

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

Rohm & Haas Chemicals LLC (RHC)
730 Dale Avenue
Knoxville, Tennessee 37921
Knox County

EPA ID#: TND058660390
NAICS #: 325211 – manufacturing of resins,
plastics materials, a non-vulcanizable
thermoplastic elastomers and mixing and
blending resins on a custom basis and or
manufacturing non-customized synthetic
resins.

3) Responsible Officials

Christopher Golden, EHS Leader
cngolden@dow.com
(865) 521 – 8479

4) Inspection Participants

Stacy Bryson, RHC
Christopher Golden, RHC
Laura Johns, RHC
Benny Fuller, RHC

Jennifer McClellan, Tennessee Department of
Environment and Conservation (TDEC) -
Central Office
G. M. Webster, TDEC - Knoxville Field Office
Alan Newman, USEPA

5) Date of Inspection

September 12, 2023; 8:35 am – 4:30 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; [State Code (see below)] and Hazardous Waste Permit TNHW-148.

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.

Tennessee Hazardous Waste Management Act of 1977, Tennessee Code Annotated (Tenn. Code Ann.) § 68-212-101 et seq., and Chapter 0400-12-01 of the Rules and Regulations of the State of Tennessee (Tenn. Comp. R. & Regs.).

Pursuant to Tenn. Comp. R. & Regs. 0400-12-01-.01(2)(a) [40 C.F.R. § 262.10], a large quantity generator (LQG) is a generator who generates greater than or equal to 1,000 kilograms (2,200 lbs) of non-acute hazardous waste in a calendar month.

Pursuant to Tenn. Comp. R. & Regs. 0400-12-01-.12(1)(i) [40 C.F.R. § 273.9], a small quantity handler of universal waste (SQHUW) is a universal waste handler who accumulates less than 5,000 kilograms total of universal waste (batteries, pesticides, mercury-containing equipment, lamps, or aerosol cans, calculated collectively) at any time.

Pursuant to Tenn. Comp. R. & Regs. 0400-12-01-.03(4)(e)5.(i) [40 C.F.R. § 262.34(c)(1)], a generator may accumulate as much as 55 gallons of 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 68-212-108 of the THWMA, Tenn. Code Ann. § 68-212-108 [Section 3005 of RCRA, 42 U.S.C. § 6925], and without complying with Tenn. Comp. R. & Regs. 0400-12-01-.03(4)(e)2. [40 C.F.R. § 262.34(a) (2016)], provided that the generator complies with the satellite accumulation area (SAA) conditions listed in Tenn. Comp. R. & Regs. 0400-12-01-.03(4)(e)5.(i)(I)-(II) [40 C.F.R. § 262.34(c)(I)(i)-(ii)] (hereinafter referred to as the "SAA Permit Exemption").

Pursuant to Tenn. Comp. R. & Regs. 0400-12-01-.03(4)(e)2. [40 C.F.R. § 262.34(a) (2016)], a large quantity generator (LQG) may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status, as required by Section 68-212-108 of the THWMA, Tenn. Code Ann. § 68-212-108 [Section 3005 of RCRA, 42 U.S.C. § 6925], provided that the generator complies with the conditions listed in Tenn. Comp. R. & Regs. 0400-12-01-.03(4)(e)2.(i)-(v) [40 C.F.R. § 262.34(a)(1)-(4) (2016)] (hereinafter referred to as the "LQG Permit Exemption").

TDEC issued RCRA Permit Number: TNHW-174, in effect since September 26, 2018, and expires on September 26, 2028.

7) Purpose of Inspection

The purpose of this inspection was to conduct an unannounced compliance evaluation inspection to determine Rohm and Haas's compliance with the conditions of its RCRA Hazardous Waste Facility Operating Permit (TNHW-174) the applicable requirements of RCRA and the corresponding Tennessee regulations. This was an EPA lead inspection.

8) Facility Description

Rohm and Haas Chemical (RHC) is a subsidiary of Rohm and Haas Company which is in turn a wholly owned subsidiary of The Dow Chemical Company. RHC is a manufacturer of acrylic

polymers used as ingredients, by other manufacturers of consumer products (i.e., paints, laundry detergents, paper coatings, etc.) The facility started operations as a government owned entity in 1943 when it manufactured Plexiglas acrylic sheet used in the production of American military aircraft during the World War II. After the war, Rohm and Haas purchased the facility.

