

RCRA Inspection Report

1) Inspector and Author of Report

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2) Facility Information

Giant Cement Company
654 Judge St
Harleyville, South Carolina 29448
EPA ID SCD003351699

3) Responsible Officials

Edward “Sonny” Dougherty
Environmental Manager
sdougherty@gchi.com

4) Inspection Participants

Sonny Dougherty, Giant Cement Company
Parvez Mallick, U.S. Environmental Protection Agency, Region 4
Mark Anthony Relon, U.S. Environmental Protection Agency, Region 4
Gerald Shealy, South Carolina Department of Health and Environmental Control
Sean Hannigan, South Carolina Department of Health and Environmental Control

5) Date and Time of Inspection

June 30, 2022, 9:05am

6) Applicable Authority

Resource Conservation and Recovery Act (RCRA) Sections 3002 (42 U.S. Code – Annotated U.S.C.A. 6925 and 6927), and 40 Code of Federal Regulation (C.F.R.) Parts 260 - 270, 273, 278, & 279; South Carolina Hazardous Waste Management Act, S.C. Code Ann. § 44-56-10 et seq., and South Carolina Hazardous Waste Management Regulations (SCHWMR), S.C. Code Ann. Regs. 61-79.260-270, 61-79.273 and 61-79.279; and Hazardous Waste Permit Number SCD003351699.

Pursuant to S.C. Code Ann. Regs. 61-79.260.10 [40 C.F.R. § 260.10], a large quantity generator of hazardous waste (LQG) is a generator who generates greater than or equal to 1,000 kilograms (2,200 pounds) of non-acute hazardous waste in a calendar month.

Pursuant to S.C. Code Ann. Regs. 61-79.273.9 [40 C.F.R. § 273.9], a small quantity handler of universal waste (SQHUW) is a universal waste handler who does not accumulate 5,000 kilograms or more of universal waste (batteries, pesticides, mercury-containing equipment, lamps, or aerosol cans, calculated collectively) at any time.

Pursuant to S.C. Code Ann. Regs. 61-79.262.17 [40 C.F.R. § 262.17], an LQG may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status, as required by Section 44-56-60(a)(2) and (b)(3) of the SCHWMA, S.C. Code Ann. § 44-56-60(a)(2) and (b) [Section 3005 of RCRA, 42 U.S.C. § 6925], provided that the generator complies with the conditions listed in S.C. Code Ann. Regs. 61-79.262.17 [40 C.F.R. § 262.17] (hereinafter referred to as the “LQG Permit Exemption”).

Pursuant to S.C. Code Ann. Regs. 61-79.262.15(a) [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 any 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 44-56-60(a)(2) and (b)(3) of the SCHWMA, S.C. Code Ann. § 44-56-60(a)(2) and (b) [Section 3005 of RCRA, 42 U.S.C. § 6925], and without complying with S.C. Code Ann. Regs. 61-79.262.16(b) or R.61-79.262.17(a) [40 C.F.R. § 262.16(b) or § 262.17(a)], except as required in S.C. Code Ann. Regs. 61-79.262.15(a)(7) and (8) [40 C.F.R. § 262.15(a)(7) and (8)], provided that the generator complies with the satellite accumulation area conditions listed in S.C. Code Ann. Regs. 61-79.262.15(a) [40 C.F.R. § 262.15(a)] (hereinafter referred to as the “SAA Permit Exemption”).

7) Purpose of Inspection

The purpose of this inspection was to conduct an unannounced compliance evaluation inspection to determine Giant Cement Company (hereinafter, “Giant Cement” or the “facility”) compliance with the applicable requirements of RCRA and the corresponding South Carolina regulations. This was an EPA lead inspection.

8) Previous Inspection History

South Carolina Department of Health and Environmental Control (SCDHEC) has conducted 3 RCRA CEIs at the facility between 2016 and 2022 and found 6 violations during those inspections.

On September 22, 2020, SCDHEC conducted the most recent RCRA CEI at the facility and found 4 apparent violations of RCRA’s requirements for marking or labeling containers with an indication of the hazards of the contents within central accumulation areas (CAA) and satellite accumulation areas (SAA), marking or labeling its containers with the words “Hazardous Waste,” and submission of a quick reference guide and the contingency plan to the local emergency responders or their Emergency Planning Committee. As a result, SCDHEC issued a letter regarding the noted deficiencies to Giant Cement on October 1, 2020, and later verified

that the facility had returned to compliance from a written correspondence on October 23, 2020.

