspectors observed a path that appeared to be washed out depressing the vegetation and the grassy area to the unnamed tributary. Photograph 25 taken at 11:45 a.m.	Outfall #2 Area - Keebler West. The inspectors observed apparent ASR material released to rip rap. Rip rap continues downhill to earthen access path and unnamed tributary. Photograph 26 taken at 1:15 p.m.
	
Outfall #2 Area - Keebler West. The inspectors observed apparent ASR material released to rip rap. Rip rap continues downhill to earthen access path and unnamed tributary. Photograph 27 taken at 1:24 p.m.	Outfall #2 Area - Keebler West. The inspectors observed apparent ASR material from release accumulated on rip rap. Rip rap continues downhill to earthen access path and unnamed tributary. Photograph 28 taken at 1:27 p.m..

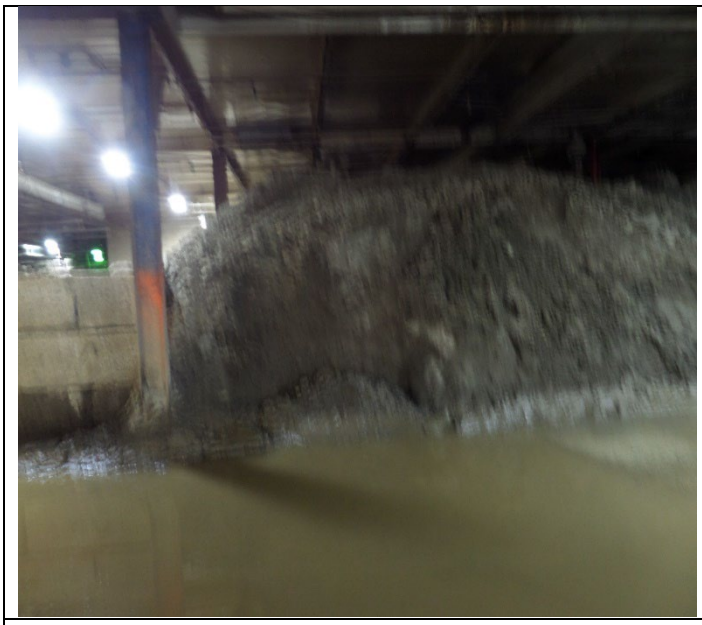
	
Outfall #2 Area - Keebler West. The inspectors observed apparent ASR material released to rip rap. Rip rap continues downhill to earthen access path and unnamed tributary. Photograph 29 taken at 1:29 p.m.	Keebler West Pile Area. The inspectors observed ASR material accumulating on ground in piles. Photograph 30 taken at 1:34 p.m.