The facility covers about 60 acres, and it is in a mixed use (industrial and residential) zone, west of downtown Knoxville. Including contractors, RHC has about 180 employees and operates 24 hours a day, seven days a week. The facility manufactures a product line of water-based acrylic emulsions and dispersants for the paint, textile, paper, and detergent markets. Hazardous, ignitable wastes are generated from raw material handling and quality control procedures and from some of the production processes.

RHC has two production departments: the Emulsion Department and the Polymers Department. The Emulsion Department uses monomers, soap, water, and other ingredients while the Polymer Department (Polymers 300's unit) uses acrylic acid and other monomers.

RHC most recently registered with the TDEC on March 1, 2022, as a Large Quantity Hazardous Waste Generator, a Small Quantity Handler of Universal Waste (batteries, lamps and mercury containing equipment), and a used oil generator.

In addition, the facility has a TDEC issued RCRA permit (#TNHW-174) for a hazardous waste container storage pad and a hazardous waste storage tank. The permit was approved on September 26, 2018, and expires on September 26, 2028. According to permit TNHW-174: hazardous wastes associated with the handling of wet solvent in the 'Polymers 300' unit, typically containing a mixture of polymer, water, and wet solvent (xylene, di isobutylene, and toluene), are piped directly from the point of generation into a 7900-gallon stainless steel upright tank (generally referred to as 'Tank 660'), with walled secondary containment, overfill alarms, and emergency backup pumps.

On August 23, 2021, the TDEC received notification that RHC intended closure of permitted storage Tank 660; closure was approved by the TDEC in correspondence dated August 25, 2022. A closure inspection was conducted by the TDEC on April 1, 2022, with the closure effective June 30, 2022. Hazardous waste formerly managed in the permitted tank are now managed in Tank 650 which currently operates as a central accumulation area (CAA) hazardous waste storage tank. In addition to the above-ground tank for hazardous waste storage, RHC also has a three-sided sheet-metal structure that contains both a CAA and a permitted storage area (HWSU-1) for hazardous waste containers.

RHC has initiated in situ remediation for a groundwater plume for solid waste management units 16, 20G, 20H, and 20N. TDEC is managing the ongoing treatment and corrective action for this groundwater plume.

The waste generated at the facility include:

Waste Stream Number	Waste Name	Generation Process	Waste Codes	Amount generated in 2022 (lbs)
15	Laboratory Waste	Disposal of unused laboratory chemicals	D001, D002, F003, U121, U147	169
24	Wet Solvent	Spent solvent from plant production process, maintenance and equipment clean out.	D001	30
29	Burnable liquids	Pumpable liquids from various plant operations.	D001, U009, U113, U118, U162	285
45	Tamol solids	Generated from the cleanout of process equipment and from the filtration of wet solvent.	D001	2,767
46	Waste Acrylonitrile	Drains from process and storage equipment.	D001, U009	523
49	Groundwater contaminated with chlorinated VOC's	RCRA corrective action	D039, D040, D043, U210	302
50	Contaminated glass	Left blank by the facility	D001, F005, U113, U162, U239	175
56	Tamol crude	Production process	D001	383,727
63	Composited absorbed monomers	Cleanup of spilled monomers	U007, U008, U009, U113, U162, D001	2,000
64	Maleic Anhydride	Cleanup of spilled maleic anhydride or obsolete material.	D002, U147	26
75	Paint solvent sludge & rags	Discard of paint sludge and rags	D001	650
78	Lead paint chips & debris	Removal of paint coating	D008	24
82	Styrene & Styrene Polymer	Disposal of unusable or polymerized raw material.	D001	420

86	Sodium Hydrosulfite	Disposal of obsolete product or unusable material.	D001, D003	30
93	Monomer flush water	Cleaning of equipment for maintenance	D001, U008, U113, U162	4,600
94	Aerosol cans	Disposal of empty or unused aerosol cans	D001, D002, D003	106
97	Waste Aqueous Ammonia	Maintenance activities	D002	38
98	CN-100 Cleaning solution	Equipment cleaning	D002	19,795
105	Copper nitrate	Disposal of absorbed or obsolete raw material.	D001	173
112	Caustic Laden Filters	Packed column scrubber filtration (air pollution control device).	D002	165
118	WEDAC Cleaner & Water	Metal equipment cleaning.	D002	708
119	Alcohol Hand Sanitizer	Disposal of unused or spilled material.	D001	1,155
120	Nitric acid contaminated debris	Spill during passivation of equipment	D002	212

9) **Previous Inspection History**

TDEC has conducted two RCRA CEIs at the subject facility between 2021 and 2022 and found no violations during those inspections including the most recent inspection on December 13, 2022.