9) Facility Description

Giant Cement owns and operates a Portland cement production facility in Dorchester County, South Carolina. The facility has approximately 1800 acres of handling, storage, and processing of raw materials, intermediates, and fuels for manufacturing Portland cement. Currently, 214 employees work at the facility. Access to the facility was controlled through the front entry gate where only facility personnel are granted entry. The inspectors had to receive parking passes from personnel to gain entry upon arrival.

The facility is a Large Quantity Generator (LQG) and a commercial treatment, storage, and/or disposal facility (TSDF) with their latest notification dated January 1, 2021. Hazardous wastes generated at the facility include, but are not limited to, the EPA waste codes D001, D004 to D009, F001 to F003, and F005. Giant Cement's Title V permit (TV-0900-0002) was issued on February 11, 2003. The facility submitted a Title V Air Permit Renewal Application in August 2007 and has been operating under a permit shield since that time. The Hazardous Waste Permit, issued April 11, 2005, is for storage of hazardous waste in one containment building and two container storage areas, as well as eleven storage tanks; treatment of hazardous waste in two shredder systems, nine storage tanks and an industrial furnace; and identification and corrective action for solid waste management units (SWMUs). The permit also requires the facility to comply with all land disposal restrictions, waste minimization guidelines, groundwater monitoring requirements and air emission standards applicable. The Hazardous Waste Permit expired on May 25, 2015 and is currently under a renewal process with the EPA. The NAICS Numbers for this facility are 327310 - Cement Manufacturing and 562211 - Hazardous Waste Treatment and Disposal.

Giant Cement's process is heat-intensive, requiring fuel with high British Thermal Unit (BTU) contents to reach the desired temperatures for producing clinker, the primary material necessary for the manufacturing of cement. The facility was modernized in 2005 and now operates one preheater/pre-calciner kiln and associated ancillary equipment for producing more than 1.4 million tons of Portland cement annually. Raw materials such as calcium, silica, alumina, and iron ore comprise the constituents necessary for the manufacture of cement components. The raw feed is then prepared for use in the kiln system by sizing, grinding, and blending the various raw materials. In the kiln system, the raw materials are exposed to air temperatures reaching up to 3,500°F through a countercurrent process in the kiln and preheater/pre-calciner system. The raw materials are heated to approximately 2,700°F, the temperature required to produce quality clinker. The clinker produced in the kiln is cooled and then mixed with gypsum and other additives and ground to prepare the Portland cement finished product. The finished product is stored, after which it can be packaged in bags for commercial use, retail sale, or shipped directly to customers in trucks and rail cars. The source of heat energy in the kiln is the combustion of conventional fuels such as pulverized coal, natural gas, and fuel oil. The kiln also uses hazardous and non-hazardous waste-derived fuels as a substitute for conventional fuels. Non-hazardous materials are also used as a raw material substitute for silica, alumina, and iron in the raw meal.

10) Opening Conference

On June 30, 2022, EPA inspectors Parvez Mallick and Mark Anthony Relon, accompanied by

SCDHEC inspectors Gerald Shealy and Sean Hannigan, arrived at Giant Cement at approximately 9:05 a.m. Sonny Dougherty, Environmental Manager, immediately received the inspectors. Sonny Dougherty, and the inspectors were joined by Angeleigh Weber, EHS Coordinator, for the opening conference. The inspectors introduced themselves, showed their credentials to Sonny and Angeleigh, and explained the purpose of the visit. The inspectors described the anticipated use of equipment (digital camera) during the inspection and provided a request for records. The inspectors 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 inspection participants also discussed health and safety protocols and required personal protective equipment before Sonny led the inspectors on a tour of the Facility operations.

Sonny 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 inspector did not provide a copy of the agency's information sheet for small businesses, which can be found at <https://www.epa.gov/compliance/small-business-resources-information-sheet>.

