RCRA Inspection Report

1) Inspector and Author of Report

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U.S. Environmental Protection Agency, Region 4
Enforcement and Compliance Assurance Division
Chemical Safety and Land Enforcement Branch
RCRA Enforcement Section
61 Forsyth Street, S.W.
Atlanta, Georgia 30303

2) Facility Information

Fort Dearborn
103 Lumpkin Campground Road
Dawsonville, Georgia

EPA ID#: GA0000575696
NAICS #: 323111 - COMMERCIAL GRAVURE PRINTING

3) Responsible Officials

Randy Smith
EHS Manager
rasmith@fortdearborn.com

4) Inspection Participants

Brooke York	Inspector	United State Environmental Protection Agency (EPA)
Lynn Preston	Inspector	Georgia Environmental Protection Division (GAEPD)
Joel Truelove	Planning Manager	Fort Dearborn
Damien Van Laningham	Quality Manager	Fort Dearborn
Michael Krivanek	General Manager	Fort Dearborn
Brandon Lowry	Maintenance Manager	Fort Dearborn
Randy Smith[1]	EHS Manager	Fort Dearborn

5) Date of Inspection

November 28, 2023, 9:15 AM

6) Applicable Regulations[2]

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; and the State Code (see below).

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[1] By phone.

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

Georgia Hazardous Waste Management Act, Ga. Code Ann. § 12-8-60 *et seq.*, and Georgia Hazardous Waste Management Rules, Ga. Comp. R. and Regs. 391-3-11.01 to 391-3-11.18 (2016 and 2018)

Pursuant to O.C.G.A. §12-8-62(15) [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 Ga. Comp. R. and Regs. 391-3-11-.18 [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 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 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 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] (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], 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 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").

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 261.4(a)(23)], hazardous secondary material generated and legitimately reclaimed within the United States or its territories and under the control of the generator are excluded from being solid waste and may be accumulated 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 material complies with conditions listed in Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 261.4(a)(23)(i) and (ii)] (hereinafter referred to as the "Hazardous Secondary Materials Exclusion").

7) Purpose of Inspection

The purpose of this inspection was to conduct an unannounced compliance evaluation inspection to determine Fort Dearborn compliance with, the applicable requirements of RCRA and the corresponding Georgia regulations. This was an EPA lead inspection.

8) Facility Description

Fort Dearborn and Multi-Color Corporation (MCC) were acquired by Clayton, Dubilier & Rice (CD&R) in 2021. CD&R merged Fort Dearborn and MCC. The facility location in Dawsonville, Georgia is currently undergoing a transition as a result of this transaction. The Dawsonville, Georgia facility manufactures labels for various consumer products, such as soda, washing detergent, or salad dressing. The location was previously owned and operated by Sleevco, as a commercial printing operation. The facility receives ink bases and film from its vendors. Inks are further mixed onsite to create specific and proprietary colors, which are then printed (using Flexopress printers) onto labels, primarily film. The facility operates in a 90,000 square foot leased building, three shifts daily 5 days per week. The facility employees approximately 100 people. Sleevco first notified at this location as a large quantity generator of hazardous waste in 1996. Fort Dearborn began operation at this location in 2016. Its most recent notification of the large quantity generation of hazardous waste was made March 1, 2022, with the submittal of the 2021 Biennial Report. The facility reports the generation of hazardous waste ethanol, a D001 waste, characteristic for ignitability. Fort Dearborn has a Synthetic Minor Clean Air Act Permit, and National Pollution Discharge Elimination System Permit Clean Water Act Permit from GAEPD

9) Previous Inspection History

On November 7, 2014, GAEPD conducted the most recent RCRA CEI at the subject facility and found no apparent violations of RCRA's requirements.

10) Opening Conference

On November 28, 2023, EPA inspector Brooke York, accompanied by GAEPD inspector Lynn Preston, arrived at Fort Dearborn at approximately 9:15 AM. Joel Truelove, Planning Manager, immediately received the inspectors. Joel Truelove, and the inspectors were joined by Michael Krivanek, General Manager, Damien Van Laningham, Quality Manager, Randy Smith (by phone), EHS Manager, for the opening conference. The inspectors introduced themselves, showed their credentials to Joel Truelove 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 EPA inspector explained that the Small Business Regulatory Enforcement Fairness Act's classification of a "small business" is generally set by the Small Business Administration using the business' SIC/NAICS code and annual receipts or number of employees. A copy of the EPA's information sheet for small businesses can be found at https://www.epa.gov/sites/production/files/2017-06/documents/smallbusinessinfo.pdf. The EPA inspector also discussed the company's ability, pursuant to 40 C.F.R. § 2.203, to assert a business confidentiality claim for information submitted to EPA. The company did not assert a business confidentiality claim.

