INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We Protect Hoosiers and Our Environment.
100 N. Senate Avenue • Indianapolis, IN 46204
(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov
Eric J. Holcomb, *Governor*
Brian C. Rockensuess, *Commissioner*

July 3, 2024

VIA EMAIL

Ms. Taylor Lyon
Environmental Engineer
Fort Wayne Assembly General Motors LLC
12200 Lafayette Center Rd
Roanoke, In 46783

Re: Violation Letter
Fort Wayne Assembly General Motors LLC
IND115304594
Roanoke, Allen County

Dear Ms. Lyon:

On 6/18/2024, a representative of the Indiana Department of Environmental Management, Office of Land Quality, conducted an inspection of Fort Wayne Assembly General Motors LLC, located at 12200 Lafayette Center Rd, Roanoke, IN. This inspection was conducted pursuant to IC 13-14-2-2. For your information, and in accordance with IC 13-14-5, a summary of the inspection is provided below:

Type of Inspection: Compliance Evaluation Inspection

Results of Inspection: Violations were discovered and require a submittal.

Within thirty (30) days of receipt of this letter, a written detailed explanation, documenting compliance with each of the requirements listed in the inspection report, must be submitted to this office. Failure to respond adequately to this Violation Letter may result in a referral to the OLQ Enforcement Section. Please direct any response to this letter and any questions to Kari Clevenger at 317-760-3702. Thank you for your attention to this matter.

Sincerely,

Susan Lowry
Section Chief
Hazardous Waste Compliance Section
Compliance Branch

Enclosure
cc: Allen County Health Department

HAZARDOUS WASTE INSPECTION REPORT
INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

Inspector's Name:	Kari Clevenger
Others Present	Susan Lowry | Section Chief
Date:	Tuesday, June 18, 2024
Time In:	9:36 AM
Time Out:	4:55 PM
Inspection Type	Compliance Evaluation Inspection

General Information

Facility Information

Facility Name	Fort Wayne Assembly General Motors LLC
Facility Location	12200 Lafayette Center Rd Roanoke, IN 46783 Allen County
Facility Mailing Information	Same Address as Facility
Facility Contact	Same as Primary Facility Contact
Primary Facility Contact During Inspection	Taylor Lyon Environmental Engineer 260-519-8357 taylor.lyon@gm.com

Other Facility Contact(s) During Inspection

Salutation	First Name	Last Name	Title	Phone Number	Email
Ms.	Baliey	Blinger	Summer Intern		
Mr.	Matt	Arbuckle	Environmental Supervisor		
Ms.	Alexis	McClure	Resource Manager		

Facility ID

EPA ID Number	IND115304594	**NAICS Code**	33611, 336110

Facility Status

File Status	Large Quantity Generator	**Other Activities**	Large Quantity Universal Waste Handler Hazardous Waste Tank

Outstanding Issues

Last Inspection Date	8/15/2019
Previous Violations	○ Yes ◉ No
Details	EPA Inspection

Inspection Narrative

IDEM staff arrived at Fort Wayne Assembly General Motors LLC on June 18, 2024, to conduct a compliance evaluation inspection (CEI). Fort Wayne Assembly General Motors LLC is located at 12200 Lafayette Center Road, Roanoke, Indiana and is notified as a Large Quantity Generator. This site is part of IDEM's Environmental Stewardship Program (ESP) and thus was given advanced notice of the inspection. IDEM staff met with Ms. Taylor Lyons, Environmental Engineer, Matt Arbuckle, Environmental Supervisor, and Bailey Blinger, Summer Intern. IDEM staff explained the reason

for the inspection and Ms. Lyons, Mr. Arbuckle, and Ms. Blinger participated in the walk through of the facility. Ms. Alexis McClure participated in the walkthrough of the CIS building and in the exit conference.

Fort Wayne Assembly General Motors LLC assembles GM trucks at the facility and is 750 acres with approximately 4.3 million square feet. The facility operates 3 shifts Monday through Friday and employs approximately 4,000 employees.

The facility operates two paint booths, North and South Booths. The painting and clear coat is done in the North Booth and the pre-treatment and electrodeposition is done in the South Booth. Hazardous waste is generated mostly from the painting operations at the facility. Paint related activities include solvent from purging/cleaning of paint lines, and hazardous waste solids/debris from associated processes. Spent solvents from the spray booths and the purge pots at the facility are managed as a result of a 2009 Consent Agreement and Final Order (CAFO) with the U.S. EPA and are considered product until it reaches the 90-day hazardous waste tank. Several other hazardous waste streams are generated at the facility and are listed in the waste streams table in the report.

It was indicated to IDEM staff that the facility submitted notification of hazardous waste secondary material (HSM) activity at the facility on June 11, 2024, in RCRAInfo. The facility intends to manage the reclaimed purge waste (D001, D018, D035) as HSM starting on June 30, 2024, so the purge waste was subject to full regulation as a hazardous waste at the time of this inspection.

In the CIS building the facility had several 55-gallon containers of water treatment chemicals that the facility no longer intends to use at the facility. Four (4) of the 55-gallon containers were labeled “discard” and/or “expired chemical” (see photos 3-6), facility personnel indicated during the inspection that these chemicals are still considered a product and that would be used at another facility or used to pH adjust at the onsite wastewater treatment plant. Facility personnel indicated that the remaining chemicals were either going another facility for use or back to the manufacture.

The inspection consisted of an opening conference, facility walkthrough, paperwork review, and closing conference. The facility walkthrough included the assembly, final repair, mechanical room, tool room, paint department including the paint kitchen, tote room, purge pots, paint department maintenance area, north and south paint booths, tank farm, CIS building (90-day storage area), and body shop. The paperwork review consisted of contingency plan, quick reference guide, manifests, LDRs, training records, notifications to local authorities, weekly inspections records, daily tank inspections, and tank integrity testing.

Violations were discovered during the inspection, see DOV section for further details. Some violations were corrected after the inspection and documentation was provided. Outstanding violations require a submittal within 30 days to Kari Clevenger at kcleveng@idem.in.gov.

Regulatory Status			
Observed Activity	Large Quantity Generator	**Other Activities**	Used Oil Generator Universal Waste Handler Hazardous Waste Tank
Documents Reviewed	Contingency Plan Manifests Training Records Land Disposal Notification Purge Pot Processes		
Comments			

Waste Management
Comments:
Waste Stream(s) Information
Waste Streams (•) Yes ( ) No ( ) Not Inspected ( ) Not Applicable
List waste stream(s) information that varies from the most recent Annual Report (Example: additional waste streams, waste streams no longer generated, significant increase/decrease in generation rate, etc.)

EPA Waste Codes	Description	Source	Generation Rate	Disposition
D001, D018, D035	Reclaimed Purge	Paint gun	~ 8300 gallons per month	Gage Products Co., MID005338801
D001, D005, D029, D035	Aerosol Can Fluid	Aerosol Can Puncturing	~15 lbs. per month	Tradebe, IND000646943
D001, D018, D035	Paint related material	Painting	~800 lbs. per month	Tradebe, IND000646943
D001, D018	Absorbents & Gasoline	Spill cleanup	~60 lbs. per month	Tradebe, IND000646943
D007	Leather PPE	PPE	~50 lbs. per month	Tradebe, IND000646943
D001, D018, U154	Flammable Solids	Tank farm	~12 lbs. per month	Tradebe, IND000646943
D001, D018, U154	Flammable Liquids	Tank Farm	~400 lbs. per month	Tradebe, IND000646943
D001	Hand Sanitizer	Expired	12066 lbs. in 2023, varies per year	Tradebe, IND000646943
D009	Broken Fluorescent Lamps	Maintenance	Varies, ships twice a year	Tradebe, IND000646943
D002, D008	Leaking Lead Acid Batteries	Assembly	Varies	Tradebe, IND000646943
PHARM	Non-credible hazardous waste pharmaceuticals	Clinic	Varies, ships at least once a year	Tradebe, IND000646943
Universal Waste	Fluorescent Bulbs	Bulb Replacement	Varies, ships twice a year	Clean Earth
Universal Watse	Mixed Batteries	Operations	Varies, ships twice a year	Clean Earth
Non-hazardous waste	Sealer Waste	Operations	Varies	Landfill, Fort Wayne
Non-hazardous	Used Oil	Maintenance	Varies	Safety Kleen
Non-hazardous	Oil Filters	Maintenance	Varies	Safety Kleen

Exempted/Excluded (●) Yes ( ) No ( ) Not Inspected ( ) Not Applicable

Explanation

Explanation
40 CFR 261.2 (c)(2)(ii) - Commercial chemical product, listed in 261.33, used as a fuel
329 IAC 3.1-6-4 - Scrap metal

Waste Management Areas

Container Management Area(s) (●) Yes ( ) No ( ) Not inspected ( ) Not applicable

EPA Waste Codes	Location	Number	Size	Type of Container
D007	CIS	1	55-gallon	Steel
D001, D005, D029, D035	CIS	1	55-gallon	Steel
D002, D008	CIS	1	55-gallon	Plastic

D001, D018, D035	CIS	7	55-gallon	Steel
D001, D018, D035	CIS	4	55-gallon	Steel
D009	CIS	1	55-gallon	Plastic
Used Oil	CIS	1	250-gallon	Varies
Oil Filters	CIS	4	55-gallon	Steel

Satellite Area(s) (•) Yes ( ) No ( ) Not inspected ( ) Not applicable

EPA Waste Codes	Location	Comments
D001, D005, D029, D035	CIS	Aerosol can fluid, missing hazard indication for toxic.
D002, D009	CIS	Missing hazard indication for toxic
D001, D005, D029, D035	Final Repair, Tool Room, Mechanical Room	Aerosol cans, missing hazard indication for toxic
D001, D018, D035	Final Repair, Paint Kitchen, Mechanical room, Tool Room, Paint Mixing,	Missing hazard indication for toxic
D001, D018, U154	Tank Farm, Final Repair	Missing hazard indication for toxic

Tanks, Restricted Waste Sites, and Other Regulated Units
(•) Yes ( ) No ( ) Not inspected ( ) Not applicable

EPA Waste Codes	Type/Construction	Location	Quantity On-Site	Size	Unit
D001, D018, D035	Aboveground/welded stainless steel	Tank Farm, Tank 19; Tank 20 is not currently in use.	32.6 inches; approximately 3,797.90 gallons	18,950 gallons	Tank

Environmental Releases

Visible Releases/Contamination/Discharges	( ) Yes (•) No Release Observed

Compliance Assistance

P2 Information

The following P2 suggestions could possibly save money, reduce waste and/or minimize risk. You might consider having a P2 assessment, or a voluntary technical assistance consultation from IDEM staff. Please visit the agency's P2 web site at http://www.in.gov/idem/5298.htm for additional information.

Contact by IDEM OPPTA Requested	( ) Yes (•) No	
P2 Suggestions		

Guidance Materials

Guidance Materials Provided to Facility	

Checklist
(Checked box indicates a compliance concern)

Standards	TSDF Permit Requirements
☐ Hazardous Waste Determination	☐ TSDF Permit Requirements

☐ Recordkeeping (SQG and LQG) ☐ Identifying Hazardous Waste Numbers (SQG and LQG) ☐ Generator Category Determination ☐ Notification (SQG, LQG, Transporter, TSDF) ☐ Release to the Environment, Disposal of Solid Waste ☐ Illegal Dumping ☐ Other Violation	☐ Other Violation

LQG Hazardous Waste Standards	**SQG Hazardous Waste Standards**
☐ Accumulate for 90 Days or Less ☐ Container Condition ☐ Compatibility of Waste with Container ☐ Containers Closed ☐ Container Handling ☐ Central Accumulation Area Inspection ☐ Ignitable or Reactive Wastes - Distance from Property Line ☐ Ignitable or Reactive Wastes - Sources of Ignition/Reaction: "No Smoking" signs ☐ Conditions for Accumulation of Incompatible Wastes ☐ Container Labeled "Hazardous Waste" ☑ Container Marked with Indication of Hazards ☐ Containers Marked with Accumulation Start Date ☐ Tank Integrity Assessment ☑ Tank Containment and Detection of Releases ☐ Tank General Operating Requirements ☑ Tank Inspections ☐ Tank Subpart BB - Monthly Pump and Valve Monitoring ☐ Tank Subpart CC - Annual Inspection/Monitoring ☐ Tank Labeled "Hazardous Waste" ☐ Tank Marked with Indication of Hazards ☐ Tank Documentation for 90-Day Accumulation ☐ Maintenance and Operation of Facility ☐ Required Equipment ☐ Testing and Maintenance of Equipment ☐ Aisle Space	☐ Accumulate for 180 Days or Less ☐ Accumulation Limit ☐ Container Condition ☐ Compatibility of Waste with Container ☐ Containers Closed ☐ Container Handling ☐ Central Accumulation Area Inspections ☐ Conditions for Accumulation of Incompatible Wastes ☐ Container Labeled "Hazardous Waste" ☐ Container Marked with Indication of Hazards ☐ Container Marked with Accumulation Start Date ☐ Tank Operating Conditions ☐ Tank Inspections ☐ Tank Labeled "Hazardous Waste" ☐ Tank Marked with Indication of Hazardous ☐ Tank Documentation for 180-Day Accumulation ☐ Land Disposal Restrictions ☐ Maintenance and Operation of Facility ☐ Required Equipment ☐ Testing and Maintenance of Equipment ☐ Access to Communications or Alarm System ☐ Aisle Space ☐ Arrangements with Local Authorities ☐ Arrangements with Local Authorities - Documentation ☐ Emergency Coordinator ☐ Emergency Information Posted ☐ Employee Training ☐ Other Small Quantity Generator Standards

☐ Arrangements with Local Authorities ☐ Arrangements with Local Authorities - Documentation ☐ Contingency Plan Developed ☐ Content of Contingency Plan ☐ Copies of Contingency Plan ☐ Contingency Plan Quick Reference Guide ☐ Emergency Coordinator ☑ Personnel Training Program ☐ Personnel Training - Complete Within Six Months ☐ Personnel Training Annual Review ☐ Personnel Training Documentation ☐ Personnel Training Record Retention ☐ Notification for Closure ☐ Land Disposal Restrictions ☐ Large Quantity Generator - Other Violations	**VSQG Standards** ☐ Hazardous Waste Generation Limit ☐ Hazardous Waste Accumulation Limit ☐ Hazardous Waste Determination ☐ Proper Disposal ☐ Prohibited Disposal of Liquids in Landfills

Satellite Accumulation – SQG and LQG	**Manifest and Recordkeeping - LQG and SQG**
☐ Quantity Limits, Point of Generation, Under Control of Operator ☐ Container Condition ☐ Compatibility with Container ☐ Incompatible Wastes ☐ Containers Closed ☐ Container Labeled "Hazardous Waste" ☑ Container Marked with Indication of Hazards ☐ Preparedness and Prevention ☐ Excess Generation	☐ Manifest General Requirements ☐ Use of the Manifest

Episodic Generation	**Hazardous Secondary Materials**
☐ Notification ☐ EPA ID Number ☐ Accumulate for 60 Days or Less ☐ Accumulation Prohibitions ☐ Container Labeling ☐ Tank Labeling and Recordkeeping ☐ Recordkeeping ☐ Preparedness and Prevention ☐ Other Violation	☐ Reclaimed Under Control of the Generator ☐ Contained ☐ Speculative Accumulation ☐ Notice ☐ Documentation of Legitimacy Determination ☐ Emergency Preparedness and Response ☐ Emergency Procedures (Accumulates 6,000 kg or Less) ☐ Emergency Procedures (Accumulates Greater than 6,000 kg) ☐ Other Violation

Solvent-Contaminated Wipes – Disposal	Solvent-Contaminated Wipes - Laundered or Dry Cleaned
☐ Container Management (Non-leaking containers)	☐ Container Management (Non-leaking containers)
☐ Closed Containers	☐ Closed Containers
☐ Labeling	☐ Labeling
☐ Accumulation Time	☐ Accumulation Time
☐ No Free Liquids	☐ No Free Liquids
☐ Free Liquids Management	☐ Free Liquids Management
☐ Documentation	☐ Documentation
☐ Final Disposition	☐ Clean Water Act

Universal Waste – All Facilities	Used Oil – All Facilities
☐ Universal Waste Labeling	☐ Rebuttable Presumption Applies
☐ Containers - Closed, Good Condition, No Evidence of Leaks	☐ Containers and Tanks in Good Condition
☐ Universal Waste - Bulb Crushing Prohibition	☐ Containers/Tank Labeling
	☐ Release Clean Up and Containment
	☐ Burning Restrictions - Generated On-site or DIY, .5M BTU

Description of Violation(s)

LQG HAZARDOUS WASTE STANDARDS

CONTAINER MARKED WITH INDICATION OF HAZARDS

CITATION:
40 CFR 262.17(a)(5)(i)(B): A large quantity generator must mark or label its containers with an indication of the hazards of the contents (examples include, but are not limited to, the applicable hazardous waste characteristic(s) (i.e., ignitable, corrosive, reactive, toxic); hazard communication consistent with the Department of Transportation requirements at 49 CFR part 172 subpart E (labeling) or subpart F (placarding); a hazard statement or pictogram consistent with the Occupational Safety and Health Administration Hazard Communication Standard at 29 CFR 1910.1200; or a chemical hazard label consistent with the National Fire Protection Association code 704).

DETAILS:
IDEM staff observed the following containers in the 90-day storage area that are missing the indication of hazard for toxic.

Four (4) 55-gallon containers of “paint & purge solvent”, see photo 9.
Four (4) 55-gallon containers of “paint mix”, see photo 10.
Seven (7) 55-gallon containers of “paint”, see photo 11.

Violations were corrected after the inspection and provided by email that was received 6/20/2024.

REQUIRED ACTION:
In the future, ensure that all hazardous waste containers are marked or labeled with an indication of its hazards.

TANK CONTAINMENT AND DETECTION OF RELEASES

CITATION:
40 CFR 262.17(a)(2) referencing 40 CFR 265.193 (Tank Secondary Containment Systems): (a) In order to prevent the release of hazardous waste or hazardous waste constituents to the environment, secondary containment that meets the requirements of this section must be provided (except as provided in paragraphs (f) and (g) of this section).: (1) For all new and existing tank systems or components, prior to their being put into service. (2) For tank systems that store or treat

materials that become hazardous wastes, within 2 years of the hazardous waste listing, or when the tank system has reached 15 years of age, whichever comes later.
(b) Secondary containment must be (1) Designed, installed, and operated to prevent any migration of wastes or accumulated liquid out of the system to the soil, groundwater, or surface water at any time during the use of the tank system; and (2) Capable of detecting and collecting releases and accumulated liquids until the collected material is removed.
(c) Secondary containment systems must be at a minimum: (1) Constructed of or lined with materials that are compatible with the waste…(2) Placed on a foundation or base capable of providing support to the secondary containment system… (3) Provided with a leak detection system that is designed and operated so that it will detect the failure of either the primary and secondary containment structure or any release of hazardous waste or accumulated liquid in the secondary containment system within 24 hours. (4) Sloped or otherwise designed or operated to drain and remove liquids resulting from leaks, spills, or precipitation. Spilled or leaked waste and accumulated precipitation must be removed from the secondary containment system within 24 hours, or in as timely a manner as is possible to prevent harm to human health or the environment…

(e)(1) External liner systems must be designed or operated to contain 100 percent of the capacity of the largest tank within its boundary; designed or operated to prevent run-on or infiltration of precipitation into the secondary containment system unless the collection system has sufficient excess capacity to contain run-on or infiltration. Such additional capacity must be sufficient to contain precipitation from a 25-year, 24-hour rainfall event; free of cracks or gaps; and designed and installed to completely surround the tank and to cover all surrounding earth likely to come into contact with the waste if released from the tank(s) (i.e., capable of preventing lateral as well as vertical migration of the waste).

(e)(2) Vault systems must be designed or operated to contain 100 percent of the capacity of the largest tank within its boundary; designed or operated to prevent run-on or infiltration of precipitation into the secondary containment system unless the collection system has sufficient excess capacity to contain run-on or infiltration. Such additional capacity must be sufficient to contain precipitation from a 25-year, 24-hour rainfall event; constructed with chemical-resistant water stops in place at all joints (if any); provided with an impermeable interior coating or lining that is compatible with the stored waste and that will prevent migration of waste into the concrete.

DETAILS:
IDEM staff observed several cracks in the hazardous waste tank's secondary containment liner (see photos 7 & 8). Facility personnel indicated that the cracks had been present since winter and that no action had been taken since the concrete was free from cracks and the facility was switching to managing the tank as hazardous secondary material (HSM) starting on June 30, 2024. Once the facility switches to HSM they facility intends on taking the secondary containment liner

Violations were corrected after the inspection and provided by email that was received 6/20/2024.

REQUIRED ACTION:
Ensure a secondary containment system that complies with 40 CFR 265.193. Once the facility manages switches to hazardous secondary material secondary containment will no longer be required.

TANK INSPECTIONS

CITATION:
40 CFR 262.17(a)(2) referencing 40 CFR 265.195: (a) The owner or operator must inspect, where present, at least once each operating day, data gathered from monitoring and leak detection equipment to ensure that the tank system is being operated according to its design. (b) Except as noted under paragraph (c) of this section, the owner or operator must inspect at least once each operating day: (1) Overfill/spill control equipment to ensure that it is in good working order; (2) Above ground portions of the tank system, if any, to detect corrosion or releases of waste; and (3) The construction materials and area immediately surrounding the externally accessible portion of the tank system, including the secondary containment system, to detect erosion or signs of releases of hazardous waste .
(c) Owners or operators of tank systems that either use leak detection equipment to alert facility personnel to leaks, or implement established workplace practices to ensure leaks are promptly identified, must inspect at least weekly those areas described in paragraphs (b)(1) through (3) of this section. Use of the alternate inspection schedule must be documented in the facility's operating record. This documentation must include a description of the established workplace practices at the facility. (e) Ancillary equipment that is not provided with secondary containment, as described in §265.193(f)(1) through (4), must be inspected at least once each operating day.
(g) The owner or operator must document in the operating record of the facility an inspection of those items in paragraphs (a) and (b).

DETAILS:
IDEM staff observed several cracks in the tank secondary containment liner and a review of the tank daily inspections from March, April, and May 2024 indicated that the containment was free from cracks. Facility personnel indicated that the cracks had been present since winter and that no action had been taken since the concrete was free from cracks and the facility was switching to managing the tank as hazardous secondary material (HSM) on June 30, 2024. The June inspection log was filled out with “N’s” in the majority of the columns, however facility personnel indicated that this was in preparation for the HSM switch over and was not filled out correctly. Daily inspections are inadequate due to being inconsistent and not documenting cracks to the liner and corrective actions.

REQUIRED ACTION:
Ensure that daily inspections conducted identify and document construction materials and area immediately surrounding the externally accessible portion of the tank system, including the secondary containment system, to detect erosion or signs of releases of hazardous waste. Once the facility switches to HSM tank inspections will no longer be required.

PERSONNEL TRAINING PROGRAM

CITATION:
40 CFR 262.17(a)(7)(i)(A): Facility personnel must successfully complete a program of classroom instruction, online training (e.g. computer-based or electronic), or on-the-job training that teaches them to perform their duties in a way that ensures compliance with this part. The large quantity generator must ensure that this program includes all the elements described in the document required under paragraph (a)(7)(iv) of this section.
(B) This program must be directed by a person trained in hazardous waste management processes and must include instruction which teaches facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to the positions in which they are employed.
(C) At a minimum, the training program must be designed to ensure facility personnel are able to respond effectively to emergencies by familiarizing them with emergency procedures, emergency equipment, and emergency systems, including, where applicable: (1) Procedures for using, inspecting, repairing, and replacing facility emergency and monitoring equipment; (2) Key parameters for automatic waste feed cut-off systems; (3) Communications or alarm systems; (4) Response to fires or emergencies; (5) Response to ground-water contamination incidents; and (6) Shutdown of operations.
(D) For facility employees that receive emergency response training pursuant to OSHA regulations 29 CFR 1910.120(p)(8) and 1910.120(q), the large quantity generator is not required to provide separate emergency response training pursuant to this section, provided that the overall facility training meets all the conditions of exemption in this section.

DETAILS:
A review of the tank daily inspections from March, April, and May 2024 indicated that the containment was free from cracks. Facility personnel indicated that the cracks had been present since winter and that no action had been taken since the concrete was free from cracks and the facility was switching to managing the tank as hazardous secondary material on June 30, 2024. The June inspection log was filled out with “N’s” in the majority of the columns, however facility personnel indicated that this was in preparation for the HSM switch over and was not filled out correctly. Personnel have not been adequately trained to conduct inspections and identify corrective actions.

REQUIRED ACTION:
Ensure that facility personnel are adequately trained to conduct inspections that meet the requirements in 40 CFR 262.17(a)(7)(i)(A).

SATELLITE ACCUMULATION - SQG AND LQG

CONTAINER MARKED WITH INDICATION OF HAZARDS

CITATION:
40 CFR 262.15(a)(5)(ii): A generator must mark or label its (satellite) containers with an indication of the hazards of the contents (examples include, but are not limited to, the applicable hazardous waste characteristic(s) (i.e., ignitable, corrosive, reactive, toxic); hazard communication consistent with the Department of Transportation requirements at 49 CFR part 172 subpart E (labeling) or subpart F (placarding); a hazard statement or pictogram consistent with the Occupational Safety and Health Administration Hazard Communication Standard at 29 CFR 1910.1200; or a chemical hazard label consistent with the National Fire Protection Association code 704).

DETAILS:
IDEM staff observed the following satellite accumulation areas that did not have the hazard indication for toxic.

Mechanical Room: SAA1 (one (1) 55-gallon container of aerosol cans)
Tool Room: SAA5 (one (1) 55-gallon container of aerosol cans)
Final Repair: SAA9 (one (1) 55-gallon container of absorbents w/gasoline), SAA11 (one (1) 55-gallon container of gas rags), SAA13 (one (1) 55-gallon container of paint cans), SAA15 (one (1) 55-gallon container of aerosol cans), SAA16 (one (1) 55-gallon container of paint pens)
CIS Building: Aerosol Cans (one (1) -gallon container), SAA41 (one (1) -gallon container of leaking lead acid batteries)
Tank Farm: SAA42 (one (1) -gallon container of waste gasoline, photo 13) and SAA43 (one (1) 55-gallon container of tank farm solids, rags, etc., see photo 12)
Paint Mix: SAA52, SAA53, SAA54, SAA55 (paint & purge solvent)

Violations were corrected after the inspection and provided by email that was received 6/20/2024.

REQUIRED ACTION:
Ensure to mark or label all satellite hazardous waste containers with the indication of the hazards of the contents.

Inspection Documentation		
Photographs	◉ Yes ○ No	
Map	◉ Maps	
GPS Location Collected	○ Yes ◉ No	
Analytical Screening Conducted	○ Yes ◉ No	
Lab Sample	○ Yes ◉ No	

Inspection Results/Actions	
Comments:	As a best management practice, facility personnel should refrain from labeling product containers as “expired chemical” or “discard” if the facility does not intend to dispose of the material. Facility personnel should be able demonstrate that the product has a legitimate use and can be used at the facility or sent to another facility for use. If the material is discarded it would require proper waste determination and disposal.
Inspection Results	
Violations were discovered and require a submittal.	
Multi-Media Concerns	
No concerns noted	

Finalize Inspection		
Written Summary of Inspection	Notice of Inspection and Verbal Summary Provided	
Inspector Information	Printed/Typed Name	Kari Clevenger
	Phone Number:	317-760-3702
	Email Address:	kcleveng@idem.in.gov
	Signature:	Obtained on the Inspection Verification/Findings Form
Facility Representative Signature	Printed/Typed Name:	Taylor Lyon

	Signature:	Obtained on the Inspection Verification/Findings Form

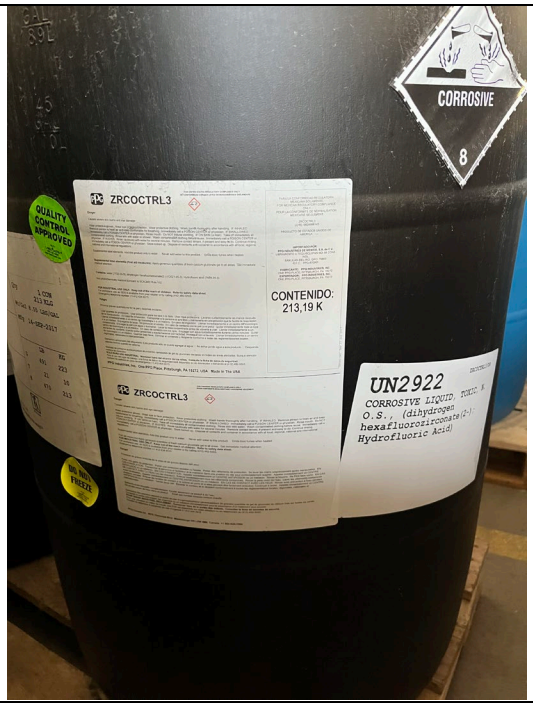
Photo Table: Fort Wayne Assembly General Motors LLC

	**Number**	1
	Description	One (1) 55-gallon container of "FUELSOLV PB2020" located in the CIS building. Identified by facility personnel as a product used to stabilize diesel fuel.
	Photographer	Kari Clevenger
	Facility Name	Fort Wayne Assembly General Motors LLC
	Photo Date	6/18/2024
	Others	Susan Lowry- IDEM Taylor Lyon - Fort Wayne GM LLC Matt Arbuckle - Fort Wayne GM LLC

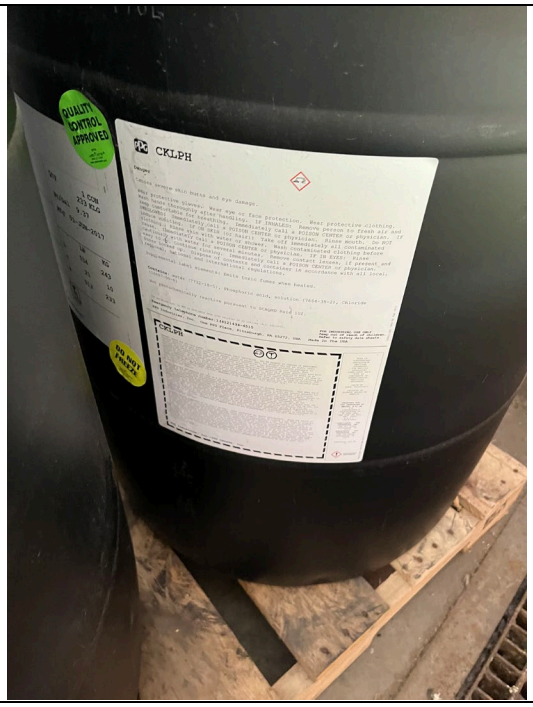
	**Number**	2
	Description	Additional image of the 55-gallon container from photo 1.
	Photographer	Kari Clevenger
	Facility Name	Fort Wayne Assembly General Motors LLC
	Photo Date	6/18/2024
	Others	Susan Lowry- IDEM Taylor Lyon - Fort Wayne GM LLC Matt Arbuckle - Fort Wayne GM LLC

Number	3
Description	Two (2) 55-gallon containers of "ZIRCOBOND CONTROL #3" and two (2) 55-gallon containers of "CHEMKLEEN PH ADJUST DOWN" stored in the CIS building. Containers were marked "Please Discard" and "Expired Chemical". Facility personnel stated they would use this.
Photographer	Kari Clevenger
Facility Name	Fort Wayne Assembly General Motors LLC
Photo Date	6/18/2024
Others	Susan Lowry- IDEM Taylor Lyon - Fort Wayne GM LLC Matt Arbuckle - Fort Wayne GM LLC

Number	4
Description	Top view of containers in photo 3 and view of the "Please Discard" and "Expired Chemical" label. Facility personnel stated they would use this.
Photographer	Kari Clevenger
Facility Name	Fort Wayne Assembly General Motors LLC
Photo Date	6/18/2024
Others	Susan Lowry- IDEM Taylor Lyon - Fort Wayne GM LLC Matt Arbuckle - Fort Wayne GM LLC



Number	5
Description	Label for the "ZORNBOND Control #3" from photo 3.
Photographer	Kari Clevenger
Facility Name	Fort Wayne Assembly General Motors LLC
Photo Date	6/18/2024
Others	Susan Lowry- IDEM Taylor Lyon - Fort Wayne GM LLC Matt Arbuckle - Fort Wayne GM LLC



Number	6
Description	Label for the "CHEMKLEEN PH ADJUST DOWN" from photo 3.
Photographer	Kari Clevenger
Facility Name	Fort Wayne Assembly General Motors LLC
Photo Date	6/18/2024
Others	Susan Lowry- IDEM Taylor Lyon - Fort Wayne GM LLC Matt Arbuckle - Fort Wayne GM LLC

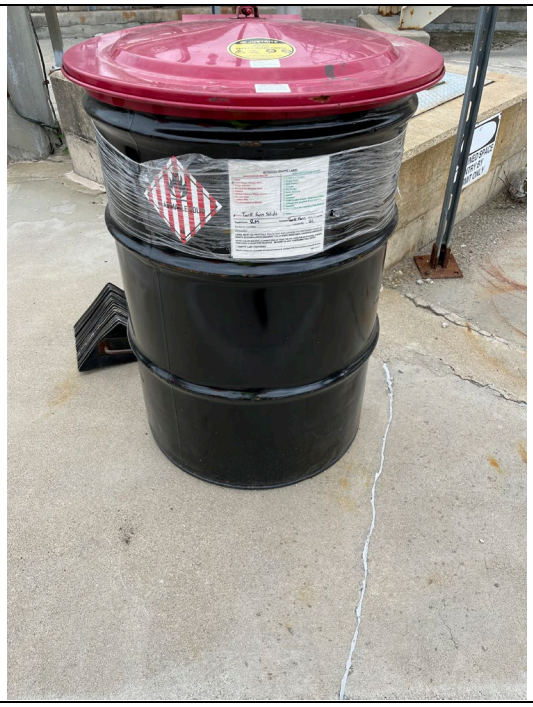
	**Number**	7
	Description	Cracks in liner of the hazardous waste tank secondary containment area.
	Photographer	Kari Clevenger
	Facility Name	Fort Wayne Assembly General Motors LLC
	Photo Date	6/18/2024
	Others	Susan Lowry- IDEM Taylor Lyon - Fort Wayne GM LLC Matt Arbuckle - Fort Wayne GM LLC