10) **Opening Conference**

On September 14, 2023, EPA inspector Alan Newman, accompanied by TDEC inspectors Gerald Webster and Jennifer McClellan, arrived at Rohm and Haas at approximately 8:35 a.m. Stacy Bryson, Manufacturing EHS Leader, immediately received the inspectors. Stacy Bryson, and the inspectors were joined by Christopher Golden, EHS Leader, for the opening conference. The inspectors introduced themselves, showed their credentials to Christopher Golden, and explained the purpose of the visit.

The inspectors 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.

Christopher Golden 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 before Facility representative led the inspectors on a tour of the Facility operations.

11) Inspection Observations

Permitted Hazardous Waste Container Storage Area

The inspection tour started at the permitted hazardous waste container storage area which is co-located with a CAA for containers. A three-sided shed with an asphalt base was bifurcated into a permitted section and a section designated as a CAA.

Pursuant to Permit TNHW-174 Section 8.1-7, the container storage pad has a design capacity of 12,096 gallons. The permitted volume for storage at any one time is 9,900 gallons (the equivalent of 180 55-gallon containers). The container storage pad consists of a 25-foot by 52-foot, curbed concrete pad, designed to contain any spills. The pad is bordered on the south side by a grate covered trench. The trench drains to a collection sump. All joints are sealed with a chemical-resistant sealer. The inspection team noted that the volume of waste present on the day of the inspection was for less than the permitted amount (Photos 1-3, 8).

The hazardous waste in storage on the day of the inspection included:

Container Size	Waste (WS#)	Accumulation Start Date and Photo Number
One 55-gallon black metal container	Spent aerosol cans (WS94)	8/4/2023 – Photo 3
One 55-gallon blue poly container	Diesel and Sand	7/19/2023 – Photo 3
One 20-gallon container	Contaminated Glass	8/24/2023
Two 5-gallon plastic containers	One for Sharps and one for Lab Pack Code B	8/24/2023 – Photo 3 9/1/2023– Photo 3

Each container was in good condition, closed, and labeled with the words "Hazardous Waste" and with the indication of the hazard. The oldest ASD was July 19, 2023. The inspection team noted pre-cursors to cracks developing in the floor of the area (Photo 8). The inspection team also noted that the sump underneath the grates were partially full of dirt and debris. The inspection team recommends that this sump area be cleaned out when buildup of debris is noted. These are areas of concern for the inspection team.

Hazardous Waste Central Accumulations Area for Containers

RHC manages a CAA adjacent to with their permitted hazardous waste storage area (Photos 4-8). The area was identified with appropriate signage. 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.

At the time of the inspection, there was one 5-gallon plastic pail labeled as non-hazardous waste, three 55-gallon metal containers labeled as WS94, WS75 and WS50 hazardous waste, respectively, six 55-gallon containers labeled as non-hazardous waste, one 50-pound bag labeled as non-hazardous waste, two 55-gallon containers of WS92, and two 55-gallon containers of used oil were stored in the 90-day area of the shed. Each container was in good condition, closed, and labeled as to the indication of hazards of its contents. The oldest ASD for these containers was August 25, 2023. One 55-gallon container of building steel debris was not labeled with an indication of the hazard (Photo 7). The inspection team noted one area where the floor of the CAA had been repaired. This area did not appear to have been resealed after the repair. RHC documented that the floor was re-sealed in this area and added newly painted lines to re-establish aisles.

Pursuant to Tenn. Comp. R. & Regs. 0400-12-01-.03(1)(h)1.(v)(I)II. [40 C.F.R. § 262.17(a)(5)(i)(B)], which is a condition of the LQG Permit Exemption, a generator must mark or label its containers with the following: an indication of the hazards of the contents clearly visible for inspection on each container.

