

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

Plymouth Engineered Shapes
201 Commerce Court
Hopkinsville, Kentucky 42240
Christian County

EPA ID#: KYD084270461
NAICS #: 331491 – Nonferrous metal (except copper and aluminum) rolling, drawing, and extruding and 331221 – Rolled Steel Shape manufacturing.

3) Responsible Officials

Dawn Pickett, Environmental Engineer
(270) 350 - 8066
dpickett@plymouth.com

4) Inspection Participants

Dawn Pickett, Plymouth
Jenna Griffith, Plymouth
Rickey Searcy, Plymouth
Archie England, Plymouth
Mark Groves, Plymouth
Cody Traylor, Plymouth

Curtis Scott, KDEP
Scott Gerstner, KDEP
Ethan Morgan, KDEP
Alan Newman, USEPA

5) Date of Inspection

May 3, 2023; 9:00 am to 5:15 pm

6) Applicable Regulations¹

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; Rules Governing Hazardous Waste Management Title 401 of Kentucky Administrative Regulations (401 K.A.R.) Chapters 30 through 40 and 44 Kentucky Department for Environmental Protection.

¹ 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.

Kentucky Revised Statutes Title XVIII, Chapter 224, Subchapter 46-Hazardous Waste et seq. (2006), and Title 401 of the Kentucky Administrative Regulations (K.A.R.) Chapters 30 through 38, 43 and 44 (2006).

Pursuant to 401 KAR 39:080 Section 1 [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 401 KAR 39:080 Section 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 KRS 224.46-520(1) [Section 3005 of RCRA, 42 U.S.C. § 6925], provided that the generator complies with the conditions listed in 401 KAR 39:080 Section 1 [40 C.F.R. § 262.17] (hereinafter referred to as the “LQG Permit Exemption”).

Pursuant to 401 KAR 39:080 Section 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 KRS 224.46-520(1) [Section 3005 of RCRA, 42 U.S.C. § 6925], and without complying with 401 KAR 39:080 Section 1 [40 C.F.R. § 262.16(b) or § 262.17(a)], except as required in 401 KAR 39:080 Section 1 [40 C.F.R. § 262.15(a)(7) and (8)], provided that the generator complies with the satellite accumulation area conditions listed in 401 KAR 39:080 Section 1 [40 C.F.R. § 262.15(a)] (hereinafter referred to as the “SAA Permit Exemption”).

Pursuant to 401 KAR 39:080 Section 3(1) [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.

7) Purpose of Inspection

The purpose of this inspection was to conduct an unannounced compliance evaluation inspection to determine Plymouth Engineered Shapes compliance with the applicable requirements of RCRA and the corresponding Kentucky regulations. This was an EPA lead inspection.

8) Facility Description

Plymouth Engineered Shapes (Plymouth) is part of Plymouth Tube Company which is headquartered in Illinois and operates eight manufacturing facilities in the United States. Plymouth Tube began operations in 1980 in Hopkinsville, Kentucky. Plymouth manufactures titanium, stainless, nickel alloy, carbon & alloy semi-finished extrusions and semi-finished shaped bar. Plymouth operates as a large quantity generator of hazardous waste, a small quantity handler of universal waste and a generator of used oil. Plymouth occupies 13 acres with approximately 130,000 square feet under roof and employs 100 workers. Plymouth Tube Company is a family-owned business. Plymouth operates three shifts, 24 hours-a-day, five days-a-week.

As a registered LQG, Plymouth generates 10 hazardous waste streams including:

Waste Streams	Waste Description	EPA Waste Codes
1	Hydrofluoric/nitric acid	K062, D002
2	Pickle tank sludge	K062, D002
3	Blanchard Sludge	D007
4	West Bay Saw Dust Filters	D007
5	Ceramic Dust	D006
6	Contaminated Filters	K062
7	Alkaline Fluid	D007
8	Waste Paint	D001, D005, D006, D007
9	Waste Aerosols	D001, D005, D006, D007, D008, D035
10	Citric Acid	D002

Access to the facility is through a locked reception area. Plymouth last notified as a large quantity generator on August 1, 2022.

9) Previous Inspection History

KDEP has conducted two RCRA CEIs at the subject facility between 2014 and 2018 and found fifteen violations during those inspections. On October 12, 2018, KDEP conducted the most recent RCRA CEI at the subject facility and found no apparent violations of RCRA's requirements.