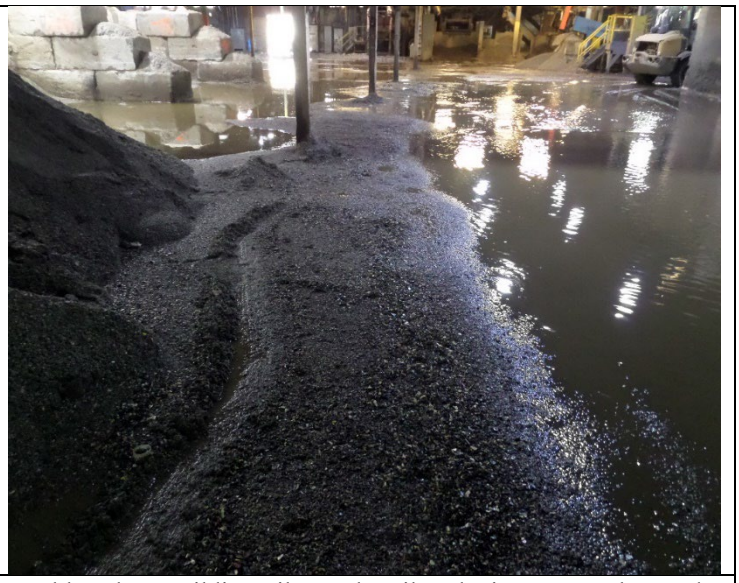
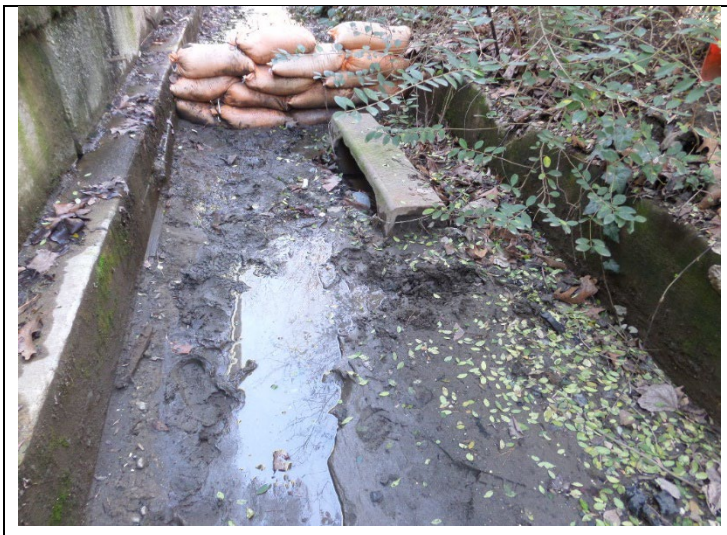
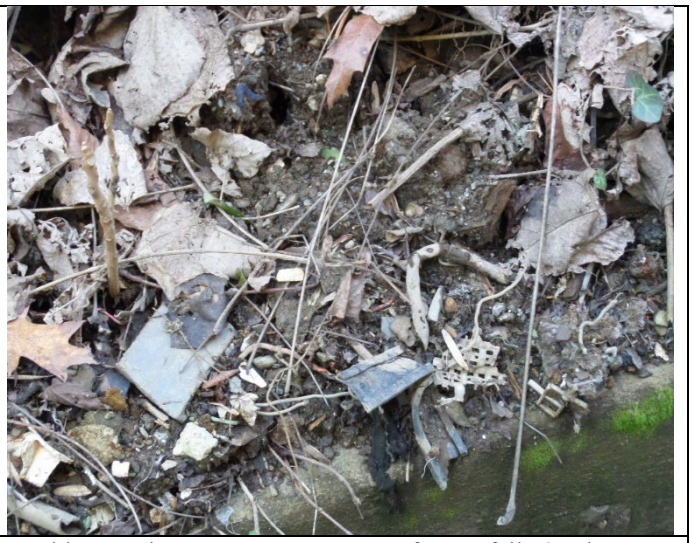
	
Keebler West Pile Area. The inspectors observed ASR material removed from the Keebler West storage area. The inspectors observed the original asphalt lot appeared worn, cracked and in disrepair. Photograph 31 taken at 1:38 p.m.	Keebler West Pile Area. The inspectors observed ASR material accumulating on the ground in piles. Photograph 32 taken at 1:47 p.m.

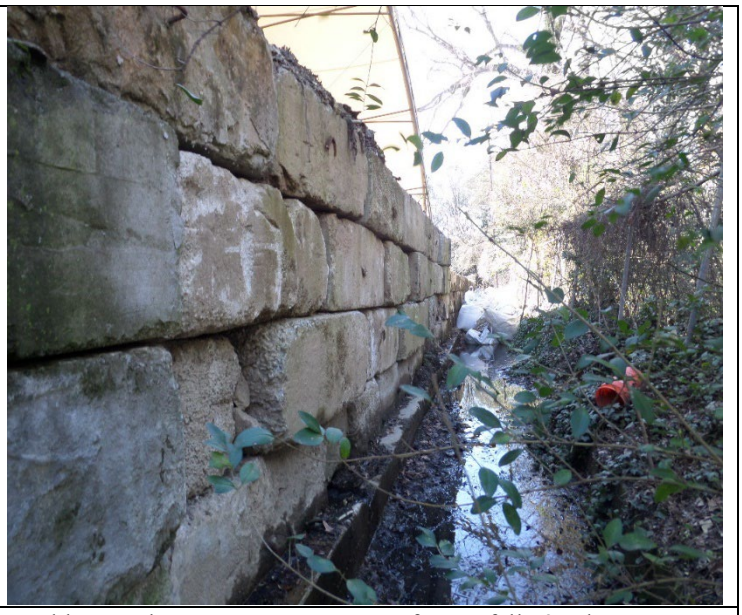
	
Keebler West Area Behind Keebler Plant Building. The inspectors observed the alley way behind Keebler Plant Building near Keebler West/NW corner. Photograph 33 taken at 1:51 p.m.	Wastewater Treatment/Area. The inspectors observed solids/sludge containing ASR material accumulating in this area. Photograph 34 taken at 2:02 p.m.
	