CAA Tank 650

RHC operates one CAA 6,500-gallon hazardous waste tank for storage of process waste which is shipped out as waste flammable liquids (Xylene) D001 (Photos 9-17). The first waste managed in this tank was in November 2021. Hazardous waste is generated during the process and transferred to this tank via pipeline or container. This tank is housed in a secondary containment dike. This tank is subject to RCRA Subpart BB and CC regulations. Tank 650 has a vacuum/pressure relief valve (VPRV) which is the primary means of emission control. The tank is also connected to the site closed-vent system and thermal vapor incinerator. Ancillary equipment for Tank 650, which consist of 51 valves, 1 pump (inspected monthly), 1 spill stop, and 1 relief valve, are subject to subpart BB and inspected on a quarterly basis and recorded in a log.

The CAA tank was labeled with the words “Hazardous Waste” and the indication of the hazard. The indication of the hazard label was damaged. Although still legible, the inspection team recommends that the label be replaced. Records show that the tank was last emptied on August 29, 2023, well within the last 90 days. The inspection team noted that the piping to the process was labeled with an incorrect tank number. Formerly these lines were used to transfer waste from the process to the permitted hazardous waste tank (Tank 660) that was closed in

2021. There was also a section of the transfer line that had been replaced but was not painted to match the remaining transfer line. The inspection team noted some debris inside the secondary containment of Tank 650. This is an area of concern for the inspection team, and it is recommended that the debris be removed on a regular basis or as accumulated.

Facility Process Areas with Satellite Accumulation Areas, Used Oil, and Universal Wastes:

RHC manages multiple SAAs and areas where other wastes are stored. These include:

Area	Container size and waste accumulated	Comments (Photo #)
Pumphouse Nine	One 55-gallon metal container of mixed monomers (WS 29)	(Photo 18)
Process area near Tank 916 and 917	One 55-gallon metal container for Cleanout of process equipment and from filtration of wet solvent (WS45)	This area was empty on the day of the inspection
Maintenance shop	55-gallon metal container of Aerosol Cans (WS94)	(Photo 23)
QC Laboratory	Five 5-gallon containers for Code B, Code C, Code D, Code K, Code O, and Sharpes hazardous waste (WS15) One 20-gallon container for contaminated glass (WS50)	The Code O container had a broken lid and was open (Photos 20-21)
Scrubber area	One 55-gallon metal container for spent caustic Filters (WS112)	There was no waste in this container on the day of the inspection (Photo 19)
Used Oil Room Lower Paint Shop	Two 55-gallon containers of Used oil One 55-gallon container of SAA paint related material (WS75)	(Photo 22)

Each container was closed, in good condition, and labeled with the words “Hazardous Waste” and with the indication of the hazard except as noted in the comments in the table. Each SAA area was equipped with emergency equipment including a fire extinguisher and spill equipment. Radios are used for communication throughout the facility.

Pursuant to Tenn. Comp. R. & Regs. 0400-12-01-.03(1)(f)1.(iv) [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.

Facility Area for Universal Waste Management:

RHC manages universal waste (UW) lamps and batteries in the electrical shop (Photos 24-26).

Type of Universal Waste	Number, Size, and Type of Container	Accumulation Start Date
Used Ballast (not UW)	Two 5-gallon plastic buckets with lid	8/3/2023 8/11/2022
Small Lead Acid Batteries	One 5-gallon plastic bucket with lid	5/5/2023
NiCad Nickel-Cadmium Batteries	One 5-gallon plastic bucket with lid	8/11/2022
Small Lithium-ion Batteries	One 5-gallon plastic bucket with lid	5/5/2023
Dry Cell – Alkaline Batteries	Two 5-gallon plastic buckets with lid	12/1/2023 8/3/2023
8-foot fluorescent lamps	One fiber cylinder	12/1/2022
4-foot fluorescent lamps	Two fiber cylinders	4/19/2023 7/7/2023
Misc UW Lamps	One 30-gallon blue poly with lid	12/1/2022

Each of the containers of lamps and batteries was in good condition, closed, labeled as universal waste, and marked with an ASD. The ASD for the NiCad batteries was listed as August 11, 2022; however, shipping records indicated that this date had not been changed on the container when the most recent shipment was sent off site. The oldest date observed on any container of UW batteries was May 5, 2023, and on any container of UW lamps was December 1, 2022.

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 Plan, which was last updated on May 24, 2023. 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. The emergency Response Leader 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 includes 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 list appears to be up to date. 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 Emergency Response Plan (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 on May 24, 2023.