11) **Findings**

Liquid Waste Derived Fuel (LWDF) Loading Area

This loading area is where railcars containing hazardous blended fuels are pumped into the tank farm for energy use in their kiln. The inspectors observed several tags associated with ancillary equipment connected to the LWDF storage tanks, and all the tags observed were not legible (Photographs 1-4 and Photograph 6). The inspectors could not read tags located at pumps near the LWDF Control Room. The inspectors asked facility personnel their reasoning as to why they were unreadable; they responded that it was due to coats of paint relating to dust maintenance. Two closed 5-gallon containers were found labeled "Hazardous Waste" with EPA waste codes F001, F005, D001, D006, and D008, and an indication of the hazards of the contents (Photograph 5). Facility personnel mentioned that they were left there for use in cleaning up any residual spills from the railcars transferring waste to the pumps. The inspectors found one 2-gallon container and one 55-gallon container of solid debris dated May 27, 2022 in their satellite accumulation area (SAA) (Photograph 7-8). Facility personnel called this SAA a "one-year permitted storage area" and mentioned that it was an applicable standard under their permit.

Pursuant to HW Permit SCD003351699, IV.D.3. Air Emission Standards, the Permittee shall insure that all hazardous wastes placed in tanks are managed in compliance with R.61-79.264.200 [40 C.F.R. § 264.200]. Pursuant to R.61-79.264.200 [40 C.F.R. §264.200], which incorporates R.61-79.264 Subpart BB [40 C.F.R. Part 264 Subpart BB], 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 as required by R.61-79.264.1050(d) [40 C.F.R. § 264.1050(d)].

Pursuant to HW Permit SCD003351699, XI.B. Emission Control Technology, which incorporates the applicable requirements of R.61-79.264 Subparts AA and BB [40 C.F.R. Part 264 Subparts AA and BB], 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 as required by R.61-79.264.1050(d) [40 C.F.R. § 264.1050(d)].

Tank Farm

A total of four (4) LWDF storage tanks were found. The inspectors observed the following above ground tanks:

- 1) Calciner Burner Tank (K-801) was labeled with a National Fire Prevention Association (NFPA) 704 label included a Health Hazard (blue) of 2, Flammability Hazard (red) of 2, and Stability Hazard (yellow) of 0; from 0 being a minimal hazard to 4 being a severe hazard under the Occupational Safety and Health Administration (OSHA) Hazard Communication Standard (Photograph 25).
- 2) Main Burner Tank (K-802) had a Flammable label and a NFPA 704 label with a Health Hazard (blue) of 2, Flammability Hazard (red) of 2, and Stability Hazard (yellow) of 0 (Photograph 22).
- 3) HW Flammable Tank (K-803) had a Flammable label and a NFPA 704 label with a Health Hazard (blue) of 2, Flammability Hazard (red) of 2, and Stability Hazard (yellow) of 0.
- 4) Cold Blend Tank (K-666) had a Flammable label and a NFPA 704 label with a Health Hazard (blue) of 2, Flammability Hazard (red) of 2, and Stability Hazard (yellow) of 0 (Photograph 25).

Multiple instances within the tank farm displayed tags that were unreadable due to coats of dust and paint (Photographs 9-21). Facility personnel mentioned that certain tags contained multiple connections (e.g., 5 connections correspond to one tag). Inspectors discovered three (3) 5-gallon containers within the tank farm; of which two contained tubing and one left opened (Photographs 23 and 24). Two containers were labeled “Hazardous Waste” with no indication of the hazards of the contents and one container potentially displaying no hazardous waste label or an indication of the hazards of the contents. Inspectors asked facility personnel to repaint, or properly clean the hazardous waste labels, Department of Transportation (DOT) placards, and the NFPA 704 labels displayed on the tanks as they were difficult to read from the amount of dust covered.

Pursuant to HW Permit SCD003351699, IV.D.3. Air Emission Standards, the Permittee shall insure that all hazardous wastes placed in tanks are managed in compliance with R.61-79.264.200 [40 C.F.R. § 264.200]. Pursuant to R.61-79.264.200 [40 C.F.R. §264.200], which incorporates R.61-79.264 Subpart BB [40 C.F.R. Part 264 Subpart BB], 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 as required by R.61-79.264.1050(d) [40 C.F.R. § 264.1050(d)].