10) Opening Conference

On May 3, 2023, EPA inspector Alan Newman, accompanied by KYDEP inspectors Curtis Scott, Scott Gerstner, and Ethan Morgan, arrived at Plymouth at approximately 9:00 am. Dawn Pickett, Environmental Engineer, immediately received the inspectors and was present for the opening conference. The inspectors introduced themselves, showed their credentials to Dawn Pickett 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.

Dawn Pickett and Jenna Griffith provided an overview of the facility's history and current operations during the opening conference. The inspection participants also discussed health and safety protocols and required personal protective equipment (hard hat, safety glasses, kevlar sleeves, and hearing protection) before Dawn Pickett and Jenna Griffith led the inspectors on a tour of the Facility operations.

11) Inspection Observations

The facility receives metal billets which are cut to specifications, prepped, and extruded through a hydraulic die. The extrusions are straightened, shot blasted, sized, and finished in an alkaline, hydrofluoric, and nitric acid bath as per product type and process used.

Plymouth declares alkaline material, hydrofluoric acid, and nitric acid waste when removed from the process tanks. A pump truck is called when the products start to show signs of lower quality. The acids are removed as product from the process tanks; the baths are still finishing the steel when removed from the bath. Once removed from the process, the waste acids are declared hazardous waste and managed appropriately. Formerly, alkaline oil skimmings were recovered from the alkaline bath and managed as hazardous waste. Plymouth changed the process to use an oleophilic material to collect oil skimmings and leave the alkaline product in the bath since the inspection in 2018. Plymouth is able to manage these oleophilic skimmings as non-hazardous waste. Plymouth manufactures its own dies for hot and cold draw, spent dies are remelted and or reused. The facility maintains an exclusion for K062 rinse waters. Plymouth maintains a TCLP sampling result for the filter cakes generated by the wastewater treatment plant (WWTP). The WWTP operates on a batch process. Sludge and filters from the tanks are only generated during maintenance and clean out events.

Facility Process Area with Satellite Accumulation Area (SAA):

Plymouth manages SAAs in multiple locations including maintenance, finishing, the laboratory, blanching, and zinc coating (Photographs 1-11). The inspection team noted that there were two 55-gallon containers accumulating aerosol cans. These containers were labeled with an indication of the hazard as flammable but did not include the hazard of toxic (Photographs 1-4). These containers were labeled with toxic indications of hazard during the inspection. The other containers accumulating waste in SAA containers were in good condition, labeled, and closed.

Pursuant to 401 KAR 39:080 Section 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 (ii) with an indication of the hazards of the contents.

Facility Area with Central Accumulation Area (CAA):

Plymouth manages a hazardous waste CAA in the finishing area. The area consists of a secondary containment pallet along the rear wall of the facility. Plymouth periodically manages ignitable and/or reactive waste in this CAA, and the inspectors did not note a “No Smoking” sign. On the day of the inspection, there were no ignitable or reactive wastes in storage at this location; the inspection team advised Plymouth to place a “No Smoking” sign in the CAA prior to storage of D001 or D003 wastes. On the day of the inspection, there was one 55-gallon metal container of Chromium waste. This container was in good condition, closed, labeled, and marked with an accumulation start date of May 1, 2023 (Photographs 12-13).

The CAA is equipped with an internal communications including an intercom and multiple phone extensions 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.

Facility Area for Universal Waste and Used Oil Management:

Plymouth manages universal waste batteries, fluorescent lamps, and used oil in various locations throughout the facility including the WWTP, in between the drawing lines and the Goff area, and the maintenance area. Plymouth conducts batch wastewater treatment of rinse baths. The resulting wastewaters are discharged to the local POTW.

The inspectors observed a container of universal waste batteries with an accumulation start date of June 2, 2022, near I-beam J13 and a 5-gallon plastic container of universal waste batteries with an accumulation start date of November 3, 2022, near I-beam D13 (Photographs 14-16). Plymouth was also accumulating universal waste batteries in the WWTP in two 5-gallon plastic containers with accumulation start dates of November 2, 2022, and July 26, 2022. These containers were labeled as universal waste batteries and in good condition (Photographs 17-19). Plymouth replaced the former production floor overhead metal halide lighting with LED lamps. Office areas still function with 4-foot fluorescent lamps. The inspection team noted two 4-foot lamp boxes with accumulation start dates of October 5, 2022, and December 16, 2022 (Photographs 20-22). These boxes were labeled and closed.