Joel Truelove and Michael Krivanek provided an overview of the facility's history and current operations during the opening conference. The Damien Van Laningham discussed health and

safety protocols and required personal protective equipment before Michael Krivanek led the inspectors on a tour of the Facility operations.

11) Inspection Observations

South Pressroom

There are 2 printing presses in the South Pressroom, a Windmoller and Holscher (W&H) 8 color and a Paper Converting Machine Company (PCMC) Fusion C 10 color. Facility representative explained that a fire had occurred on November 7, 2023 in the W&H 8 Color, resulting in some damage. At the time of the CEI, technicians were actively working to repair the machine.

A satellite accumulation area (SAA) was observed in the South Pressroom near the work area for the W&H 8 color press. This SAA contained the containers seen in Figures 3 through 5. The container on the left of the work bench was not labeled with the words "Hazardous Waste" and was open. The inspectors observed solvent in the container. At the time of the inspection, the Facility labeled the container hazardous waste.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [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 Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.15(a)(5)(i)], which is a condition of the SAA Permit Exemption, a generator is required to mark or label its containers (i) with the words "Hazardous Waste."

It appears that technicians routinely place parts for cleaning in partially filled 5-gallon buckets of solvent, for cleaning/soaking. A parts washer is conveniently located between the presses with an indication of flammable hazard label only.

The inspectors stressed the importance of using the parts washer, rather than numerous open unlabeled buckets of solvent with parts for cleaning. These buckets should be appropriately labeled and closed.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.17(a)(6)], which incorporates Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.251], and is a condition of the LQG Permit Exemption, a generator is required to maintain and operate its facility to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment.

Inspectors observed a SAA containing an open (missing the small bung) 55-gallon container labeled hazardous waste, with an indication of flammability (Figures 1 and 2).

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [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.

The small bung on a 55-gallon container of waste solvent was replaced in the presence of the inspectors. The inspectors expressed concern about the red flip top funnels used on the containers not providing a seal.

Two full mop buckets contained a mixture of water and solvent. The mop water is placed in 55-gallon drums, and it is disposed of as hazardous waste. The mop buckets were not closed or labeled**.**

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [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 Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.15(a)(5)], which is a condition of the SAA Permit Exemption, a generator is required to mark or label its containers (i) with the words "Hazardous Waste" and (ii) with an indication of the hazards of the contents.

Other containers noted included: One (1) 55-gallon drum of print head wash. It was closed and labeled as hazardous waste and had a hazard label; one (1) 55-gallon drum of water-based, non-hazardous waste; and one (1) 21-gallon red container with a flip lid for the collection of solvent rags.

Solvent wipes are used for cleaning. The solvent wipes are collected in SAAs. They are laundered by Aramark.

Plate Room

No hazardous waste was observed in this area.

Ink Room

Product ink is stored in the Ink Room. The operator in this area mixes and thins inks for the presses. It appears that when the operator opens a product container of ink the lid is placed back on top of the container and not clamped down. This is an area of concern. This practice could result in unnecessary spills, leaks and organic air emissions. A SAA containing one open unlabeled 55-gallon container of hazardous waste solvent was observed in the Ink Room

(Figures 7 and 8). The container was labeled and the latch on the red funnel was latched in the presence of the inspectors.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [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 Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.15(a)(5)], which is a condition of the SAA Permit Exemption, a generator is required to mark or label its containers (i) with the words "Hazardous Waste.

Maintenance and Distillation Area

The facility operates a distillation unit, Clean Planet AC150 (Figure 13), to recover solvent used by the presses for head cleaning. The used solvent for recovery is hard piped to the totes that are piped to the distillation unit. The solvent goes through the distillation process and is then piped to one of the other totes. Once the totes are full of reclaimed solvent, they are moved to the Tote Farm area, where they are connected to the piped system to be used to clean the heads on the presses. The totes of used solvents (Figures 9-11) were not labeled and did not have an indication of the hazards.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.11], a person who generates a solid waste, as defined in Ga. Comp. R. and Regs. 391-3-11-.07(1) [40 C.F.R. § 261.2], must determine if that waste is a hazardous waste following the methods articulated in Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.11], including determining if the waste is excluded from regulation and maintaining records of these determinations.