Pursuant to HW Permit SCD003351699, XI.B. Emission Control Technology, which incorporates the applicable requirements of R.61-79.264 Subparts AA and BB [40 C.F.R. Part 264 Subparts AA and BB], 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 as required by R.61-79.264.1050(d) [40 C.F.R. § 264.1050(d)].

Pursuant to S.C. Code Ann. Regs. 61-79.262.17(a)(1)(iv) [40 C.F.R. § 262.17(a)(1)(iv)], which is a condition of the LQG Permit Exemption, (A) a container holding hazardous waste must always be closed during accumulation, except when it is necessary to add or remove waste; and (B) A container holding hazardous waste must not be opened, handled, or stored in a manner that may rupture the container or cause it to leak.

Pursuant to S.C. Code Ann. Regs. 61-79.262.17(a)(5)(ii) [40 C.F.R. § 262.17(a)(5)(ii)], which is a condition of the LQG Permit Exemption, a generator must mark or label its tanks with the words “Hazardous Waste”; mark or label its tanks with an indication of the hazards of the contents; use inventory logs, monitoring equipment or other records to demonstrate that hazardous waste has been emptied within 90 days of first entering the tank; and keep inventory logs or records with the above information on site and readily available for inspection.

Used Oil Area

This area is adjacent to their Lube Shop and provides maintenance to their machinery. The inspectors observed four (4) 275-gallon containers, one of which was tipped over/broken (Photographs 26-28). The inspectors could not access and read labels of the used oil containers because oil/water was pooling in the secondary containment (Photograph 28). It appears that the facility was not maintaining and managing released used oil within the secondary containment. The inspectors instructed the facility to clean-up secondary containment and mark used oil containers stored adjacent to the Lube shop.

Pursuant to S.C. Code Ann. Regs. 61-79.279.22(d) [40 C.F.R. § 279.22(d)], upon detection of a release of used oil to the environment, the facility must clean up and manage properly the released used oil and other materials.

Pursuant to S.C. Code Ann. Regs. 61-79.279.22(c)(1) [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.”

Product and Used Oil Tank Farm

This tank farm included product tanks and two (2) 500-gallon used oil tanks (Photograph 29). The inspectors noticed the secondary containment also consisted of spilled oil sheens (Photograph 30). Facility personnel mentioned that they will clean up their secondary containments and have the used oil put in frac tanks sent to Giant Resource Recovery (GRR) Attala.

Pursuant to S.C. Code Ann. Regs. 61-79.279.22(d) [40 C.F.R. § 279.22(d)], upon detection of a release of used oil to the environment, the facility must clean up and manage properly the released used oil and other materials.

Oil Shop

The oil shop adjacent to the product and used oil tank farm provides maintenance service to vehicles operating in the facility. Inspectors noticed one 40-gallon container and one 5-gallon container overfilled with oil filters (Photograph 31).

SAA Solids Area: Giant Cement manages a SAA in their SAA Solids Area for managing hazardous waste solids generated by lab sampling. The inspectors observed one (1) 30-gallon container in this SAA (Photograph 32). The container was in the middle of two lab countertops holding lab equipment, and it was equipped with a flip top lid, which was closed. The container was labeled “Hazardous Waste” with F005, D001, D006, D008 EPA hazardous waste codes, and an indication of the hazards of the contents were identified with a “Flammable” label..

SAA Liquids Area: Giant Cement manages a SAA in their SAA Liquids Area for managing hazardous waste sludge/solid debris that is generated by lab sampling. The inspectors observed one (1) 0.6-gallon and one (1) 2-gallon container in this SAA (Photographs 33-34). The containers were located inside a lab ventilation hood and were equipped with a flip top and latched lid, respectively; both of which were closed. The containers were labeled F001-F005, D001, D006, and D008 hazardous waste. The 0.6-gallon container was named sludge/solid debris, both the 0.6-gallon and 2-gallon containers were identified with an indication of hazards of the contents.

Metals Prep Area: Giant Cement manages a SAA in their Metals Prep area of the laboratory. The inspectors observed one (1) closed 30-gallon flip top container of lab sampling waste marked “Hazardous Waste,” labeled with the EPA waste code F001-F005, D001, F006, F008, and identified with an indication of hazards of the contents.