Wastewater Treatment Area. The inspectors observed solids/sludge containing ASR material accumulating in this area. Photograph 35 taken at 2:04 p.m.	Wastewater Treatment Area. The inspectors observed solids/sludge containing ASR material accumulating in this area. Photograph 36 taken at 2:06 p.m.

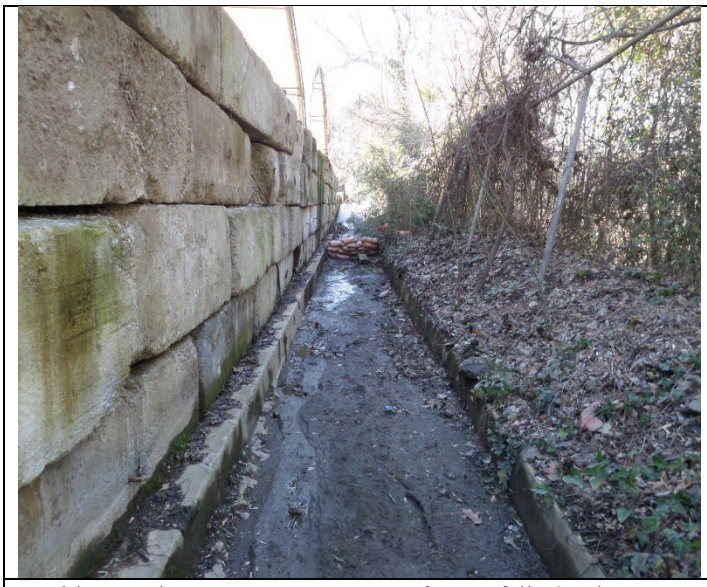
	
Keebler Plant Building Filter Press Area. The inspectors observed filter cake generated from the filter press accumulating with wastewater and solids on the concrete floor. Photograph 37 taken at 2:07 p.m.	Keebler Plant Building Filter Press Area. The inspectors observed the area next to filter press contained wastewater and solids accumulating on the concrete floor. Photograph 38 taken at 2:07 p.m.

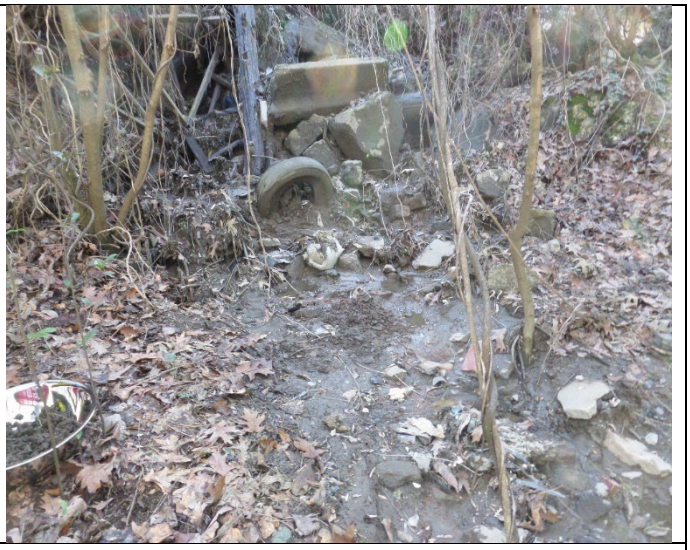
	
Keebler Plant Building Filter Cake Pile/Alley Way. The inspectors observed wastewater and solids accumulating on the concrete floor in the alley way next to filter cake storage area. Approximated several inches of water throughout the area. Photograph 39 taken at 2:08 p.m.	Keebler Plant Building Filter Press Area. The inspectors observed filter cake generated from the filter press accumulating with wastewater and solids on the concrete floor. Photograph 40 taken at 2:08 p.m.