Universal Waste

Universal waste was stored in the Maintenance Shop. Waste batteries stored in a closed, 5-gallon container were observed. The container was not labeled with the appropriate words or an accumulation date**.** Manifests dated June 30, 2022, January 11, 2022 and December 30, 2021 showed the disposal of universal waste through Safety Kleen.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.18 [40 C.F.R. § 273.14(a)], a SQHUW must label or mark each Universal Waste battery or container or tank in which the batteries are contained clearly with one of the following phrases: "Universal Waste - Battery(ies)," or "Waste Battery(ies)," or "Used Battery(ies)."

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.18 [40 C.F.R. § 273.15(a) and (c)], a SQHUW may accumulate universal waste no longer than one year and must to be able to demonstrate

the length of time that the universal waste has accumulated from the date that it became a waste or was received.

A maintenance department employee said there were no used aerosol cans accumulated. The employee was unsure of the current procedure for aerosol cans. A photo of the aerosol can puncture unit was provided along with a written procedure for aerosol cans. The aerosol can puncture unit was not observed during the inspection in SAA near the Clean Planet Distiller.

CAA by the Tote Farm

Fort Dearborn manages a hazardous waste CAA in the Tote Farm. The CAA is between the distillation unit and the Tote Farm. The area was identified with a sign which read "Hazardous Waste Central Accumulation Area No Smoking." The facility manages ignitable waste in this CAA.

The CAA is equipped with an internal communications or alarm system capable of providing immediate emergency instruction to facility personnel; it is equipped with a device capable of summoning emergency assistance from local police departments, fire departments, or state or local emergency response teams; it is equipped with portable fire extinguishers, fire control equipment, spill control equipment, and decontamination equipment; and it is equipped with water to supply water hose streams, or foam producing equipment, or automatic sprinklers, or water spray system.

The inspectors observed nine 55-gallon containers of hazardous waste solvent (D001) in the CAA. The oldest date observed on the containers was November 26, 2023. At the time of the CEI, all containers appeared to be properly labeled and marked. The CAA did not have sufficient aisle space to access all sides of the container in storage (Figure 14).

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.17(a)(6)], which incorporates Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.255], and is a condition of the LQG Permit Exemption, a generator is required to maintain aisle space to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment to any area of facility operation in an emergency, unless aisle space is not needed for any of these purposes.

Laminator

The inspectors observed a container for the accumulation of excluded solvent contaminated wipes.

North Pressroom

Fort Dearborn operates a W&H 10 color press in the North Pressroom. The inspectors observed a Gravure press, no longer in operation, in the North Pressroom. Facility representatives informed the inspectors that it had been out of service longer than 90 days and that there are plans for disassembly and sale.

The inspectors observed a bucket liner that had a small amount of liquid in it in the trashcan in the North pressroom (Figure 15). The inspectors observed a SAA. The following containers were observed in the North Press Room:

- Three (3) 21-gallon red drums of excluded solvent wipes.
- One (1) parts washer (description - Flexo wash, anilox roll cleaner)
- One (1) 55-gallon drum ink waste with funnel latched, which did not provide a seal.
- Two (2) 5-gallon buckets of parts soaking in 80/20 solvent. The 5-gallon containers need to be closed**,** appropriately labeled with the words "hazardous waste," and an indication of the hazard of its contents**.**
- One (1) 80/20 cutting solvent, without an indication of the hazard of its contents.
- One 55-gal drum of non-hazardous water. This drum was collecting rainwater from a roof leak.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [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 Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.15(a)(5)], which is a condition of the SAA Permit Exemption, a generator is required to mark or label its containers (i) with the words "Hazardous Waste" and (ii) with an indication of the hazards of the contents.

Machine Shop

The inspectors observed the Machine Shop. A variety of machines were observed in this area, including a blasting unit. Inspectors asked where the filter and the spent blasting media were disposed when spent. The facility representative stated that these were disposed of as solid waste. *The inspectors requested a waste determination, via waste analysis, be made on this waste the next time the blast media becomes spent.*

CAA Building

The inspectors observed the CAA Building. At the time of the CEI, there were 104 55-gallon containers in the area. The oldest date observed was September 28, 2023.