Metals Analysis Room (ICP Room): Giant Cement manages a SAA in their Metals Analysis Room for managing hazardous waste generated by lab sampling. The inspectors observed one (1) 30-gallon container and seven (6) 5-gallon containers in this SAA. The 30-gallon container was located near the corner door leading to the SAA Metals Prep, and was equipped with a flip top lid, which was closed. The container was labeled F001-F005, D001, F006, F008 hazardous waste, and identified with an indication of hazards of the contents. The 5-gallon containers were in multiple areas underneath lab equipment and near the rear door, equipped with a bottle cap with some connected tubing, of which one of the containers was partially open (Photograph 37). The containers were labeled F001-F005, D001, D006, D008 hazardous waste, and identified with an indication of hazards of the contents, corrosive labels (Photographs 32- 38). Two (2) 5-gallon containers were found full and missing the required accumulation start date. Since the total volumetric number for containers exceeded the required 55-gallon limit for satellite accumulation areas (SAA), accumulation start dates should be labeled and removal of excess should also be within three consecutive calendar days.

Pursuant to S.C. Code Ann. Regs. 61-79.262.15(a)(4) [40 C.F.R. § 262.15(a)(4)], which is a condition of the SAA Permit Exemption, a generator is required to keep containers of hazardous waste closed at all times during accumulation, except when adding, removing, or consolidating waste; or when temporary venting of a container is necessary for the proper operation of equipment, or to prevent dangerous situations, such as build-up of extreme pressure.

Pursuant to S.C. Code Ann. Regs. 61-79.262.15(a)(6)(ii) [40 C.F.R. § 262.15(a)(6)(ii)], which is a condition of the SAA Permit Exemption, a generator who accumulates either acute hazardous waste listed in § 261.31 or § 261.33(e) of this chapter or non-acute hazardous waste in excess of the amounts listed in paragraph (a) of this section at or near any point of generation must remove the excess from the satellite accumulation area within three consecutive calendar days to a central accumulation area or to an on-site interim status or permitted treatment, storage, or disposal facility.

90-Day Storage Central Accumulation Area (CAA): Giant Cement manages a hazardous waste CAA in the 90 Day Storage Area. Their CAA is located outside their laboratory building. The facility manages ignitable waste in this CAA, and the inspectors did not observe “No Smoking”

signs within or near the CAA.

The area is not equipped with an internal communications or alarm system capable of providing immediate emergency instruction to facility personnel; it is not equipped with a device capable of summoning emergency assistance from local police departments, fire departments, or state or local emergency response teams; it is not equipped with portable fire extinguishers, fire control equipment, spill control equipment, and decontamination equipment; and it is not equipped with water to supply water hose streams, or foam producing equipment, or automatic sprinklers, or water spray system. Inspectors observed one (1) 55-gallon container within an overpack stored on a wooden pallet (Photographs 39-40). The container was closed, labeled F001, F005, D001, D006, D008 hazardous waste, identified with an indication of hazards of the contents, and dated June 15, 2022.

Electrical Shop: Giant Cement manages universal waste lamps in their electrical shop. The inspectors observed one container of universal waste lamps in this area during the inspection. One 4-foot box of used lamps, which was closed and marked with an accumulation start date, was labeled universal waste lamps. The oldest date observed on any container of used lamps was December 29, 2021.

Records Review

The inspectors reviewed the following documentation as a part of the records review: waste analysis plan; contingency plan; daily and weekly inspections logs for the on-site storage area and storage tanks; training records; a random selection of in-coming hazardous waste manifests and out-going hazardous waste manifests; copies of shipment from a foreign source; and records for most recent copies of tank integrity testing and visual tank inspection.

The inspectors reviewed hazardous waste training completed in 2020, 2021 and 2022 calendar years. The training records indicated that primary and secondary emergency coordinators have not received yearly RCRA refresher training.

Pursuant to HW Permit SCD003351699, II.G. Personnel Training, the Permittee shall conduct personnel training, as required by R.61-79.264.16 [40 C.F.R. § 264.16]. This training shall follow the outline described in Section 8 of the approved Permit application. Section 8 states that refresher training is provided to all current employees once every calendar year.