Plymouth was storing one 55-gallon metal container of used oil in the WWTP area (Photographs 23-24). Plymouth was operating one parts washer and was storing a 55-gallon metal container of used oil in the maintenance area (Photographs 25-26). The inspection team noted on 1-gallon plastic container of unknown liquid in the maintenance area; the container was not marked to identify its contents. Maintenance staff identified the contents as used oil and placed the contents into the designated used oil container. Used oil containers must be labeled with the words "Used Oil." Plymouth utilizes cloth absorbents to clean up machine oils; these clothes are laundered and reused (Photograph 27).

Pursuant to 401 KAR 39:080 Section 4(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."

Plymouth utilized caustic baths, a nitric acid bath, a hydrofluoric acid bath, and rinse waters in the finishing process (Photographs 28-31). These tanks appeared to be in good condition. Plymouth generates multiple waste streams of non-hazardous waste through processing feedstock including filter press sludge, glass table dust waste, Goff blaster sludge waste, among other wastes (Photographs 32-35). Plymouth accumulates metals for recycling in multiple containers at the site (Photographs 37-40).

12) **Records Review**

Contingency Plan and Quick Reference Guide (QRG):

The actions that facility personnel should take in response to an emergency are described in the facility's Emergency Response, Evacuation, and Contingency and Fire Prevention Plan Revision H dated October 2022.

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. Dawn Pickett is listed as the primary emergency coordinator, and the other individuals (Rickey Searcy) are listed in the order in which they will assume responsibility as alternates. Jenna Griffith is listed as the primary emergency coordinator on the Contingency Plan Quick Reference Guide (QRG), and the other individuals (Dawn Pickett and John Reynolds). These two documents do not name the same coordinators (Photograph 41).

The plan does not include a list of all emergency equipment at the facility. The list includes spill control equipment; no other equipment is listed. The list does not appear to be up to date. 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 Emergency Response, Evacuation and Contingency Plan (and its quick reference guide) was most recently submitted to the Christian County PEPC and Christian County EMA office on March 21, 2021. The facility maintains verbal agreement with Safety Kleen to perform 24-hour spill response. The contingency plan was updated in October 2022 (Revision H) and no subsequent notification was sent.

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 street map of the facility in relation to surrounding businesses, schools and residential areas; the locations of water supply; and the identification of on-site notification systems.

The quick reference guide did not include a map of the facility showing where hazardous wastes are generated or the name and emergency telephone numbers of the current emergency coordinators (Photograph 42).

Pursuant to 401 KAR 39:080 Section 1(1)] [40 C.F.R. § 262.17(a)(6)], which incorporates [401 KAR 39:080 Section 1(1)] [40 C.F.R. § 262.261(d-e)], and is a condition of the LQG Permit Exemption, (d) the contingency plan must list names and emergency telephone numbers of all persons qualified to act as emergency coordinator, and this list must be kept up to date and (e) the contingency plan must include a list of all emergency equipment at the facility where this equipment is required, and this list must be kept up to date.

Pursuant to 401 KAR 39:080 Section 1(1)] [40 C.F.R. § 262.17(a)(6)], which incorporates 401 KAR 39:080 Section 1(1)] [40 C.F.R. § 262.262(a)], and is a condition of the LQG Permit Exemption, a large quantity generator must submit a copy of the contingency plan and all revisions to all local emergency responders (i.e., police departments, fire departments, hospitals and State and local emergency response teams that may be called upon to provide emergency services). This document may also be submitted to the Local Emergency Planning Committee, as appropriate.

Pursuant to 401 KAR 39:080 Section 1(1)] [40 C.F.R. § 262.17(a)(6)], which incorporates 401 KAR 39:080 Section 1(1)] [40 C.F.R. § 262.262(b)], and is a condition of the LQG Permit Exemption, a large quantity generator that is otherwise amending its contingency plan must at that time submit a quick reference guide of the contingency plan to the local emergency responders identified at paragraph (a) of this section or, as appropriate, the Local Emergency Planning Committee. The quick reference guide must include all the elements listed in 40 C.F.R. § 262.262(b)(1) through (8).