	**Number**	8
	Description	Additional crack in liner not depicted in photo 7 of the hazardous waste tank secondary containment area.
	Photographer	Kari Clevenger
	Facility Name	Fort Wayne Assembly General Motors LLC
	Photo Date	6/18/2024
	Others	Susan Lowry- IDEM Taylor Lyon - Fort Wayne GM LLC Matt Arbuckle - Fort Wayne GM LLC

Number	9
Description	Four (4) 55-gallon containers of "paint & purge solvent" waste located in the CIS building are missing the hazard indication for toxic.
Photographer	Kari Clevenger
Facility Name	Fort Wayne Assembly General Motors LLC
Photo Date	6/18/2024
Others	Susan Lowry- IDEM Taylor Lyon - Fort Wayne GM LLC Matt Arbuckle - Fort Wayne GM LLC

Number	10
Description	Four (4) 55-gallon containers of "paint mix" waste located in the CIS building are missing the hazard indication for toxic.
Photographer	Kari Clevenger
Facility Name	Fort Wayne Assembly General Motors LLC
Photo Date	6/18/2024
Others	Susan Lowry- IDEM Taylor Lyon - Fort Wayne GM LLC Matt Arbuckle - Fort Wayne GM LLC

Number	11
Description	Seven (7) 55-gallon containers of "paint" waste located in the CIS building are missing the hazard indication for toxic.
Photographer	Kari Clevenger
Facility Name	Fort Wayne Assembly General Motors LLC
Photo Date	6/18/2024
Others	Susan Lowry- IDEM Taylor Lyon - Fort Wayne GM LLC Matt Arbuckle - Fort Wayne GM LLC

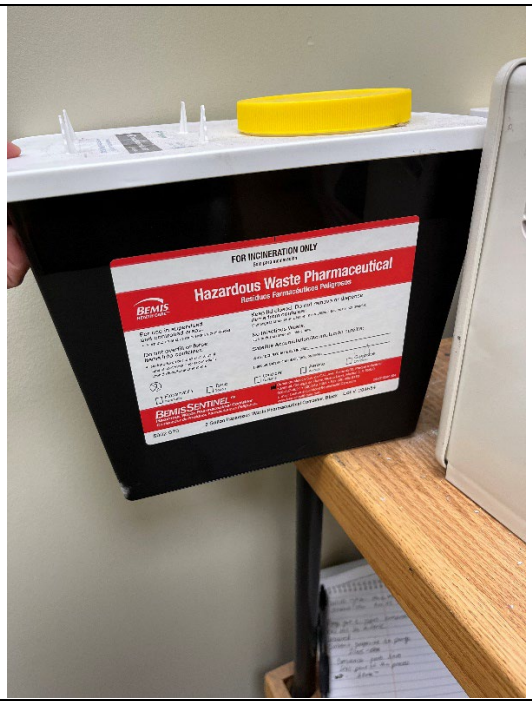


Number	12
Description	One (1) 55-gallon satellite accumulation container of "tank farm solids" located near the tank farm. Container missing the hazard indication for toxic.
Photographer	Kari Clevenger
Facility Name	Fort Wayne Assembly General Motors LLC
Photo Date	6/18/2024
Others	Susan Lowry- IDEM Taylor Lyon - Fort Wayne GM LLC Matt Arbuckle - Fort Wayne GM LLC

Number	13
Description	One (1) 55-gallon satellite accumulation container of "waste gasoline" located near the tank farm. Container missing the hazard indication for toxic.
Photographer	Kari Clevenger
Facility Name	Fort Wayne Assembly General Motors LLC
Photo Date	6/18/2024
Others	Susan Lowry- IDEM Taylor Lyon - Fort Wayne GM LLC Matt Arbuckle - Fort Wayne GM LLC

Number	14
Description	Example of one of the purge pots associated with paint in the south paint booth.
Photographer	Kari Clevenger
Facility Name	Fort Wayne Assembly General Motors LLC
Photo Date	6/18/2024
Others	Susan Lowry- IDEM Taylor Lyon - Fort Wayne GM LLC Matt Arbuckle - Fort Wayne GM LLC

Number	15
Description	Two (2) “Hazardous Waste Pharmaceuticals” bins located in the clinic.
Photographer	Kari Clevenger
Facility Name	Fort Wayne Assembly General Motors LLC
Photo Date	6/18/2024
Others	Susan Lowry- IDEM Taylor Lyon - Fort Wayne GM LLC Matt Arbuckle - Fort Wayne GM LLC



Number	16
Description	Close up of the labeling of the “Hazardous Waste Pharmaceutical” container.
Photographer	Kari Clevenger
Facility Name	Fort Wayne Assembly General Motors LLC
Photo Date	6/18/2024
Others	Susan Lowry- IDEM Taylor Lyon - Fort Wayne GM LLC Matt Arbuckle - Fort Wayne GM LLC

SARA Reportables

1- 31950 Purge solvent
2- 32596 Thinner
3- 460-S0226
4- 9091G-
5- Antifreeze/Coolant
6- Basecoat Paint Group 3
7- Basecoat Paint (Group 5)
8- Basecoat Paint (Group 7)
9- Basecoat Paint (Group 8)
10- Basecoat Paint (Group 9)
11- Basecoat Paint (Group 1)
12- PVS Nolwood Sodium Hypochlorite 12.5% Solution
13- Betamate 1486 Structual Adhesive
14- Betaseal 15955N
15- Blue Flame
16- Booth Control 4205 NP
17- CK 185A
18- Sulfuric Acid 66 Degree
19- CKSP1R-1-24-17
20- Clearcoat Paint (Glory Red Tinted Clear Coat)
21- Clearcoat Paints (Group 1)
22- DefendAl Heavy Duty Pre Charged Coolant / Antifreeze 23- Dexron VI (ATF)
24- Diesel Exhaust Fluid
25- Diesel Fuels
26-
27- ELPO Bath
28- ELPO Paste
29- ELPO Resin
30- Ferric Chloride
31- Freon 113
32- Freon 123 Refrigerant
33-
34-
35- Hydraulon 404
36- KLEA 134A Refrigerant
37- Lead Acid Batteries- ubiquitous
38- Liquichlor/Sodium Hypochlorite/Bleach Solution
39- Nalco 3DT 230
40- Nalco 3DT231
41- P8040 Audioguard Coating
42-
43- P8368 Antichip)
44- Plant Equipment Oils and Lubricants- ubiquitous
45- Power Steering Fluid
46- Primer Paint (Medium Gray Primer)
47- Road Salt
49-Sodium Hydroxide (50% Caustic Soda Liquid)
50- Solstic yf Refrigerant (R1234-yf)
51- Sulfuric acid w/more than 51%
52- Teroson EP 4560
53- Uniseal 162.2
54- Uniseal Sealers
55- Unleaded Gasoline wit Ethanol
56- Versilok 253S
57- Windshield Washer Fluid
58- Zircobond pH Buffer (Pretreatment Chemical)
59- Zircobond Rinse Additive (Pretreatment Chemical)
60- Zircobond RRF (Pretreatment Chemical)
61-

Fire hydrant locations. 2 1/2 NPFT @ 155 psi.

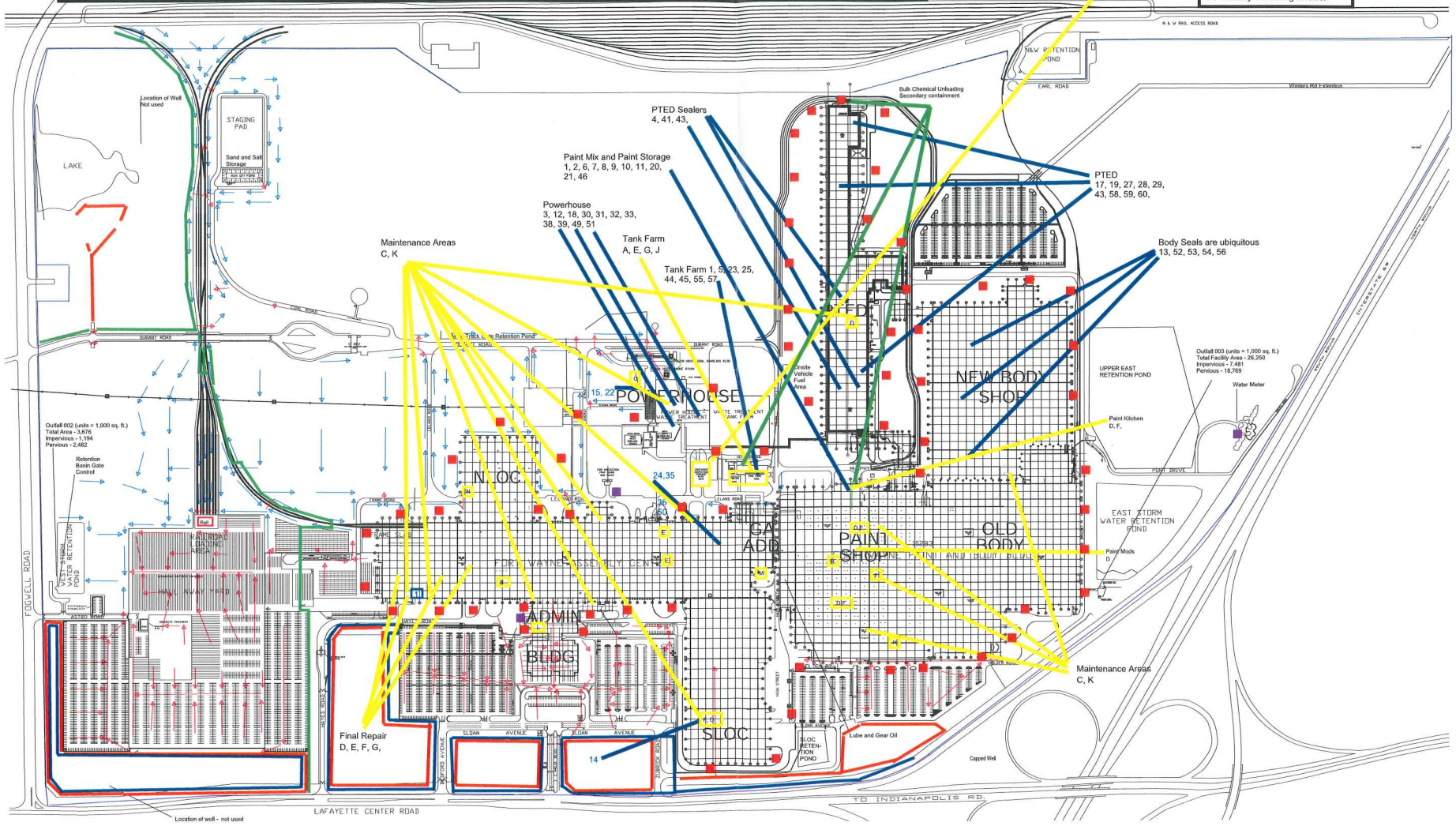
Within the buildings columns with a red rectangle are marked for easy identification of 1 1/2 NPFT water supply approx 100-150 ft apart. Water supply locations are strategically located to provide overlaping sections of protection.

City fire hydrant location. 2 1/2 NPFT @ 55 psi.

90 DAY CAA (CIS Bldg)

Hazardous Waste

A. Reclaim Purge
B. Aerosol Can Fluid
C. Aerosol Can
D. Solids containing flammable liquid
E. Gasoline containing liquids
F. Paint Related Material
G. Absorbent Pads w/ gasoline
H. Leather PPE / Debris contaminated
I. Lead Acid Batteries - leaking
J. Tank Farm Flammable Solids
K. Broken Bulbs
L. Pharmaceutical Waste
M. Flammable Gas
N. Airbags / Seatbelt pretensioners
O. Siloxane Dust
P. Mercury containing articles.



INSPECTION VERIFICATION/FINDINGS

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
100 N. Senate Avenue
Indianapolis, Indiana 46204-2251
Telephone: (800) 451-6027 or (317) 232-8603
Web Page: http://www.in.gov/idem/

On 6/18/2024 an inspection of Fort Wayne Assembly GM LLC was conducted by the undersigned representative of the Indiana Department of Environmental Management (IDEM), Office of Land Quality.

Type of Inspection (may include more than one):

- [X] Routine Compliance Evaluation
- [ ] Follow Up Inspection
- [ ] Compliance Assistance Inspection
- [ ] Complaint
- [ ] Multi-Media Screening Evaluation
- [ ] Other: _____

Inspection Findings:
These findings are considered preliminary and identify specific compliance issues discovered during the above-noted inspection that the designated agent of IDEM believes may be a violation of a statute(s), rule(s) or permit(s) issued by IDEM.

- [ ] No violations were discovered with respect to the particular items observed during the inspection.
- [ ] Violations were discovered but corrected during the inspection.
- [X] Violations were discovered and require a submittal from you and/or follow-up inspection by IDEM.
- [ ] Violations were discovered and may subject you to an appropriate enforcement response.
- [X] Additional information/review is required to evaluate overall compliance.
- [ ] Other/Comments (attachment may be included): _____

****

Confidential Information
In accordance with 329 IAC 6.1 (http://www.in.gov/legislative/iac/T03290/A00061.PDF) a person submitting information to the department for which confidential treatment is requested shall make a written claim of confidentiality at the time of submittal of the information. A person may request confidential treatment of information at the time the information is acquired through the actions of the department, such as inspections. The written claim for confidential treatment may be broad, but must be sufficiently clear to allow for accurate identification of the information claimed to be confidential. In accordance with 329 IAC 6.1-4-1(d), supporting information must be submitted to the commissioner within five (5) working days from the time the information claimed as confidential is acquired by the department. A person submitting a claim of confidentiality shall designate and segregate the information and the supporting information to which the claim applies in a manner that is sufficiently clear to allow the department to identify all confidential claim materials. Confidential information may include (but is not limited to) written or printed material, maps, charts, photographs, or samples (see definition of information at 329 IAC 6.1-2-8). The undersigned Owner/Representative has alleged information acquired during this inspection [ ] **does** [✓] **does not** (check one) contain confidential information. A check in the "does" box is not a written claim for confidential treatment of information acquired during this inspection.

Notice of Oral Report
In accordance with IC 13-14-5 an oral report of the inspection was provided to the undersigned Owner/Agent at the conclusion of the inspection. The oral report includes any specific matters discovered during the inspection that the IDEM representative believes may be a violation of a law or of a permit issued by the department. The report does not include matters not evident to the IDEM representative or any fact that indicates an intentional, a knowing, or a reckless violation.

IDEM Representative:

Kari Clevenger	Kari A Clevenger	6/18/2024
Printed Name	Signature	Date
317-760-3702	kcleveng@idem.in.gov	9:36 am / 4:55 pm
Phone Number	Email	Time In/ Out

Owner/Representative:

Taylor Lyon	Taylor Lyon	Environmental Engineer
Printed Name	Signature	Title
260-519-8357	taylor.lyon@gm.com	6/18/24
Phone Number	Email	Date

IDEM prefers to email your report. Please check this box to indicate you prefer to receive a copy of the inspection report via U.S. mail: [✓]

SAFETY DATA SHEET

The information in this Safety Data Sheet is required pursuant to Hazardous Product Regulations 2015.

Date of issue/Date of revision 7 September 2023
Version 5.01

Section 1. Identification

Product name : CHEMKLEEN PH ADJUST DOWN
Product code : CKLPH
Other means of identification : Not available.
Product type : Liquid.

Relevant identified uses of the substance or mixture and uses advised against

Product use : Industrial applications.
Use of the substance/ mixture : Coating. Paints. Painting-related materials.
Uses advised against : Not applicable.

Supplier : PPG Canada Inc.
5676 Timberlea Blvd
Mississauga ON L4W 4M6
Canada
+1 905-629-7999

Pretreatment and Specialty Products
23000 St. Clair Avenue
Euclid, OH 44117

Emergency telephone number : (412) 434-4515 (U.S.)
(514) 645-1320 (Canada)
SETIQ Interior de la República: 800-00-214-00 (México)
SETIQ Ciudad de México: (55) 5559-1588 (México)

Technical Phone Number : 1-888-774-2001 (US and Canada)

Section 2. Hazard identification

Classification of the substance or mixture : CORROSIVE TO METALS - Category 1
SKIN CORROSION - Category 1
SERIOUS EYE DAMAGE - Category 1

GHS label elements

Hazard pictograms :

Signal word : Danger
Hazard statements : May be corrosive to metals.
Causes severe skin burns and eye damage.

Section 2. Hazard identification

Precautionary statements

Prevention : Wear protective gloves, protective clothing and eye or face protection. Keep only in original packaging. Wash thoroughly after handling.

Response : Absorb spillage to prevent material damage. IF INHALED: Remove person to fresh air and keep comfortable for breathing. Immediately call a POISON CENTER or doctor. IF SWALLOWED: Immediately call a POISON CENTER or doctor. Rinse mouth. Do NOT induce vomiting. IF ON SKIN (or hair): Take off immediately all contaminated clothing. Rinse skin with water. Immediately call a POISON CENTER or doctor. Wash contaminated clothing before reuse. IF IN EYES: Rinse cautiously with water for several minutes. Remove contact lenses, if present and easy to do. Continue rinsing. Immediately call a POISON CENTER or doctor.

Storage : Store locked up. Store in a corrosion resistant container with a resistant inner liner.

Disposal : Dispose of contents and container in accordance with all local, regional, national and international regulations.

Supplemental label elements : Emits toxic fumes when heated.

Percentage of the mixture consisting of ingredient(s) of unknown acute inhalation toxicity: 22.5%

Section 3. Composition/information on ingredients

Substance/mixture : Mixture
Product name : CHEMKLEEN PH ADJUST DOWN
Other means of identification : Not available.

CAS number/other identifiers

Ingredient name	Synonyms	% (w/w)	CAS number
Phosphoric acid		10 - 30*	7664-38-2

*Ranges if listed above for hazardous ingredient(s) are prescribed ranges. The actual concentration(s) or actual concentration range(s) are being withheld as a trade secret.

SUB codes represent substances without registered CAS Numbers.

There are no additional ingredients present which, within the current knowledge of the supplier and in the concentrations applicable, are classified as hazardous to health or the environment and hence require reporting in this section.

Occupational exposure limits, if available, are listed in Section 8.

Section 4. First-aid measures

If ingestion, irritation, any type of overexposure or symptoms of overexposure occur during or persists after use of this product, contact a POISON CONTROL CENTER, EMERGENCY ROOM OR PHYSICIAN immediately; have Safety Data Sheet information available. Never give anything by mouth to an unconscious or convulsing person.

Description of necessary first aid measures

Eye contact : Remove contact lenses, irrigate copiously with clean, fresh water, holding the eyelids apart for at least 10 minutes and seek immediate medical advice.

Inhalation : Remove to fresh air. Keep person warm and at rest. If not breathing, if breathing is irregular or if respiratory arrest occurs, provide artificial respiration or oxygen by trained personnel.

Skin contact : Remove contaminated clothing and shoes. Wash skin thoroughly with soap and water or use recognized skin cleanser. Do NOT use solvents or thinners.

Section 4. First-aid measures

Ingestion : If swallowed, seek medical advice immediately and show this container or label. Keep person warm and at rest. Do NOT induce vomiting.

Most important symptoms/effects, acute and delayed

Potential acute health effects

Eye contact : Causes serious eye damage.

Inhalation : No known significant effects or critical hazards.

Skin contact : Causes severe burns.

Ingestion : No known significant effects or critical hazards.

Over-exposure signs/symptoms

Eye contact : Adverse symptoms may include the following:
pain
watering
redness

Inhalation : No specific data.

Skin contact : Adverse symptoms may include the following:
pain or irritation
redness
blistering may occur

Ingestion : Adverse symptoms may include the following:
stomach pains

Indication of immediate medical attention and special treatment needed, if necessary

Notes to physician : Treat symptomatically. Contact poison treatment specialist immediately if large quantities have been ingested or inhaled.

Specific treatments : No specific treatment.

Protection of first-aiders : No action shall be taken involving any personal risk or without suitable training. If it is suspected that fumes are still present, the rescuer should wear an appropriate mask or self-contained breathing apparatus. It may be dangerous to the person providing aid to give mouth-to-mouth resuscitation. Wash contaminated clothing thoroughly with water before removing it, or wear gloves.

See toxicological information (Section 11)

Section 5. Fire-fighting measures

Extinguishing media

Suitable extinguishing media : Use an extinguishing agent suitable for the surrounding fire.

Unsuitable extinguishing media : None known.

Specific hazards arising from the chemical : In a fire or if heated, a pressure increase will occur and the container may burst.

Hazardous thermal decomposition products : Decomposition products may include the following materials:
phosphorus oxides

Section 5. Fire-fighting measures

Special protective actions for fire-fighters : Promptly isolate the scene by removing all persons from the vicinity of the incident if there is a fire. No action shall be taken involving any personal risk or without suitable training.

Special protective equipment for fire-fighters : Fire-fighters should wear appropriate protective equipment and self-contained breathing apparatus (SCBA) with a full face-piece operated in positive pressure mode.

Section 6. Accidental release measures

Personal precautions, protective equipment and emergency procedures

For non-emergency personnel : No action shall be taken involving any personal risk or without suitable training. Evacuate surrounding areas. Keep unnecessary and unprotected personnel from entering. Do not touch or walk through spilled material. Do not breathe vapor or mist. Provide adequate ventilation. Wear appropriate respirator when ventilation is inadequate. Put on appropriate personal protective equipment.

For emergency responders : If specialized clothing is required to deal with the spillage, take note of any information in Section 8 on suitable and unsuitable materials. See also the information in "For non-emergency personnel".

Environmental precautions : Avoid dispersal of spilled material and runoff and contact with soil, waterways, drains and sewers. Inform the relevant authorities if the product has caused environmental pollution (sewers, waterways, soil or air).

Methods and materials for containment and cleaning up

Small spill : Stop leak if without risk. Move containers from spill area. Dilute with water and mop up if water-soluble. Alternatively, or if water-insoluble, absorb with an inert dry material and place in an appropriate waste disposal container. Absorb spillage to prevent material damage. Dispose of via a licensed waste disposal contractor.

Large spill : Stop leak if without risk. Move containers from spill area. Absorb spillage to prevent material damage. Approach release from upwind. Prevent entry into sewers, water courses, basements or confined areas. Wash spillages into an effluent treatment plant or proceed as follows. Contain and collect spillage with non-combustible, absorbent material e.g. sand, earth, vermiculite or diatomaceous earth and place in container for disposal according to local regulations (see Section 13). Dispose of via a licensed waste disposal contractor. Contaminated absorbent material may pose the same hazard as the spilled product. Note: see Section 1 for emergency contact information and Section 13 for waste disposal.

Section 7. Handling and storage

Precautions for safe handling

Protective measures : Put on appropriate personal protective equipment (see Section 8). Do not get in eyes or on skin or clothing. Do not breathe vapor or mist. Do not ingest. If during normal use the material presents a respiratory hazard, use only with adequate ventilation or wear appropriate respirator. Keep in the original container or an approved alternative made from a compatible material, kept tightly closed when not in use. Empty containers retain product residue and can be hazardous. Do not reuse container. Absorb spillage to prevent material damage.

Section 7. Handling and storage

Advice on general occupational hygiene : Eating, drinking and smoking should be prohibited in areas where this material is handled, stored and processed. Workers should wash hands and face before eating, drinking and smoking. Remove contaminated clothing and protective equipment before entering eating areas. See also Section 8 for additional information on hygiene measures.

Conditions for safe storage, including any incompatibilities : Store in accordance with local regulations. Store in original container protected from direct sunlight in a dry, cool and well-ventilated area, away from incompatible materials (see Section 10) and food and drink. Store in a corrosion resistant container with a resistant inner liner. Store locked up. Keep container tightly closed and sealed until ready for use. Containers that have been opened must be carefully resealed and kept upright to prevent leakage. Do not store in unlabeled containers. Use appropriate containment to avoid environmental contamination.

Section 8. Exposure controls/personal protection

Control parameters

Occupational exposure limits

Ingredient name	Exposure limits
Phosphoric acid	**CA Alberta Provincial (Canada, 6/2018). Skin sensitizer.** 15 min OEL: 3 mg/m³ 15 minutes. 8 hrs OEL: 1 mg/m³ 8 hours. **CA British Columbia Provincial (Canada, 6/2022).** STEL: 3 mg/m³ 15 minutes. TWA: 1 mg/m³ 8 hours. **CA Ontario Provincial (Canada, 6/2019).** STEL: 3 mg/m³ 15 minutes. TWA: 1 mg/m³ 8 hours. **CA Quebec Provincial (Canada, 6/2022).** STEV: 3 mg/m³ 15 minutes. TWAEV: 1 mg/m³ 8 hours. **CA Saskatchewan Provincial (Canada, 7/2013).** STEL: 3 mg/m³ 15 minutes. TWA: 1 mg/m³ 8 hours.

Consult local authorities for acceptable exposure limits.

Recommended monitoring procedures : Reference should be made to appropriate monitoring standards. Reference to national guidance documents for methods for the determination of hazardous substances will also be required.

Appropriate engineering controls : If user operations generate dust, fumes, gas, vapor or mist, use process enclosures, local exhaust ventilation or other engineering controls to keep worker exposure to airborne contaminants below any recommended or statutory limits.

Environmental exposure controls : Emissions from ventilation or work process equipment should be checked to ensure they comply with the requirements of environmental protection legislation. In some cases, fume scrubbers, filters or engineering modifications to the process equipment will be necessary to reduce emissions to acceptable levels.

Individual protection measures

Section 8. Exposure controls/personal protection

Hygiene measures : Wash hands, forearms and face thoroughly after handling chemical products, before eating, smoking and using the lavatory and at the end of the working period. Appropriate techniques should be used to remove potentially contaminated clothing. Wash contaminated clothing before reusing. Ensure that eyewash stations and safety showers are close to the workstation location.

Eye/face protection : Chemical splash goggles and face shield.

Skin protection

Hand protection : Chemical-resistant, impervious gloves complying with an approved standard should be worn at all times when handling chemical products if a risk assessment indicates this is necessary. Considering the parameters specified by the glove manufacturer, check during use that the gloves are still retaining their protective properties. It should be noted that the time to breakthrough for any glove material may be different for different glove manufacturers. In the case of mixtures, consisting of several substances, the protection time of the gloves cannot be accurately estimated.

Body protection : Personal protective equipment for the body should be selected based on the task being performed and the risks involved and should be approved by a specialist before handling this product.

Other skin protection : Appropriate footwear and any additional skin protection measures should be selected based on the task being performed and the risks involved and should be approved by a specialist before handling this product.

Respiratory protection : Respirator selection must be based on known or anticipated exposure levels, the hazards of the product and the safe working limits of the selected respirator. If workers are exposed to concentrations above the exposure limit, they must use appropriate, certified respirators. Use a properly fitted, air-purifying or air-fed respirator complying with an approved standard if a risk assessment indicates this is necessary.

Section 9. Physical and chemical properties

Appearance

Physical state : Liquid.
Color : Not available.
Odor : Not available.
Odor threshold : Not available.
pH : 2.3
Melting point : Not available.
Boiling point : >37.78°C (>100°F)
Flash point : Closed cup: Not applicable. [Product does not sustain combustion.]
Auto-ignition temperature : Not available.
Decomposition temperature : Not available.
Flammability : Not available.
Lower and upper explosive (flammable) limits : Not available.
Evaporation rate : Not available.
Vapor pressure : Not available.
Vapor density : Not available.
Relative density : 1.12
Density (lbs / gal) : 9.35

Section 9. Physical and chemical properties

Solubility(ies) :

Media	Result
cold water	Partially soluble

Partition coefficient: n-octanol/water : Not applicable.

Viscosity : Kinematic (40°C (104°F)): >21 mm^2/s (>21 cSt)

Volatility : 87% (v/v), 77.5% (w/w)

% Solid. (w/w) : 22.5

Section 10. Stability and reactivity

Reactivity : No specific test data related to reactivity available for this product or its ingredients.

Chemical stability : The product is stable.

Possibility of hazardous reactions : Under normal conditions of storage and use, hazardous reactions will not occur.

Conditions to avoid : When exposed to high temperatures may produce hazardous decomposition products.
Refer to protective measures listed in sections 7 and 8.

Incompatible materials : Keep away from the following materials to prevent strong exothermic reactions: oxidizing agents, strong alkalis, strong acids.

Hazardous decomposition products : Depending on conditions, decomposition products may include the following materials: phosphorus oxides

Section 11. Toxicological information

Information on toxicological effects

Acute toxicity

Product/ingredient name	Result	Species	Dose	Exposure
Phosphoric acid	LD50 Dermal LD50 Oral	Rabbit Rat	2.74 g/kg 1.25 g/kg	- -

Conclusion/Summary : There are no data available on the mixture itself.

Irritation/Corrosion

Conclusion/Summary

Skin : There are no data available on the mixture itself.

Eyes : There are no data available on the mixture itself.

Respiratory : There are no data available on the mixture itself.

Sensitization

Skin : There are no data available on the mixture itself.

Respiratory : There are no data available on the mixture itself.

Mutagenicity

Conclusion/Summary : There are no data available on the mixture itself.

Carcinogenicity

Section 11. Toxicological information

Conclusion/Summary : There are no data available on the mixture itself.

Reproductive toxicity

Conclusion/Summary : There are no data available on the mixture itself.

Teratogenicity

Conclusion/Summary : There are no data available on the mixture itself.

Specific target organ toxicity (single exposure)

Not available.

Specific target organ toxicity (repeated exposure)

Not available.

Target organs : Contains material which may cause damage to the following organs: upper respiratory tract, skin, eye, lens or cornea.

Aspiration hazard

Not available.

Information on the likely routes of exposure

Potential acute health effects

Eye contact : Causes serious eye damage.

Inhalation : No known significant effects or critical hazards.

Skin contact : Causes severe burns.

Ingestion : No known significant effects or critical hazards.

Over-exposure signs/symptoms

Eye contact : Adverse symptoms may include the following:
pain
watering
redness

Inhalation : No specific data.

Skin contact : Adverse symptoms may include the following:
pain or irritation
redness
blistering may occur

Ingestion : Adverse symptoms may include the following:
stomach pains

Delayed and immediate effects and also chronic effects from short and long term exposure

Conclusion/Summary : There are no data available on the mixture itself. If splashed in the eyes, the liquid may cause irritation and reversible damage. Ingestion may cause nausea, diarrhea and vomiting. This takes into account, where known, delayed and immediate effects and also chronic effects of components from short-term and long-term exposure by oral, inhalation and dermal routes of exposure and eye contact.

Short term exposure

Potential immediate effects : There are no data available on the mixture itself.

Potential delayed effects : There are no data available on the mixture itself.

Section 11. Toxicological information

Long term exposure

Potential immediate effects : There are no data available on the mixture itself.

Potential delayed effects : There are no data available on the mixture itself.

Potential chronic health effects

General : No known significant effects or critical hazards.

Carcinogenicity : No known significant effects or critical hazards.

Mutagenicity : No known significant effects or critical hazards.

Reproductive toxicity : No known significant effects or critical hazards.

Numerical measures of toxicity

Acute toxicity estimates

Product/ingredient name	Oral (mg/kg)	Dermal (mg/kg)	Inhalation (gases) (ppm)	Inhalation (vapors) (mg/l)	Inhalation (dusts and mists) (mg/l)
CHEMKLEEN PH ADJUST DOWN	5555.6	12177.9	N/A	N/A	N/A
Phosphoric acid	1250	2740	N/A	N/A	N/A

Section 12. Ecological information

Toxicity

Not available.

Persistence and degradability

Not available.

Bioaccumulative potential

Not available.

Mobility in soil

Soil/water partition coefficient (K_{OC}) : Not available.

Section 13. Disposal considerations

Disposal methods : The generation of waste should be avoided or minimized wherever possible. Disposal of this product, solutions and any by-products should at all times comply with the requirements of environmental protection and waste disposal legislation and any regional local authority requirements. Dispose of surplus and non-recyclable products via a licensed waste disposal contractor. Waste should not be disposed of untreated to the sewer unless fully compliant with the requirements of all authorities with jurisdiction. Waste packaging should be recycled. Incineration or landfill should only be considered when recycling is not feasible. This material and its container must be disposed of in a safe way. Care should be taken when handling emptied containers that have not been cleaned or rinsed out. Empty

Section 13. Disposal considerations

containers or liners may retain some product residues. Avoid dispersal of spilled material and runoff and contact with soil, waterways, drains and sewers.

Disposal should be in accordance with applicable regional, national and local laws and regulations.

Refer to Section 7: HANDLING AND STORAGE and Section 8: EXPOSURE CONTROLS/PERSONAL PROTECTION for additional handling information and protection of employees. Section 6. Accidental release measures

Section 14. Transport information

	TDG	IMDG	IATA
UN number	Not regulated.	Not regulated.	Not regulated.
UN proper shipping name	-	-	-
Transport hazard class (es)	-	-	-
Packing group	-	-	-
Environmental hazards	No.	No.	No.
Marine pollutant substances	Not applicable.	Not applicable.	Not applicable.

Additional information

TDG : None identified.
IMDG : None identified.
IATA : None identified.

Special precautions for user : **Transport within user's premises:** always transport in closed containers that are upright and secure. Ensure that persons transporting the product know what to do in the event of an accident or spillage.

Transport in bulk according to IMO instruments : Not applicable.

Section 15. Regulatory information

National Inventory List

Canada inventory (DSL) : All components are listed or exempted.

Section 16. Other information

Hazardous Material Information System (U.S.A.)

Health : 3 **Flammability** : 0 **Physical hazards** : 1
(*) - Chronic effects

Caution: HMIS® ratings are based on a 0-4 rating scale, with 0 representing minimal hazards or risks, and 4 representing significant hazards or risks. Although HMIS® ratings and the associated label are not required on MSDSs or products leaving a facility under 29 CFR 1910.1200, the preparer may choose to provide them. HMIS® ratings are to be used with a fully implemented HMIS® program. HMIS® is a registered trademark and service mark of the American Coatings Association, Inc.

The customer is responsible for determining the PPE code for this material. For more information on HMIS® Personal Protective Equipment (PPE) codes, consult the HMIS® Implementation Manual.

Section 16. Other information

National Fire Protection Association (U.S.A.)