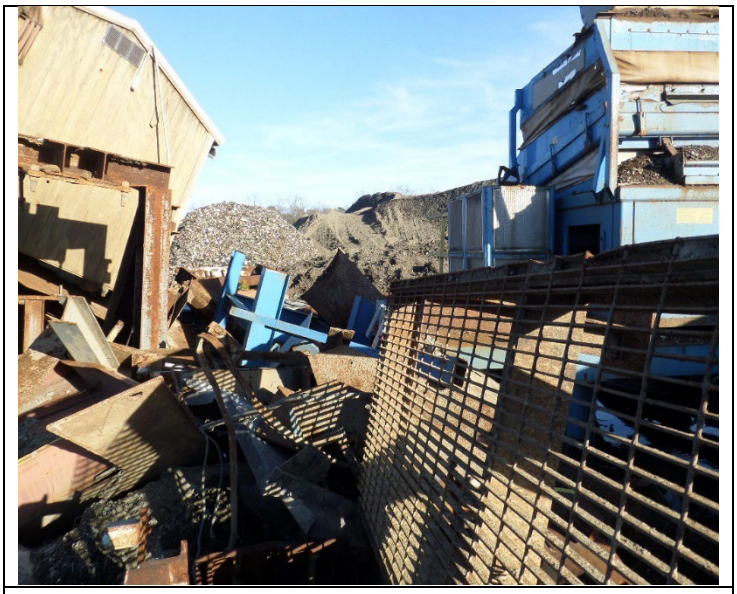
	
Keebler Plant Building Filter Cake Pile. The inspectors observed wastewater and solids accumulating on the concrete floor next to the Pile. Photograph 41 taken at 2:29 p.m.	Keebler Plant Building Filter Cake Pile. The inspectors observed wastewater and solids accumulating on the concrete floor next to the Pile. Photograph 42 taken at 2:29 p.m.
	
Keebler Plant Building Filter Cake Pile. The inspectors observed wastewater and solids accumulating on the concrete floor next to the Pile. Photograph 43 taken at 2:30 p.m.	Keebler Plant Building Filter Cake Pile. The inspectors observed wastewater and solids accumulating on the concrete floor next to the Pile. Photograph 44 taken at 2:30 p.m.

	
Keebler Plant Building Filter Cake - Backside Pile. The inspectors observed filter cake in this area. Photograph 45 taken at 2:35 p.m.	Keebler Plant Building Filter Cake Pile. The inspectors observed wastewater and solids accumulating on the concrete floor next to the Pile. Photograph 46 taken at 2:38 p.m.
	
Keebler North Concrete Conveyance for Outfall #3. The inspectors observed a drain that discharges to the outfall pipe in the wooded area in Photograph 16. Photograph 47 taken at 2:59 p.m.	Keebler North Concrete Conveyance for Outfall #3. The inspectors observed ASR material accumulating on soil surfaces. Photograph 48 taken at 3:00 p.m.

	
Keebler North Concrete Conveyance for Outfall #3. The inspectors observed ASR material accumulating on soil surfaces. Photograph 49 taken at 3:00 p.m.	Keebler North Concrete Conveyance for Outfall #3. The inspectors observed ASR material accumulating on top of the Bunker block wall. Photograph 50 taken at 3:06 p.m.

	
Keebler North Concrete Conveyance for Outfall #3. The inspectors observed ASR material and solids accumulating in the concrete conveyance and on soil surfaces. Photograph 51 taken at 3:07 p.m.	Access Path Next to Wooded Area Behind Keebler North Bunker Area. The inspectors observed a washout containing ASR material flowing from Outfall #3 pipe to the earthen access path. Distance from Outfall #3 pipe approximately 150-180 feet. Photograph 52 taken at 3:12 p.m.

	
Access Path Next to Wooded Area Behind Keebler North Bunker Area. The inspectors observed a washout containing ASR material flowing from Outfall #3 pipe to the earthen access path. Distance from Outfall #3 pipe approximately 150-180 feet. Photograph 53 taken at 3:13 p.m.	Wooded Area Behind Keebler North Bunker Area (see photograph 16). The inspectors observed a washout containing ASR material flowing from the outfall #3 pipe to ground surfaces. The inspectors took a split sample in this area. Photograph 54 taken at 3:21 p.m.
12 	
3320 Empire Boulevard Stormwater Pond. A water sample was collected from the pond. Photograph 55 taken at 4:28 p.m.	3320 Empire Boulevard ASR Pile. The inspectors observed a large ASR pile. Photograph 56 taken at 4:30 p.m.



3320 Empire Boulevard ASR Pile. The inspectors observed a white colored pile next to ASR Pile. Photograph 57 taken at 4:33 p.m.

Attachment 1
LSASD Sampling Investigation Final Report
March 24, 2023

Attachment 2
LSASD Sampling Investigation Final Report
April 24, 2023