The inspectors reviewed Giant Cement's available records of inspections of the hazardous waste central accumulation areas (CAA) for three years. Records review indicated that the facility did not conduct weekly inspections at the laboratory CAA during April 6 – April 22, 2022, and June 9 – June 22, 2022.

Pursuant to HW Permit SCD003351699, II.D. General Inspection Requirements, the Permittee shall follow the general inspection requirements set out in R.61-79.264.15 [40 C.F.R. § 264.15] and Section 6.3 of the approved Permit application. The Permittee shall remedy any deterioration or malfunction discovered by an inspection as required by R.61-79.264.15(c) [40 C.F.R. § 264.15(c)] and the Permit application. Section 6.3.2.1 states that containers and containment areas in the facility container storage areas (On-Site Storage Area, Truck and Railcar Unloading Area No. 1, and Tank Truck Direct Transfer Area 1)

are inspected at least once per week for the following.

Giant Cement's records did not include the time of each monitoring event or the instrument reading for each monitoring point. Their records also did not include the name or signature of the person conducting the air monitoring.

Pursuant to HW Permit SCD003351699, I.E.9.(c), which incorporates R.61-270.30(j)(3) [40 C.F.R. § 270.30(j)(3)], records of monitoring information shall specify the dates, exact place, and times of sampling or measurements; the individuals who performed the sampling or measurements; the dates analyses were performed; the individuals who performed the analyses; the analytical techniques or methods used; and the results of such analyses.

12) Closing Conference

The inspectors conducted the exit meeting at approximately 3:20pm with Sonny Dougherty. During this meeting, the inspectors stated their preliminary conclusions of the inspection. Giant Cement agreed to provide Leak Detection and Repair (LDAR) records within one to two weeks. On July 5, 2022, Sonny Dougherty provided LDAR records in an email to Gerald Shealy, Sean Hannigan, Parvez Mallick, and Mark Anthony Relon.

13) List of Appendices

Appendix 1 – Photo Log.
Camera – Canon PowerShot SD980 IS (EPA Property Number S75319).

14) Signed

Parvez Mallick
Environmental Engineer

Date

MARK ANTHONY RELON

Digitally signed by MARK ANTHONY
RELON
Date: 2022.09.02 13:58:38 -04'00'

Mark Anthony Relon
Environmental Engineer

Date

15) Concurrence and Approval

Araceli B. Chavez
Chief
RCRA Enforcement Section

Date

Appendix I
Graphic Packaging International, LLC – Stone Mountain
RCRA CEI Photographs
Parvez Mallick, US EPA



LWDF Loading Area equipment with indistinguishable tags. Photograph 1 taken at 10:34am



LWDF Loading Area equipment with indistinguishable tags. Photograph 2 taken at 10:34am



LWDF Loading Area equipment with indistinguishable tags. Photograph 3 taken at 10:34am



LWDF Loading Area equipment with indistinguishable tags. Photograph 4 taken at 10:35am

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LWDF Loading Area containers found. Photograph 5 taken at 10:38am



LWDF Loading Area equipment with indistinguishable tags. Photograph 6 taken at 10:39am



LWDF Loading Area permitted SAA. Photograph 7 taken at 10:40am



LWDF Loading Area permitted SAA. Photograph 8 taken at 10:42am

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Tank Farm area with indistinguishable tags on equipment. Photograph 9 taken at 10:45am



Tank Farm area with indistinguishable tags on equipment. Photograph 10 taken at 10:47am



Tank Farm area with indistinguishable tags on equipment. Photograph 11 taken at 10:48am



Tank Farm area with indistinguishable tags on equipment. Photograph 12 taken at 10:49am

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Tank Farm area with indistinguishable tags on equipment. Photograph 13 taken at 10:50am



Tank Farm area with indistinguishable tags on equipment. Photograph 14 taken at 10:50am



Tank Farm area with indistinguishable tags on equipment. Photograph 15 taken at 10:51am



Tank Farm area with indistinguishable tags on equipment. Photograph 16 taken at 10:53am

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Tank Farm area with indistinguishable tags on equipment. Photograph 17 taken at 10:53am