The CAA is equipped with an internal communications or alarm system capable of providing immediate emergency instruction to facility personnel; it is equipped with a device capable of summoning emergency assistance from local police departments, fire departments, or state or local emergency response teams; it is equipped with portable fire extinguishers, fire control equipment, spill control equipment, and decontamination equipment; and it is equipped with water to supply water hose streams, or foam producing equipment, or automatic sprinklers, or water spray system. The CAA did not have sufficient aisle space to access all sides of the container in storage (Figure 20).

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.17(a)(6)], which incorporates Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.255], and is a condition of the LQG Permit Exemption, a generator is required to maintain aisle space to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment to any area of facility operation in an emergency, unless aisle space is not needed for any of these purposes.

12) Records Review

Waste Manifest and Land Disposal Restriction (LDR) Records:

The inspectors reviewed UHWM and land disposal restriction forms for the past three years. Generally, hazardous waste (D001) is transported by Action Resources to the destination facility, Giant Resource Recovery – Attalla, Inc. (ALD070513767). The most recent shipment was on November 16, 2023. One incident on October 17, 2023, resulted in a vendor shipping hazardous waste (D001, U112) from the facility. The vendor used a different generator identification number for the location, GAR000097014, to ship the hazardous waste to the destination facility, Safety-Kleen Systems, Inc. (KYD053348108).

Contingency Plan (CP) and Quick Reference Guide (QRG):

The actions that facility personnel should take in response to an emergency are described in the facility's CP, which was last updated on November 2018.

The plan describes actions facility personnel must take 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.

The plan describes arrangements agreed to with the local police department, fire department, other emergency response teams, emergency response contractors, equipment suppliers, local hospitals or the Local Emergency Planning Committee.

The plan lists the names and emergency telephone numbers for persons identified as emergency coordinators. Randy Smith is listed as the primary emergency coordinator, and the other individuals are listed in the order in which they will assume responsibility as alternates.

The plan appears to include a list of all emergency equipment at the facility. The list includes fire extinguishing systems, spill control equipment, communications and alarm systems, and decontamination equipment. The plan includes the location and a physical description of each item on the list, and a brief outline of its capabilities.

The plan includes an evacuation plan for personnel. This plan describes signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes.

A copy of the CP (and its quick reference guide) was most recently submitted to the police department, fire department, hospital, State and local emergency response teams and the Local Emergency Planning Committee in November 2018.

The quick reference guide includes the types/names of hazardous waste in layman's terms and the associated hazard associated with each hazardous waste present at any one time; the estimated maximum amount of each hazardous waste that may be present at any one time; the identification of any hazardous wastes where exposure would require unique or special treatment by medical or hospital staff; a map of the facility showing where hazardous wastes are generated, accumulated and treated and routes for accessing these wastes; a street map of the facility in relation to surrounding businesses, schools and residential areas; the locations of water supply; the identification of on-site notification systems; and the name of the emergency coordinator(s) and emergency telephone number(s).

Training Records:

The inspectors requested RCRA training records for Gene Gilbert, Randy Smith, Dan Laningham, Eric Anacleto, and Rusty Turner. The sign-in sheets were provided for the RCRA Training are summarized in the table below.

Employee	2020	2021	2022	2023
Gene Gilbert	--	--	--	--
Randy Smith	11/19/2020	10/28/2021	9/21/2022 11/10/2022	12/4/2023
Dan Van Laningham			11/10/2022	12/4/2023
Eric Anacleto			11/10/2022	12/4/2023
Rusty Turner			11/10/2022	
Rick Robertson	11/19/2020	10/28/2021		
Bill Stewart	11/19/2020			
Brian Murray		10/28/2021		
Michael Krivanek			11/10/2022	12/4/2023
Paul Eubanks				12/4/2023

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.17(a)(7)(i)(A)], which is a condition of the LQG Permit Exemption, (i) Facility personnel must successfully complete a program of classroom instruction or on-the-job training that teaches them to perform their duties in a way that ensures the facility's compliance with the regulations.

Weekly Inspection Records:

The inspectors reviewed Fort Dearborn's available records of inspections of the hazardous waste central accumulation area (CAA) for the past three years. The inspection log (Figure 23) includes a checklist to record observations about leaking containers and for deterioration of containers caused by corrosion or other factors. The inspection log should be updated to record observations about aisle space, visible container labels, legible container labels, complete container labels, closed lids and bungs, material on outside of container, rings tight, rings turned down, condition of containers, containers compatible with waste, container grounding, control of ignition sources, container stacking, container storage time, contents of containment units, housekeeping, emergency communication, fire extinguisher, spill response kit, and salvage drums. The records include the date of the inspection but must be updated to include the time, and the name, signature and initials of the employee conducting the inspection.