Health : 3 **Flammability** : 0 **Instability** : 1

Date of issue/Date of revision 7 September 2023

Organization that prepared the SDS : EHS

Key to abbreviations : ATE = Acute Toxicity Estimate
BCF = Bioconcentration Factor
GHS = Globally Harmonized System of Classification and Labelling of Chemicals
IATA = International Air Transport Association
IBC = Intermediate Bulk Container
IMDG = International Maritime Dangerous Goods
LogPow = logarithm of the octanol/water partition coefficient
MARPOL = International Convention for the Prevention of Pollution From Ships, 1973 as modified by the Protocol of 1978. ("Marpol" = marine pollution)
N/A = Not available
SGG = Segregation Group
UN = United Nations

Indicates information that has changed from previously issued version.

Disclaimer

The information contained in this data sheet is based on present scientific and technical knowledge. The purpose of this information is to draw attention to the health and safety aspects concerning the products supplied by PPG, and to recommend precautionary measures for the storage and handling of the products. No warranty or guarantee is given in respect of the properties of the products. No liability can be accepted for any failure to observe the precautionary measures described in this data sheet or for any misuse of the products.

Subject:	Spill Response		
Trainer:	Return to;	Dexter Bridges	
Duration	2	Location; GM FW	
Overtime	No	Type	Simulated Practical

Description:

Spill response

Training Goals

To understand what a hazardous material is and how to recognize them.

To understand security's role in a hazardous material incident.

To understand the nature of hazardous material.

To be able to read a SDS sheet, DOT guide book, NFPA placards ,and EPA labels

Material Referenced: HCS pictograms and hazard material book

GM 2024 Annual refresher course

Trainer signature _____ Date June 24 2024

Due: July 14 2024

Shift/date	Print Name	Signature
_____	Barry Baeske	_____
_____	Gay Balentine	_____
_____	Jennifer Bixler	_____
_____	Matthew Bokhart	_____
_____	Dexter Bridges	_____
_____	James Britten	_____
_____	Heather Brookes	_____
_____	Dan Deifenbaugh	_____
_____	Grayson Denton	_____
_____	Kathy Dodson	_____
_____	Larry Drudge	_____
_____	Gabrielle Gowell	_____
_____	Jackie Henry	_____

_____	Jan Howard	_____

Shift/date	Print Name	Signature
_____	Taya Kern	_____
_____	Melanie Martin	_____
_____	Thomas McCloud	_____
_____	Kyle McGinnis	_____
_____	Andrew Mergy	_____
_____	Debora Minkosky	_____
_____	Jailene Ortiz	_____
_____	Jeffrey Schwartz	_____
_____	Shannon Sexton	_____
_____	Charles Smith	_____
_____	Dave Stein	_____
_____	Keith Thieme	_____

_____	Bailey Ulfig	_____
_____	Jamie Waikel	_____

Shift/date	Print Name	Signature
_____	Kevin Wilken	_____
_____	Kenneth Williams	_____
_____	Berhanu Woldeyes	_____
_____	Wayne Wolfgram	_____
_____	Ryan Yeater	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____

TRAINING RECORD

Security Training Department

Subject:	**Hazardous Material/Asbestos Communications**		
Trainer:	**Various/As Signed**		
Duration:	**1.5 hours**	**Location: GM FW**	
Overtime:	**No**	**Type:**	**Simulated Practical**

DESCRIPTION:

HAZWOPER understanding and response.

TRAINING GOALS

To understand what a hazardous material is and how to recognize them.
To understand Security's role in a hazardous material incident.
To understand the nature of hazardous materials.
To understand the forms of chemicals and the routes of entry.
To be able to read SDS sheets, DOT guidebook, NFPA placards, and EPA labels.
To be able to identify Asbestos and know what to do if found.

MATERIALS REFERENCED:

Hazardous Communications Study Guide
Hazmat Placards and Classes
HCS Pictograms and Hazards
NFPA Hazardous Material Label

TRAINER SIGNATURE: _____ ENTERED: 3/31/23

TRAINING RECORD

Security Training Department

SIGN-IN SHEET

Date/Shift	Print Name:	Signature:
3/30 /3rd	Joel Amick	
3/30 /3rd	Dexter Bridges	
3-14 /3rd	James Britten	
3-14 /3rd	Grayson Denton	
3-14 /3rd	Kathy Dodson	
3/30 /3rd	Bryce Foerman	
3/30 /3rd	Jeff Gray	
NLE /3rd	Bobby Mason	NLE
3/30 /3rd	Thomas McCloud	
3/30 /3rd	Mason Satterthwaite	
3/30 /3rd	Jeff Schwartz	
3/30 /3rd	Keith Thieme	
3.30 /3rd	Kenneth Williams	
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/		
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/		
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/		

TRAINING RECORD

Security Training Department

Subject:	**Hazardous Material/Asbestos Communications**		
Trainer:	**Various/As Signed**		
Duration:	**1.5 hours**	**Location: GM FW**	
Overtime:	**No**	**Type:**	**Simulated Practical**

DESCRIPTION:

Basic HAZWOPER understanding and response.

TRAINING GOALS

To understand what a hazardous material is and how to recognize them.
To understand Security's role in a hazardous material incident.
To understand the nature of hazardous materials.
To understand the forms of chemicals and the routes of entry.
To be able to read SDS sheets, DOT guidebook, NFPA placards, and EPA labels.
To be able to identify Asbestos and know what to do if found.

MATERIALS REFERENCED:

Hazardous Communications Study Guide
Hazmat Placards and Classes
HCS Pictograms and Hazards
NFPA Hazardous Material Label

TRAINER SIGNATURE: [signature] ENTERED: 3/31/23

TRAINING RECORD

Security Training Department

SIGN-IN SHEET

Date/Shift	Print Name:	Signature:
3/30 /1st	Chad Andorfer	
4·17 /1st	Barry Baeske	
3/30/23 /1st	Cameron Dargis	
4/18/23 /1st	Dan Deifenbaugh	
4-18 /1st	Larry Drudge	
3·30 /1st	Jackie Henry	
4/29 /1st	Kamari Hogue	
3-31 /1st	Jan Howard	
5/16 /1st	Kyle McGinnis	
3/30/23 /1st	Andrew Mergy	
3/30/23 /1st	Debora Minkosky	
3/30/23 /1st	Samantha Penrod	
3-31-23 /1st	Shannon Sexton	
3/31 /1st	Charles Smith	
3/31 /1st	Dave Stein	
3-31 /1st	James Waikel	
3/31/23 /1st	Ryan Yeater	
/		
/		
/		
/		

TRAINING RECORD

Security Training Department

Subject:	**Hazardous Material/Asbestos Communications**		
Trainer:	**Various/As Signed**		
Duration:	**1.5 hours**	**Location: GM FW**	
Overtime:	**No**	**Type:**	**Simulated Practical**

DESCRIPTION:

Basic HAZWOPER understanding and response.

TRAINING GOALS

To understand what a hazardous material is and how to recognize them.
To understand Security's role in a hazardous material incident.
To understand the nature of hazardous materials.
To understand the forms of chemicals and the routes of entry.
To be able to read SDS sheets, DOT guidebook, NFPA placards, and EPA labels.
To be able to identify Asbestos and know what to do if found.

MATERIALS REFERENCED:

Hazardous Communications Study Guide
Hazmat Placards and Classes
HCS Pictograms and Hazards
NFPA Hazardous Material Label

TRAINER SIGNATURE: [signature] ENTERED: 3/3/23

TRAINING RECORD

Security Training Department

SIGN-IN SHEET

Date/Shift	Print Name:	Signature:
4/12/23 /2nd	Gayle Balentine	Gayle B
3/30 /2nd	Matthew Bokhart	
4/12/23 /2nd	Hannah Brown	
3-31 /2nd	Dillon Fenker	Dillon Fenker
3/30 /2nd	Christopher Goodyear	
4/12/23 /2nd	Dave Hollingsworth	
3/30/23 /2nd	Taya Kern	Taya Kern
/2nd 4/15/23	Melanie Martin	
3/30/23 /2nd	Jose Nevares	
NLE /2nd	Brianna Purvis	NLE
4/3/23 2nd	Rachel Tharp	Rachel Tharp
3/30/23 /2nd	Bailey Ulfig	Bailey Ulfig
4/3/23 /2nd	Andrew Wildes	
3/30 /2nd	Berhanu Woldeyes	
03/30/23 /2nd	Wayne Wolfgram	Wayne Wolfgram
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SAFETY DATA SHEET

Date of issue/Date of revision 27 June 2021
Version 11.01

Section 1. Identification

Product name : ZIRCOBOND CONTROL#3
Product code : ZRCOCTRL3
Other means of identification : Not available.
Product type : Liquid.

Relevant identified uses of the substance or mixture and uses advised against

Product use : Industrial applications.
Use of the substance/ mixture : Coating. Paints. Painting-related materials.
Uses advised against : Not applicable.

Manufacturer : Pretreatment and Specialty Products
23000 St. Clair Avenue
Euclid, OH 44117
Emergency telephone number : (412) 434-4515 (U.S.)
(514) 645-1320 (Canada)
SETIQ Interior de la República: 800-00-214-00 (México)
SETIQ Ciudad de México: (55) 5559-1588 (México)
Technical Phone Number : 1-888-774-2001 (US and Canada)

Section 2. Hazards identification

OSHA/HCS status : This material is considered hazardous by the OSHA Hazard Communication Standard (29 CFR 1910.1200).
Classification of the substance or mixture : SKIN CORROSION - Category 1
SERIOUS EYE DAMAGE - Category 1
GHS label elements
Hazard pictograms :

Signal word : Danger
Hazard statements : Causes severe skin burns and eye damage.
Precautionary statements
Prevention : Wear protective gloves, protective clothing and eye or face protection. Wash thoroughly after handling.

Section 2. Hazards identification

Response : IF INHALED: Remove person to fresh air and keep comfortable for breathing. Immediately call a POISON CENTER or doctor. IF SWALLOWED: Immediately call a POISON CENTER or doctor. Rinse mouth. Do NOT induce vomiting. IF ON SKIN (or hair): Take off immediately all contaminated clothing. Rinse skin with water. Immediately call a POISON CENTER or doctor. Wash contaminated clothing before reuse. IF IN EYES: Rinse cautiously with water for several minutes. Remove contact lenses, if present and easy to do. Continue rinsing. Immediately call a POISON CENTER or doctor.
Apply generous quantities of fresh calcium gluconate gel to all areas. Get immediate medical attention.

Storage : Store locked up.

Disposal : Dispose of contents and container in accordance with all local, regional, national and international regulations.

Supplemental label elements : Add this product only to water. Never add water to this product. Emits toxic fumes when heated.

Hazards not otherwise classified : None known.

Section 3. Composition/information on ingredients

Substance/mixture : Mixture

Product name : ZIRCOBOND CONTROL#3

Ingredient name	%	CAS number
dihydrogen hexafluorozirconate(2-)	≥1.0 - <5.0	12021-95-3

SUB codes represent substances without registered CAS Numbers.

Any concentration shown as a range is to protect confidentiality or is due to batch variation.

There are no additional ingredients present which, within the current knowledge of the supplier and in the concentrations applicable, are classified as hazardous to health or the environment and hence require reporting in this section.

Occupational exposure limits, if available, are listed in Section 8.

Section 4. First aid measures

If ingestion, irritation, any type of overexposure or symptoms of overexposure occur during or persists after use of this product, contact a POISON CONTROL CENTER, EMERGENCY ROOM OR PHYSICIAN immediately; have Safety Data Sheet information available. Never give anything by mouth to an unconscious or convulsing person.

Description of necessary first aid measures

Eye contact : Check for and remove any contact lenses. Immediately flush eyes with running water for at least 15 minutes, keeping eyelids open. Seek immediate medical attention.

Inhalation : Remove to fresh air. Keep person warm and at rest. If not breathing, if breathing is irregular or if respiratory arrest occurs, provide artificial respiration or oxygen by trained personnel.

Skin contact : Remove contaminated clothing and shoes. Wash skin thoroughly with soap and water or use recognized skin cleanser. Do NOT use solvents or thinners.
Apply generous quantities of fresh calcium gluconate gel to all areas. Get immediate medical attention.

Section 4. First aid measures

Ingestion : If swallowed, seek medical advice immediately and show this container or label. Keep person warm and at rest. Do NOT induce vomiting.

Most important symptoms/effects, acute and delayed

Potential acute health effects

Eye contact : Causes serious eye damage.

Inhalation : No known significant effects or critical hazards.

Skin contact : Causes severe burns.

Ingestion : No known significant effects or critical hazards.

Over-exposure signs/symptoms

Eye contact : Adverse symptoms may include the following:
pain
watering
redness

Inhalation : No specific data.

Skin contact : Adverse symptoms may include the following:
pain or irritation
redness
blistering may occur

Ingestion : Adverse symptoms may include the following:
stomach pains

Indication of immediate medical attention and special treatment needed, if necessary

Notes to physician : Treat symptomatically. Contact poison treatment specialist immediately if large quantities have been ingested or inhaled.

Specific treatments : No specific treatment.

Protection of first-aiders : No action shall be taken involving any personal risk or without suitable training. If it is suspected that fumes are still present, the rescuer should wear an appropriate mask or self-contained breathing apparatus. It may be dangerous to the person providing aid to give mouth-to-mouth resuscitation. Wash contaminated clothing thoroughly with water before removing it, or wear gloves.

See toxicological information (Section 11)

Section 5. Fire-fighting measures

Extinguishing media

Suitable extinguishing media : Use an extinguishing agent suitable for the surrounding fire.

Unsuitable extinguishing media : None known.

Specific hazards arising from the chemical : In a fire or if heated, a pressure increase will occur and the container may burst.

Hazardous thermal decomposition products : Decomposition products may include the following materials:
halogenated compounds
metal oxide/oxides

Section 5. Fire-fighting measures

Special protective actions for fire-fighters : Promptly isolate the scene by removing all persons from the vicinity of the incident if there is a fire. No action shall be taken involving any personal risk or without suitable training.

Special protective equipment for fire-fighters : Fire-fighters should wear appropriate protective equipment and self-contained breathing apparatus (SCBA) with a full face-piece operated in positive pressure mode.

Section 6. Accidental release measures

Personal precautions, protective equipment and emergency procedures

For non-emergency personnel : No action shall be taken involving any personal risk or without suitable training. Evacuate surrounding areas. Keep unnecessary and unprotected personnel from entering. Do not touch or walk through spilled material. Do not breathe vapor or mist. Provide adequate ventilation. Wear appropriate respirator when ventilation is inadequate. Put on appropriate personal protective equipment.

For emergency responders : If specialized clothing is required to deal with the spillage, take note of any information in Section 8 on suitable and unsuitable materials. See also the information in "For non-emergency personnel".

Environmental precautions : Avoid dispersal of spilled material and runoff and contact with soil, waterways, drains and sewers. Inform the relevant authorities if the product has caused environmental pollution (sewers, waterways, soil or air).

Methods and materials for containment and cleaning up

Small spill : Stop leak if without risk. Move containers from spill area. Dilute with water and mop up if water-soluble. Alternatively, or if water-insoluble, absorb with an inert dry material and place in an appropriate waste disposal container. Dispose of via a licensed waste disposal contractor.

Large spill : Stop leak if without risk. Move containers from spill area. Approach release from upwind. Prevent entry into sewers, water courses, basements or confined areas. Wash spillages into an effluent treatment plant or proceed as follows. Contain and collect spillage with non-combustible, absorbent material e.g. sand, earth, vermiculite or diatomaceous earth and place in container for disposal according to local regulations (see Section 13). The spilled material may be neutralized with sodium carbonate, sodium bicarbonate or sodium hydroxide. Dispose of via a licensed waste disposal contractor. Contaminated absorbent material may pose the same hazard as the spilled product. Note: see Section 1 for emergency contact information and Section 13 for waste disposal.

Section 7. Handling and storage

Precautions for safe handling

Protective measures : Put on appropriate personal protective equipment (see Section 8). Do not get in eyes or on skin or clothing. Do not breathe vapor or mist. Do not ingest. If during normal use the material presents a respiratory hazard, use only with adequate ventilation or wear appropriate respirator. Keep in the original container or an approved alternative made from a compatible material, kept tightly closed when not in use. Keep away from alkalis. Empty containers retain product residue and can be hazardous. Do not reuse container.

Section 7. Handling and storage

Special precautions : Add this product only to water. Never add water to this product. Do not get in eyes or on skin or clothing. If during normal use the material presents a respiratory hazard, use only with adequate ventilation or wear appropriate respirator. If this material is part of a multiple component system, read the Safety Data Sheet(s) for the other component or components before blending as the resulting mixture may have the hazards of all of its parts.

Advice on general occupational hygiene : Eating, drinking and smoking should be prohibited in areas where this material is handled, stored and processed. Workers should wash hands and face before eating, drinking and smoking. Remove contaminated clothing and protective equipment before entering eating areas. See also Section 8 for additional information on hygiene measures.

Conditions for safe storage, including any incompatibilities : Do not store below the following temperature: 5°C (41°F). Store in accordance with local regulations. Store in original container protected from direct sunlight in a dry, cool and well-ventilated area, away from incompatible materials (see Section 10) and food and drink. Store locked up. Separate from alkalis. Keep container tightly closed and sealed until ready for use. Containers that have been opened must be carefully resealed and kept upright to prevent leakage. Do not store in unlabeled containers. Use appropriate containment to avoid environmental contamination.

Section 8. Exposure controls/personal protection

Control parameters

Occupational exposure limits

Ingredient name	Exposure limits
dihydrogen hexafluorozirconate(2-)	**ACGIH TLV (United States, 3/2020).** STEL: 10 mg/m³, (as Zr) 15 minutes. TWA: 5 mg/m³, (as Zr) 8 hours. **OSHA PEL (United States, 5/2018).** TWA: 5 mg/m³, (as Zr) 8 hours.

Key to abbreviations

A	= Acceptable Maximum Peak	S	= Potential skin absorption
ACGIH	= American Conference of Governmental Industrial Hygienists.	SR	= Respiratory sensitization
C	= Ceiling Limit	SS	= Skin sensitization
F	= Fume	STEL	= Short term Exposure limit values
IPEL	= Internal Permissible Exposure Limit	TD	= Total dust
OSHA	= Occupational Safety and Health Administration.	TLV	= Threshold Limit Value
R	= Respirable	TWA	= Time Weighted Average
Z	= OSHA 29 CFR 1910.1200 Subpart Z - Toxic and Hazardous Substances		

Consult local authorities for acceptable exposure limits.

Recommended monitoring procedures : If this product contains ingredients with exposure limits, personal, workplace atmosphere or biological monitoring may be required to determine the effectiveness of the ventilation or other control measures and/or the necessity to use respiratory protective equipment. Reference should be made to appropriate monitoring standards. Reference to national guidance documents for methods for the determination of hazardous substances will also be required.

Appropriate engineering controls : If user operations generate dust, fumes, gas, vapor or mist, use process enclosures, local exhaust ventilation or other engineering controls to keep worker exposure to airborne contaminants below any recommended or statutory limits.

Section 8. Exposure controls/personal protection

Environmental exposure controls : Emissions from ventilation or work process equipment should be checked to ensure they comply with the requirements of environmental protection legislation. In some cases, fume scrubbers, filters or engineering modifications to the process equipment will be necessary to reduce emissions to acceptable levels.

Individual protection measures

Hygiene measures : Wash hands, forearms and face thoroughly after handling chemical products, before eating, smoking and using the lavatory and at the end of the working period. Appropriate techniques should be used to remove potentially contaminated clothing. Wash contaminated clothing before reusing. Ensure that eyewash stations and safety showers are close to the workstation location.

Eye/face protection : Chemical splash goggles and face shield.

Skin protection

Hand protection : Chemical-resistant, impervious gloves complying with an approved standard should be worn at all times when handling chemical products if a risk assessment indicates this is necessary. Considering the parameters specified by the glove manufacturer, check during use that the gloves are still retaining their protective properties. It should be noted that the time to breakthrough for any glove material may be different for different glove manufacturers. In the case of mixtures, consisting of several substances, the protection time of the gloves cannot be accurately estimated.

Body protection : Personal protective equipment for the body should be selected based on the task being performed and the risks involved and should be approved by a specialist before handling this product.

Other skin protection : Appropriate footwear and any additional skin protection measures should be selected based on the task being performed and the risks involved and should be approved by a specialist before handling this product.

Respiratory protection : Respirator selection must be based on known or anticipated exposure levels, the hazards of the product and the safe working limits of the selected respirator. If workers are exposed to concentrations above the exposure limit, they must use appropriate, certified respirators. Use a properly fitted, air-purifying or air-fed respirator complying with an approved standard if a risk assessment indicates this is necessary.
The respiratory protection shall be in accordance to 29 CFR 1910.134.

Section 9. Physical and chemical properties

Appearance

Physical state : Liquid.

Color : Not available.

Odor : Not available.

Odor threshold : Not available.

pH : 1.2

Melting point : Not available.

Boiling point : >37.78°C (>100°F)

Flash point : Closed cup: Not applicable. [Product does not sustain combustion.]

Auto-ignition temperature : Not available.

Decomposition temperature : Not available.

Flammability (solid, gas) : Not available.

Section 9. Physical and chemical properties

Lower and upper explosive (flammable) limits	:	Not available.
Evaporation rate	:	Not available.
Vapor pressure	:	Not available.
Vapor density	:	Not available.
Relative density	:	1.03
Density (lbs / gal)	:	8.6
Solubility	:	Soluble in the following materials: cold water.
Partition coefficient: n-octanol/water	:	Not applicable.
Viscosity	:	Kinematic (40°C (104°F)): >21 mm^2/s (>21 cSt)
Volatility	:	99% (v/v), 95.59% (w/w)
% Solid. (w/w)	:	4.41

Section 10. Stability and reactivity

Reactivity	:	No specific test data related to reactivity available for this product or its ingredients.
Chemical stability	:	The product is stable.
Possibility of hazardous reactions	:	Under normal conditions of storage and use, hazardous reactions will not occur.
Conditions to avoid	:	When exposed to high temperatures may produce hazardous decomposition products. Refer to protective measures listed in sections 7 and 8.
Incompatible materials	:	Keep away from the following materials to prevent strong exothermic reactions: oxidizing agents, strong alkalis, strong acids.
Hazardous decomposition products	:	Depending on conditions, decomposition products may include the following materials: halogenated compounds metal oxide/oxides

Section 11. Toxicological information

Information on toxicological effects

Acute toxicity

Conclusion/Summary	:	There are no data available on the mixture itself.

Irritation/Corrosion

Conclusion/Summary

Skin	:	There are no data available on the mixture itself.
Eyes	:	There are no data available on the mixture itself.
Respiratory	:	There are no data available on the mixture itself.

Sensitization

Conclusion/Summary

Skin	:	There are no data available on the mixture itself.

Section 11. Toxicological information

Respiratory : There are no data available on the mixture itself.

Mutagenicity

Conclusion/Summary : There are no data available on the mixture itself.

Carcinogenicity

Conclusion/Summary : There are no data available on the mixture itself.

Reproductive toxicity

Conclusion/Summary : There are no data available on the mixture itself.

Teratogenicity

Conclusion/Summary : There are no data available on the mixture itself.

Specific target organ toxicity (single exposure)

Not available.

Specific target organ toxicity (repeated exposure)

Not available.

Target organs : Contains material which causes damage to the following organs: bones, teeth.
Contains material which may cause damage to the following organs: upper respiratory tract, skin.

Aspiration hazard

Not available.

Information on the likely routes of exposure

Potential acute health effects

Eye contact : Causes serious eye damage.
Inhalation : No known significant effects or critical hazards.
Skin contact : Causes severe burns.
Ingestion : No known significant effects or critical hazards.

Over-exposure signs/symptoms

Eye contact : Adverse symptoms may include the following:
pain
watering
redness

Inhalation : No specific data.

Skin contact : Adverse symptoms may include the following:
pain or irritation
redness
blistering may occur

Ingestion : Adverse symptoms may include the following:
stomach pains

Delayed and immediate effects and also chronic effects from short and long term exposure

Conclusion/Summary : There are no data available on the mixture itself. If splashed in the eyes, the liquid may cause irritation and reversible damage. Ingestion may cause nausea, diarrhea and vomiting. This takes into account, where known, delayed and immediate effects and also chronic effects of components from short-term and long-term exposure by oral, inhalation and dermal routes of exposure and eye contact.

Short term exposure

Section 11. Toxicological information

Potential immediate effects : There are no data available on the mixture itself.

Potential delayed effects : There are no data available on the mixture itself.

Long term exposure

Potential immediate effects : There are no data available on the mixture itself.

Potential delayed effects : There are no data available on the mixture itself.

Potential chronic health effects

General : No known significant effects or critical hazards.

Carcinogenicity : No known significant effects or critical hazards.

Mutagenicity : No known significant effects or critical hazards.

Reproductive toxicity : No known significant effects or critical hazards.

Numerical measures of toxicity

Acute toxicity estimates

Product/ingredient name	Oral (mg/kg)	Dermal (mg/kg)	Inhalation (gases) (ppm)	Inhalation (vapors) (mg/l)	Inhalation (dusts and mists) (mg/l)
ZIRCOBOND CONTROL#3	2267.6	6802.7	N/A	N/A	11.3
dihydrogen hexafluorozirconate(2-)	100	300	N/A	N/A	0.5

Section 12. Ecological information

Toxicity

Not available.

Persistence and degradability

Not available.

Bioaccumulative potential

Not available.

Mobility in soil

Soil/water partition coefficient (K_{OC}) : Not available.

Section 13. Disposal considerations

Disposal methods : The generation of waste should be avoided or minimized wherever possible. Disposal of this product, solutions and any by-products should at all times comply with the requirements of environmental protection and waste disposal legislation and any regional local authority requirements. Dispose of surplus and non-recyclable products via a licensed waste disposal contractor. Waste should not be disposed of untreated to the sewer unless fully compliant with the requirements of all authorities with jurisdiction. Waste packaging should be recycled. Incineration or landfill should only be considered when recycling is not feasible. This material and its container must be disposed of in a safe way. Care should be taken when handling emptied containers that have not been cleaned or rinsed out. Empty containers or liners may retain some product residues. Avoid dispersal of spilled material and runoff and contact with soil, waterways, drains and sewers.

Disposal should be in accordance with applicable regional, national and local laws and regulations.

Refer to Section 7: HANDLING AND STORAGE and Section 8: EXPOSURE CONTROLS/PERSONAL PROTECTION for additional handling information and protection of employees. Section 6. Accidental release measures

14. Transport information

	DOT	IMDG	IATA
UN number	UN3264	UN3264	UN3264
UN proper shipping name	CORROSIVE LIQUID, ACIDIC, INORGANIC, N.O.S. (Hydrofluoric acid)	CORROSIVE LIQUID, ACIDIC, INORGANIC, N.O.S. (Hydrofluoric acid)	CORROSIVE LIQUID, ACIDIC, INORGANIC, N.O.S. (Hydrofluoric acid)
Transport hazard class (es)	8	8	8
Packing group	II	II	II
Environmental hazards	No.	No.	No.
Marine pollutant substances	Not applicable.	Not applicable.	Not applicable.

Additional information

DOT : None identified.

IMDG : The segregation group has been manually assigned based upon product analysis.

IATA : None identified.

Special precautions for user : **Transport within user's premises:** always transport in closed containers that are upright and secure. Ensure that persons transporting the product know what to do in the event of an accident or spillage.

Transport in bulk according to IMO instruments : Not applicable.

Section 15. Regulatory information

United States

United States inventory (TSCA 8b) : All components are active or exempted.

U.S. Federal regulations :

SARA 302/304

SARA 304 RQ : Not applicable.

Composition/information on ingredients

No products were found.

SARA 311/312

Classification : SKIN CORROSION - Category 1
SERIOUS EYE DAMAGE - Category 1

Composition/information on ingredients

Name	%	Classification
dihydrogen hexafluorozirconate (2-)	≥1.0 - <5.0	CORROSIVE TO METALS - Category 1 ACUTE TOXICITY (oral) - Category 3 ACUTE TOXICITY (dermal) - Category 3 ACUTE TOXICITY (inhalation) - Category 3 SKIN CORROSION - Category 1B SERIOUS EYE DAMAGE - Category 1

Additional environmental information is contained on the Environmental Data Sheet for this product, which can be obtained from your PPG representative.

Section 16. Other information

Hazardous Material Information System (U.S.A.)

Health : 3 * **Flammability** : 0 **Physical hazards** : 0

(*) - Chronic effects

Caution: HMIS® ratings are based on a 0-4 rating scale, with 0 representing minimal hazards or risks, and 4 representing significant hazards or risks. Although HMIS® ratings and the associated label are not required on MSDSs or products leaving a facility under 29 CFR 1910.1200, the preparer may choose to provide them. HMIS® ratings are to be used with a fully implemented HMIS® program. HMIS® is a registered trademark and service mark of the American Coatings Association, Inc.

The customer is responsible for determining the PPE code for this material. For more information on HMIS® Personal Protective Equipment (PPE) codes, consult the HMIS® Implementation Manual.

National Fire Protection Association (U.S.A.)

Health : 3 **Flammability** : 0 **Instability** : 0

Date of previous issue : **1/19/2021**

Organization that prepared the SDS : EHS

Section 16. Other information

Key to abbreviations : ATE = Acute Toxicity Estimate
BCF = Bioconcentration Factor
GHS = Globally Harmonized System of Classification and Labelling of Chemicals
IATA = International Air Transport Association
IBC = Intermediate Bulk Container
IMDG = International Maritime Dangerous Goods
LogPow = logarithm of the octanol/water partition coefficient
MARPOL = International Convention for the Prevention of Pollution From Ships, 1973 as modified by the Protocol of 1978. ("Marpol" = marine pollution)
N/A = Not available
SGG = Segregation Group
UN = United Nations

Indicates information that has changed from previously issued version.

Disclaimer

The information contained in this data sheet is based on present scientific and technical knowledge. The purpose of this information is to draw attention to the health and safety aspects concerning the products supplied by PPG, and to recommend precautionary measures for the storage and handling of the products. No warranty or guarantee is given in respect of the properties of the products. No liability can be accepted for any failure to observe the precautionary measures described in this data sheet or for any misuse of the products.

PURGE THINNER RECLAIM TANK SYS[illegible] INSPECTION LOG

Month & Year: MAY 2024

Inspection Requirements

Marking a "Yes" in the table below indicates the items or areas inspected comply with the following requirements:

Tank, Supports, Foundation	Tank level: Note level of tank, in inches and see conversion chart on page 2 (max level is 126 inches or 19,000 gallons). Tank level is used as primary method to demonstrate compliance with 40 CFR 265.194(b)(2). Alarm: Green = Normal operating conditions, Yellow = Equipment fault or failure Spills or leaks: No signs of leaks by dripping at valves, unions, welds, or cracks. Corrosion or fractures: No visible signs.
Containment Area	Spills or leaks: Containment/floor is free of chemical spills, no evidence of purge sheen or layering of liquids. Chemical containment: No chipping or cracking in chemical barrier (cement paint), no visible bare cement, no cracks in cement.
Product or Waste Spill	Reclaim Purge Area, Process Fluids Area, Unloading/Loading Area: No evidence or concern for spill of product or waste materials.
Rainwater Accumulation	Fuel Island Pit: Check for accumulation of storm water in pit area. If rainwater is below grate over pit, mark 'Y' for no accumulation. If rainwater is above grate over pit, mark 'N' and file a work order with facility help desk to have the rainwater removed (3225). Record work order number as a Corrective Action.

INSPECTOR INFORMATION			TANK (including top), SUPPORTS, FOUNDATION AND ANCILLARY EQUIPMENT				CONTAINMENT AREA		PRODUCT OR WASTE SPILL			RAINWATER ACCUMULATION	COMMENTS / CORRECTIVE ACTION
DAY OF MONTH	TIME	INSPECTOR	TANK LEVEL (inches)	ALARM FAULT (green = normal yellow = fault)	SPILLS OR LEAKS	CORROSION OR FRACTURES	SPILLS OR LEAKS	CRACKS	RECLAIM PURGE AREA	PROCESS FLUIDS AREA	UNLOADING / LOADING AREAS	FUEL ISLAND PIT	CORRECTIVE ACTION
1	1711	J. Ortiz	25.5	Green	Y	Y	Y	Y	Y	Y	Y	Y	NA
2	1729	J. Ortiz	25.5	Green	Y	Y	Y	Y	Y	Y	Y	Y	NA
3	1535	J. Ortiz	25.5	Green	Y	Y	Y	Y	Y	Y	Y	Y	NA
4	2105	M. Shotfner	25.5	Green	Y	Y	Y	Y	Y	Y	Y	Y	N/A
5	2034	M. Shotfner	25.5	Green	Y	Y	Y	Y	Y	Y	Y	Y	N/A
6	1603	J. Ortiz	25.5	Green	Y	Y	Y	Y	Y	Y	Y	Y	NA
7	1700	J. Ortiz	25.5	Green	Y	Y	Y	Y	Y	Y	Y	Y	NA
8	1644	J. Ortiz	25.5	Green	Y	Y	Y	Y	Y	Y	Y	Y	NA
9	1952	J. Ortiz	25.5	Green	Y	Y	Y	Y	Y	Y	Y	Y	NA
10	2038	J. Ortiz	25.5	Green	Y	Y	Y	Y	Y	Y	Y	Y	NA
11	1745	M. Shotfner	25.5	Green	Y	Y	Y	Y	Y	Y	Y	Y	N/A
12	1835	M. Shotfner	14.8	Yellow	Y	Y	Y	Y	Y	Y	Y	Y	N/A
13	2012	J. Ortiz	17.5	Yellow	Y	Y	Y	Y	Y	Y	Y	Y	NA
14	1848	J. Ortiz	22.1	Yellow	Y	Y	Y	Y	Y	Y	Y	Y	NA
15	1730	J. Ortiz	23.6	Yellow	Y	Y	Y	Y	Y	Y	Y	Y	NA
16	1752	J. Ortiz	25.7	Yellow	Y	Y	Y	Y	Y	Y	Y	Y	NA
17	1939	J. Ortiz	26.7	Yellow	Y	Y	Y	Y	Y	Y	Y	Y	NA
18	1859	M. Shotfner	27.6	Yellow	Y	Y	Y	Y	Y	Y	Y	Y	N/A
19	2019	M. Shotfner	27.9	Yellow	Y	Y	Y	Y	Y	Y	Y	Y	NA
20	1705	J. Ortiz	29.3	Yellow	Y	Y	Y	Y	Y	Y	Y	Y	NA
21	2041	J. Ortiz	32.3	Yellow	Y	Y	Y	Y	Y	Y	Y	Y	NA
22	1756	J. Ortiz	8.4	Yellow	Y	Y	Y	Y	Y	Y	Y	Y	NA

INSPECTOR INFORMATION			TANK (including top), SUPPORTS, FOUNDATION AND ANCILLARY EQUIPMENT				CONTAINMENT AREA		PRODUCT OR WASTE SPILL			RAINWATER ACCUMULATION	COMMENTS / CORRECTIVE ACTION
DAY OF MONTH	TIME	INSPECTOR	TANK LEVEL (Kgal) H4.2	ALARM FAULT (green - normal yellow - fault)	SPILLS OR LEAKS	CORROSION OR FRACTURES	SPILLS OR LEAKS	CRACKS	RECLAIM PURGE AREA	PROCESS FLUIDS AREA	UNLOADING / LOADING AREAS	FUEL ISLAND PIT	CORRECTIVE ACTION
23	1729	J. ORTIZ	Yellow	Yellow	Y	Y	Y	Y	Y	Y	Y	Y	N/A
24	2257	J. ORTIZ	20.4	Yellow	Y	Y	Y	Y	Y	Y	Y	Y	N/A
25	2022	M Shaffer	18.0	Yellow	Y	Y	Y	Y	Y	Y	Y	Y	N/A
26	2108	M Shaffer	20.8	Yellow	Y	Y	Y	Y	Y	Y	Y	Y	N/A
27	1905	J. ORTIZ	20.8	Yellow	Y	Y	Y	Y	Y	Y	Y	Y	N/A
28	2/27	M Shaffer	25.0	Yellow	Y	Y	Y	Y	Y	Y	Y	Y	N/A
29	1750	J. ORTIZ	20.7	Yellow	Y	Y	Y	Y	Y	Y	Y	Y	N/A
30	2044	J. ORTIZ	28.5	Yellow	Y	Y	Y	Y	Y	Y	Y	Y	N/A
31	1725	J. ORTIZ	29.2	Yellow	Y	Y	Y	Y	Y	Y	Y	Y	N/A

NOTE: IF THERE ARE ANY SPILLS/LEAKS/DRIPS, CONTACT A FACILITY SUPPORT SUPERVISOR (unit 50) IMMEDIATELY FOR CLEAN-UP AND NOTIFY ENVIRONMENTAL ENGINEERING AT 2662 OR 2480.