Tank Farm area with indistinguishable tags on equipment. Photograph 18 taken at 10:57am



Tank Farm area with indistinguishable tags on equipment. Photograph 19 taken at 10:57am



Tank Farm area with indistinguishable tags on equipment. Photograph 20 taken at 10:59am

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Tank Farm area with indistinguishable tags on equipment. Photograph 21 taken at 11:01am



Tank Farm area hazardous waste tank labels. Photograph 22 taken at 11:02am



Tank Farm area with three (3) containers; two (2) with tubing and one (1) left open. Photograph 23 taken at 11:02am



Tank Farm area with tubing connected to containers. Photograph 24 taken at 11:03am

Appendix I
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Tank Farm area hazardous waste tank labels. Photograph 25 taken at 11:06am	Used Oil area with 275-gallon container labeled "Used Oil." Photograph 26 taken at 11:51am
	
Used Oil area with broken 275-gallon container. Photograph 27 taken at 11:52am	Used Oil area consisting of oil sheens. Photograph 28 taken at 11:52am

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Product and Used Oil tank farm. Photograph 29 taken at 11:55am



Product and Used Oil tank farm consisting of oil sheens. Photograph 30 taken at 11:58am



Oil Shop with containers overfilled with used oil filters. Photograph 31 taken at 11:59am



SAA Solids Area. Photograph 32 taken at 1:45pm

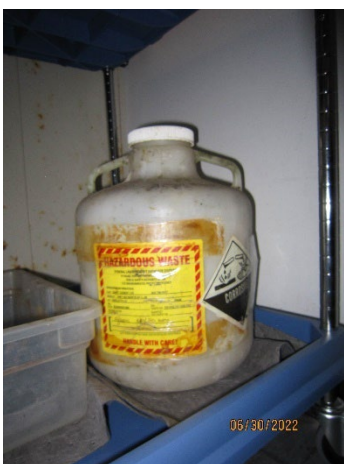
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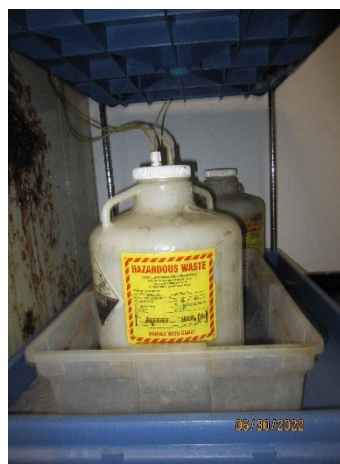
SAA Liquids Area. Photograph 33 taken at 1:45pm



SAA Liquids Area. Photograph 34 taken at 1:45pm

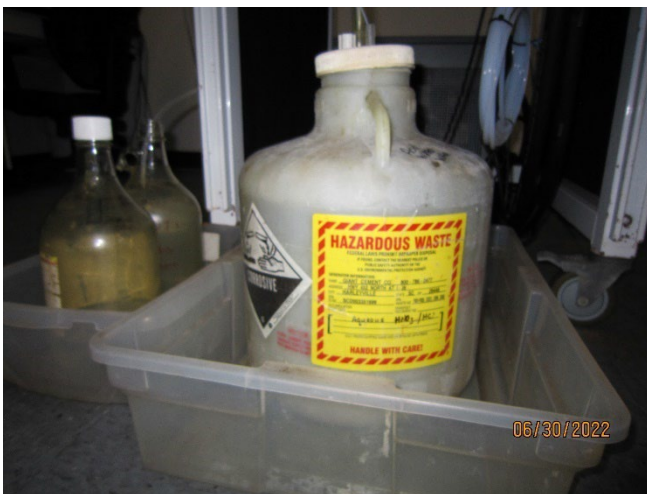


ICP Room. Photograph 35 taken at 1:56pm



ICP Room. Photograph 36 taken at 1:57pm

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Parvez Mallick, US EPA



ICP Room 5-gallon container partially open.
Photograph 37 taken at 1:59pm



ICP Room. Photograph 38 taken at 2:01pm



90-Day Storage Central Accumulation Area. Photograph 39
taken at 2:04pm



90-Day Storage Central Accumulation Area. Photograph 40
taken at 2:05pm