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 reviewed facility job descriptions and employee names that were provided for emergency response leader, immediate response leader, laboratory analyst, site guard, utilities operator, site nurse, other technical personal, and EH&S specialist. Each description included the requisite skill, education, or other qualifications, and duties of facility personnel assigned to that position. RHC 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 2023.

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 2022. Hazardous waste manifest records show that D001 hazardous waste flammable liquids (Xylene) are routinely shipped to Safety-Kleen System, Inc. (KYD053348108), and the most recent shipment was made on August 31, 2023. There were no issues noted with manifest or LDR notification records on the day of the inspection.

Weekly Inspection Records:

The inspectors reviewed RHC available records of inspections of the weekly hazardous waste CAA, the weekly permitted storage area, and the daily CAA hazardous waste Tank 650 since 2022. The inspection log includes a checklist to record observations about leaking containers and for deterioration of containers caused by corrosion or other factors. 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 also reviewed the hazardous waste minimization plan dated March 1, 2023, the closure cost estimate dated December 2022, the fire hydrant monthly inspection form, the emergency response trailer inspection log, the emergency radio inspection log, fire and evacuation alarm inspection log, sprinkler system, fire doors, eye wash/shower inspection log, perimeter inspection log, medical oxygen – escape pack inspection log, fire pump and supply tank inspection form, EHS atmospheric monitoring instrument calibration log, waste determination records, tank assessments, and organic air emission monitoring required by 264/265 Subparts AA, BB and CC.

- Rohm and Haas needs to examine if this facility will be subject to the pharmaceutical regulations that are found in Tennessee Rule 0400-12-01-.09(16) Hazardous Waste Pharmaceuticals.

13) Closing Conference

The inspectors conducted the exit meeting at 4:00 pm with Christopher Golden, Laura Johns, and Stacy Bryson. During this meeting, the inspectors stated their preliminary conclusions of the inspection. RHC agreed to provide financial assurance documentation within one week. On September 14, 2023, Stacy Bryson provided the financial test records in an email to Alan Newman and Gerald Webster. The inspection team also requested an inventory of the permitted storage area, the CAA for containers, the 2022 annual waste report, corrections of laboratory SAA, picture of the cleaned-out dike area for Tank 650, verification that no free liquids are stored in the QC Laboratory SAA. All these items were sent either on September 15, 2023, or on October 26, 2023, to Alan Newman and Gerald Webster.

14) List of Attachments

Attachment 1 – Photo Log:

26 Photos taken on: September 14, 2023

Photos taken by: Gerald Webster

15) **Signed**

ALAN NEWMAN

Digitally signed by ALAN NEWMAN
Date: 2023.12.14 12:05:56 -05'00'

Alan Newman
Environmental Engineer

16) **Concurrence**

ARACELI CHAVEZ

Digitally signed by ARACELI
CHAVEZ
Date: 2023.12.14 12:09:01 -05'00'

Araceli B. Chavez
RCRA Enforcement Section

Appendix 1

Photograph Log:

26 Photos taken September 14, 2023.

Photos taken by Gerald Webster



Photograph 1: Permitted Container Storage Area and CAA for containers.



Photograph 4: Signage for CAA for containers.



Photograph 2: Signage for Permitted Container Storage Area.



Photograph 5: CAA for containers.



Photograph 3: Permitted Container Storage Area .



Photograph 6: CAA for containers.



Photograph 7: CAA for containers.



Photograph 8: Floor of Hazardous waste container CAA.



Photograph 9: Hazardous waste tank CAA.



Photograph 10: Former Hazardous waste permitted tank.



Photograph 11: Hazardous waste tank CAA.



Photograph 12: Hazardous waste tank CAA.



Photograph 14: Hazardous waste tank CAA.



Photograph 15: Hazardous waste tank CAA.



Photograph 13: Hazardous waste tank CAA.



Photograph 16: Hazardous waste tank CAA.



Photograph 17: Hazardous waste tank CAA.



Photograph 18: SAA Pumphouse 9.



Photograph 19: SAA Scrubber Area.



Photograph 20: SAA laboratory.



Photograph 21: SAA laboratory.



Photograph 23: SAA Maintenance Shop.



Photograph 22: SAA Used Oil Room.



Photograph 24: Universal Waste Storage in Electrical Shop.



Photograph 25: UW Li-Ion battery storage bucket.



Photograph 26: UW Li-Ion battery storage bucket.