RETURN INSPECTION RECORD TO ENVIRONMENTAL ENGINEERING AT THE END OF EACH MONTH

Table. Purge Reclaim Tank Depth to Volume Conversion Chart. Total tank depth is 126 inches.

Liquid depth (in)	0	12	24	36	48	60	72	84	96	108	120	126
Liquid Volume (US gal)	0	920.47	2522.60	4479.60	6647.60	8924.40	11222.0	13456.0	15555.0	17335.0	18670.0	19000.0

PURGE THINNER RECLAIM TANK SY[illegible] INSPECTION LOG

Month & Year: APRIL 2024

Inspection Requirements

rking a "Yes" in the table below indicates the items or areas inspected comply with the following requirements:

nk, Supports, undation	Tank level: Note level of tank, in inches and see conversion chart on page 2 (max level is 126 inches or 19,000 gallons). Tank level is used as primary method to demonstrate compliance with 40 CFR 265.194(b)(2). Alarm: Green = Normal operating conditions, Yellow = Equiptment fault or failure Spills or leaks: No signs of leaks by dripping at valves, unions, welds, or cracks. Corrosion or fractures: No visible signs.
ntainment ea	Spills or leaks: Containment/floor is free of chemical spills, no evidence of purge sheen or layering of liquids. Chemical containment: No chipping or cracking in chemical barrier (cement paint), no visible bare cement; no cracks in cement.
oduct or ste spill	Reclaim Purge Area, Process Fluids Area, Unloading/Loading Area: No evidence or concern for spill of product or waste materials.
inwater cumulation	Fuel Island Pit: Check for accumulation of storm water in pit area. If rainwater is below grate over pit, mark 'Y' for no accumulation. If rainwater is above grate over pit, mark 'N' and file a work order with facility help desk to have the rainwater removed (3225). Record work order number as a Corrective Action.

INSPECTOR INFORMATION			TANK (including top), SUPPORTS, FOUNDATION AND ANCILLARY EQUIPMENT				CONTAINMENT AREA		PRODUCT OR WASTE SPILL			RAINWATER ACCUMULATION	COMMENTS / CORRECTIVE ACTION
AY OF ONTH	TIME	INSPECTOR	TANK LEVEL (inches)	ALARM FAULT (green - normal, yellow - fault)	SPILLS OR LEAKS	CORROSION OR FRACTURES	SPILLS OR LEAKS	CRACKS	RECLAIM PURGE AREA	PROCESS FLUIDS AREA	UNLOADING / LOADING AREAS	FUEL ISLAND PIT	CORRECTIVE ACTION
1	2010	K WILKEN	27.2	YELLOW	Y	Y	Y	Y	Y	Y	Y	Y	NA
2	1854	K WILKEN	29.9	YELLOW	Y	Y	Y	Y	Y	Y	Y	Y	NA
3	1950	K WILKEN	32.6	YELLOW	Y	Y	Y	Y	Y	Y	Y	Y	NA
4	2006	K WILKEN	36.0	YELLOW	Y	Y	Y	Y	Y	Y	Y	Y	NA
5	2032	K WILKEN	38.5	YELLOW	Y	Y	Y	Y	Y	Y	Y	Y	NA
6	2150	K WILKEN	39.0	YELLOW	Y	Y	Y	Y	Y	Y	Y	Y	NA
7	2135	K WILKEN	39.4	YELLOW	Y	Y	Y	Y	Y	Y	Y	Y	NA
8	1937	K WILKEN	39.2	YELLOW	Y	Y	Y	Y	Y	Y	Y	Y	NA
9	2021	K WILKEN	10.9	YELLOW	Y	Y	Y	Y	Y	Y	Y	Y	NA
10	2111	K WILKEN	14.8	YELLOW	Y	Y	Y	Y	Y	Y	Y	Y	NA
11	2135	K WILKEN	18.4	YELLOW	Y	Y	Y	Y	Y	Y	Y	Y	NA
12	2234	K WILKEN	20.9	YELLOW	Y	Y	Y	Y	Y	Y	Y	Y	NA
13	2108	K WILKEN	22.2	YELLOW	Y	Y	Y	Y	Y	Y	Y	Y	NA
14	2043	K WILKEN	21.3	YELLOW	Y	Y	Y	Y	Y	Y	Y	Y	NA
15	2255	K WILKEN	24.4	YELLOW	Y	Y	Y	Y	Y	Y	Y	Y	NA
16	2055	K WILKEN	28.0	YELLOW	Y	Y	Y	Y	Y	Y	Y	Y	NA
17	1935	J ORTIZ	30.8	Yellow	Y	Y	Y	Y	Y	Y	Y	Y	N/A
18	2118	J ORTIZ	33.4	Yellow	Y	Y	Y	Y	Y	Y	Y	Y	N/A
19	1626	M Shoffner	35.3	Yellow	Y	Y	Y	Y	Y	Y	Y	Y	N/A
20	1854	J ORTIZ	37.5	Yellow	Y	Y	Y	Y	Y	Y	Y	Y	N/A
21	2026	J. ORTIZ	37.3	Yellow	Y	Y	Y	Y	Y	Y	Y	Y	N/A
22	1749	J. ORTIZ	9.8	Yellow	Y	Y	Y	Y	Y	Y	Y	Y	N/A

INSPECTOR INFORMATION			TANK (Including top), SUPPORTS, FOUNDATION AND ANCILLARY EQUIPMENT				CONTAINMENT AREA		PRODUCT OR WASTE SPILL			RAINWATER ACCUMULATION	COMMENTS / CORRECTIVE ACTION
DAY OF MONTH	TIME	INSPECTOR	TANK LEVEL (Kgal)	ALARM FAULT (green - normal yellow - fault)	SPILLS OR LEAKS	CORROSION OR FRACTURES	SPILLS OR LEAKS	CRACKS	RECLAIM PURGE AREA	PROCESS FLUIDS AREA	UNLOADING / LOADING AREAS	FUEL ISLAND PIT	CORRECTIVE ACTION
23	1758	J. ORTIZ	14.7	Yellow	Y	Y	Y	Y	Y	Y	Y	Y	NA
24	2005	J. ORTIZ	17.4	Yellow	Y	Y	Y	Y	Y	Y	Y	Y	NA
25	1907	J. ORTIZ	21.2	Yellow	Y	Y	Y	Y	Y	Y	Y	Y	NA
26	2020	J. ORTIZ	25.3	Yellow	Y	Y	Y	Y	Y	Y	Y	Y	NA
27	2059	M Shaffner	25.5	Yellow	Y	Y	Y	Y	Y	Y	Y	Y	n/a
28	2058	M Shaffner	25.5	Green	Y	Y	Y	Y	Y	Y	Y	Y	n/a
29	2020	J. ORTIZ	25.5	Green	Y	Y	Y	Y	Y	Y	Y	Y	NA
30	1825	J. ORTIZ	25.5	Green	Y	Y	Y	Y	Y	Y	Y	Y	NA
31													

NOTE: IF THERE ARE ANY SPILLS/LEAKS/DRIPS, CONTACT A FACILITY SUPPORT SUPERVISOR (unit 50) IMMEDIATELY FOR CLEAN-UP AND NOTIFY ENVIRONMENTAL ENGINEERING AT 2662 OR 2480.

RETURN INSPECTION RECORD TO ENVIRONMENTAL ENGINEERING AT THE END OF EACH MONTH

Table. Purge Reclaim Tank Depth to Volume Conversion Chart. Total tank depth is 126 inches.

Liquid depth (in)	0	12	24	36	48	60	72	84	96	108	120	126
Liquid volume (US gal)	0	920.47	2522.60	4479.60	6647.60	8924.40	11222.0	13456.0	15533.0	17335.0	18670.0	19000.0

PURGE THINNER RECLAIM TANK SY[illegible] INSPECTION LOG

Month & Year: MARCH 2024

Inspection Requirements	
arking a "Yes" in the table below indicates the items or areas inspected comply with the following requirements:	
nk, Supports, undation	Tank level: Note level of tank, in inches and see conversion chart on page 2 (max level is 126 inches or 19,000 gallons). Tank level is used as primary method to demonstrate compliance with 40 CFR 265.194(b)(2). Alarm: Green = Normal operating conditions, Yellow = Equipment fault or failure Spills or leaks: No signs of leaks by dripping at valves, unions, welds, or cracks. Corrosion or fractures: No visible signs.
ntainment ea	Spills or leaks: Containment/floor is free of chemical spills, no evidence of purge sheen or layering of liquids. Chemical containment: No chipping or cracking in chemical barrier (cement paint), no visible bare cement, no cracks in cement.
oduct or iste spill	Reclaim Purge Area, Process Fluids Area, Unloading/Loading Area: No evidence or concern for spill of product or waste materials.
inwater cumulation	Fuel Island Pit: Check for accumulation of storm water in pit area. If rainwater is below grate over pit, mark 'Y' for no accumulation. If rainwater is above grate over pit, mark 'N' and file a work order with facility help desk to have the rainwater removed (3225). Record work order number as a Corrective Action.

INSPECTOR INFORMATION			TANK (including top), SUPPORTS, FOUNDATION AND ANCILLARY EQUIPMENT				CONTAINMENT AREA		PRODUCT OR WASTE SPILL			RAINWATER ACCUMULATION	COMMENTS / CORRECTIVE ACTION
AY OF ONTH	TIME	INSPECTOR	TANK LEVEL (inches)	ALARM FAULT (green - normal yellow - fault)	SPILLS OR LEAKS	CORROSION OR FRACTURES	SPILLS OR LEAKS	CRACKS	RECLAIM PURGE AREA	PROCESS FLUIDS AREA	UNLOADING / LOADING AREAS	FUEL ISLAND PIT	CORRECTIVE ACTION
1	2152	K WILKEN	15.8	Y	Y	Y	Y	Y	Y	Y	Y	Y	N/A
2	2205	K WILKEN	19.8	Y	Y	Y	Y	Y	Y	Y	Y	Y	NA
3	[illegible]11	C. ANDORFER	22.9	Y	Y	Y	Y	Y	Y	Y	Y	Y	NA
4	1705	K WILKEN	24.05	Y	Y	Y	Y	Y	Y	Y	Y	Y	NA
5	2201	K WILKEN	28.00	Y	Y	Y	Y	Y	Y	Y	Y	Y	NA
6	2032	K WILKEN	30.4	Y	Y	Y	Y	Y	Y	Y	Y	Y	NA
7	1748	K WILKEN	32.6	Y	Y	Y	Y	Y	Y	Y	Y	Y	NA
8	2251	K WILKEN	34.8	Y	Y	Y	Y	Y	Y	Y	Y	Y	NA
9	2043	K WILKEN	36.9	Y	Y	Y	Y	Y	Y	Y	Y	Y	NA
10	1652	C. ANDORFER	36.9	Y	Y	Y	Y	Y	Y	Y	Y	Y	NA
11	2108	K WILKEN	10.1	Y	Y	Y	Y	Y	Y	Y	Y	Y	NA
12	2023	K WILKEN	12.1	Y	Y	Y	Y	Y	Y	Y	Y	Y	NA
13	1903	K WILKEN	14.95	Y	Y	Y	Y	Y	Y	Y	Y	Y	NA
14	1836	K WILKEN	17.8	Y	Y	Y	Y	Y	Y	Y	Y	Y	NA
15	2014	K WILKEN	21.9	Y	Y	Y	Y	Y	Y	Y	Y	Y	NA
16	2044	K WILKEN	23.4	Y	Y	Y	Y	Y	Y	Y	Y	Y	NA
17	1900	C. ANDORFER	28.00	Y	Y	Y	Y	Y	Y	Y	Y	Y	NA
18	1910	K WILKEN	27.0	Y	Y	Y	Y	Y	Y	Y	Y	Y	NA
19	2103	K WILKEN	28.1	Y	Y	Y	Y	Y	Y	Y	Y	Y	NA
20	2023	K WILKEN	31.2	Y	Y	Y	Y	Y	Y	Y	Y	Y	NA
21	1825	K WILKEN	34.8	Y	Y	Y	Y	Y	Y	Y	Y	Y	NA
22	1810	K WILKEN	38.0	Y	Y	Y	Y	Y	Y	Y	Y	Y	NA

INSPECTOR INFORMATION			TANK (including top), SUPPORTS, FOUNDATION AND ANCILLARY EQUIPMENT				CONTAINMENT AREA		PRODUCT OR WASTE SPILL			RAINWATER ACCUMULATION	COMMENTS / CORRECTIVE ACTION
DAY OF MONTH	TIME	INSPECTOR	TANK LEVEL (Kgal)	ALARM FAULT (green - normal yellow - fault)	SPILLS OR LEAKS	CORROSION OR FRACTURES	SPILLS OR LEAKS	CRACKS	RECLAIM PURGE AREA	PROCESS FLUIDS AREA	UNLOADING / LOADING AREAS	FUEL ISLAND PIT	CORRECTIVE ACTION
23	0715	K WILKEN	38.5	Y	Y	Y	Y	Y	Y	Y	Y	Y	N/A
24	1743	C. ANDORRE	38.9	Y	Y	Y	Y	Y	Y	Y	Y	Y	N/A
25	2043	K WILKEN	10.3	Y	Y	Y	Y	Y	Y	Y	Y	Y	N/A
26	2015	K WILKEN	15.6	Y	Y	Y	Y	Y	Y	Y	Y	Y	N/A
27	2248	K WILKEN	21.9	Y	Y	Y	Y	Y	Y	Y	Y	Y	N/A
28	1951	K WILKEN	24.2	Y	Y	Y	Y	Y	Y	Y	Y	Y	N/A
29	2156	K WILKEN	26.1	Y	Y	Y	Y	Y	Y	Y	Y	Y	N/A
30	2214	K WILKEN	26.8	Y	Y	Y	Y	Y	Y	Y	Y	Y	N/A
31	1630	C. ANDORRE	26.5	Y	Y	Y	Y	Y	Y	Y	Y	Y	

NOTE: IF THERE ARE ANY SPILLS/LEAKS/DRIPS, CONTACT A FACILITY SUPPORT SUPERVISOR (unit 50). IMMEDIATELY FOR CLEAN-UP AND NOTIFY ENVIRONMENTAL ENGINEERING AT 2662 OR 2480.

RETURN INSPECTION RECORD TO ENVIRONMENTAL ENGINEERING AT THE END OF EACH MONTH

Table, Purge Reclaim Tank Depth to Volume Conversion Chart. Total tank depth is 126 inches.

Liquid depth (in)	0	12	24	36	48	60	72	84	96	108	120	126
Liquid Volume (us gal)	0	920.47	2522.60	4479.60	6647.60	8924.40	11222.0	13456.0	15533.0	17335.0	18670.0	19000.0

Reclaim Purge Pot/Piping Daily Inspection Log

1. Inspect for the presence of liquid/leaking at each purge pot and associated piping. Circle "Y" if none is present, "N" otherwise.
2. If liquid is present, file a work order with the facilities help desk (3225) and record the work order # on the back of this form.
3. Report the presence of liquid immediately to paint maintenance (2176) and environmental engineering (2480 or 2662).

Month: MAY

Year: 2024

3rd

Day of Month	Time	Inspector's Name	Reclaim Purge Piping Free of Leaks?	Mod 1 Free of Liquid?	Mod 2 Free of Liquid?	Mod 3 Free of Liquid?	Mod 4 Free of Liquid?	Mod 5 Free of Liquid?	Mod 6 Free of Liquid?	Mod 7 Free of Liquid?	Mod 8 Free of Liquid?	Mod 9 Free of Liquid?	Mod 10 Free of Liquid?	West Prime Free of Liquid?	East Prime Free of Liquid?
1	0355	K WILKEN	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N
2	0404	K WILKEN	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N
3	0510	K WILKEN	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N
4	0230	J Schwartz	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N
5	0130	J Schwartz	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N
6	0110	K WILKEN	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N
7	0352	K WILKEN	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N
8	0451	K WILKEN	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N
9	0249	K WILKEN	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N
10	0221	K WILKEN	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N
11	0045	J Schwartz	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N
12	0230	J Schwartz	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N
13	0431	K WILKEN	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N
14	0321	K WILKEN	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N
15	0351	K WILKEN	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N
16	*	not completed	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N
17	0503	K WILKEN	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N
18	0115	J Schwartz	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N
19	0320	J Schwartz	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N
20	0347	K WILKEN	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N
21	0404	K WILKEN	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N
22	0501	K WILKEN	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N
23	0415	K WILKEN	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N
24	0448	K WILKEN	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N
25	0200	J Schwartz	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N
26	0230	J Schwartz	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N
27	0158	K WILKEN	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N
28	0148	K WILKEN	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N
29	0201	K WILKEN	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N
30	0457	K WILKEN	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N
31	0403	K WILKEN	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N

Reclaim Purge Pot/Piping Daily Inspection Log

1. Inspect for the presence of liquid/leaking at each purge pot and associated piping. Circle "Y" if none is present, "N" otherwise.
2. If liquid is present, file a work order with the facilities help desk (3225) and record the work order # on the back of this form.
3. Report the presence of liquid immediately to paint maintenance (2176) and environmental engineering (2480 or 2662).

Month: April

Year: 2024

Day of Month	Time	Inspector's Name	Reclaim Purge Piping Free of Leaks?	Mod 1 Free of Liquid?	Mod 2 Free of Liquid?	Mod 3 Free of Liquid?	Mod 4 Free of Liquid?	Mod 5 Free of Liquid?	Mod 6 Free of Liquid?	Mod 7 Free of Liquid?	Mod 8 Free of Liquid?	Mod 9 Free of Liquid?	Mod 10 Free of Liquid?	West Prime Free of Liquid?	East Prime Free of Liquid?
1	0110	G. Denton	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N
2	0120	G. Denton	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N
3	0240	G. Denton	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N
4	0450	G. Denton	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N
5	0115	G. Denton	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N
6	~~0230~~	~~J. Schwartz~~	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N
7	~~0124~~	~~J. Schwartz~~	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N
8	0320	G. Denton	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N
9	0215	G. Denton	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N
10	0350	G. Denton	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N
11	0450	G. Denton	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N
12	0310	G. Denton	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N
13	0130	J Schwartz	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N
14	0440	J Schwartz	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N
15	0057	K WILKEN	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N
16	0120	G. Denton	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N
17	0452	K WILKEN	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N
18	0240	K WILKEN	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N
19	0120	J Schwartz	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N
20	0330	J Schwartz	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N
21	0455	K WILKEN	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N
22	0445	K WILKEN	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N
23	0457	K WILKEN	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N
24	0536	K WILKEN	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N
25	0432	K WILKEN	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N
26	0404	K WILKEN	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N
27	0115	J Schwartz	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N
28	0300	J Schwartz	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N
29	0225	K WILKEN	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N
30	0503	K WILKEN	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N
31			Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N

Reclaim Purge Pot/Piping Daily Inspection Log

1. Inspect for the presence of liquid/leaking at each purge pot and associated piping. Circle "Y" if none is present, "N" otherwise.
2. If liquid is present, file a work order with the facilities help desk (3225) and record the work order # on the back of this form.
3. Report the presence of liquid immediately to paint maintenance (2176) and environmental engineering (2480 or 2662).

Month: March

Year: 2024

Day of Month	Time	Inspector's Name	Reclaim Purge Piping Free of Leaks?	Mod 1 Free of Liquid?	Mod 2 Free of Liquid?	Mod 3 Free of Liquid?	Mod 4 Free of Liquid?	Mod 5 Free of Liquid?	Mod 6 Free of Liquid?	Mod 7 Free of Liquid?	Mod 8 Free of Liquid?	Mod 9 Free of Liquid?	Mod 10 Free of Liquid?	West Prime Free of Liquid?	East Prime Free of Liquid?
1	0415	G. Denton	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N
2	0145	G. Denton	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N
3	0230	J Schwartz	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N
4	0250	G. Denton	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N
5	0320	G Denton	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N
6	0450	G. Denton	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N
7	0145	G. Denton	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N
8	0130	J Schwartz	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N
9	0200	J Schwartz	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N
10	0150	J Schwartz	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N
11	0930	J Schwartz	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N
12	0140	G. Denton	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N
13	0130	J Schwartz	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N
14	0120	G. Denton	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N
15	0200	J Schwartz	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N
16	0130	J Schwartz	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N
17	0215	J Schwartz	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N
18	0240	G Denton	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N
19	0210	G. Denton	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N
20	0300	G. Denton	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N
21	0410	G. Denton	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N
22	0215	G. Denton	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N
23	0130	G. Denton	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N
24	0130	J Schwartz	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N
25	0150	J Schwartz	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N
26	0300	G. Denton	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N
27	0351	G. Denton	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N
28	0250	G. Denton	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N
29	0115	J Schwartz	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N
30	0120	J. Schwartz	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N
31	0130	G. Denton	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N	Y or N

90-Day Haz Waste Drum Storage Inspections

Month and Year: June 24

Inspection Requirements	
Marking a "Yes" in the table below indicates the items or areas inspected comply with the following requirements:	
Storage Area	No deterioration of CIS Building or cracks in concrete floor
	Proper segregation of incompatible wastes (i.e. acids/bases; flammable/oxidizer)
	Emergency response equipment for spills such as wet vacuum, squeegees, various absorbents, etc. is available
	Phone is in proper working condition
	Appropriate fire extinguishers are available
Containers	All containers are in good condition (i.e. do not have ruptures, leaks, dents or rust that could impact structure)
	All containers are tightly closed during storage & only opened when adding or removing waste
	All containers are labeled with the material they contain according to TIS FTW02
	All containers containing hazardous waste are labeled with the words "Hazardous Waste"
Label Dates	White Internal waste and DOT shipping labels reflect the date the container became full (for SAA containers)
	The S8 drum and aerosol can liquid drum at the CIS Building are dated when waste is first added to the drum
	All dates on hazardous waste containers are less than 90 days from today
	All labels and hazard diamonds are visible
Aisle Space	Aisle space between containers is at least 2 ft
	Aisle space is unobstructed
Containment Dry	Containment/floor in 90-day areas and tank farm are free of chemical spills
	Containment/floor is free of accumulated rain or potable water
Sump working	Manual sump used to drain the CIS containment and tank farm sump are functional (not applicable for 90-day area in Paint)

Six consecutive days is the maximum allowed time between inspections. Performed weekdays to meet the 7-Day Inspection Frequency Requirement.

Day of the month	Inspector (initials)	Container Inspection and Storage (CIS) Building*						Paint Department by Column S8				
		Storage Area (Y/N)	Containers (Y/N)	Label Dates (Y/N)	Aisle Space (Y/N)	CIS/Tank Farm Containment Dry (Y/N)	CIS/Tank Farm Sump Working (Y/N)	Storage Area (Y/N)	Containers (Y/N)	Label Dates (Y/N)	Aisle Space (Y/N)	Containment Dry (Y/N)
1												
2												
3	BL	Y	Y	Y	Y	Y	Y					
4	CC	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y
5	BL	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y
6	CC	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y
7	BL	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y

Day of the month	Inspector (initials)	Container Inspection and Storage (CIS) Building*						Paint Department by Column S8				
		Storage Area (Y/N)	Containers (Y/N)	Label Dates (Y/N)	Aisle Space (Y/N)	CIS/Tank Farm Containment Dry (Y/N)	CIS/Tank Farm Sump Working (Y/N)	Storage Area (Y/N)	Containers (Y/N)	Label Dates (Y/N)	Aisle Space (Y/N)	Containment Dry (Y/N)
8												
9												
10	CL	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y
11	CL	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y
12	CL	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y
13	CL	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y
14	CL	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y
15												
16												
17	CL	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y
18	CL	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y
19												
20												
21												
22												
23												
24												
25												
26												
27												
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29												
30												
31												

NOTE: INDICATE CORRECTIVE ACTION TO "N" ANSWERS BELOW & NOTIFY ENVIRONMENTAL ENGINEERING AT 2662 or 2480.

* Includes aerosol can solvent waste drum.

MAY 2 2 2009

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5

IN THE MATTER OF:	)	
	)	**DOCKET NOs.**
	)	**RCRA-03-2009-0099**
	)	**RCRA-04-2009-4007(b)**
General Motors Automotive - North America	)	**RCRA-05-2004-0001**
	)	**RCRA-07-2009-0001**
300 Renaissance Center	)	**Honorable Barbara A. Gunning**
Detroit, Michigan 48265-3000	)	**Administrative Law Judge**
EPA ID MID 005 356 902	)	
MID 000 718 544	)	
MID 005 356 928	)	
OHD 041 063 074	)	
KSD 981 126 253	)	
MOT 300 010 261	)	
DED 0023692905	)	
GA GAD003310810	)	
	)	
Respondent.	)	
	)	

RECEIVED
MAY 26 2009
REGIONAL HEARING CLERK
U.S. ENVIRONMENTAL
PROTECTION AGENCY

CONSENT AGREEMENT

The United States Environmental Protection Agency (EPA) by and through the under-signed Complainants, and Respondent, General Motors Automotive – North America (GM), agree that settlement of the matters addressed herein without further delay is in their respective interests and in the public interest, and having consented to the entry to this Consent Agreement and the attached Final Order before taking any additional testimony and without further adjudication of any issues of law or fact herein, Complainants and Respondent agree to comply with the terms of this Consent Agreement and Final Order (CAFO).

I. Preliminary Statement

1. This is a civil administrative action instituted under Sections 3008(a) and (g) of the Solid Waste Disposal Act, as amended by the Resource Conservation Recovery Act of 1976 and

the Hazardous and Solid Waste Amendments of 1984 (HSWA) (collectively "RCRA"), 42 U.S.C. §§ 6928(a) and (g), and the Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties, Issuance of Compliance or Corrective Action Orders, and the Revocation, Termination or Suspension of Permits ("Consolidated Rules"), 40 C.F.R. Part 22.

2. Complainants in this matter are:

(a) Abraham Ferdas, Director, Land and Chemicals Division, Region 3;

(b) Caroline Y.F. Robinson, Chief, RCRA & OPA Enforcement and Compliance Branch, Region 4;

(c) Margaret Guerriero, Director, Land and Chemicals Division, Region 5; and

(d) Donald Toensing, Chief, RCRA Enforcement and State Programs Branch, Region 7.

3. Complainants are, by lawful delegation, authorized to institute and settle civil administrative actions brought pursuant to Sections 3008(a) and (g) of RCRA, 42 U.S.C. §§ 6928(a) and (g).

4. Jurisdiction for this action is conferred upon EPA by Sections 3006(b) and 3008 of RCRA, 42 U.S.C. §§ 6926(b) and 6928.

5. Pursuant to Section 3006 of RCRA, 42 U.S.C. § 6926, the Administrator of EPA (Administrator) may authorize a state to administer the RCRA hazardous waste program in lieu of the federal program when the Administrator finds that the state program meets certain conditions. The States of Delaware, Georgia, Michigan, Ohio, Kansas and Missouri have been authorized to administer hazardous waste programs pursuant to Subtitle C of RCRA.

6. Although EPA has granted the States of Delaware, Georgia, Michigan, Ohio, Kansas and Missouri authority to enforce their own hazardous waste programs, EPA maintains

jurisdiction to enforce independent enforcement actions pursuant to Section 3008(a) of RCRA, 42 U.S.C. § 6928(a).

7. Pursuant to Section 3008 of RCRA, 42 U.S.C. § 6928, the Administrator may issue an order assessing a civil penalty for any past or current violation and/or requiring compliance immediately or within a specified time period.

8. Pursuant to Section 3007 of RCRA, 42 U.S.C. § 6927, representatives of the Administrator may inspect at reasonable times any establishment or other place where hazardous wastes are or have been generated, stored, treated, disposed of, or transported from any establishment or other place.

9. Any violation of regulations promulgated pursuant to Subtitle C of RCRA, 42 U.S.C. §§ 6921-6939(e), or of any state provision authorized pursuant to Section 3006 of RCRA, 42 U.S.C. § 6926, constitutes a violation of RCRA, subject to the assessment of civil penalties and issuance of compliance orders as provided by Section 3008 of RCRA, 42 U.S.C. § 6928.

10. Pursuant to Section 3006(g) of RCRA, 42 U.S.C. § 6926(g), the requirements established by HSWA are immediately effective in a state upon their federal effective date regardless of such state's authorization status. EPA has jurisdiction immediately to implement and enforce those portions of the HSWA requirements before any such state receives final authorization, including regulations at 40 C.F.R. Part 265, Subparts BB, CC and J.

11. Pursuant to Sections 2002 and 3002 of RCRA, 42 U.S.C. §§ 6912 and 6922, EPA promulgated rules pertaining to generators of hazardous waste as set forth at 40 C.F.R. Part 262.

12. Pursuant to Sections 2002 and 3004 of RCRA, 42, U.S.C. §§ 6912 and 6924, EPA promulgated rules pertaining to owners and/or operators of treatment, storage and disposal

facilities as set forth at 40 C.F.R. Parts 264 and 265.

13. Pursuant to Section 3004(n) of RCRA, 42 U.S.C. § 6924(n), EPA promulgated regulations to monitor and control air emissions at certain hazardous waste treatment, storage, and disposal facilities. 40 C.F.R. Parts 264 and 265, Subparts AA, BB, and CC.

14. Pursuant to Section 3004 of RCRA, 42 U.S.C. § 6924, EPA promulgated regulations governing the management and monitoring of tanks and tank systems that store or treat hazardous waste. 40 C.F.R. Parts 264 and 265, Subpart J.

15. Respondent, GM, is incorporated in and doing business in the State of Delaware. Respondent also does business in Georgia, Illinois, Michigan, Ohio, Kansas and Missouri and is a "person" as that term is defined in 42 U.S.C. § 6903(15).

16. U.S. EPA, Region 5, filed a Complaint in RCRA-05-2004-0001 ("Complaint") in this matter on October 17, 2003, alleging that Respondent had violated and was continuing to violate RCRA regulations set forth in 40 C.F.R. Parts 264 and 265, Subparts J, BB and CC (or the equivalent authorized State regulations) in its automotive painting operations at its facilities in Pontiac, Michigan; Orion, Michigan and Moraine, Ohio.

17. On or about November 21, 2003, Respondent filed an Answer in RCRA-05-2004-0001.

18. A hearing was held in RCRA-5-2004-0001 from June 20, 2005 through June 30, 2005 regarding the claims alleged in the Complaint. The Presiding Administrative Law Judge, the Honorable Barbara A. Gunning, issued an Initial Decision on April 14, 2006, and Respondent appealed that Initial Decision to the Environmental Appeals Board on May 19, 2006. On June 20, 2008, the EAB issued its Order remanding this matter to Judge Gunning for further consideration.

19. In 2006 and 2007 EPA issued many Section 3007 RCRA Information Requests (42 U.S.C. § 6927) to some of Respondent's automobile and truck assembly plants (Assembly Plants) throughout the United States concerning RCRA Subpart J, BB and CC compliance for use, storage and disposal of Purge Mixture as defined herein.

20. EPA and/or authorized states have conducted RCRA inspections of several of Respondent's Assembly Plants for RCRA Subpart J, BB and CC compliance since the late 1990's and EPA has issued several Notices of Violation against Respondent.

21. This Consent Agreement is entered into pursuant to Sections 3008(a) of RCRA, 42 U.S.C. § 6928(a), and the Consolidated Rules. Specifically, the Complainants and the Respondent (collectively referred to as the "Parties"), have determined that settlement is consistent with the provisions and objectives of RCRA and applicable regulations and, therefore, have agreed to the terms of this written Consent Agreement in accordance with 40 C.F.R. § 22.18(b).

22. EPA has provided notice concerning this action to the appropriate authorized states (listed in paragraph 5, above), pursuant to Section 3008(a)(2) of RCRA, 42 U.S.C. § 6928(a)(2).

23. The Consolidated Rules provide that where the parties agree to settlement of one or more causes of action before the filing of a complaint, a proceeding may be simultaneously commenced and concluded by the issuance of a CAFO. 40 C.F.R. §§ 22.13(b) and 22.18(b)(2). In addition to the allegations set forth in the Complaint, this CAFO simultaneously commences and concludes new proceedings brought by Regions 3, 4, 5 and 7.

24. For purposes of this proceeding, Respondent admits the jurisdictional allegations of the Complaint and this CAFO and agrees not to contest EPA's jurisdiction with respect to execution of this Consent Agreement, issuance of the attached Final Order, or the enforcement

thereof. 40 C.F.R. § 22.18.