Pursuant to 401 KAR 39:080 Section 1(1)] [40 C.F.R. § 262.17(a)(6)], which incorporates 401 KAR 39:080 Section 1(1)] [40 C.F.R. § 262.262(c)], and is a condition of the LQG Permit Exemption, generators must update, if necessary, their quick reference guides, whenever the contingency plan is amended and submit these documents to the local emergency responders identified at paragraph (a) of this section or, as appropriate, the Local Emergency Planning Committee.

Pursuant to 401 KAR 39:080 Section 1(1)] [40 C.F.R. § 262.17(a)(6)], which incorporates 401 KAR 39:080 Section 1(1)] [40 C.F.R. § 262.263(d-e)], and is a condition of the LQG Permit Exemption, a generator is required to review and immediately amend its contingency plan, if necessary, whenever the list of emergency coordinator changes or the list of emergency equipment changes.

Training Records:

The inspectors reviewed facility job descriptions for Environmental Coordinator, Facilities Maintenance Technician/Wastewater, Maintenance Coordinator. Each description included the requisite skill, education, or other qualifications, and duties of facility personnel assigned to that position. Plymouth provided a written description of the type and amount of both introductory and continuing training to be given to each person filling the positions listed above. The inspectors reviewed records of employee hazardous waste training completed in 2020-2023. During the review of records, Rickey Searcy, Operations Manager, last received RCRA training in February 2022 which is over a year old. The facility did not provide job titles along with names of the employees within that title for staff who have hazardous waste responsibilities.

Pursuant to 401 KAR 39:080 Section 1(1) [40 C.F.R. § 262.17(a)(7)(iii-iv)], which is a condition of the LQG Permit Exemption, (iii) facility personnel must take part in an annual review of the initial training required by this section; and/or (iv) the generator must maintain training records that include, among others: the job title for each position at the facility related to hazardous waste management, and the name of the employee filling each job; a written job description for each position; a written description of the type and amount of both introductory and continuing training that will be given to each person filling a position; and records documenting that the training required has been given to and completed by Facility personnel.

Waste Manifest and Land Disposal Restriction (LDR) Records:

The inspectors reviewed available hazardous waste manifest records and land disposal restriction forms for shipments of hazardous waste sent since 2020. Hazardous waste manifest records show that D007 hazardous waste liquid are routinely shipped to Tradebe Treatment & Recycling of Tennessee (TND000772186), and the most recent shipment was made on April 24, 2023. The inspection team reviewed the manifest and shipping records for hazardous waste, universal waste, and used oil. Documentation for shipping was confirmed for nonhazardous waste sludge, oil/coolant, Goff Sludge, quench sludge, burr sludge, and oil filters which is managed by American Bio Mass. E-scrap is managed by Scott Recycling; Used oil is managed by Safety-Kleen. Wastewaters generated from the Goff Sludge operations is managed by APEX. Facility representatives were unable to document that universal waste was being sent to an appropriate facility for disposal. The inspection team noted that two manifests were missing signed returned copies (018623561JJK from 10/13/2020 and 007862212FLE from 10/29/2020) (Photographs 43-44). Both returned copies were obtained during the inspection. The returned manifest copies document that the waste was transported in a timely manner. All other shipping records appeared to be in compliance.

Pursuant to 401 KAR 39:080 Section 1(9) [40 C.F.R. § 262.20], a generator, except for very small quantity generators, shall not offer hazardous waste to a transporter or a to a treatment, storage, or disposal facility that has not received and EPA identification number.

Pursuant to 401 KAR 39:080 Section 3(1) [40 C.F.R. § 273.18], a small quantity handler of universal waste is prohibited from sending or taking universal waste to a place other than another universal waste handler, a destination facility, or a foreign destination.

Pursuant to 401 KAR 39:080 Section 1(1) [40 C.F.R. § 262.42(a)(2)], a generator of 1,000 kilograms or greater of hazardous waste in a calendar month, or greater than 1 kg of acute hazardous waste listed in § 261.31 or § 261.33(e) in a calendar month, must submit an Exception Report to the EPA Regional Administrator for the Region in which the generator is located if he has not received a copy of the manifest with the handwritten signature of the owner or operator of the designated facility within 45 days of the date the waste was accepted by the initial transporter.