13) Closing Conference

The inspectors conducted the exit meeting with Damien Van Laningham and Michael Krivanek. During this meeting, the inspectors stated their preliminary conclusions of the inspection. They agreed to provide the records requested and listed on the "Closing Conference Agenda" within ten business days. On December 5, 2023, Randy Smith provided the requested records in an email to Brooke York, EPA, and Lynn Preston, GAEPD.

14) List of Attachments

Attachment 1 – Photo Log:

15) Signed

BROOKE YORK Digitally signed by BROOKE YORK
Date: 2024.01.19 09:21:30 -05'00'

Brooke York
Environmental Engineer

16) Concurrence

ARACELI CHAVEZ Digitally signed by ARACELI CHAVEZ
Date: 2024.01.22 08:37:15 -05'00'

Araceli B. Chavez
RCRA Enforcement Section

Attachment 1 – Photo Log

23 Photos taken on: November 28, 2023
Photos taken by: Brooke York
Photos taken with: Canon Power Shot ELPH180
EPA Property Tag: 922063017858

Figure 1: IMG_0221.JPG – SAA in South Pressroom

Figure 2: IMG_0222.JPG – Top of 55-gallon Container in SAA in South Pressroom

Figure 3: IMG_0223.JPG – Excluded Solvent Contaminated Wipes Container

Figure 4: IMG_0224.JPG – Containers in the South Pressroom

Figure 5: IMG_0225.JPG – Unknown Waste Container in the South Pressroom

Figure 6: IMG_0226.JPG – Solvent Container by PCMC Press

Figure 7: IMG_0227.JPG – SAA Ink Room

Figure 8: IMG_0228.JPG – SAA Ink Room

Figure 9: IMG_0229.JPG – Solvent Recycling System

Figure 10: IMG_0230.JPG – Solvent Recycling System

Figure 11: IMG_0231.JPG – Solvent Recycling System

Figure 12: IMG_0232.JPG – Solvent Recycling System

Figure 13: IMG_0233.JPG – Solvent Recycling System

Figure 14: IMG_0234.JPG – CAA by the Tote Farm

Figure 15: IMG_0235.JPG – Bucket Liner in Trashcan in North Pressroom

Figure 16: IMG_0236.JPG - Excluded Solvent Contaminated Wipes Container in North Pressroom

Figure 17: IMG_0237.JPG – North Pressroom SAA

Figure 18: IMG_0238.JPG – Excluded Solvent Contaminated Wipes Container in North Pressroom

Figure 19: IMG_0239.JPG – Exterior of the CAA

Figure 20: IMG_0240.JPG - CAA

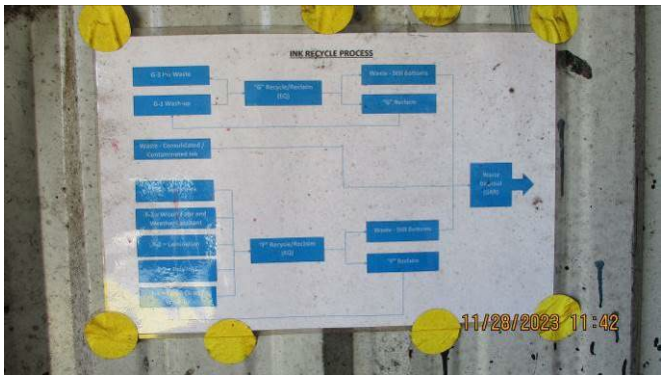

Figure 21: IMG_0241.JPG – Ink Recycle Process on the CAA wall

Figure 22: IMG_0242.JPG - CAA

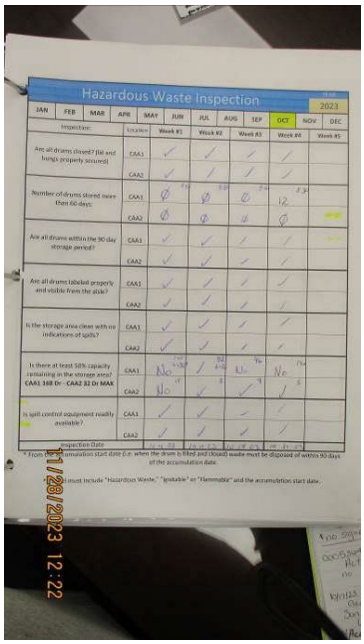

Figure 23: IMG_0243.JPG – Weekly Inspection Log