25. Respondent waives any and all rights under any provision of law to any additional hearing on the allegations contained in the Complaint and this CAFO. Respondent also waives any right to contest the allegations in the Complaint and this CAFO and any right to appeal this Consent Agreement or the Final Order that accompanies this Consent Agreement. See 40 C.F.R. § 22.18.

26. For the purposes of this proceeding, Respondent neither admits nor denies the specific factual allegations contained in the Complaint or otherwise contained in this CAFO and does not contest the conclusions and determinations contained in this CAFO. 40 C.F.R. § 22.18(b).

27. Respondent agrees to pay the civil penalty specified in Section VII of this Consent Agreement. 40 C.F.R.§ 22.18(b).

II. General Factual Basis

28. Respondent is and was at all times relevant to this matter the owner and operator of the following facilities: the Pontiac East Assembly Plant, also known as the "Pontiac Assembly Center" ("Pontiac facility"), 2100 South Opdyke Road, Pontiac, MI 48341-3155 [MID 005 356 902]; the Orion Assembly Plant ("Orion facility"), 4555 Giddings Road, Lake Orion, Michigan 48359 [MID 000 718 544]; the Moraine Assembly Plant ("Moraine facility"), 2601 West Stroop Road, Moraine, Ohio 45439 [OHD 041 063 074]; the Wilmington Assembly Plant ("Wilmington facility"), 801 Boxwood, Wilmington, Delaware 19804 [DED 0023692905]; Doraville, 3900 Motors Industrial Way, Doraville, Georgia 30360 ("Doraville facility") [EPA ID# GAD003310810]; the Fairfax Assembly Plant ("Fairfax facility"), 3201 Fairfax Trafficway, Kansas City, Kansas 66115 [KSD 981 126 253]; the Wentzville Assembly Plant ("Wentzville

facility"), 1500 East Route "A", Wentzville, Missouri 63385 [MOT 300 010 261]; the GM Lansing Car Assembly Plant ("Lansing Facility"),401 N. Verlinden Avenue, Lansing, Michigan 48915 [MID 005 356 928] (These facilities are collectively referred to as "the Facilities").

29. Respondent has filed Notifications of Hazardous Waste Activities (Notifications) for the Facilities pursuant to Section 3010 of RCRA, 42 U.S.C. § 6930. The Notifications specify the type of hazardous waste activity Respondent is engaged in at each of its Facilities and identify the hazardous waste(s) managed at each Facility.

30. The painting operations at each of Respondent's Facilities identified in paragraph 28 above are substantially similar to the painting operations described in paragraphs 15 through 27 of the Complaint. The parties refer to the mixture of purge solvent, clearcoat, primer and paint which GM generates when it cleans its paint applicators and manifolds at each of the Facilities as "Purge Mixture."

31. EPA has conducted inspections at each of Respondent's Facilities and has issued information requests to Respondent pursuant to RCRA § 3007 regarding some of those Facilities.

32. The Parties have engaged in settlement negotiations and have agreed that, in general, circumstances similar to those alleged in paragraphs 53 through 188 of the Complaint exist at each of Respondent's Facilities; and have further agreed that, to the extent alleged violations of 40 C.F.R. Part 265, Subparts J, BB and CC (or the applicable analogous requirement of any applicable authorized state program) now exist or have existed at those Facilities, those alleged violations should be addressed in this CAFO.

33. Entry of this CAFO is an appropriate means of resolving the violations alleged in the Complaint; and without the issuance of further administrative complaints, entry of this CAFO is an appropriate means of settling Complainants' civil claims for penalties under RCRA

Section 3008(a), 42 U.S.C. § 6928(a), as alleged below at Respondent's other Facilities identified in paragraph 28 of this CAFO.

III. Region 3 Allegations

A. Wilmington Assembly Plant - Owning and/or operating a hazardous waste storage facility without a permit or interim status

34. The allegations of Paragraphs 1 though 33, above, are incorporated by reference as if fully set forth at length herein.

35. The Delaware Regulations Governing Hazardous Waste ("DRGHW") are authorized pursuant to Section 3006(b) of RCRA , 42 U.S.C. § 6926(b) (53 Fed. Reg. 23837 (June 8, 1984), 61 Fed. Reg. 41345 (August 8, 1996), 63 Fed. Reg. 44152 (August 18, 1998), 65 Fed. Reg. 42871 (July 12, 2000), 67 Fed. Reg. 51478 (August 8, 2002), 69 Fed. Reg. 10171 (March 4, 2004), and 69 Fed. Reg. 60091 (October 7, 2004)). Certain provisions of Delaware's hazardous waste management program, through the authorizations referenced in the immediately preceding sentence, have become requirements of Subtitle C of RCRA and are, accordingly, enforceable by EPA pursuant to Section 3008(a) and (g) of RCRA, 42 U.S.C. § 6928(a) and (g). Section 3005(a) and (e) of RCRA, 42 U.S.C. § 6925(a) and (e), and DRGHW Part 122 provide, in pertinent part, that a person may not own or operate a hazardous waste storage, treatment, or disposal facility unless such person has first obtained a permit for the facility or has qualified for interim status for the facility.

36. DRGHW § 262.34(a) provides that a generator may accumulate hazardous wastes on-site for 90 days or less without a permit or without interim status provided that certain conditions are met, including, *inter alia,* the condition in DRGHW § 262.34.(a)(1)(ii) that a generator who accumulates such hazardous waste in tanks must comply with the applicable requirements of Subpart J of DRGHW Part 265.

37. Tanks 1 and 2, are located at Respondent's Wilmington Facility in an area identified by Respondent as the "Purge Solvent Recovery Room."

38. At the time of the EPA inspection of the Wilmington Facility on August 17, 2006, Tanks 1 and 2 were and currently are used to store "waste clearcoat," "waste spent solvent mixture," "waste primer" and "primer waste spent solvent mixture," all of which are solid wastes and hazardous wastes as those terms are defined at DRGHW § 260.10 and § 261.2 and 3.

39. Tanks 1 and 2 are "tanks" and, along with the piping, fittings, flanges, connectors, valves and other pieces of ancillary equipment associated with Tanks 1 and 2, constitute a "tank system" used for the "storage" of "hazardous waste" within the meaning of DRGHW § 260.10.

40. DRGHW § 265.193(a) provides that secondary containment that meets the requirements of DRGHW § 265.193 must be provided for new and existing tank systems.

41. DRGHW § 193(d) provides that secondary containment for tanks must include one or more of the following devices: 1) a liner; 2) a vault; 3) a double-walled tank; or 4) an equivalent device as approved by the Secretary of the Delaware Department of Natural Resources and Environmental Control.

42. DRGHW § 265.193(e)(1)(iv) provides that an external liner system used as secondary containment for tanks must be designed and installed to completely surround the tanks and to cover all surrounding earth likely to come into contact with the waste if released from a tank (i.e. capable of preventing lateral as well as vertical migration of waste).

43. At the time of the EPA inspection of the Facility on August 17, 2006, Respondent failed to qualify for the "less than 90 day" generator accumulation exemption of DRGHW § 262.34(a) by failing to satisfy the condition for the exemption requiring that external liner secondary containment for tanks be designed and installed to completely surround Tanks 1 and 2 and cover all surrounding earth likely to come into contact with the waste if released from Tanks 1 and 2 (i.e., capable of preventing lateral as well as vertical migration of waste), as set forth in DRGHW § 262.34(a)(1)(ii), which references DRGHW Part 265, Subpart J, which in turn includes DRGHW § 265.193(e)(1). Respondent was required to have a permit or interim status

for the storage of hazardous waste in Tanks 1 and 2. At all relevant times, Respondent did not have a permit or interim status for Tanks 1 and 2. Respondent violated RCRA § 3005, 42 U.S.C. § 6925, and DRGHW § 270 by owning and operating a hazardous waste storage facility, i.e., Tanks 1 and 2, without a permit or interim status.

B. Wilmington Assembly Plant - Tanks 1 and 2 – Improper Secondary Containment

44. The allegations of Paragraphs 1 though 33, above, are incorporated by reference as if fully set forth at length herein.

45. DRGHW § 264.193(a) provides, with exceptions not relevant to this matter, that secondary containment that meets the requirements of DRGHW § 264.193(a) must be provided for new and existing tanks storing hazardous waste.

46. DRGHW § 264.193(d) provides that secondary containment for tanks must include one or more of the following devices: 1) a liner; 2) a vault; 3) a double-walled tank; or 4) an equivalent device as approved by the Secretary of the Delaware Department of Natural Resources and Environmental Control.

47. DRGHW § 264.193(e)(1)(iv) provides that external liner systems used as secondary containment for tanks must be designed and installed to completely surround the tanks and to cover all surrounding earth likely to come into contact with the waste if released from a tank (i.e. capable of preventing lateral as well as vertical migration of waste).

48. Respondent violated DRGHW § 264.193(e)(1)(iv) by failing to design and install secondary containment for Tanks 1 and 2 that completely surrounds Tanks 1 and 2 and to cover all surrounding earth likely to come into contact with the waste if released from Tanks 1 and 2 (i.e. capable of preventing lateral was well as vertical migration of waste).

IV. Region 4 Allegations

Doraville – Owning and/or operating a hazardous waste storage facility without a permit or interim status

49. The allegations of Paragraphs 1 through 33 above, are incorporated by reference as if fully set forth at length herein.

50. Pursuant to Section 3006(b) of RCRA, 42 U.S.C. § 6926(b), on August 21, 1984, the State of Georgia (the State) received final authorization from EPA to carry out certain portions of the State hazardous waste program in lieu of the federal program set forth in RCRA. The requirements of the authorized State program are found in the Georgia Hazardous Waste Management Act ("GHWMA"), § 12-8-60 through § 12-8-83, and regulations set forth at Chapter 391-3-11 of the Georgia Hazardous Waste Management Rules ("GHWMR").

51. Pursuant to 40 C.F.R. § 262.34(a) and Chapter 391-3-11-.8 of GHWMR, a generator may accumulate hazardous waste on site for ninety day or less without a permit or interim status, provided that certain conditions are met, including *inter alia*, that the generator complies with the requirements for owners and operators in 40 C.F.R. § 265, Subpart CC and Chapter 391-3-11-.10 of GHWMR.

52. Respondent owns and, up until September 26, 2008, operated an automobile assembly plant in Doraville, GA which contains a hazardous waste tank that was subject to the requirements of 40 C.F.R. § 265, Subpart CC and Chapter 391-3-11-.10 of GHWMR.

53. Pursuant to 40 C.F.R. § 265.1085(c)(4) and Chapter 391-3-11-.10 of GHWMR, owners or operators are required to perform inspections of their tanks and closure devices. Pursuant to 40 C.F.R. § 265.1085(c)(4)(ii) and Chapter 391-3-11-.10 of GHWMR, these inspections must be performed at least every year. Respondent failed to conduct these inspections for the years 2005, 2006, and 2007.

54. By failing to comply with the requirements of 40 C.F.R. § 265.1085(c)(4)(ii) and Chapter 391-3-11-.10 of GHWMR, Respondent failed to qualify for the "less than 90-day" generator accumulation exemption of 40 C.F.R. § 262.34(a)(1)(ii) and Chapter 391-3-11-.08 of GHWMR, which references 40 C.F.R. Part 265, Subpart J, and Chapter 391-3-11-.10 of GHWMR which in turn includes 40 C.F.R. § 265.1085(c)(4)(ii), and therefore was operating a storage facility without a permit in violation of Section 12-8-66 of the GHWHA [Section 3005 of RCRA, 42 U.S.C. § 6925].

V. Region 5 Allegations

A. Lansing Facility – Daily Tank Inspection Log violation

55. The allegations of Paragraphs 1 though 33 above, are incorporated by reference as if fully set forth at length herein.

56. On or about June 22 through 23, 2004, EPA conducted a Multimedia Compliance Evaluation Inspection at the GM Lansing Car Assembly Plant, Lansing, Michigan.

57. At the time of the inspection the Lansing Facility did not have a hazardous waste storage license. The Lansing Facility subsequently closed and was demolished.

58. In order to avoid the need for a hazardous waste storage license, large quantity generators storing hazardous waste in a tank must inspect, where present, at least once each operating day: (1) Overfill/spill control equipment to ensure that it is in good working order; (2) The aboveground portions of the tank system, if any, to detect corrosion or releases of waste; (3) Data gathered from monitoring equipment and leak-detection equipment, to ensure that the tank system is being operated according to its design; and (4) The construction materials and the area immediately surrounding the externally accessible portion of the tank system including secondary containment structures (e.g., dikes) to detect erosion or signs of releases of hazardous

waste (e.g. wet spots, dead vegetation). See, MAC R 299.9306(1)(a)(ii) and 40 C.F.R. Part 265, Subparts J, AA, BB, and CC, except for the provisions of §§265.197(c) and 265.200, and the generator complies with the provisions of R 299.9615, except for R 299.9615(1). This is also a requirement of owners and operators of hazardous waste storage facilities, under MAC R 299.9601(1), (2)(h), and (3)(b); 299.9615(1); and 40 C.F.R. § 264.195(b)(2).

59. During the records review portion of the inspection, the inspectors reviewed "Plant 6 Hazardous Waste Storage Tank/Waste Thinner System Inspection" records. The inspectors observed that from 4/15/03 through 3/18/04, the GM Lansing inspector had noted for Tank B6-102 a "Leak sensor off" light was on. No corrective action was noted on the daily inspection logs.

60. Additionally, during the inspection, the inspectors observed an area on the east side of the containment area that appeared wet. The 6/22/04, daily tank inspection logs had indicated a "no" for signs of wet spots.

61. The GM Lansing Facility's failure to comply with the provisions of the above referenced license exemption in that they did not ensure that Overfill/spill control equipment was in good working order is a violation of MAC R 299.9306(1)(a)(ii). [40 C.F.R. §265.201(c)]

B. Lansing Facility - Failure to maintain adequate aisle space in the less than 90 day hazardous waste accumulation area in Building #22

62. The allegations of Paragraphs 1 though 33 above, are incorporated by reference as if fully set forth at length herein.

63. In order to avoid the need for a hazardous waste storage license, a large quantity generator must comply with the provisions of MAC R 299.9306(1)(d). MAC R 299.9306(1) and 40 C.F.R. § 262.34(a)(4). Specifically, 40 C.F.R. § 262.34(a)(4) requires the generator comply with the requirements for owners or operators in Subparts C and D in 40 CFR Part 265,

with § 265.16, and with 40 CFR § 268.7(a)(5). In 40 CFR Part 265, Subpart C, § 265.35 requires that the owner or operator must 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. This is also a requirement of owners and operators of hazardous waste storage facilities, under MAC R 299.9606(1).

64. At the time of the inspection, the inspectors observed inadequate aisle space in the less than 90 day hazardous waste accumulation area in Building #22. The inspectors observed 55-gallon containers of hazardous waste that were staged next to each other without any aisle space. These conditions resulted in inadequate aisle space to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment and decontamination equipment to the less than 90 day accumulation area.

65. GM Lansing therefore failed to comply with the above-referenced condition for a license exemption, and violated the storage facility aisle space requirement in MAC R 299.9306(1)(d). [40 CFR Part 265, Subpart C, § 265.35]

C. Lansing Facility - Cracks and Gaps in the Surface Coating of the Building #22 Hazardous Waste Accumulation Area

66. The allegations of Paragraphs 1 though 33 above, are incorporated by reference as if fully set forth at length herein.

67. In order to avoid the need for a hazardous waste storage license, large quantity generators storing containers of hazardous waste must have a hazardous waste storage area that includes an impervious base free of cracks or gaps. See, MAC R 299.9306(1)(a)(i) and 40 C.F.R. § 264.175(b)(1). This is also a requirement of owners and operators of hazardous waste storage facilities, under MAC R 299.9601(1), (2)(g), and (3)(b); 299.9614(1)(a); and 40 C.F.R.

§ 264.175(b)(1).

68. During the inspection of GM Lansing's hazardous waste accumulation area, located in Building #22, the inspectors observed several areas that were cracked or had gaps in the surface coating.

69. GM Lansing therefore failed to comply with the above-referenced condition for a license exemption, in that it violated the storage facility containment system requirement, MAC R 299.9306(1)(a)(i). [40 C.F.R. § 264.175(b)(1)].

VI. Region 7 Allegations

A. GM Fairfax – Failure to maintain secondary containment for hazardous waste accumulation tank

70. The allegations of Paragraphs 1 though 33 above, are incorporated by reference as if fully set forth at length herein.

71. On or about August 23 through 26, 2005, EPA conducted a RCRA Compliance Evaluation Inspection (CEI) at the GM Fairfax facility in Kansas City, Kansas.

72. Federal regulations (40 C.F.R. § 265.193(e)(1)(iii) and (iv)) and Kansas Administrative Regulations (KAR), Article 31, Chapter 28-31-4(g)(1)(B) require a large quantity generator to maintain secondary containment free of gaps and cracks and designed and installed to completely surround the tank and to cover all surrounding earth likely to come into contact with the waste if released from the tank (i.e., capable of preventing lateral as well as vertical migration of the waste). To meet these performance standards, concrete secondary containment structures must include an impermeable interior coating or lining that is compatible with the stored waste and that will prevent migration of waste into the concrete.

73. At the time of the inspection of the Fairfax facility on or about August 23 through 26, 2005, GM was operating the facility as a large quantity generator of hazardous waste.

74. At the time of the EPA inspection, the hazardous waste accumulation tank located within the tank farm that was used to accumulate the spent purge solvent at the Fairfax Facility, carrying the D001 and D035 waste codes, had a capacity of 12,000 gallons.

75. During the inspection of the Fairfax facility, the inspector noted two 6-inch long cracks in the concrete secondary containment structure for the purge solvent storage tank referenced in paragraph 74. The inspector also noted two expansion joints where the joint sealant was pulled away from the concrete, leaving gaps. The concrete structure did not have an impermeable coating or lining in place at the time of the inspection.

76. Failure to maintain secondary containment free of gaps and cracks and failure to have an impermeable interior coating or lining that is compatible with the stored waste and that will prevent migration of waste into the concrete is a violation of KAR 28-31-4(g)(1)(B). [40 CFR 265.193(e)(1)(iii) and (iv)]

B. <u>GM Fairfax – Failure to mark hazardous waste accumulation tank with start date</u>

77. The allegations of Paragraphs 1 though 33 and 71 above, are incorporated by reference as if fully set forth at length herein.

78. KAR 28-31-4(g)(2) requires that, in order for a large quantity generator of hazardous waste to accumulate hazardous waste for 90 days or less, without a permit or obtaining interim status, the date upon which each period of accumulation begins is clearly marked and visible for inspection on each tank.

79. During the inspection of the Fairfax facility, the inspector noted that the tank referenced in Paragraph 74 above was not marked with the date that hazardous waste began accumulating in the tank.

80. The inspector reviewed the daily tank inspection logs and the hazardous waste manifests but could not determine that all waste was removed from the tank every 90 days.

81. Respondent violated KAR 28-31-4(g)(2) by failing to mark the hazardous waste accumulation tank with the start date of accumulation.

C. GM Wentzville - Owning and/or operating a hazardous waste storage facility without a permit or interim status

82. The allegations of Paragraphs 1 though 33 above, are incorporated by reference as if fully set forth at length herein.

83. On or about February 8 through 11, 2005, EPA conducted a RCRA CEI at the GM Wentzville facility in Wentzville, Missouri.

84. Missouri Revised Statutes (RSMo) 260.390.1(1) and Section 3005 of RCRA provide, in pertinent part, that a person may not own or operate a hazardous waste storage, treatment, or disposal facility unless such person has first obtained a permit for the facility or has qualified for interim status for the facility

85. At the time of the inspection of the Wentzville facility on or about February 8 through 11, 2005, GM was operating the facility as a large quantity generator of hazardous waste.

86. During the inspection of the Wentzville facility, the inspector noted that Tank 12 contained 1964 gallons of hazardous purge solvent, carrying the D001 waste code.

87. According to facility records reviewed during the inspection, hazardous waste was placed into Tank 12 on March 29, 2004.

88. Respondent violated RSMo 260.390.1(1) and Section 3005 of RCRA by storing hazardous waste in Tank 12 for more than 90 days without interim status or a permit.

D. GM Wentzville - Failure to document all inspection items in the operating record

89. The allegations of Paragraphs 1 though 33 and 83, above, are incorporated by reference as if fully set forth at length herein.

90. Title 10 of the Missouri Code of State Regulations (CSR) 25-5.262(1) and 40 C.F.R. § 265.195(g) require that the facility document in the operating record of the facility the inspection of those items in 40 CFR 265.195(a) and (b).

91. During the inspection, the inspector reviewed multiple tank inspection logs, each log covering one calendar week. Multiple tank inspection logs lacked information required to be documented by 40 C.F.R. § 265.195(g).

92. Failure to document all inspection items in the operating record of the facility is a violation of 10 CSR 25-5.262(1). [40 C.F.R. § 265.195(g)]

VII. Terms of Agreement

93. Except as set forth in paragraphs 94 through 97, and 115 below, Respondent shall comply with the provisions of 40 C.F.R. Part 265, Subparts J and CC, or the analogous authorized state requirements, as applicable, for all tanks that are owned or operated by Respondent and that store Purge Mixture, and the equipment ancillary to the tanks, immediately prior to where the pipes exit and enter the tanks. Nothing in this CAFO shall be construed to impose any regulation under RCRA Subtitle C on the Purge Mixture in the pipes other than on those pipes immediately prior to the storage tanks.

94. Subject to Paragraphs 108 and 115 below, within three years of the effective date of this order, GM shall comply with the secondary containment requirements of DRGHW § 265.193 for Tanks 1 and 2 at the Wilmington Assembly plant. GM shall ensure that an external impermeable liner for the secondary containment for Tanks 1 and 2 completely

surrounds the tanks and covers all surrounding earth likely to come into contact with the hazardous waste if released from a tank (i.e., the liner shall be capable of preventing lateral as well as vertical migration of waste) as required by DRGHW § 265.193(e)(1)(iv). Alternately, if the tanks no longer store hazardous waste then such liner is not required.

95. Within three (3) years of the effective date of this order, Respondent shall submit to EPA a certification signed by the Wilmington Facility Plant Manager (or as otherwise permitted under 40 C.F.R.§ 270.11(a)(1)), stating that the Wilmington Assembly Plant is in compliance with Paragraph 94 of this CAFO. This certification shall be sent to Jeanna Henry, Environmental Scientist, U.S. EPA, Region 3, 1650 Arch Street (MC 3LC70), Philadelphia, PA 19103, with a copy to Duncan Campbell, RCRA Branch (LR-8J), U.S.EPA, Region 5, 77 West Jackson Boulevard, Chicago, Illinois 60604-3590. The certification shall be as follows:

> *I certify that the GM Wilmington, Delaware Assembly Plant is in compliance with Paragraph 94 of the Consent Agreement and Final Order filed In the Matter of General Motors Automotive, Docket No. RCRA-03-2009-0099. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.*

96. Subject to Paragraphs 108 and 115 below, within three (3) years of the effective date of this order, Respondent will comply with the secondary containment requirements of Kansas Administrative Regulations (KAR), Article 31, Chapter 28-31-4(g)(1)(B) and Title 40 of the Code of Federal Regulations (CFR) 265.193(e)(1)(iii) and (iv) at the Fairfax plant in Kansas City, Kansas. Compliance will consist of the application of an impermeable liner that is compatible with the stored waste and that will prevent migration of waste into the concrete, at the hazardous waste accumulation tank for the spent purge solvent. Alternately, if the tanks no longer store hazardous waste then such liner is not required.

97. On or before March 1, 2012, Respondent shall submit to EPA a certification signed by the Fairfax Facility Plant Manager (or as otherwise permitted under 40 C.F.R. § 270.11(a)(1), stating that the Fairfax Facility in Kansas City, Kansas is in compliance with Paragraph 96 of this CAFO. This certification shall be sent to Elizabeth Koesterer, (AWMD/RESP) U.S.EPA, Region 7, 901 North 5th Street, Kansas City, Kansas 66101, with a copy to Duncan Campbell, RCRA Branch (LR-8J), U.S.EPA,, Region 5, 77 West Jackson Boulevard, Chicago, Illinois 60604-3590. The certification shall be as follows:

I certify that the Fairfax Facility in Kansas City, Kansas is in compliance with Paragraph 96 of the Consent Agreement and Final Order (Docket No. RCRA-05-2004-0001). I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

98. Respondent shall pay a civil penalty in the amount of forty-eight thousand two hundred and sixty dollars ($48,260) to resolve Complainants' claims for civil penalties arising from the violations of RCRA alleged in the Complaint or referenced above in this CAFO. Such civil penalty is based upon consideration of the factors set forth in Section 3008(a)(3) of RCRA, 42 U.S.C. § 6928(a)(3), the RCRA Civil Penalty Policy, and 40 C.F.R. Part 19. Such civil penalty shall become due and payable within thirty (30) days of Respondent's receipt of a true and correct copy of the CAFO. Respondent must pay the civil penalty identified in this paragraph by check, or by electronic wire transfer, and it must be payable to "Treasurer, the United States of America." If payment is made by check, the check must be paid to:

U.S. Environmental Protection Agency
Fines and Penalties
Cincinnati Finance Center
P.O. Box 979077
St. Louis, MO 63197-9000

The name of the Respondent, the billing document number and the Docket Number of this proceeding must be clearly marked on the face of the check. EPA will furnish Respondent with

the billing document number upon entry of this CAFO. Failure to pay the full amount of the civil penalty assessed under this Consent Agreement may subject Respondent to a civil action to collect any unpaid portion of the civil penalty. Furthermore, in order to avoid the assessment of interest, administrative costs and a late payment penalty in connection with such civil penalties, as described in paragraph 103 of this Consent Agreement, Respondent must pay the civil penalty no later than thirty (30) calendar days after the date on which a copy of this CAFO is received by the Respondent.

99. Respondent shall send copies of the transmittal of the payment to:

(a) Regional Hearing Clerk
U.S. Environmental Protection Agency
77 West Jackson Boulevard, (E-13J)
Chicago, Illinois 60604

(b) Jeanna Henry
Environmental Scientist
U.S. Environmental Protection Agency
1650 Arch Street (MC 3LC70)
Philadelphia, PA 19103

(c) Larry Lamberth
RCRA and OPA Enforcement and Compliance Branch
RCRA Division
U.S. Environmental Protection Agency
Sam Nunn Atlanta Federal Center
61 Forsyth Street
Atlanta, GA 30303

(d) Duncan Campbell
U.S. Environmental Protection Agency
RCRA Branch
Land and Chemicals Division
77 West Jackson Boulevard, (LR-8J)
Chicago, Illinois 60604

(e) Elizabeth Koesterer (AWMD/RESP)
U.S. Environmental Protection Agency
901 North 5th Street
Kansas City, KS 66101

100. Respondent shall be liable for stipulated penalties to the EPA, as specified below, for failure to comply with the requirements of Section VII of this CAFO, unless excused by EPA, in its sole discretion.

101. For failure to comply with the requirements of this CAFO, Respondent shall pay stipulated penalties in the following amounts for each day during which the violations continue:

Period of Failure to Comply	Penalty Per Violation Per day
1st through 7th day	$100.00
8th through 21st day	$250.00
22nd through 30th day	$500.00
Greater than 30 days	$1,000.00

These stipulated penalties apply separately and fully to each of Respondent's Facilities, and may become due for violations at more than one Facility on a day of violation. Stipulated penalties accrue regardless of notice of the violation from EPA. For purposes of calculating interest, administrative costs and late payment penalty, the stipulated penalties become "due" upon receipt by the Respondent of a written notice from EPA that payment of such stipulated penalties is due.

102. Respondent's failure to timely comply with any material and substantial provision of this CAFO may subject Respondent to a civil action pursuant to Section 3008(c) of RCRA, 42 U.S.C. § 6928(c), to collect penalties for any noncompliance with the Order (as well as injunctive relief). The amount of any stipulated penalties Respondent has paid for any such failure to comply may be subtracted from any penalty amount sought by EPA for such failure to comply pursuant to Section 3008(c) of RCRA, 42 U.S.C. § 6928(c), at EPA's discretion, which discretion will not be unreasonably withheld.

103. EPA is required to assess interest and penalties on debts owed to the United States and a charge to cover the costs of processing and handling the delinquent claim, and Respondent agrees to pay these amounts under this CAFO. Interest, at the statutory judgment rate provided for in 31 U.S.C. § 3717, will therefore begin to accrue on the civil penalty agreed to herein and/or on any stipulated penalty imposed pursuant to this CAFO on the date a copy of this CAFO is received by Respondent (in the case of civil penalties) or a copy of the notice for stipulated penalties is received by Respondent. However, EPA will not seek to recover interest on any portion of the civil penalty or any stipulated penalties that is paid within thirty (30) calendar days after the date on which such interest begins to accrue. Pursuant to 31 U.S.C. § 3717, Respondent must pay the following amounts on any amount overdue:

(a) Interest. Any unpaid portion of a civil penalty or stipulated penalty must bear interest at the rate established by the Secretary of the Treasury pursuant to 31 U.S.C. § 3717(a)(1). Interest will be assessed at the rate of the United States Treasury tax and loan rate in accordance with 40 C.F.R. § 13.11(a).

(b) Monthly Administrative Handling Charge. Respondent must pay an administrative handling charge of $15.00 on any overdue debt, with an additional charge of $15.00 for each subsequent thirty (30) calendar day period over which an overdue balance remains.

(c) Late-Payment Penalty. On any portion of a civil penalty or stipulated penalty more than ninety (90) calendar days delinquent, Respondent must pay a late-payment penalty of six percent per annum, which will accrue from the date the penalty payment became delinquent. This late-payment is in addition to charges which accrue or may accrue under subparagraphs (a) and (b).

104. Penalties paid pursuant to this CAFO are not deductible for federal purposes under 28 U.S.C. § 162(f).

105. Nothing in this agreement prohibits, alters, or in any way limits EPA's ability to seek any other remedies or sanctions available by virtue of Respondent's violation of this CAFO.

106. This CAFO represents a final settlement of Respondent's civil liability under Section 3008(a) of RCRA, 42 U.S.C. § 6928(a), for: (a) the specific claims for the violations

alleged in the administrative complaint issued by Region 5 of the EPA; and (b) the allegations otherwise asserted in this CAFO. Nothing in this CAFO is intended to, nor shall be construed to, operate in any way to resolve any criminal liability of Respondent arising from the violations addressed in this CAFO. Compliance with this CAFO shall not be a defense to any actions subsequently commenced pursuant to Federal or State laws and regulations, and it is the responsibility of Respondent to comply with such laws and regulations.

107. Nothing in this CAFO relieves Respondent from its obligation to comply with all applicable federal, state and local statutes and regulations, including the RCRA Subtitle C requirements at 40 C.F.R. Parts 260 through 279, and authorized State programs, at the Facilities.

108. If, in good faith, Respondent obtains a written variance, exemption, or waiver from an authorized state from any of the requirements set forth in this CAFO, and if Respondent complies with the terms of any such variance, exemption or waiver, Respondent shall not be liable for stipulated penalties which might accrue pursuant to paragraph 101 until EPA gives written notice to Respondent that Respondent is out of compliance with this CAFO. Stipulated penalties in such an instance will accrue beginning thirty days after EPA gives notice to Respondent that Respondent is out of compliance with this CAFO.

109. Respondent waives any rights it may possess in law or equity to challenge the authority of EPA to bring a civil action in the appropriate United States District Court to compel compliance with the CAFO or to seek an additional penalty for such noncompliance.

110. Each party agrees to bear its own costs and attorney's fees in the action(s) resolved by this CAFO.

111. This CAFO shall be binding upon all Parties to this matter, and their successors and assigns. The undersigned representative of each Party to this CAFO certifies that he or she

is duly authorized by the Party whom he or she represents to enter into the terms and bind that Party to them.

112. Notwithstanding any other provision of this Consent Order, EPA expressly reserves any all rights to bring an enforcement action pursuant to Section 7003 of RCRA, 42 U.S.C. § 6973, or other statutory authority should EPA find that the handling, storage, treatment, transportation, or disposal of solid waste or hazardous waste at any of the Facilities may present an imminent and substantial endangerment to health or the environment. EPA also expressly reserves the right: (a) for any matters other than violations alleged in the Complaint, or resolved through this CAFO, to take any action authorized under Section 3008 of RCRA, 42 U.S.C. § 6928; (b) to enforce compliance with the applicable provisions of any applicable authorized state hazardous waste program; (c) to take any action under 40 C.F.R. Parts 124 and 270 and applicable analogous requirements of any authorized state hazardous waste program; EPA also expressly reserves the right to enforce compliance with this CAFO.

113. The contacts for the parties under this CA/FO are as follows:

EPA Region 3:
Jeanna Henry
Environmental Scientist
U.S. Environmental Protection Agency
1650 Arch Street (MC 3LC70)
Philadelphia, PA 19103

EPA Region 4:
Larry Lamberth
RCRA and OPA Enforcement and Compliance Branch
RCRA Division
U.S. Environmental Protection Agency
Sam Nunn Atlanta Federal Center
61 Forsyth Street
Atlanta, GA 30303

EPA Region 5: Duncan Campbell
U.S. Environmental Protection Agency
RCRA Branch
Land and Chemicals Division
77 West Jackson Boulevard, (LR-8J)
Chicago, Illinois 60604

EPA Region 7: Elizabeth Koesterer (AWMD/RESP)
U.S. Environmental Protection Agency
901 North 5th Street
Kansas City, KS 66101

GM: James Walle
General Motors Corporation
Mail Code 482-C24-D24
300 Renaissance Center
P.O. Box 300
Detroit, Michigan 48265-3000

114. Respondent may request an extension of performance dates or other modification (not to include modification to the penalty provision in paragraph 98) to the terms of this CAFO for good cause. A request for the extension or modification must be addressed to the contact for the pertinent EPA Region, with a copy to the contact for OECA, be in writing and include, but not limited to: (a) if requesting an extension of any deadline specified in this CAFO, the anticipated date by which Respondent will complete the task; (b) the reason for the requested modification; and (c) any documentation to support the "good cause" to grant such modification request. Any decision by the pertinent EPA Region to allow an extension will be in its sole discretion and will not be unreasonably withheld. Any decision by EPA to allow an extension shall be in writing and signed by the Complainant for the pertinent Region and the Respondent.