Weekly Inspection Records:

The inspectors reviewed Plymouth's available records of inspections of the hazardous waste central accumulation area (CAA) since January 1, 2021. The inspection log includes a checklist to record observations about leaking containers and for deterioration of containers caused by corrosion or other factors. The inspection log includes a checklist to record observations about container markings, attention to accumulation time, compatibility of containers, determination of potential spills, condition of containers, ensuring containers are closed, ensuring storage of containers prevents damage or spill, required aisle space and any observations. The records include the date and time of the inspection and the name, signature and initials of the employee conducting the inspection. Employees do routinely record inspection observations and subsequent follow-up actions on the inspection log. The inspection team noted that the period between inspections stretched to 10 days on a few occasions. This is an area of concern. Pursuant to 401 KAR 39:080 Section 1(1) [40 C.F.R. § 262.17(a)(1)(v)], which is a condition of the LQG Permit Exemption, a generator is required to, at least weekly, inspect central accumulation areas looking for leaking containers and for deterioration of containers caused by corrosion or other factors.

Annual Report:

Plymouth prepared and submitted the Annual Report to KDEP. The inspection team requested documentation that this Annual Report had also been sent to the Kentucky county judge executives or the chief executive office as required by state regulations. Plymouth failed to document that the Annual Report had been sent as required.

Pursuant to 401 KAR 39:080 Section 1(8)(b) [40 C.F.R. § 262.41(a)], (b) each generator, except for very small quantity generators, shall submit a copy of the Hazardous Waste Annual Report established in paragraph (a) of this subsection as established in KRS 224.46-510(1)(h).

Pursuant to KRS 224.46-510(1)(h), generators shall provide the report required in paragraph (g) of this subsection to the county judge/executive of the county or chief executive officer of an urban-county government within which the waste site or facility which will receive waste from the generator is located and to the county judge/executive of the county or chief executive officer of an urban-county government within which the generator is located in order that the county judge/executive or chief executive officer may make the report available to the county law enforcement and emergency services for emergency planning purposes.

13) Closing Conference

The inspectors conducted the exit meeting at approximately 4:30 pm with Rickey Searcy, Archie England, Jenna Griffith, and Dawn Pickens. During this meeting, the inspectors stated their preliminary conclusions of the inspection.

14) **List of Appendices**

Appendix 1 – Photo Log

44 Photos taken on: May 3, 2023

Photos taken by: Alan Newman

Photographs taken with Lumix Digital

EPA Property Tag: S75870

15) **Signed**

ALAN NEWMAN

Digitally signed by ALAN NEWMAN
Date: 2023.08.25 10:37:32 -04'00'

Alan Newman
Environmental Engineer

16) **Concurrence**

ARACELI CHAVEZ

Digitally signed by ARACELI CHAVEZ
Date: 2023.08.25 13:38:58 -04'00'

Araceli B. Chavez
Chief
RCRA Enforcement Section

Appendix 1

Photograph Log:

44 Photographs taken May 3, 2023.
Photographs taken by Alan Newman
Photographs taken with Lumix Digital
EPA Property Tag: S75870



Photograph 1: SAA Aerosol Cans.



Photograph 4: SAA Aerosol Cans.



Photograph 2: SAA Aerosol Cans



Photograph 5: Laboratory SAA.



Photograph 3: SAA Aerosol Cans.



Photograph 6: Laboratory SAA.



Photograph 7: Coating Booth Dust SAA.



Photograph 10: Blanchard SAA.



Photograph 8: Coating Booth Dust SAA.



Photograph 11: Blanchard SAA.



Photograph 9: Blanchard Waste Accumulation point – continuous generation from process.