115. Respondent shall be under no obligation imposed pursuant to this CAFO to manage Purge Mixture as a solid waste or a hazardous waste at a Facility referred to in this CAFO on and after the date that any regulation (e.g. the Revised Definition of Solid Waste: 40 C.F.R. 261.2(c)

(3) and 261.4(a)(23); 73 F.R. 64668 (Oct. 30, 2008)) promulgated by EPA which excludes or exempts Purge Mixture as a solid waste or a hazardous waste becomes effective and enforceable by EPA in the state in which any such Facility is located.

116. Respondent may request termination of the CAFO thirty (30) calendar days after it has certified that it is in compliance with 40 C.F.R. Part 265, Subparts J and CC, and the requirements of this CAFO. Respondent shall submit the written request for termination to Chief, Enforcement and Compliance Assurance Branch, Land and Chemicals Division, Region 5. Upon receipt of the written request and after reviewing all information, EPA will notify Respondent in writing regarding its decision with respect to the termination of the CAFO. EPA may request further information and/or documentation before deciding that compliance has been demonstrated. This CAFO shall terminate upon EPA's determination that Respondent has complied with the requirements of the CAFO.

117. Upon the effective date of this CAFO, EPA agrees to make appropriate corrections to the ECHO data base for the RCRA compliance status of the GM Facilities identified in this CAFO.

118. This Consent Agreement is effective upon the filing of the Final Order. 40 C.F.R. § 22.31(b).

119. Each undersigned representative of a party to this Consent Agreement and Final Order certifies that he or she is fully authorized to enter into the terms and conditions of this Consent Agreement and Final Order and to legally bind such party to this document.

IN THE MATTER OF: General Motors Automotive – North America
Docket Nos RCRA-03-2009-0099
RCRA-04-2009-4007(b)
RCRA-05-2004-0001
RCRA-07-2009-0001

Respondent: GM

Agreed to this 14th day of May, 2009.

By: _____
Kenneth R. Knight
Executive Director Global World Wide Facilities Group, General Motors Corp.

IN THE MATTER OF: General Motors Automotive – North America
Docket Nos RCRA-03-2009-0099
RCRA-04-2009-4007(b)
RCRA-05-2004-0001
RCRA-07-2009-0001

For Complainant, United States Environmental Protection Agency, Region III:

Date: May 13, 2009 By: _____
Joyce A. Howell
Senior Assistant Region Counsel

After reviewing the foregoing Consent Agreement and other pertinent information, the Director, Land and Chemicals Division, EPA Region III, recommends that the Regional Administrator of the Regional Judicial Officer issue the Final Order attached hereto.

Date: 5/14/09 By: _____
Abraham Ferdas
Director
Land and Chemicals Division

IN THE MATTER OF: General Motors Automotive – North America
Docket Nos RCRA-03-2009-0099
RCRA-04-2009-4007(b)
RCRA-05-2004-0001
RCRA-07-2009-0001

For Complainant, United States Environmental Protection Agency, Region 4:

Date: 5/19/09

By: _____
Caroline Y.F. Robinson, Chief
RCRA & OPA Enforcement and
Compliance Branch

IN THE MATTER OF: General Motors Automotive – North America
Docket Nos RCRA-03-2009-0099
RCRA-04-2009-4007(b)
RCRA-05-2004-0001
RCRA-07-2009-0001

For Complainant, United States Environmental Protection Agency, Region V:

Agreed to this 21st day of May, 2009.

By: _____
Margaret Guerriero
Director, Land and Chemicals Division, Region 5

IN THE MATTER OF: General Motors Automotive – North America
Docket Nos RCRA-03-2009-0099
RCRA-04-2009-4007(b)
RCRA-05-2004-0001
RCRA-07-2009-0001

For the Complainant:
The United States Environmental Protection Agency, Region 7

Date: May 19, 2009

Donald Toensing for
Chief, RCRA Enforcement and State Programs Branch
Air and Waste Management Division
U.S. Environmental Protection Agency
Region 7

Date: 5/19/09

Chris R. Dudding
Assistant Regional Counsel
U.S. Environmental Protection Agency
Region 7

IN THE MATTER OF: General Motors Automotive – North America
Docket Nos RCRA-03-2009-0099
RCRA-04-2009-4007(b)
RCRA-05-2004-0001
RCRA-07-2009-0001

FINAL ORDER

The foregoing Consent Agreement is hereby approved, ratified and incorporated by reference into this Final Order in accordance with the Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties and the Revocation/Termination or Suspension of Permits, ("Consolidated Rules of Practice"), 40 C.F.R. Part 22 (with specific reference to 40 C.F.R. Sections 22.13(b) and 22.18(b)(2) and (3)). The Respondent is hereby ORDERED to comply with all of the terms of the foregoing Consent Agreement effective immediately upon filing of this Consent Agreement and Final Order with the Regional Hearing Clerk. This Order disposes of this matter pursuant to 40 C.F.R. §§ 22.18 and 22.31 [64 Fed. Reg. 40138 (July 23, 1999)].

Date: 5/21/09

Renée Sarajian

RENÉE SARAJIAN, Regional Judicial Officer
For EPA Region 3

IN THE MATTER OF: General Motors Automotive – North America
Docket Nos RCRA-03-2009-0099
RCRA-04-2009-4007(b)
RCRA-05-2004-0001
RCRA-07-2009-0001

FINAL ORDER

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Date: 5/22/2009

For EPA Region 4

IN THE MATTER OF: General Motors Automotive – North America
Docket Nos RCRA-03-2009-0099
RCRA-04-2009-4007(b)
RCRA-05-2004-0001
RCRA-07-2009-0001

FINAL ORDER

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Date: May 22, 09

For EPA Region 5

IN THE MATTER OF: General Motors Automotive – North America
Docket Nos RCRA-03-2009-0099
RCRA-04-2009-4007(b)
RCRA-05-2004-0001
RCRA-07-2009-0001

FINAL ORDER

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Date: May 22, 2009 Robert Patrick, Regional Judicial Officer

For EPA Region 7

IN THE MATTER OF: General Motors Automotive – North America
Docket Nos RCRA-03-2009-0099
RCRA-04-2009-4007(b)
RCRA-05-2004-0001
RCRA-07-2009-0001

CERTIFICATE OF SERVICE

I hereby certify that today I filed the original of this Consent Agreement and Final Order and this Certificate of Service in the office of the Regional Hearing Clerk, United States Environmental Protection Agency, Region 5, 77 W. Jackson Boulevard, Chicago, IL 60604-3590, and that I then caused true and accurate copies of the filed document to be promptly mailed to the following by First Class Mail:

Honorable Barbara A. Gunning
Administrative Law Judge (1900L)
Office of the Administrative Law Judges
Ariel Rios Building
1200 Pennsylvania Ave., N.W.
Washington, D.C. 20460

James Walle
General Motors Corporation
Mail Code 482-C24-D4
300 Renaissance Center
P.O. Box 300
Detroit, Michigan 48265-3000

Certified Mail #

Dated: May 26, 2009

Patricia Jeffries-Harwell
Legal Technician (C-14J)
United States Environmental Protection Agency
77 W. Jackson Boulevard
Chicago, Illinois 60604-3590

RCRA CERTIFICATION

For

Reclaim Thinner Storage Tanks Secondary Containment

GENERAL MOTORS FORT WAYNE, INDIANA

JUNE 1997

Burns & McDonnell

RCRA CERTIFICATION
FOR
RECLAIM THINNER STORAGE TANKS
SECONDARY CONTAINMENT
GENERAL MOTORS
FORT WAYNE, INDIANA

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FOR
RECLAIM THINNER STORAGE TANKS
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GENERAL MOTORS
FORT WAYNE, INDIANA

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GENERAL MOTORS
FORT WAYNE ASSEMBLY PLANT
RCRA CERTIFICATION REPORT
for
RECLAIM THINNER STORAGE TANKS

1.0 PURPOSE/SCOPE

Burns & McDonnell (B&McD) was retained by General Motors Corporation (GM) to design a new Reclaim Thinner storage tank and secondary containment system. The Reclaim Thinner tank system and associated portions of the secondary containment system design and construction of this project are the subject of this certification report. The two tank system is designed for the collection and for less-than-90 day storage of waste paint thinner discharged by the plant's vehicle painting operations.

B&McD provided the design of foundations, secondary containment systems, mechanical, electrical and control systems for this project. B&McD also provided construction specifications except for Section 09705 - Chemically Resistant Coatings and Linings, which was provided by GM. GM provided the plant engineering personnel to perform the resident construction engineering services. B&McD provided shop drawing review for the structural steel and tank shop drawings. The location of the Reclaim Thinner tanks is shown on the site drawings attached in Appendix E.

In addition to providing design phase services, GM retained B&McD to review the design and construction of the reclaim thinner tank system and submit a certification, sealed by a professional engineer. This certification is to verify that the facility was constructed according to design drawings and is suitable for the service of providing less-than-90 day storage of liquid waste in accordance with the requirements of 40 CFR Part 264.192, "Design and Installation of New Tank Systems or Components."

Information for this report was obtained through inspection reports provided by GM, independent inspectors, equipment manufacturers, and B&McD design engineers. In addition, site visits were conducted by B&McD personnel near the completion of construction to verify the information obtained.

2.0 FACILITY DESCRIPTION

The RCRA less-than-90-day storage consists of two 18,950 gallon tanks. The tanks are horizontal with flat heads, and each supported by saddles on two concrete pedestals. The tanks and saddles are of welded stainless steel construction, designed and constructed in accordance with UL-142 (1993). Two mixers are installed on the primary tank (tank 19). Nozzles are installed on the secondary tank (tank 20) for possible future installation of mixers on the secondary tank. The purpose of the mixers is to suspend solids which may have settled prior to loading onto a tanker truck for transport to the recycling facility. Both tanks are situated inside a concrete secondary containment area.

The secondary containment area measures 48 feet, 10 inches by 32 feet, 6 inches and is constructed of formed-in-place concrete. This area provides secondary containment for the above ground reclaim thinner piping and tanks. A monolithic slab serves as the foundation for the tanks, platforms, and perimeter walls. The interior walls, joints, and floor of the containment area are coated with a chemically resistant liner. Chemically resistant water stops are installed in all perimeter wall joints with the slab.

The floor of the containment area is sloped to a sump located along the east wall for the collection of rainwater or spills. The sump is equipped with an air diaphragm pump which normally discharges into the plant industrial waste sewer. The pump discharge piping is equipped with valves to allow isolation from the industrial waste sewer system. Should a spill or leak occur within the containment area, it will be pumped out into a tanker truck. The sump pump must be manually started.

Influent reclaim thinner is transported to the containment area by means of one, double contained 2-inch pipe from an existing pumphouse. The piping that distributes the thinner to the tanks within the containment area is single walled. Effluent and clean out piping is routed from the tank to the tank truck loading area. The truck loading area is surrounded by a curb. Rainwater is collected by a sump. A manually initiated sump pump system is configured to allow discharge to a tanker truck, or to the plant industrial waste sewer.

2.1 Certification Boundary

The boundary for this certification is the secondary containment wall, including tanks, piping and equipment therein, and including the load-out and clean-out piping to the truck loading area. A single 2-inch double contained influent reclaim thinner pipe from the pump house enters the north side of the secondary containment area. There are four possible effluent locations. One 4-inch double contained unloading line for each tank to the truck loading area, and one 6-inch clean-out pipe from each tank to the truck loading area. The certification boundary for all four of these pipelines is the capped hose connection for each pipe located at the truck loading area. The General Layout Plan (1189-301) is attached in Appendix E showing the tank and truck loading area layout. Also, included in Appendix A is the Process Piping Plan (1189-401), which show the influent and effluent piping at the reclaim thinner tank secondary containment.

3.0 DESIGN BASIS

The intent of this section is to describe the necessary basis of design for the key components of the reclaim thinner tank system so a review can be conducted of the design criteria used for this facility for conformance with the necessary design requirements. The key components include foundation design, tank design, secondary containment design, and piping and ancillary equipment design. The necessary basis of design is determined by 40 CFR Part 264.192, "Design and Installation of New

Tank Systems or Components" and 40 CFR Part 264.193 "Containment and Detection of Releases." A copy of these regulations is attached in Appendix B. The State of Indiana has adopted the federal regulations regarding this issue without amendments. In addition, the storage system is located in Allen County, Indiana, and as such the design and construction must be in accordance with 1994 Uniform Building Code.

3.1 Foundation Design

The design of the foundation for the reclaim thinner tank system must provide adequate support such that the tanks will not settle, collapse, or fail in any manner due to foundation problems. The foundation design should consider loads imparted to the foundation due to live and dead loads, or any loads due to a seismic event. The loads imparted by a seismic event should be designed for in accordance with the Uniform Building Code 1994 requirements. In addition, foundation design must consider site soil conditions which should be verified by field investigation by a professional geotechnical engineer. His recommendations, based on findings from actual field testing, shall guide the foundation design for the tank system.

3.2 Tank Design

The tanks should be designed in accordance with applicable industry design codes for the selected material of construction of the tank with due consideration given to the tank's stored contents. The tank design should include evaluation of structural support, seams, connections, and pressure controls necessary to provide a tank with sufficient structural strength to contain the stored liquids under design loading conditions, as determined by local building and fire protection codes.

3.3 Secondary Containment System Design

In order to prevent the release of hazardous waste or hazardous constituents into the environment, secondary containment must be provided for these storage tanks used for the collection and less-than-90 day storage of liquid waste.

The requirements for secondary containment and detection are defined by 40 CFR 264.193, "Containment and Detection of Releases," a copy of which is included in Appendix B. Following is a summary of the requirements for the design of secondary containment systems for new tank installations:

- Designed and constructed to prevent the migration of wastes or accumulated liquid out of the system to the soil, ground water, or surface waters.

- Designed with a system capable of detecting and collecting releases and accumulated liquids until the collected material is removed.

- Constructed of materials compatible with the waste to be stored.

- Structurally designed to have sufficient strength to prevent failure due to pressure gradients from static, hydraulic, and environmental forces.

- Provided with a leak detection system that will allow the detection of a release within 24-hours.

- Sloped to allow spilled or leaked materials and/or rainfall to drain to a collection point for removal.

- Designed to contain 100 percent of the capacity of the largest tank located within the boundary, plus the precipitation from the 25-year, 24-hour rainfall event.

- Designed and constructed with chemical resistant water stops at all joints, and provided with an impermeable coating system compatible with the stored wastes, free of cracks or gaps.

- Designed with a means to protect against formation of and ignition of vapors within the tank or containment area.

- Ancillary equipment shall be provided with full secondary containment in the form of trenching, jacketing or double-walled construction. This includes all process piping feeding or discharging from the system.

4.0 WASTE CONSTITUENTS AND CHARACTERISTICS

GM has described the primary constituents of the waste stream that will be stored in the tanks as "Reclaimable Paint Thinner" with approximately 20% solids by weight of paint residue. The reclaim thinner is used paint thinner which is a waste product discharged from the plant painting operations. The thinner is a mixture of solvents including acetone, butyl acetate, ethyl benzene, methyl-isobutyl-ketone, methyl-ethyl-ketone, toluene, and xylene. The constituents of the waste stream are documented in recent analyses provided by GM. This data, and the MSDS for the virgin thinner is attached in Appendix C. The reclaim thinner is classified as a Class 1B flammable fluid under the Uniform Fire Code, Article 79, "Flammable and Combustible Liquids".

Based on information provided by GM, the typical reclaim thinner flow into the tanks, is approximately 800 gallons per day. The total combined maximum pumping capacity of all sources pumping into the system is approximately 110 gallons per minute.

5.0 SECONDARY CONTAINMENT COATING SYSTEM

A chemically resistant coating system was installed for purposes of sealing cracks and joints in the concrete containment structure to prevent potential migration of hazardous wastes. A three component system, provided by Sentry Polymers, Inc., was selected as the secondary containment coating system consisting of the following:

- Substrate primer, Semstone 5401-RB Epoxy Penetrating Primer/Sealer
- Flexible underlayment, Semlastic 201 Self-Leveling Elastomeric Membrane

- Epoxy basecoat reinforced with chopped strand or woven fiberglass mat, Semstone 245 Solvent Resistant Novolac Concrete Protection System

Specification Section 09705 Chemically Resistant Coatings and Linings was provided by GM and is included in Appendix D, along with the manufacturer's literature. The product literature outlines the necessary surface preparation requirements for this coating system. Specification Section 09705 specified that surface preparation and installation procedures should follow the manufacturer's instructions.

Review of the manufacturer's literature indicated that this coating system is suitable for the secondary containment coating system. The finish coat (Semstone 245) is rated as suitable for constant immersion service for the constituents of the reclaim thinner noted in section 4.0 and further described in Appendix C.

A representative of the manufacturer was on-site during construction and supervised the installation of the coating system. GM observed the installation of the coating system, reviewed the contractors submittals, and provided B&McD with written verification from the manufacturer, Sentry Polymers Inc., that the installing contractor had used the proper products and that they had been placed properly in accordance with the installation procedures, and the installation was approved by Sentry's representative..

Appendix D contains correspondence from Cannon Sline which documents that the selected product was installed and it outlines the installation procedure that was used. Based on the letter from Cannon Sline, Sentry's written documentation and B&McD's site visits, it appears that the procedures for surface preparation, coating application and coating thicknesses were followed.

6.0 SECURITY AND PROTECTION FROM VEHICULAR TRAFFIC

The reclaim thinner containment area access is controlled by a chain link fence and locked gates installed around the perimeter of the containment structure. This fence is shown on the New Secondary Containment General Layout Plan (1189-301) contained in Appendix E. This fencing limits access to the site and prevents unauthorized personnel from entering the area. A lockable chain-link fence gate is located on the catwalk from the existing tank farm to restrict access.

A chainlink fence surrounds the entire plant. All points of access are monitored by GM's security personnel to prevent unauthorized vehicular traffic from entering the plant.

Guardrail has been installed on the west and north sides of the containment wall to protect from accidental vehicle damage. The containment area is bordered by the pump house building to the south, and the existing tank farm is located to the east, which protect the containment area from vehicle traffic. Guardrail is installed to protect the tank unloading piping.

7.0 FACILITY DESIGN AND INSTALLATION EVALUATION

The intent of this section is to summarize the specific design criteria to which the spill containment system was designed and document that the system was designed in accordance with 40 CFR Part 264.192 and 40 CFR Part 264.193, as described in Section 2 of this report. A copy of these regulations is attached in Appendix B.

7.1 Foundation Design

The foundation design for the spill containment system was based upon field investigation and recommendations by Materials Inspection & Testing, Inc.'s (MIT) registered professional geotechnical engineer. A copy of MIT's report is attached in Appendix F. Based on MIT's field investigation of site soil conditions, they recommended that a mat foundation be constructed to support the tanks. B&McD

structural engineers then designed the tank foundation systems using this information. The design criteria used for this foundation design are listed below:

Tank Length:	29 ft. 3 in.
Tank Diameter:	10 ft. 6 in.
Tank Capacity:	18,950 gal.
No. of Saddles:	2
Wastewater Fluid Density:	7.48 lb/gal.
Tank Fluid Weight:	141,746 lbs.
Tank Deadload:	26550 lbs., (per manufacturer)
Platform Live Load:	50 psf
Wind Load:	100 mph
Seismic Design Parameters:	Zone 1 (Z=0.10)

The above design parameters are in accordance with 1994 Uniform Building Code in effect for the plant location. The tank dimensions are in accordance with the tanks supplied for the project. The wastewater fluid unit weight of 7.48 lb/gal is based on the heaviest density data provided by GM from the waste analysis that is included in Appendix D, corresponding to 21% solid content of the waste.

Foundation design calculations for the secondary containment and the tanks are contained in Appendix G. Foundation design drawings for the facilities are contained in Appendix E.

7.2 Water stops

The concrete joint sealant system consists of both water stops and the chemically resistant coating system. Chemically resistant water stops were included in the containment design as required by regulations for construction of secondary containment systems. The water stops used were constructed of 304 stainless steel, which is resistant to attack by the waste thinner constituents. Product information on the water stops is included in Appendix E. GM's engineer observed the installation of the water stops. Documentation of his observations is contained in a letter included in Appendix L.

7.3 Tank Design

GM selected a welded stainless steel tank constructed and labeled per UL-142, Steel Aboveground Tanks for Flammable and Combustible Liquids. As such the responsibility of the tank design to meet local seismic design requirements lies with the tank manufacturer. GM and B&McD performed a shop drawing review of the preliminary tank drawings. The tanks were designed to support mixer loads in addition to the equipment and platform loading. The as-built tank drawings and design calculations submitted by Clawson Tank Company, the tank supplier, are attached in Appendix H.

The material of construction of the tanks was specified as 304 Stainless Steel, which is chemically resistant to the waste constituents identified by GM. Corrosion charts published by the National Association of Corrosion Engineers (NACE) were reviewed, and the literature notes that 304 stainless steel has the very low corrosion rates for all of the identified constituents of the paint thinner. Carbon steel tanks are typically used for virgin and reclaim thinner storage applications with success; however, an external protective coating system and periodic maintenance is required. 304 stainless steel has good corrosion resistance to the fluids stored in this application, and an external protective coating system is not required.

An independent inspection firm, MQS, was retained to perform integrity testing of the tanks with an AWS/CWI and API 653 certified inspector. The inspection consisted of ultrasonic shell thickness tests and dye penetrant inspection of the internal welds. A report including the results of the inspection is attached as Appendix K. According to the report, all welds were found to be visually acceptable and there were no recordable indications noted by liquid penetrant inspection. The minimum thickness on the tank wall is 0.245 inches. The MQS inspection may be used as a baseline to monitor tank wall thickness and determine the corrosion rate, and the life expectancy of the tank system.

UL-142 specifies a minimum wall thickness for this tank of 0.158 inches. Additional wall thickness calculations were requested from the manufacturer to verify that the tank wall thickness is sufficient. The minimum wall thickness was derived from the manufacturer's calculations based on the criteria of 18,800 psig, and was determined to be approximately 0.195 inches, which is greater than the minimum UL requirement. The manufacturer states that there are no direct formulas to reflect the conditions of the tank, and assumptions were made to evaluate the load conditions. The actual wall thickness is 0.245 inches. This leaves a corrosion allowance of approximately 0.0491 inches, or 49 mils.

The NACE corrosion data survey rates most of the constituents for corrosion of 304 stainless steel at less than 2 mils per year. Two components, Ethylbenzene and MIBK are rated at less than 20 mils per year. This data is based on pure materials in contact with metal, and the actual rate of corrosion experienced will vary with ambient conditions. Also, the NACE data does not address how liquid mixtures will affect the corrosion rate. General Motors has experience with carbon steel tanks, approximately 10 to 12 years old, in similar service without significant corrosion. It is expected that the stainless steel tanks resistance to corrosion due to ambient moisture will be superior to carbon steel, especially in the internal vapor space. The wall thickness should be monitored periodically (i.e. every two years) to determine a rate of corrosion.

7.4 Tank Venting

Normal breathing vents are required to relieve pressures caused by liquid flowing into and out of the tank, and that caused by thermal expansion and contraction. The capacity of the breather vents installed surpass the minimum requirements required by the Uniform Building Code (UBC). The tank breather vents which were installed on the tanks are equipped with a flame arrestors on the vacuum side.

Emergency venting is required for all tanks storing flammable liquids. This is required to prevent bursting of tanks if exposed to an external fire. The emergency venting requirement is specified in the Uniform Fire Code, Article 79, based on the wetted surface area of the tank. The tank venting calculations are attached in Appendix J. The total emergency venting capacity is accomplished by the combined capacity of the emergency and normal vents at a maximum internal pressure of 2.5 psig. The

capacity of the vents was obtained from certified flow curves provided by the manufacturer and supplier of the vents, Protectoseal.

7.5 Secondary Containment Design

The requirements for the design of the secondary containment system are noted in Section 2 of this report, and are based on the requirements outlined in 40 CFR Part 264.193. The following explanation of the design criteria used for this spill tank system correspond to 40 CFR Part 264.193, a copy of which can be found in Appendix B.

- The secondary containment system for the tanks and piping was designed to prevent the migration of spilled wastes to the soil, groundwater, or surface waters. As shown on the design drawings contained in Appendix F, the secondary containment system was constructed of a monolithic reinforced concrete base slab and walls supported by the slab. Per GM's field observations noted in Appendix E, Water stops were placed in all construction joints. The concrete containment area walls, floor, and joints were coated with a chemically resistant, impervious coating. These coating and sealing systems were previously described in Sections 4 and 5 of this report.

- Leak detection is accomplished by level sensors installed in the containment and unloading sumps. Detection of fluid in the sump will sound an alarm at the plant's security office, which will require a response to inspect the containment for leaks. Visual monitoring of the tanks and piping will be made by GM personnel on a periodic basis to verify system integrity. Leak detection of containment piping is facilitated by valves installed at the low point of containment piping.

- The reclaim thinner tanks and piping were constructed of materials compatible with the waste constituents. Stainless steel is resistant to corrosion by the materials stored, and also does not require paint for protection against weathering.

- Appendix H contains structural design calculations for the secondary containment area. The containment floor consists of a monolithically poured, steel reinforced concrete slab with a minimum thickness of 18". The August 5, 1996 geotechnical report from MIT, Inc. (Appendix G) recommended an allowable bearing pressure of 3000 pounds per square foot. Hydrostatic forces were considered as noted in the structural design calculations.

- The secondary containment area was designed to hold 110% of the largest capacity tank plus an additional volume equal to the volume of rainfall generated by the 25-year 24-hour storm. An additional 5.5 inches of excess freeboard was included in the design to provide a margin of safety. Calculations supporting this design are located in Appendix J. A 25-year, 24-hour storm generates 4.5 inches of rainfall, based on Technical Paper No. 40, Rainfall Frequency Atlas of the United States. The volume of accumulated rainfall is 4452 gallons based on a depth of 4.5 inches over the surface area of the containment area. The largest tank volume in the secondary containment area has nominal capacity of 18,950 gallons. See design drawings in Appendix I for dimensions and wall heights in the secondary containment area.

- The floor of the containment area is sloped to a sump located in the east corner of the containment. This is shown on Dwg. 1189-200, Foundation Plan Sections and Details, found in Appendix F. An air operated diaphragm pump is located at this sump for removal of accumulated rain fall. Pump operation must be manually initiated by an operator following visual verification that the accumulated fluid is rainwater.

- The secondary containment system was designed to allow visual inspection to determine if either of the Reclaim Thinner Tanks had leaked or overflowed. A new light pole was installed to enable night time observation. GM must visually monitor the secondary containment sump for liquid to determine if it contains accumulated rainfall or leaked waste and then determine the appropriate means of disposal of the accumulated liquid.

- The spill containment area is designed to protect against the formation and ignition of vapors. The secondary containment area is open to the atmosphere to prevent trapping vapors that rise. The secondary containment area is classified as Class I, Division 2; vertically within the height of the containment wall; and vertically within 10 ft. of the tank roof. The electrical classification is Class I, Division 1, within five feet of all tank vents, and below the containment wall. All instrumentation within these classified areas is specified as explosion proof to meet Class I, Division 1 requirements. In addition, all tanks, piping, fencing, structural steel, grating, and equipment within the secondary containment area are grounded to prevent buildup of static electrical charges which could potentially ignite explosive vapors within the containment area.

7.6 Piping and Ancillary Equipment

The piping and ancillary equipment contained within the secondary containment zone consists of 304 stainless steel piping with welded and flanged connections. All pipe within the containment area is above grade so leaks can be found by visual inspection. The secondary containment area serves as the containment for pipes installed within this area. Piping exiting the containment area has secondary containment in the form of a stainless steel secondary containment pipe. The containment piping begins prior to exiting the secondary containment wall. Valves have been installed in the low point of all containment piping to facilitate inspection for leaks.

The materials of construction of the ancillary equipment are acceptable for the reclaim thinner constituents. Valves are elastomeric sleeve lined plug valves, constructed of 304L stainless steel with elastomeric seals compatible with the stored fluids wetted parts. The piping gaskets used are also compatible with the fluids stored. Product data sheets are included in Appendix M.

Four-inch piping transports effluent from the tank to a truck loading area. The piping is double contained where it leaves the diked area.

An additional 6-inch single walled pipe is routed from each tank to the loading station to facilitate cleanout of the tank. Isolation valves are located at the tank nozzle and at the unloading area. This pipe

will normally remain empty, and is only to be used when the tank is empty to allow connection of a vacuum truck for removal of cleaning waste from the tank.

The pipes terminate with an isolation valve and cap at the truck loading area. A drip pan is situated beneath the valve flanges which will be monitored periodically for leaks.

8.0 INSPECTION RESULTS

This certification is based on periodic inspections during construction, review of construction documentation, including procedures, materials used, and construction certifications of testing and inspections provided by GM concerning key aspects of the systems construction. In addition, a review was conducted of the design drawings, design calculations, and project specifications for compliance with requirements in 40 CFR part 264.

GM had the responsibility to oversee the tank and piping installation and tank and pipe hydrostatic testing. B&McD requested that the Contractor and GM complete hydrostatic testing forms to verify that the tests had been conducted and that the tanks and piping had passed the tests. The process carrier and containment piping have passed hydrostatic and pneumatic pressure testing procedures without leaks. Forms documenting the pressure testing of the process piping are included in Appendix L. GM's engineer witnessed a pneumatic test of the tanks performed in the shop in which all welds were soaped and inspected for leaks. Appendix L contains documentation of the shop pneumatic test, and hydrostatic documentation for the tanks after they were installed on-site.

Documentation of proper installation of the coating system was provided by the coating system supplier's authorized representative who supervised the work performed by the installer.

Burns & McDonnell visited the project site at the completion of construction to verify the proper installation. Following is a summary of the results of these site visits:

June 23, 1997: Craig Buescher and Ed Johnson visited the site to verify placement of the concrete protective coating, tanks, valves and equipment. The tanks were set in the containment

area. All piping and equipment appeared to be installed on the tanks. Cannon Sline was on-site installing the coating system, thus the lower part of the containment area was not accessible. The primer and elastomeric underlayment installation appeared to be complete with the exception of the pump suction pockets in the sumps. The contractor was installing the Semstone 245 reinforced with woven fiberglass mat. Sentry's representative was not on site at the time of the visit. B&McD observed the electrician field test alarms for the electrical pipe heat tracing and containment sump level switch operation. The PLC programming was being field tested. Grounding was complete with the exception of the sump grating. Signage had been installed on the tanks indicating hazards, tank name and fluids stored. Both tanks were partially filled with water. A calibration check of the continuous level gages was being performed by changing water levels in the tanks and using a measuring stick to verify the level.

June 30, 1997 Craig Buescher and Ed Johnson (B&McD) walked through the project site with Said Asgari, a representative of the Indiana Department of Environmental Management, Ray Albright (GM), and Todd Senseny (GM). Photographs taken during this site visit are included in Appendix M. MQS was on-site performing thickness tests and weld inspections inside the tanks. The tanks were empty to facilitate the inspection. The coating system installation was complete. Locks were installed on the unloading station valves. The piping was grounded, and conduit seals were in-place. There appeared to be no variances from the construction documents, with the exception of the valves. The installed valves were plug valves. Ray Albright stated that the plug valves installed were preferred to the ball valves originally specified. Copies of the submittals were transmitted to Burns & McDonnell for inclusion in this report. All venting devices and instrumentation were installed on the tank nozzles and appeared to be functioning properly. Upon completion of the walk through Mr. Asgari verbally told Ray Albright (GM) that the tanks could be placed into service. Photos of this inspection/walkthrough are located in the appendices.

9.0 CERTIFICATION ASSESSMENT

The GM reclaim thinner secondary containment area appears to have been constructed according to the design documents, according to the documentation provided by GM, the installation contractor, MQS's tank integrity report, and Burns & McDonnell's own observations . The materials of construction are suitable for resistance to the materials present in the used paint thinner. The waste constituents present were defined by GM and are described in Appendix C of this certification report. This assessment is strictly based on the waste constituents identified by GM. The following certification is in accordance with 40 CFR Part 270.11(d).

I certify, under penalty of law, that this document and all attachments thereto were prepared under my direction or supervision in accordance with the system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature of General Motors Corporation Representative

James G. Falloon
Plant Manager
GMTG-Ft. Wayne Assembly

Signature of Registered P.E.

Edmund C. Johnson, P.E.
Indiana PE60020724

EDMUND C. JOHNSON
REGISTERED
No. 20724
STATE OF INDIANA
PROFESSIONAL ENGINEER

Appendix K - Tank Installation Inspection Report

Burns
&
McDonnell

Our Product Is Quality

MQS Inspection, Inc.
5307 W. 86th Street
Indianapolis, IN 46268
Telephone: 317-872-8196
Fax: 317-872-4798

July 7, 1997

Mr. Craig Buescher
Burns & McDonnell
1633 Des Peres Road
St. Louis, MO. 63131

Dear Craig,

This letter is in reference to the Inspections done by MQS Inspection, Inc. on New Hazardous Waste Tanks located at the GM Plant in Fort Wayne, Indiana.

On June 30th MQS sent 2 inspectors to GM Plant where they meet with Todd Senseny from GM and planned the days events. The first thing that was handled was rounding up the confined space entry gear. Todd contacted security at the plant and they was able to supply use with tri-pod, safety line and also established that tanks were safe for entry when took control, also lockout-tagout was confirmed.

Liquid Penetrant inspection was performed on interior of tanks at all inlet and outlet pipe attachment welds and on each head where lower horizontal seam weld junctions shell plate.

All welds both inside and out were Visually inspected by a AWS/ CWI & API 653 certified inspector

Ultrasonic thickness inspection was also performed on tank shell and heads at agreed upon areas which for the shell is a 3' grid and a X pattern on heads with readings 2' apart.

All findings were that of a set of new tanks with all the shell plates and heads being .250" plus or minus .005". All welds were visually acceptable and there was no recordable indications noted by Liquid penetrant inspection, all in all tanks are in great shape.

A complete detailed report is attached showing data and inspection sights along with techniques used during inspection.

All results were discussed with Todd Senseny prior to our departure on June 30th

Sincerely,

MQS Inspection, Inc.

Michael A. Evans
AWS/CWI #93110351
API 653 #1309
pcr/wo#71f-12931

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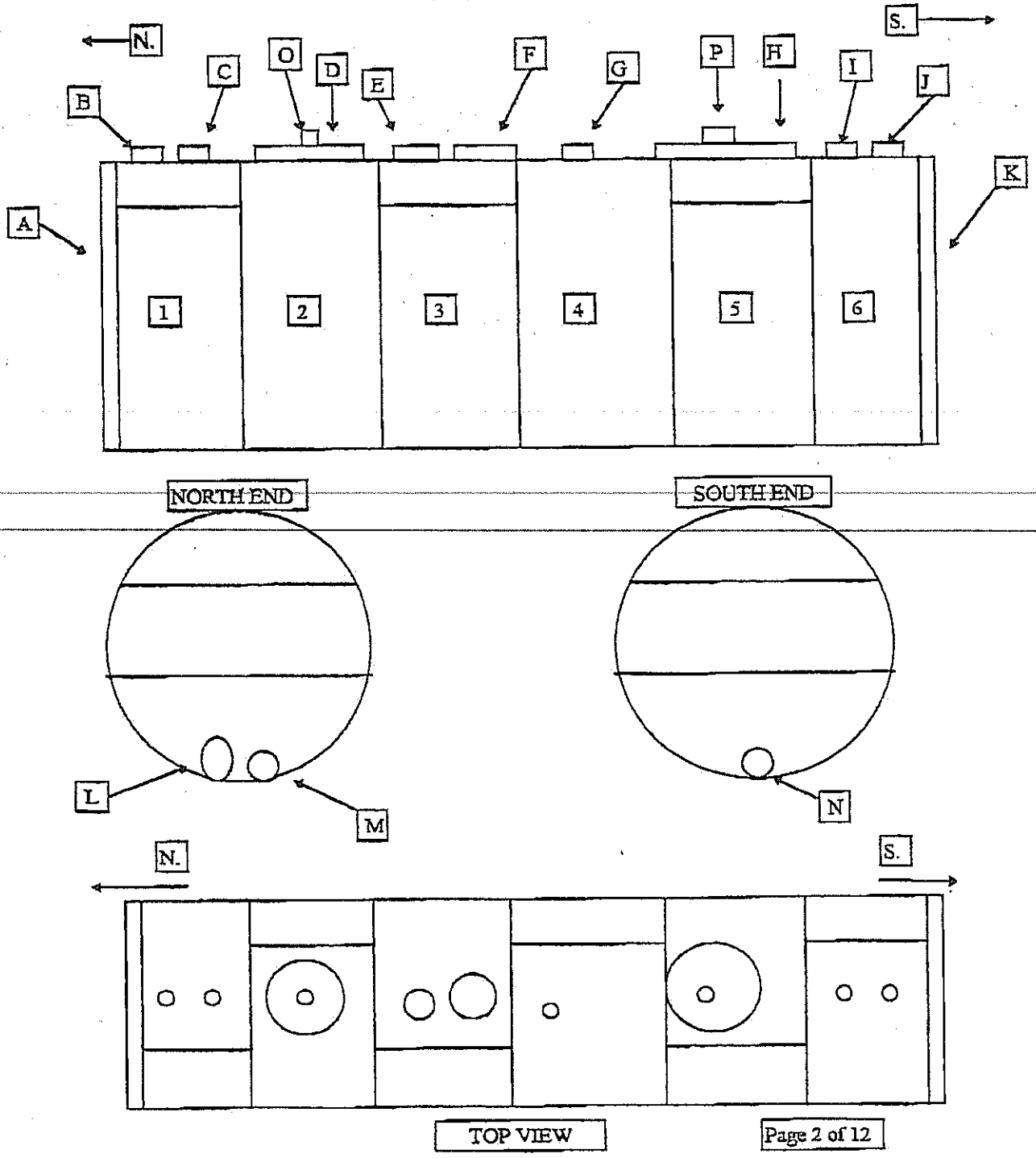
MQS Inspection, Inc.
5307 W. 86th Street
Indianapolis, IN 46268
Telephone: 317-872-8196
Fax: 317-872-4798

HAZARDOUS WASTE TANKS 19 & 20

(RECLAIMED PAINT THINNER)

TANK -LAYOUT



MQS

QUALITY CONTROL/QUALITY ASSURANCE

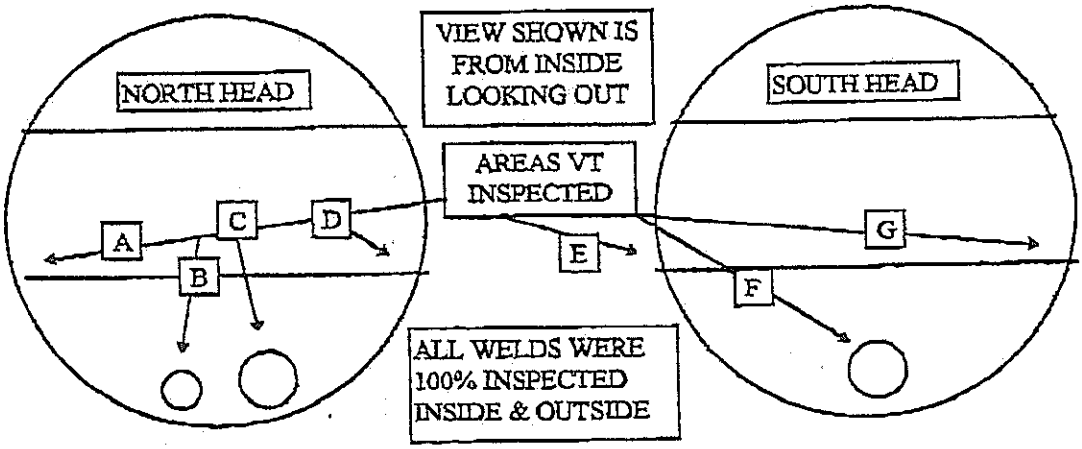
VISUAL WELD INSPECTION REPORT

CLIENT	PROJECT	Date	Page Number
ims & McDonnell	Hazardous Waste Storage Tanks	06-30-97	3 OF 12
1630 Des Peres Road	OWNER GM Corporation	Purchase Order Number GM CORP.	
Louis, MO. 63131	LOCATION SITE Fort Wayne, Indiana plant	Work Order Number 71F-12931	

Coded: LF=Lack of Fusion UC=Undercut P=Porosity UR=Undermun C=Craters EW=Excessive Weld AS=Arc Strikes CR=Cracks S=Slag

Items Inspected	Acc	Rej	Code	Items Inspected	Acc	Rej	Code
TANK #19				TANK #20			
ALL WELDS	X			ALL WELDS	X		

Notes:



Code and Section	Specification	Procedure
API 650	API 650	26.B.100-96 Rev. 0

MQS Inspector	Level	Date
MICHAEL A. EVANS 6859	VT/II	06-30-97

Report Reviewed and Accepted By	Date	Client Representative	Date

MQS

NDE TECHNIQUE RECORD/VISUAL

Form 26.A1

Facility QC Control No. 71F-12931 Technique No. 01

Client Burns & McDonnell P. O. No. GM CORP

Item Description Horizontal Storage Tanks

Part No. Tank numbers 19 & 20 Drawing No. N/A

Specification API 650 Acceptance Class API 650

Procedure 26.B.100-96 Rev. 0

WELDS		OTHER TEST ITEMS	
Weld Joint	Fillet / Full Pen.	Type of Item	N/A
Weld Process	SMAW GMAW	Processing	N/A
Base Material	Stainless Steel	Material	N/A
Material Thickness	Various	Dimensions	N/A
Weld Length/OD	Various	Additional Info	N/A
Surface Condition	As Welded	Surface Condition	N/A

[X] Direct Visual Examination

Distance from eye to surface

[X] 24 Inches or less

[ ] Other_____

Angle between eye and examination surface

[X] 30 degrees or greater

[ ] Other_____

[ ] Remote Visual Examination

Additional equipment needed

[ ] Mirrors

[ ] Boroscopes

[ ] Cameras

[ ] Magnifiers

[ ] Other_____

[X] Additional Lighting if required

[X] Flash Light

[ ] Drop Light

[ ] Other: _____

[X] Satisfactory Resolution Demonstrated

Resolution shall be considered adequate when the comibnation of access, lighting, and angle of vision either direct or remote can resolve a black line 1/32 of an inch wide on an 18% neutral grey card placed on the surface to be examined.

Other Information:

MQS

QUALITY CONTROL/QUALITY ASSURANCE

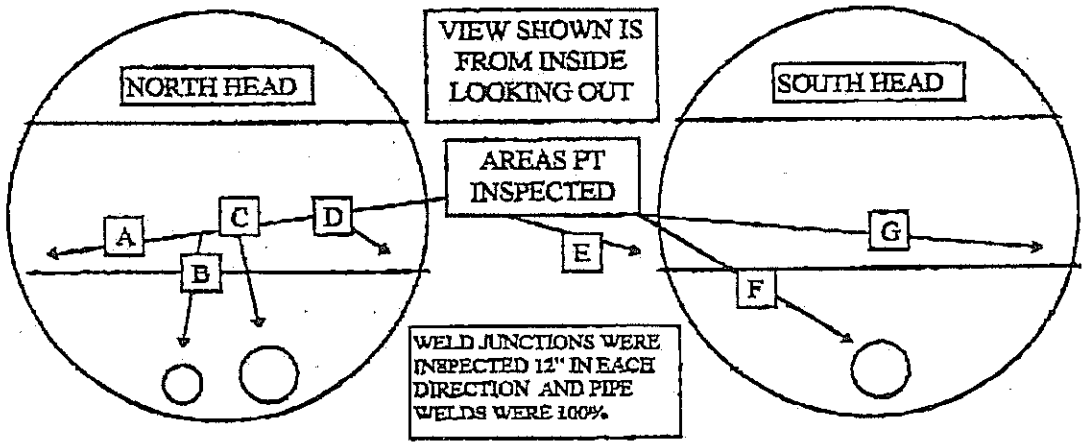
LIQUID PENETRANT INSPECTION REPORT

CLIENT	PROJECT	Date	Page Number
ims & McDonnell	Hazardous Waste Storage Tanks	06-30-97	5 OF 12
1630 Des Peres Road	OWNER GM Corporation	Purchase Order Number GM CORP.	
Louis, MO. 63131	LOCATION SITE Fort Wayne, Indiana plant	Work Order Number 71F-12931	

Coded: LF=Lack of Fusion UC=Undercut P=Porosity UR=Undermun C=Craters EW=Excessive Weld AS=Arc Strikes CR=Cracks S=Slag

Items Inspected	Acc	Rej	Code	Items Inspected	Acc	Rej	Code
TANK #19				TANK #20			
WELD LOCATIONS				WELD LOCATIONS			
A	X			A	X		
B	X			B	X		
C	X			C	X		
D	X			D	X		
E	X			E	X		
F	X			F	X		
G	X			G	X		

Notes:



Code and Section	Specification	Procedure
API 650	ASTM E 165-95	23.H.101-95 Rev. 0

MQS Inspector	Level	Date
MICHAEL A. EVANS 6859	PT/II	06-30-97

Report Reviewed and Accepted By	Date	Client Representative	Date

MQS

NDE TECHNIQUE RECORD/PENETRANT Form 23.A1

Facility QC Control No. 71F-12931 Technique No. 01

Client Burns & McDonnell Project. GM CORP

Item Description Horizontal Storage Tanks

Part No. Tank numbers 19 & 20 Drawing No. N/A

Specification API 650 ASTM E165-95 Acceptance Class 23.C.004-94 REV.0

Procedure 23.H.101-95 Rev. 0

WELDS		OTHER TEST ITEMS	
Weld Joint	Full pen. / Fillet	Type of Item	N/A
Weld Process	SMAW & GMAW	Processing	N/A
Base Material	Stainless Steel 304	Material	N/A
Material Thickness	Various	Dimensions	N/A
Weld Length/OD	Various	Additional Info	N/A
Surface Condition	As Welded	Surface Condition	N/A

PRECLEAN: Method Wipe Material Spot-check cleaner/remover SKC-S

Batch No. 96M02K Drying Time 10 minutes

PENETRANT: Material Spot-check SKL-HF/S Batch No. 90H03K

Application Brush Dwell Time 10 minutes

EMULSIFICATION: Material N/A Batch No. N/A

Application N/A Emulsification Time N/A

EXCESS PENETRANT REMOVAL Material Spot-check cleaner SKC-S Batch No. 96M02K

Method Wipe Drying Time 5 minutes

DEVELOPER Material Spot-check SKD-S2 Batch No. 95B09K

Application Aerosol can Drying Time N/A Developing Time 7 - 30 minutes

POSTCLEAN: Material Spot-check cleaner/remover SKC-S Batch No. 96M02K

Method Wipe

OTHER INFORMATION:

MQS

QUALITY CONTROL/QUALITY ASSURANCE

ULTRASONIC INSPECTION REPORT

CLIENT	PROJECT	Date	Page Number
ims & McDonnell	Hazardous Waste Storage Tanks	06-30-97	7 OF 12
1630 Des Peres Road	OWNER GM Corporation	Purchase Order Number GM CORP	
Louis, MO. 63131	LOCATION SITE Fort Wayne, Indiana Plant	Work Order Number 71F-12931	

Coded: LF=Lack of Fusion UC=Undercut P=Porosity UR=Underrun C=Craters EW=Excessive Weld AS=Arc Strikes CR=Cracks S=Slag

Items Inspected	Acc	Rej	Code	Items Inspected	Acc	Rej	Code
Tank # 19				Tank # 20			
4 readings on all attachments				4 readings on all attachments			
3' grid pattern on shell plates				3' grid pattern on shell plates			
X pattern on heads with 2' centers				X pattern on heads with 2' centers			

Notes:
All readings on parts listed above are with in manufactures tolerances for new material.
Data for head thickness can be found on page 9 of 12.
Data for shell thickness can be found on pages 11 & 12 of 12.
Data for attachments can be found on pages 8 of 12.

Code and Section	Specification	Procedure
API 650	ASTM E-797-90	22.H.700-90 Rev. 0

MQS Inspector	Level	Date
MICHAEL A. EVANS 6859	UT/II	06-30-97

Report Reviewed and Accepted By	Date	Client Representative	Date

Our Product Is Quality

MQS Inspection, Inc.
5307 W. 86th Street
Indianapolis, IN 46268
Telephone: 317-872-8196
Fax: 317-872-4798

HAZARDOUS WASTE TANK 19 & 20
(RECLAIMED PAINT THINNER)

ATTACHMENTS AND DIMENSIONS

19

LETTER	ITEM DESCRIPTION	TOP/NORTH	BOTTOM/SOUTH	EAST	WEST
A	NORTH HEAD	N/A	N/A	N/A	N/A
B	6" NOZZEL	.252"	.255"	.255"	.252"
C	8" NOZZEL	.295"	.300"	.295"	.300"
D	48" STIRATOR ACCESS	.390"	.390"	.390"	.385"
E	12" NOZZEL	.345"	.345"	.345"	.345"
F	24" MANWAY	.255"	.260"	.250"	.255"
G	4" NOZZEL	.210"	.210"	.215"	.210"
H	48" STIRATOR ACCESS	.390"	.390"	.385"	.385"
I	4" NOZZEL	.210"	.210"	.215"	.210"
J	4" NOZZEL	.210"	.210"	.210"	.215"
K	SOUTH HEAD	N/A	N/A	N/A	N/A
L	6" NOZZEL	.250"	.250"	.252"	.252"
M	4" NOZZEL	.210"	.210"	.210"	.190"
N	4" NOZZEL	.205"	.210"	.210"	.205"
O	6" NOZZEL	.255"	.260"	.255"	.255"
P	6" NOZZEL	.255"	.255"	.255"	.255"

20

LETTER	ITEM DESCRIPTION	TOP/NORTH	BOTTOM/SOUTH	EAST	WEST
A	NORTH HEAD	N/A	N/A	N/A	N/A
B	6" NOZZEL	.285"	.262"	.275"	.265"
C	8" NOZZEL	.340"	.310"	.325"	.320"
D	48" STIRATOR ACCESS	.390"	.390"	.390"	.380"
E	12" NOZZEL	.345"	.345"	.345"	.345"
F	24" MANWAY	.260"	.260"	.255"	.245"
G	4" NOZZEL	.210"	.210"	.210"	.215"
H	48" STIRATOR ACCESS	.385"	.385"	.385"	.385"
I	4" NOZZEL	.210"	.210"	.210"	.215"
J	4" NOZZEL	.205"	.215"	.210"	.210"
K	SOUTH HEAD	N/A	N/A	N/A	N/A
L	6" NOZZEL	.252"	.252"	.252"	.252"
M	4" NOZZEL	.210"	.205"	.210"	.205"
N	4" NOZZEL	.210"	.210"	.210"	.190"
O	6" NOZZEL	.255"	.255"	.255"	.255"
P	6" NOZZEL	.255"	.250"	.255"	.255"

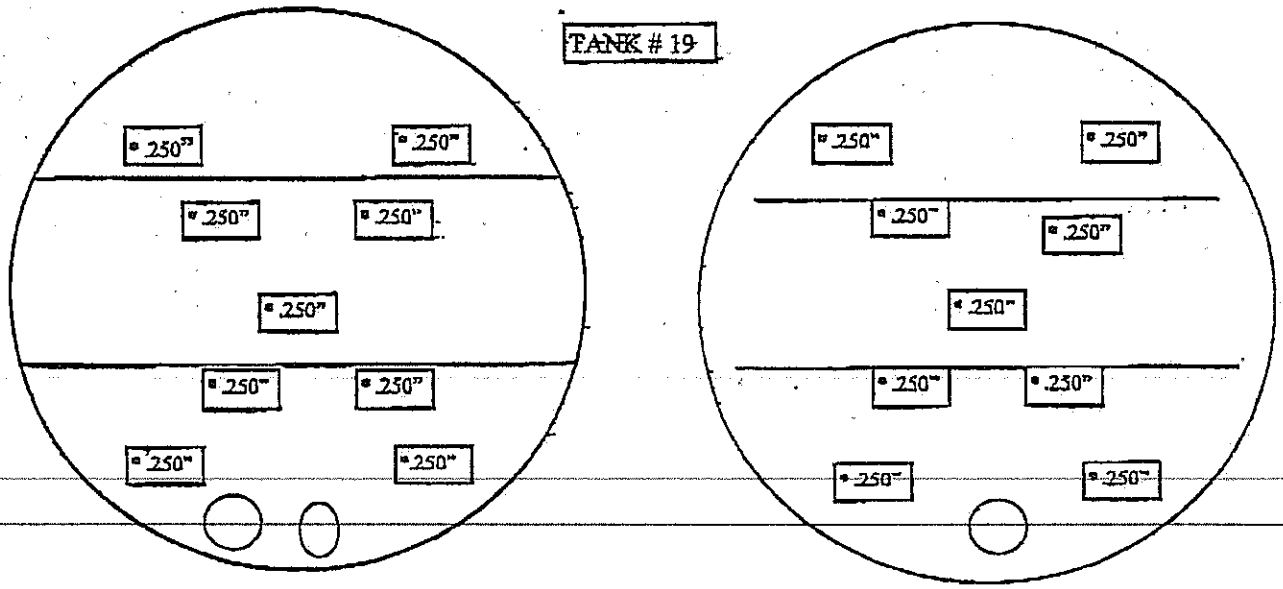
MQS Inspection, Inc. • 5307 West 86th Street • Indianapolis, IN 46268
(317) 872-8196 • FAX (317) 872-4798

HAZARDOUS WASTE TANKS 19 & 20

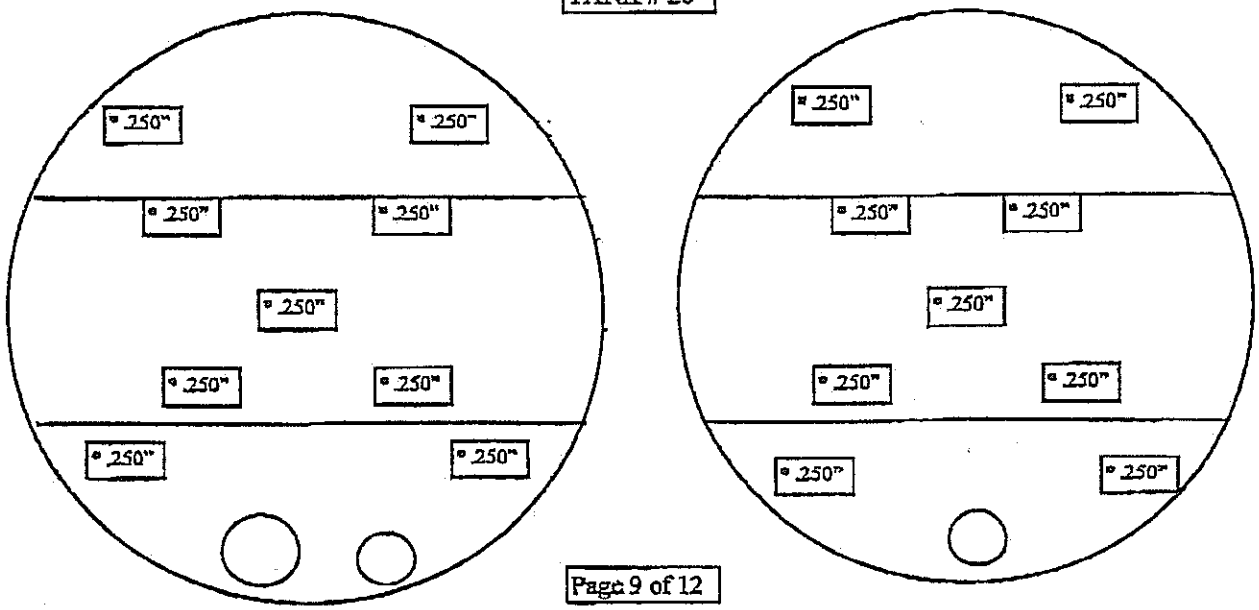
(RECLAIMED PAINT THINNER)

U. T. THICKNESS READINGS 2' X PATTERN ON HEADS

TANK # 19



TANK # 20



MQS

NDE TECHNIQUE RECORD/ULTRASONIC

FORM 22-A1-71

Facility QC Control No. 71F12931		Technique No. 01	
Client	BURNS & McDONNELL	P.O. No.	GM CORP
Item Description	RECLAIMED PAINT THINNER TANKS		
Part No.	TANKS 19 & 20	Drawing No.	N/A
Specification	API 650 ASTM E-797-90	Acceptance Class	Client Information
Procedure	MQS 22.H.700-90 REV. 0		

WELDS		OTHER TEST ITEMS	
Weld Joint	N/A	Type of Item	Plates / Pipe
Weld Process	N/A	Processing	N/A
Base Material	N/A	Material	Stainless Steel
Material Thickness	N/A	Dimensions	Various
Weld Length/OD	N/A	Additional Info	N/A
Surface Condition	N/A	Surface Condition	Smooth

PRECLEAN: Method N/A Material N/A Batch No. N/A

EQUIPMENT: Make Panametrics Model Epoch III 2300 S/N 96148207

PRESENTATION [X] A-SCAN [ ] B-SCAN [ ] C-SCAN

TRANSDUCERS:

Make techniso Model dfp0503gp S/N N-1047 Sound Beam Angle (Material) 0 deg.

Crystal Size 3/8" Dia. Crystal Material Ceramic Frequency 5.0 MHZ

Make N/A Model N/A S/N N/A Sound Beam Angle (Material) N/A

Crystal Size N/A Crystal Material N/A Frequency N/A

COUPLANT: Material ultragel II Manufacturer Sonotech Batch No. 96225

CALIBRATION BLOCK: Type Step wedge Material Mild Steel S/N 71-0049

METHOD [X] Contact [ ] Immersion [ ] Water Column

[X] Pulse Echo [ ] Resonance [ ] Through Transmission

SCANNING: [X] Manual [ ] Automatic

	Pattern	Spot	Scanning Speed	N/A	% Overlap	N/A
POST CLEAN:	Method					

OTHER INFORMATION:

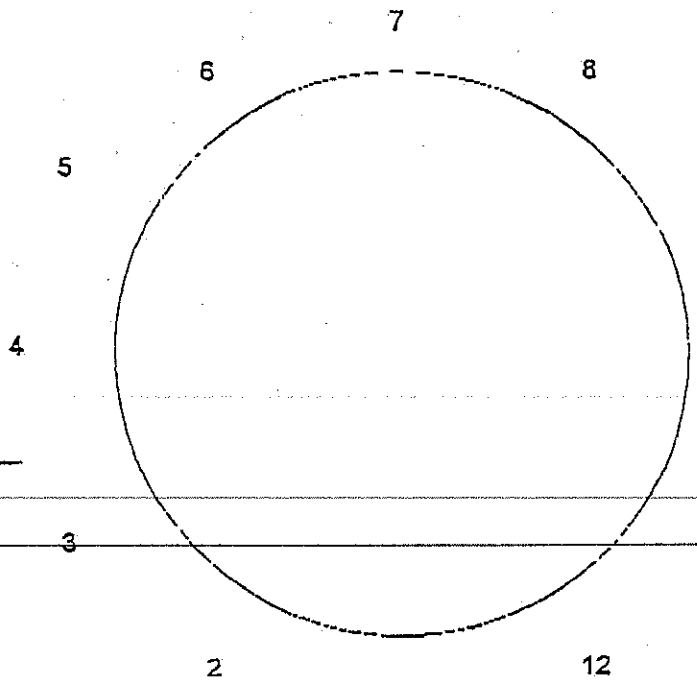
Prepared By: MICHAEL A. EVANS	Date 06-30-97	PAGE 10 OF 12

IQS Inspection, Inc.

HAZARDOUS WASTE TANK #19

(RECLAIMED PAINT THINNER)

Thickness Readings Locations



End View

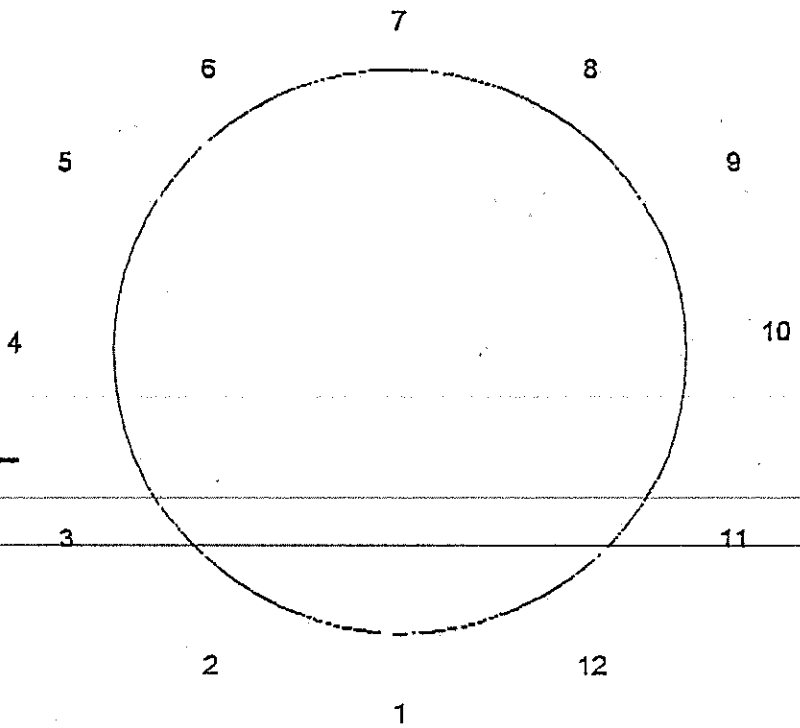
North Location	Plate# #1	#2	#3	#4	#5	#6	South
	Three Readings Per Plate North to South						
1	.245" .245" .245"	.245" .245" .245"	.245" .245" .245"	.245" .245" .245"	.245" .245" .245"	.245" .245" .245"	
2	.245" .245" .245"	.245" .245" .245"	.245" .245" .245"	.245" .245" .245"	.245" .245" .245"	.245" .245" .245"	
3	.245" .245" .245"	.245" .245" .245"	.245" .245" .245"	.245" .245" .245"	.245" .245" .245"	.245" .245" .245"	
4	.245" .245" .245"	.245" .245" .245"	.245" .245" .245"	.245" .245" .245"	.245" .245" .245"	.245" .245" .245"	
5	.245" .245" .245"	.245" .245" .245"	.245" .245" .245"	.245" .245" .245"	.245" .245" .245"	.245" .245" .245"	
6	.245" .245" .245"	.245" .245" .245"	.245" .245" .245"	.245" .245" .245"	.245" .245" .245"	.245" .245" .245"	
7	.245" .245" .245"	.245" .245" .245"	.245" .245" .245"	.245" .245" .245"	.245" .245" .245"	.245" .245" .245"	
8	.245" .245" .245"	.245" .245" .245"	.245" .245" .245"	.245" .245" .245"	.245" .245" .245"	.245" .245" .245"	
9	.245" .245" .245"	.245" .245" .245"	.245" .245" .245"	.245" .245" .245"	.245" .245" .245"	.245" .245" .245"	
10	.245" .245" .245"	.245" .245" .245"	.245" .245" .245"	.245" .245" .245"	.245" .245" .245"	.245" .245" .245"	
11	.245" .245" .245"	.245" .245" .245"	.245" .245" .245"	.245" .245" .245"	.245" .245" .245"	.245" .245" .245"	
12	.245" .245" .245"	.245" .245" .245"	.245" .245" .245"	.245" .245" .245"	.245" .245" .245"	.245" .245" .245"	

IQS Inspection, Inc.

HAZARDOUS WASTE TANK #20

(RECLAIMED PAINT THINNER)

Thickness Readings Locations



End View

North Location	Plate# Three Readings Per Plate North to South																	South
	#1			#2			#3			#4			#5			#6		
1	.245"	.245"	.245"	.245"	.245"	.245"	.245"	.245"	.245"	.245"	.245"	.245"	.245"	.245"	.245"	.245"	.245"	.245"
2	.245"	.245"	.245"	.245"	.245"	.245"	.245"	.245"	.245"	.245"	.245"	.245"	.245"	.245"	.245"	.245"	.245"	.245"
3	.245"	.245"	.245"	.245"	.245"	.245"	.245"	.245"	.245"	.245"	.245"	.245"	.245"	.245"	.245"	.245"	.245"	.245"
4	.245"	.245"	.245"	.245"	.245"	.245"	.245"	.245"	.245"	.245"	.245"	.245"	.245"	.245"	.245"	.245"	.245"	.245"
5	.245"	.245"	.245"	.245"	.245"	.245"	.245"	.245"	.245"	.245"	.245"	.245"	.245"	.245"	.245"	.245"	.245"	.245"
6	.245"	.245"	.245"	.245"	.245"	.245"	.245"	.245"	.245"	.245"	.245"	.245"	.245"	.245"	.245"	.245"	.245"	.245"
7	.245"	.245"	.245"	.245"	.245"	.245"	.245"	.245"	.245"	.245"	.245"	.245"	.245"	.245"	.245"	.245"	.245"	.245"
8	.245"	.245"	.245"	.245"	.245"	.245"	.245"	.245"	.245"	.245"	.245"	.245"	.245"	.245"	.245"	.245"	.245"	.245"
9	.245"	.245"	.245"	.245"	.245"	.245"	.245"	.245"	.245"	.245"	.245"	.245"	.245"	.245"	.245"	.245"	.245"	.245"
10	.245"	.245"	.245"	.245"	.245"	.245"	.245"	.245"	.245"	.245"	.245"	.245"	.245"	.245"	.245"	.245"	.245"	.245"
1	.245"	.245"	.245"	.245"	.245"	.245"	.245"	.245"	.245"	.245"	.245"	.245"	.245"	.245"	.245"	.245"	.245"	.245"
2	.245"	.245"	.245"	.245"	.245"	.245"	.245"	.245"	.245"	.245"	.245"	.245"	.245"	.245"	.245"	.245"	.245"	.245"

Clevenger, Kari

From: Taylor Lyon <taylor.lyon@gm.com>
Sent: Thursday, June 20, 2024 11:18 AM
To: Clevenger, Kari
Cc: Matthew Arbuckle; Glenn Perham
Subject: RE: ESP Incentive Advanced Notice of Inspection
Attachments: Initial followup information and correction actions.pdf; Glenn Perham RCRA Haz Cert.pdf; purge thinner reclaim daily inspection form for June to provide to IDEM; Tank 19 Integrity Test Excerpt-Certification - June 1997.pdf; Volume of reclaim purge in tank 19 on 6/18/24; RCRA-05-2004-0001 CA CAFO.pdf; spent purge solvent / purge pot diagram to provide to IDEM

Kari,
Please see attachments in regards to requested information and corrective actions with photos.

Taylor

From: Clevenger, Kari <KCleveng@idem.IN.gov>
Sent: Thursday, June 20, 2024 9:52 AM
To: Taylor Lyon <taylor.lyon@gm.com>
Cc: Matthew Arbuckle <matt.arbuckle@gm.com>
Subject: [EXTERNAL] RE: ESP Incentive Advanced Notice of Inspection

Taylor,

Sounds good. I will talk to you then.

Kari Clevenger
Senior Environmental Manager
Hazardous Waste Compliance

(317) 760-3702 • kcleveng@idem.in.gov

www.idem.IN.gov

From: Taylor Lyon <taylor.lyon@gm.com>
Sent: Thursday, June 20, 2024 9:27 AM
To: Clevenger, Kari <KCleveng@idem.IN.gov>
Cc: Matthew Arbuckle <matt.arbuckle@gm.com>
Subject: RE: ESP Incentive Advanced Notice of Inspection

**** This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email. ****

Will 11:30am work? If so, we will call you then with the number listed below.

From: Clevenger, Kari <KCleveng@idem.IN.gov>
Sent: Thursday, June 20, 2024 8:53 AM
To: Taylor Lyon <taylor.lyon@gm.com>
Cc: Matthew Arbuckle <matt.arbuckle@gm.com>
Subject: [EXTERNAL] RE: ESP Incentive Advanced Notice of Inspection

ATTENTION: This email originated from outside of GM.

Taylor,

I am not available after 12:30 today. I have a meeting from 10:30-11:00am today as well. I have time tomorrow if that works better in terms of time. I have the following available 8-10 am and 1-4pm. Let me know what works.

Kari Clevenger
Senior Environmental Manager
Hazardous Waste Compliance

(317) 760-3702 • kcleveng@idem.in.gov

www.idem.IN.gov

From: Taylor Lyon <taylor.lyon@gm.com>
Sent: Thursday, June 20, 2024 8:47 AM
To: Clevenger, Kari <KCleveng@idem.IN.gov>
Cc: Matthew Arbuckle <matt.arbuckle@gm.com>
Subject: RE: ESP Incentive Advanced Notice of Inspection
Importance: High

**** This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email. ****

Good morning!
We have corrected all concerns raised and would like to speak to you prior to your submission of the report if possible. Are you available today around noon? I will send all requested material shortly. Thank you!