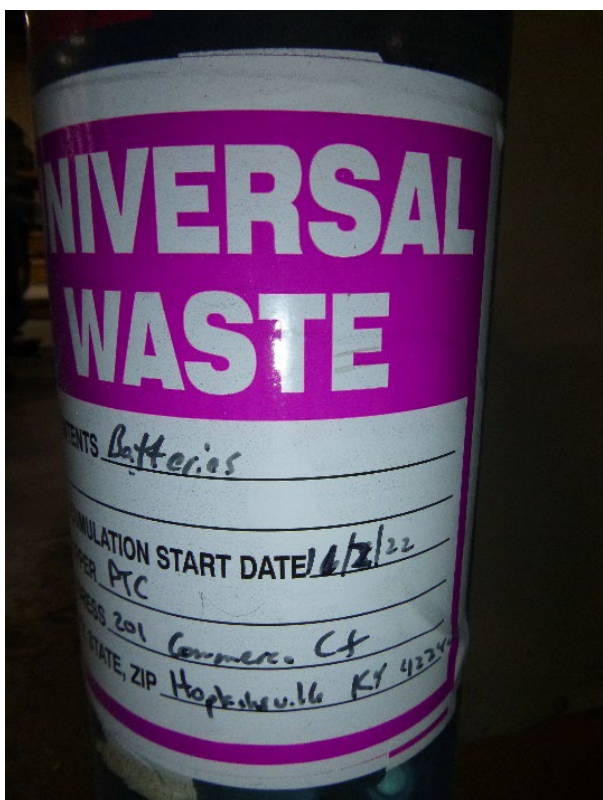
Photograph 12: CAA container.



Photograph 13: CAA container.



Photograph 15: Universal Waste batteries.



Photograph 14: Universal Waste batteries.



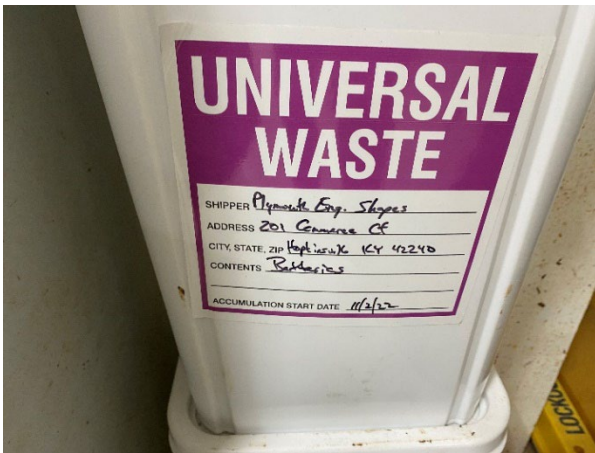
Photograph 16: Universal Waste batteries.



Photograph 17: Universal Waste batteries.



Photograph 20: Universal Waste batteries.



Photograph 18: Universal Waste batteries.



Photograph 21: Universal Waste batteries.



Photograph 19: Universal Waste batteries.



Photograph 22: Universal Waste batteries.



Photograph 23: Universal Waste batteries.



Photograph 26: Part Washer in Maintenance.



Photograph 24: Used Oil in WWTP.



Photograph 27: Absorbent cloth accumulation.



Photograph 25: Used oil in maintenance.



Photograph 28: Treatment and rinse tanks.



Photograph 29: Treatment and rinse tanks.



Photograph 30: Treatment and rinse tanks.



Photograph 31: Treatment and rinse tanks.



Photograph 32: Filter Press Sludge.



Photograph 33: Filter Press Sludge.



Photograph 34: Glass table dust waste.



Photograph 35: Goff blaster sludge waste.



Photograph 36: Nonhazardous waste accumulation.



Photograph 37: Goff blaster shot for recycle.



Photograph 38: Recyclable waste accumulation.



Photograph 39: Recyclable waste accumulation.



Photograph 40: Recyclable waste accumulation.

ENSAFE
Safety Services

EHS Facility Plan # 024-044
PLYMOUTH EXTRUDED SHAPES

Facility Name	Facility Emergency Coordinator (FEC)	Communications
Plymouth Extruded Shapes 201 Commerce Ct. Hopkinsville, KY 35.9287-87.4409	Name: Drew Pickett Title: EHS Coordinator	Office # 270-887-9228 Fax # Home # Cell # 270-350-8998 Pager # Email: dpickett@plymouth.com
	Alternate Facility Coordinator (FEC) Name: Ricky Sealey Title: Plant Manager	Office # 270-887-9221 Fax # Home # Cell # 270-207-8365 Pager # Email: rsealey@plymouth.com

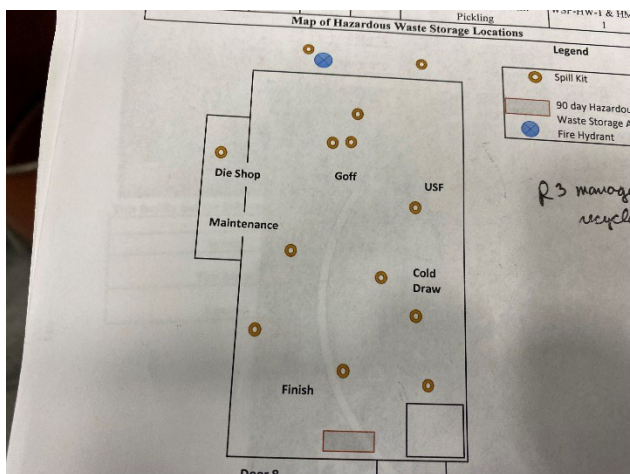
HAZARDOUS CHEMICAL(S)						
NAME	UN ID #	CAS #	FORM	PACKAGED CONTAINER	MAXIMUM QUANTITY	HEALTH HAZARD
Hydrofluoric Acid		7664-39-3	Liquid	Val Drum	8400 lbs.	Corrosive
Nitric Acid		7697-37-2	Liquid	Val Drum	21,000 lbs.	Corrosive

***HEALTH HAZARD (detailed description of each EHS chemical listed):**

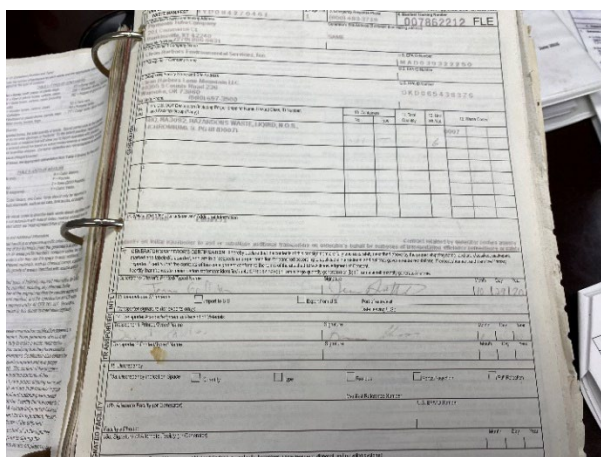
Hydrofluoric Acid:

- **EYE CONTACT:** Irritation and/or burns to the eye that may lead to vision impairment or loss.
- **INGESTION:** Burns to the mouth, esophagus and stomach. Systemic effects may occur and can be fatal.
- **INHALATION:** Hydrogen Fluoride is corrosive and irritating to the respiratory tract and mucous membranes. Deep lung inflammation (chemical pneumonitis), bleeding (pulmonary hemorrhage), abnormal fluid buildup in the lungs (pulmonary edema) and a systemic reaction are possible and can be fatal. Appearance of symptoms may be delayed.
- **SKIN CONTACT:** Burns to affected area can cause deep tissue damage and possibly a systemic reaction which can be fatal. Burns may not be immediately painful or visible.

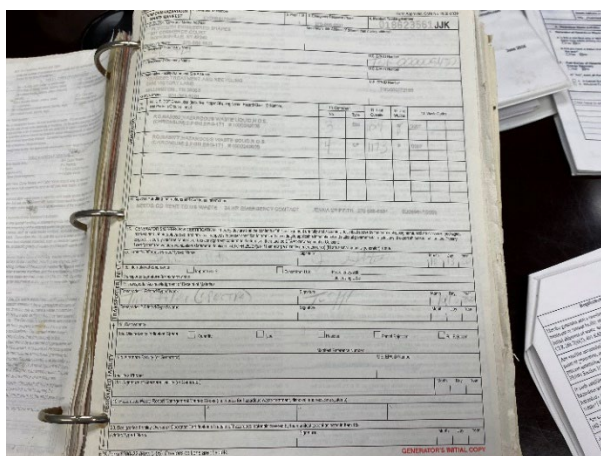
Photograph 41: Contingency Plan list of Emergency Coordinators.



Photograph 42: Map of QRG.



Photograph 43: Manifest without final signature.



Photograph 44: Manifest without final signature.