Taylor

From: Clevenger, Kari <KCleveng@idem.IN.gov>
Sent: Monday, June 17, 2024 8:03 AM
To: Larry Wade Jr <larry.wade@gm.com>; Taylor Lyon <taylor.lyon@gm.com>
Subject: [EXTERNAL] ESP Incentive Advanced Notice of Inspection

ATTENTION: This email originated from outside of GM.

Taylor,

I am providing advanced notice of intent of a hazardous waste inspection at Fort Wayne Assembly General Motors LLC per ESP incentive. Please confirm receipt of this email.

Kari Clevenger
Senior Environmental Manager
Hazardous Waste Compliance

(317) 760-3702 • kcleveng@idem.in.gov

www.idem.IN.gov

Nothing in this message is intended to constitute an electronic signature unless a specific statement to the contrary is included in this message.

Confidentiality Note: This message is intended only for the person or entity to which it is addressed. It may contain confidential and/or privileged material. Any review, transmission, dissemination or other use, or taking of any action in reliance upon this message by persons or entities other than the intended recipient is prohibited and may be unlawful. If you received this message in error, please contact the sender and delete it from your computer.

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Fort Wayne Assembly IDEM Waste Inspection 06.18.24

- Response to IDEM findings
  - EPA's Generator Improvements Rule : Not all hazards are marked on all hazardous waste drums - SAA & 90-day pad locations
    - Following slides show corrections made
      - All drums have been corrected
  - Cracks in the lining of the Hazardous waste containment area for spent purge at the tank farm.
    - Cracks in the lining have been repaired; see pictures. No cracks present in the concrete beneath the lining.
    - FWA submitted notification earlier this month to manage purge as Hazardous Secondary Material, which does not require a lining for secondary containment.

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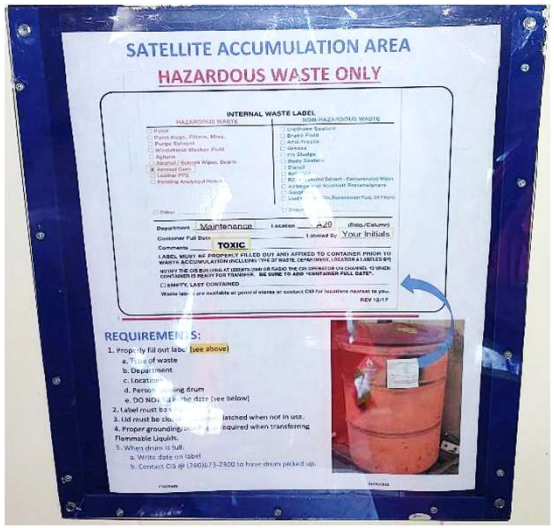
ONE TEAM · BUILT TO WIN

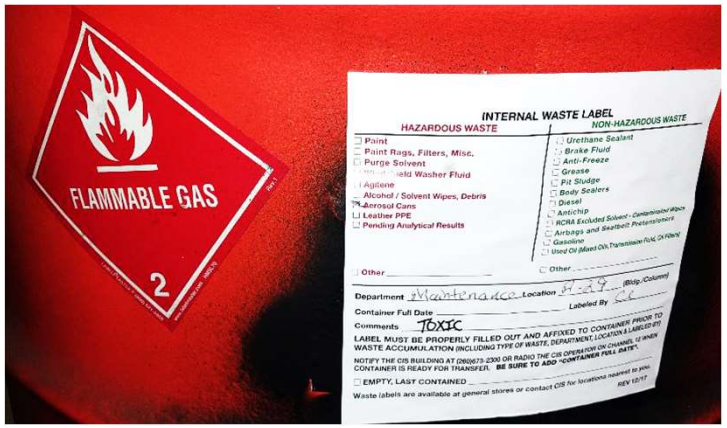
Posting Revision and Drum Label Update

Location: Mechanical Room (aerosol cans), SAA1

Hazards: Flammable, Toxic

Update: Added “Toxic” to label example on SAA posting and to label on drum





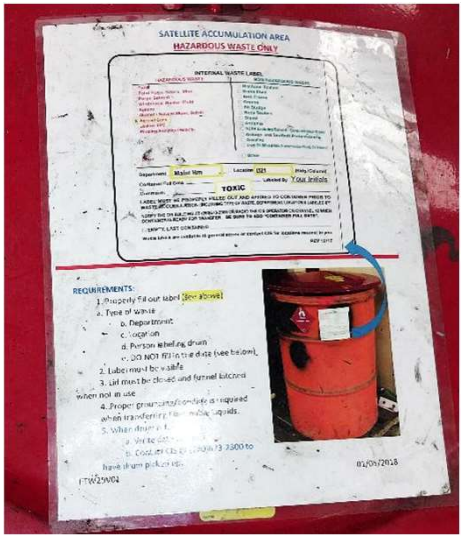
MANUFACTURING
ONE TEAM · BUILT TO WIN

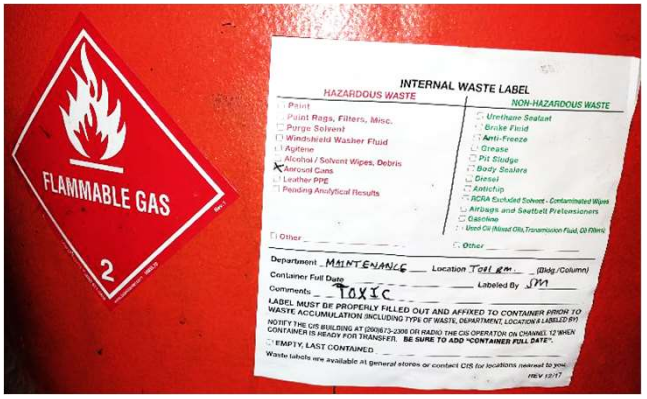
Posting Revision and Drum Label Update

Location: Tool Room (aerosol cans), SAA5

Hazards: Flammable, Toxic

Update: Added “Toxic” to label example on SAA posting and to label on drum





MANUFACTURING
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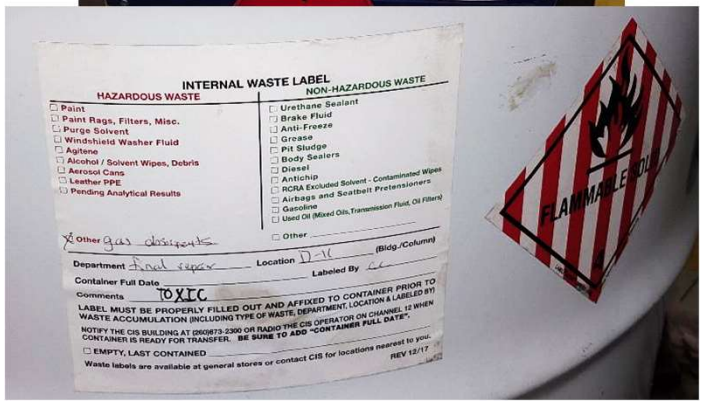
Posting Revision and Drum Label Update

Location: Final Repair (flammable solids w/ gas), SAA9

Hazards: Flammable, Toxic

Update: Added “Toxic” to label example on SAA posting and to label on drum



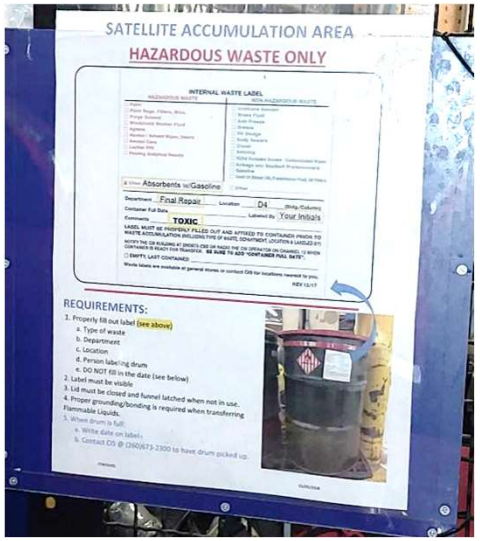
MANUFACTURING
ONE TEAM · BUILT TO WIN

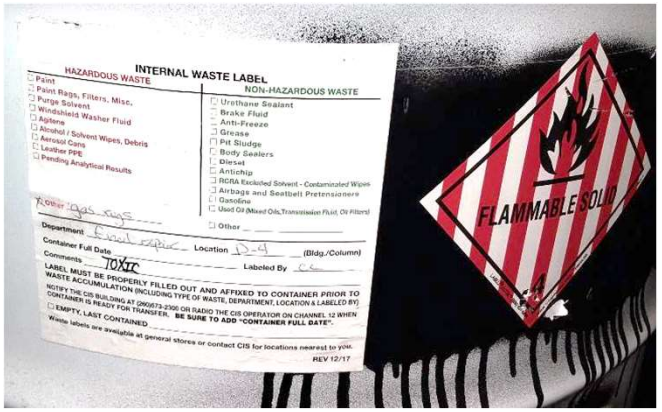
Posting Revision and Drum Label Update

Location: Final Repair (flammable solids w/ gas), SAA11

Hazards: Flammable, Toxic

Update: Added “Toxic” to label example on SAA posting and to label on drum





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Posting Revision and Drum Label Update

Location: Final Repair (empty paint cans), SAA13

Hazards: Flammable, Toxic

Update: Added “Toxic” to label example on SAA posting and to label on drum

MANUFACTURING
ONE TEAM · BUILT TO WIN

Posting Revision and Drum Label Update

Location: Final Repair (paint pens), SAA15 & SAA16

Hazards: Flammable, Toxic

Update: Added “Toxic” to label examples on SAA postings and to labels on drums

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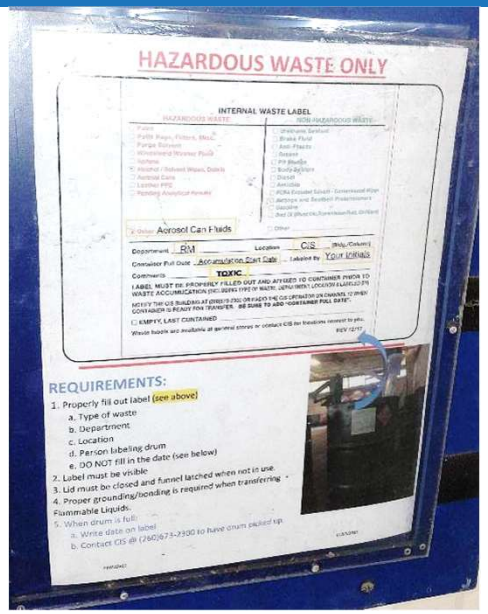
Note: photos taken from outside of doorway due to the intrinsically safe designated area

Posting Revision and Drum Label Update

Location: CIS (aerosol can liquids), 90-day pad

Hazards: Flammable, Toxic

Update: Added “Toxic” to label example on SAA posting and to label on drum



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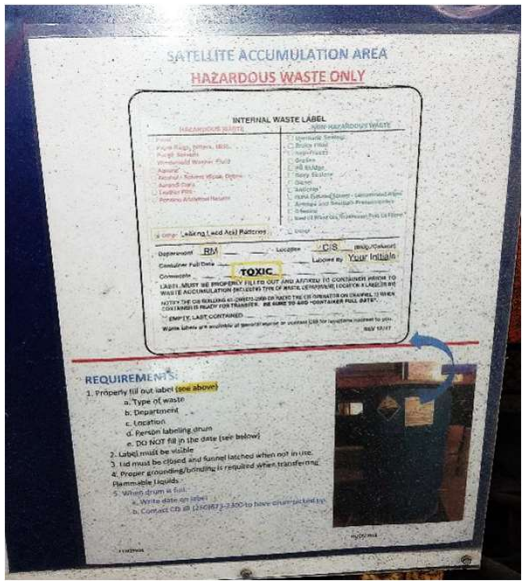
Posting Revision and Drum Label Update

Location: CIS Building (leaking lead acid batteries), SAA41

Hazards: Corrosive, Toxic

Update: Added “Toxic” to label example on SAA posting and to label on drum



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Posting Revision and Drum Label Update

Location: Tank Farm (tank farm liquids), SAA42

Hazards: Flammable, Toxic

Update: Added “Toxic” to label example on SAA posting and to label on drum

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Posting Revision and Drum Label Update

- Location: Tank Farm (tank farm solid rags, etc), SAA43
- Hazards: Flammable, Toxic
- Update: Added “Toxic” to label example on SAA posting and to label on drum

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ONE TEAM · BUILT TO WIN

Posting Revision and Drum Label Update

- Location: Paint Mix (paint, purge solvent), SAA52, SAA53, SAA54, & SAA55
- Hazards: Flammable, Toxic
- Update: Added “Toxic” to label examples on SAA postings and to labels on drums

Note: No photos taken due to intrinsically safe device requirements in area

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Posting Revision and Drum Label Update

90-Day Drum Label Updates: Added “Toxic” where applicable

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Posting Revision and Drum Label Update

90-Day Drum Label Updates: Added “Toxic” where applicable

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Posting Revision and Drum Label Update

90-Day Drum Label Updates: Added “Toxic” where applicable

MANUFACTURING
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Posting Revision and Drum Label Update

90-Day Drum Label Updates: Added “Toxic” where applicable

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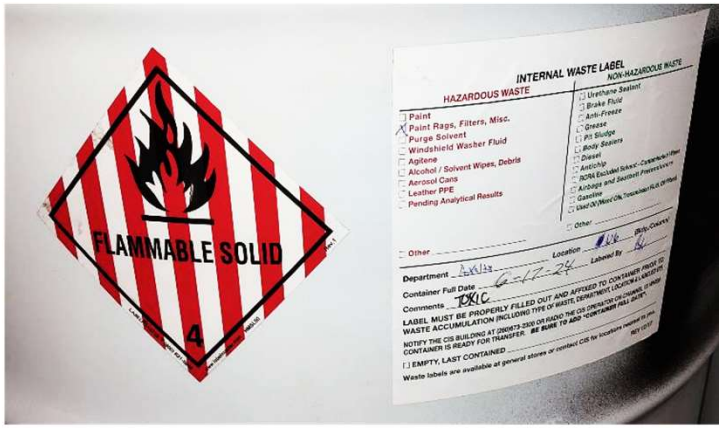
Posting Revision and Drum Label Update

90-Day Drum Label Updates: Added “Toxic” where applicable



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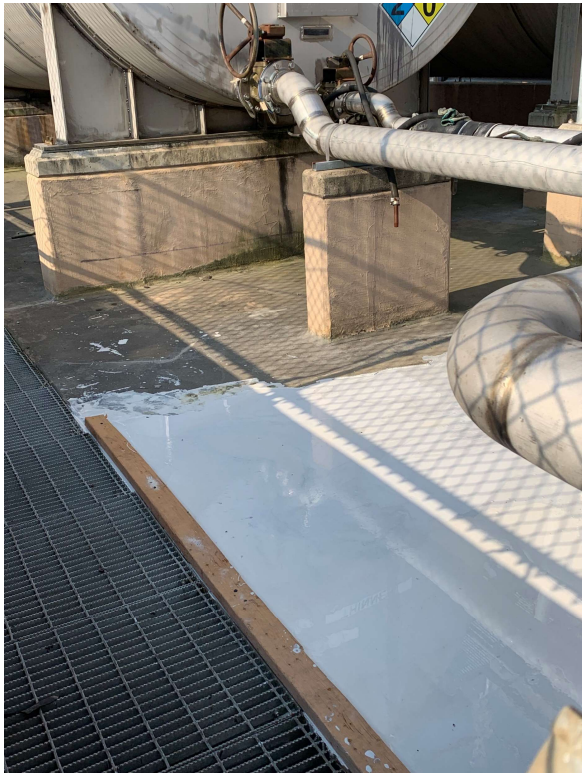
Secondary Containment Liner Repair



MANUFACTURING
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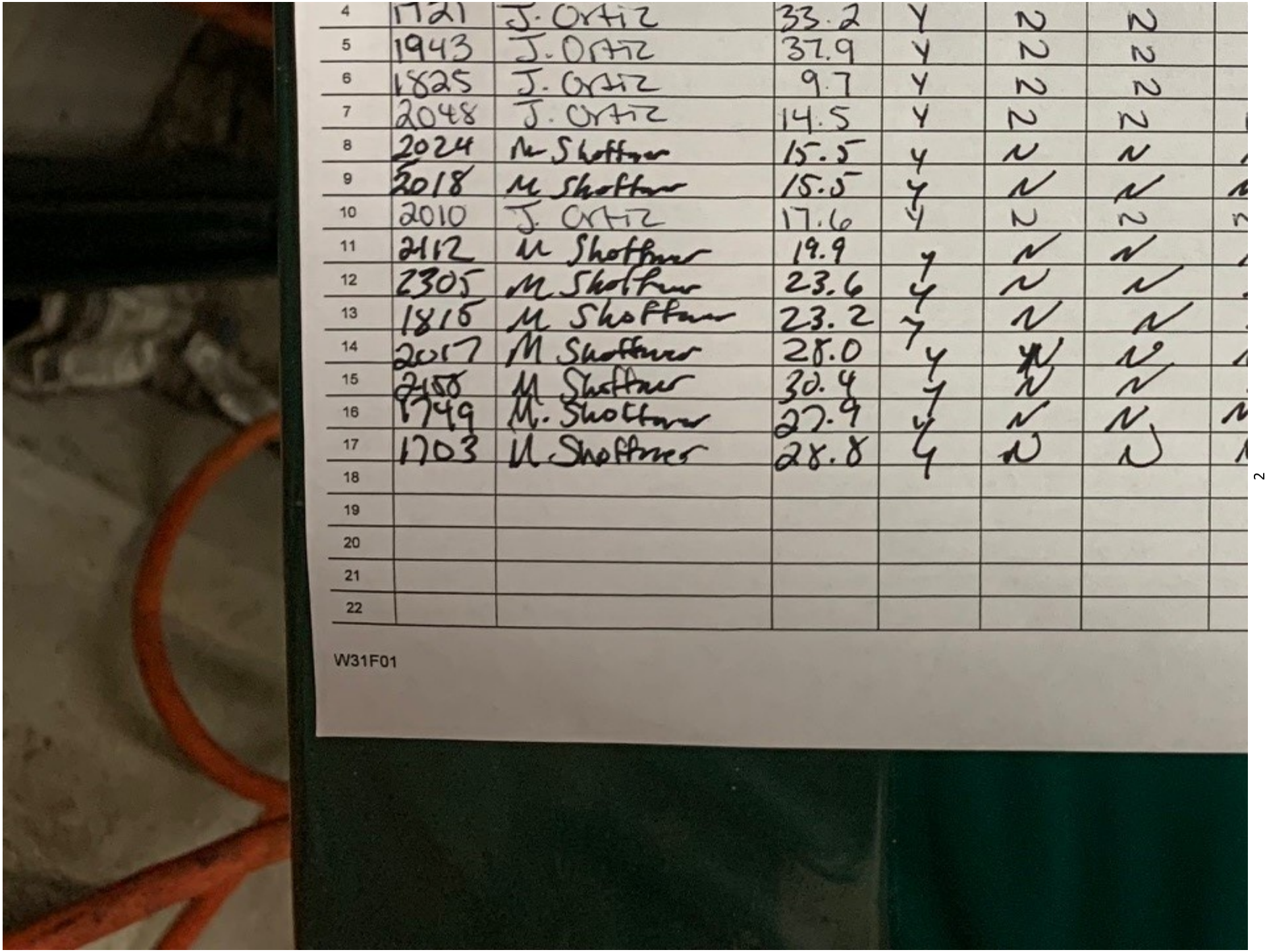
Clevenger, Kari

From: Matthew Arbuckle <matt.arbuckle@gm.com>
Sent: Tuesday, June 18, 2024 7:47 PM
To: Taylor Lyon
Subject: purge thinner reclaim daily inspection form for June to provide to IDEM

Here's the purge record we owe IDEM



4	1721	J. Ortiz	33.2	Y	2	2	
5	1943	J. Ortiz	37.9	Y	2	2	
6	1825	J. Ortiz	9.7	Y	2	2	
7	2048	J. Ortiz	14.5	Y	2	2	
8	2024	M Shaffner	15.5	Y	N	N	
9	2018	M Shaffner	15.5	Y	N	N	
10	2010	J. Ortiz	17.6	Y	2	2	
11	2112	M Shaffner	19.9	Y	N	N	
12	2305	M Shaffner	23.6	Y	N	N	
13	1816	M Shaffner	23.2	Y	N	N	
14	2017	M Shaffner	28.0	Y	N	N	
15	2150	M Shaffner	30.4	Y	N	N	
16	1749	M. Shaffner	27.9	Y	N	N	
17	1703	M Shaffner	28.8	Y	N	N	
18							
19							
20							
21							
22							

W31F01

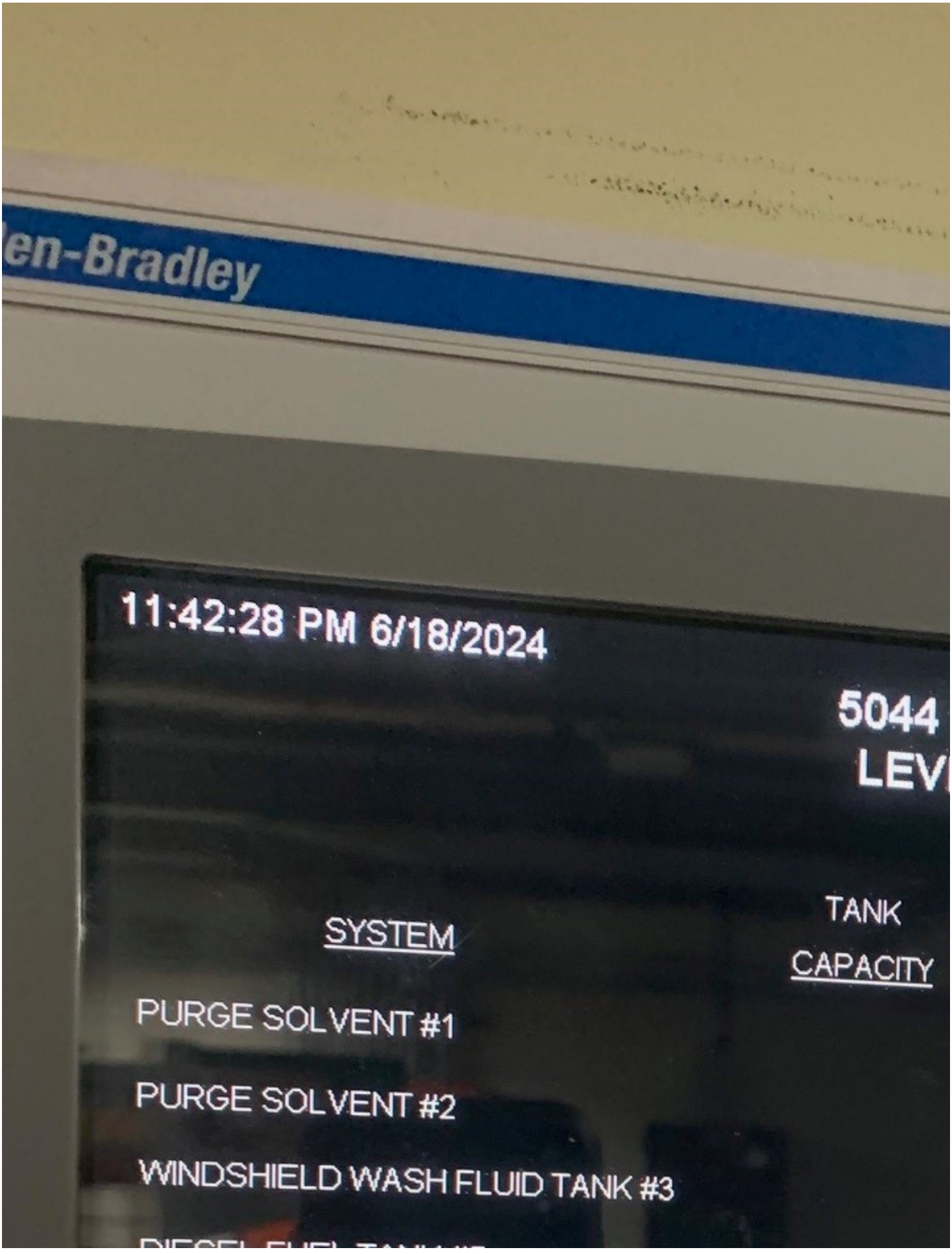
2

Sent from my iPhone

Clevenger, Kari

From: Matthew Arbuckle <matt.arbuckle@gm.com>
Sent: Thursday, June 20, 2024 9:43 AM
To: Taylor Lyon
Subject: Volume of reclaim purge in tank 19 on 6/18/24
Attachments: Tank volume conversion chart in to gal.docx

At 32.6 inches depth for the reclaim purge solvent tank (see picture below), the gallons of reclaim purge present is about 3900 gallons.

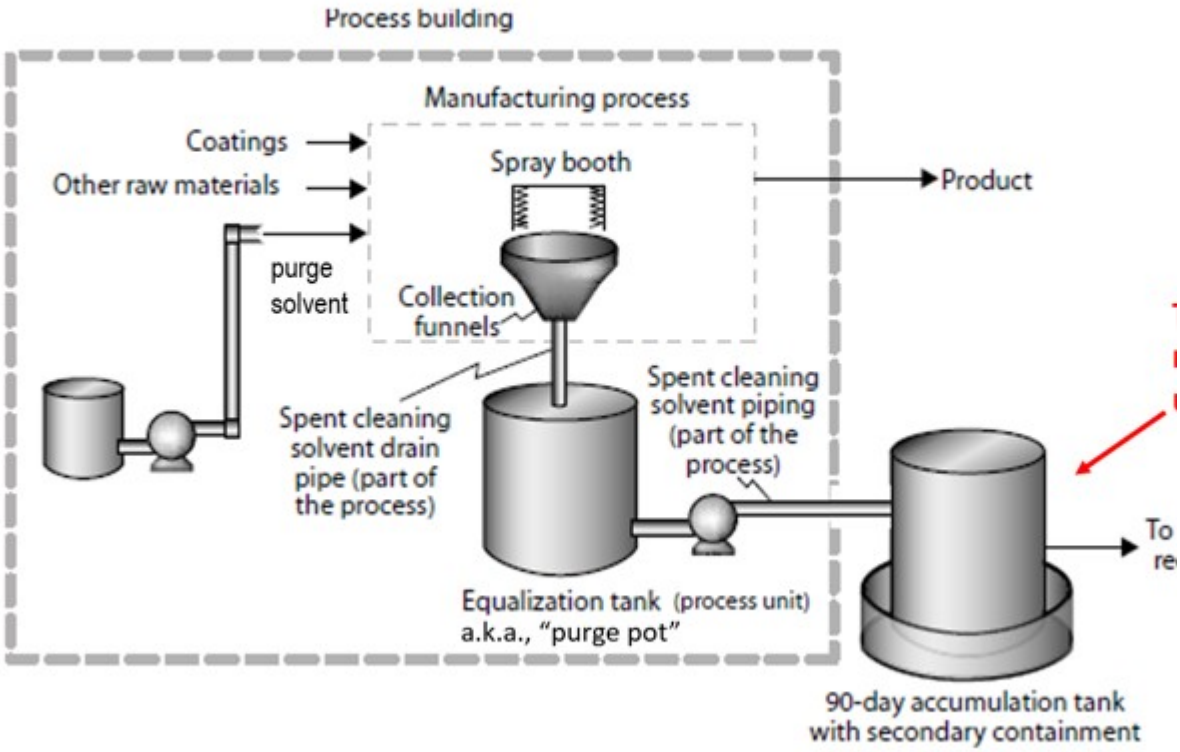

en-Bradley
11:42:28 PM 6/18/2024
5044
LEV
SYSTEM
TANK
CAPACITY
PURGE SOLVENT #1
PURGE SOLVENT #2
WINDSHIELD WASH FLUID TANK #3

Sent from my iPhone

Clevenger, Kari

From: Matthew Arbuckle <matt.arbuckle@gm.com>
Sent: Tuesday, June 18, 2024 5:58 PM
To: Taylor Lyon
Subject: spent purge solvent / purge pot diagram to provide to IDEM

How spent solvent systems at GM Facilities are managed, as a result of the 2009 settlement with EPA



Site Specific OJT General Assembly

AUS Security Solutions

Training Topic(s) to be Covered: General Assembly Floor Officer - 16 hours
Location of Training: Fort Wayne Assembly GMC

Participant: 1st Name: Jailene Last Name: Ortiz M.I. T

Supervisor: 1st Name: Kevin Last Name: Wilken M.I. ___

Start Date: 11/10/23 **End Date:** 11/10/23

Training Subject	Trainee Initials	Training Officers Initials	Date Trained/ Review
Daily Checks – 1st, 2nd and 3rd Shift	JO	KW	11/10
Mechanical Room Pump Room – Diesel & Jockey	JO	KW	11/10
Company Car Garage	JO	KW	11/10
GA Paint Kitchen – Fire doors; Ground wires; Purge; Fire Cabinets	JO	KW	11/10
Training Center – Admin – UAW	JO	KW	11/10
Transformer Rooms on Roof of GA 1,2,3	JO	RY	11/10
Data Gathering Panels (DGP) – Amp Racks	JO	RY	11/10
Administration – Penthouse, Air Handling Units, Roof, Unlocks, Mail Room, Vaults, Department Areas	JO	RY	11/10
GMIT – CO2 Sys, Panel, Heat Detectors, Aborting CO2 Sys, Sub-Floor Access, Manual Discharge of CO2 Sys	JO	KW	11/10
Engineering Mezz – Elevator, Stair Access	JO	RY	11/10
UAW Offices	JO	KW	11/10
Operations Support Center	JO	RY	11/10
Maintenance Mezz	JO	RY	11/10
Conveyor Pits – entry – Metering	JO	RY	11/10
Overhead Conveyor Decks	JO	RY	11/10
Key Round Patrol General Assembly	JO	KW	11/10
VIN Labels	JO	KW	11/10
Radio Operations	JO	RY	11/10
Material Sequencing Additions – NLOC & SLOC	JO	KW	11/10
Fork Truck Repair General Assembly	JO	KW	11/10
Fuel fill – No hot work.	JO	KW	11/10
Maintenance Shops	JO	KW	11/10
Nerve Center CC-45 SLOC	JO	KW	11/10
Windshield Install – Robot Cell Zones SLOC	JO	RY	11/10
Frame Pad	JO	KW	11/10
Chassis, Motor, Trim, Final, Final Repair, Care Line	JO	RY	11/10
Roof Access Locations F11, F18, F40	JO	RY	11/10
Emergency Vehicles – Ambulance, C/S Cart, Spill Cart, Golf Cart	JO	KW	11/10
First Aid Jump Kit and AED	JO	KW	11/10
L-dock, Tire conveyor	JO	RY	11/10
Toe-In Pits, Roll Test, Water Test	JO		11/10
Overhead Door Entrances and Egress procedure	JO	KW	11/10

Site Specific OJT General Assembly

Training Subject	Trainee Initials	Training Officers Initials	Date Trained/ Review
Audit Room (Rubber Room) OSC	JO	KW	11/10
ERP and Procedure books – review and familiarize	JO	KW	11/10
Evacuation & Take Shelter Areas	JO	KW	11/10
Unlocks Requiring GM Supervisor & Committeeman	JO	KW	11/10
Regular Unlocks	JO	RY	11/10
Safety Lock Removal Procedures	JO	RY	11/10
Responding to Emergencies -- Safety First	JO	RY	11/10
Turnstiles (Main, SLOC, Care Line)	JO	RY	11/10

I have received the training as listed above. I understand the performance expectations, job requirements and General Post Orders. All my questions have been answered to my satisfaction.

Participants Name (Print)	Participants Signature	AUS Number	Contract Number	Years on Account
Jailene Ortiz	Jailene Ortiz	96598824	637516	New Hire

Supervisor's 40 Hour Training Program

Supervisor in Training: Jailene Ortiz

Date Start: 1-9-24 Date Completed: 4-10-24

I. Daily Shift Operations

a. Monitoring conditions on the shift
   i. Post visits
   ii. Officer Uniform Inspections
   iii. Equipment (automobile, radios, uniforms)
b. Time control sign in sheet
c. Differences in Shift operations for all three shifts (shift duties)
d. Checking Security posts
   i. Appearance Scorecard questions
e. Coordination with GM management on various issues
f. Environmental Checks

Supervisor Trainer/ Dates Trained:

Trainer: Joe Nevares Date: 1-9-24

Trainer: _____ Date: _____

II. Evaluation, training and supervision of shift officers

a. Performance and Appearance of Officers
b. Annual Training
c. Pre-assignment training
d. Weekly Emergency Preparedness Drills
e. Supervising Floor and Post training

Supervisor Trainer/ Dates Trained:

Trainer: Joe Nevares Date: 1/9/24

Trainer: _____ Date: _____

III. Safety

a. Plant wide Safety meetings
b. Plant Safety walks
c. Shift Safety meetings
d. GM and UAW Safety personnel
e. Local Safety procedures (Big Safety book)
f. Review confined space procedures

Supervisor Trainer/ Dates Trained:
Trainer: Joe Nevares Date: 1/9/24
Trainer: _____ Date: _____

IV. Fire Prevention and Chapter 7 Hot Work – Supervisor's role

a. Cutting and welding review
b. Fire Inspection (AUS's' SOP's and Policies for Fire Protection, Fire Prevention and Emergency Response)
c. Cypress
    i. alarms and proprietary system
    ii. battery back-up
d. Miscellaneous – Admin. Key rounds and Watch tour patrol auditing

Supervisor Trainer/ Dates Trained:
Trainer: Joe Nevares Date: 1-15-2024
Trainer: _____ Date: _____

V. Report Guidelines

a. Make sure that every report answers **Who** was involved, **What** Happened, **Where** did it happen, **When** did it happen, **Why** did it happen, **How** did it happen.
b. Different types of report forms and Online reporting, AIMS
c. Evaluating and correcting reports
d. Global Incident Notification and Reporting Matrix
e. Local AIMs Routing Matrix
f. Reporting via email
g. Access to report files and authorization to release reports
h. Employee Relations and reports
i. Composing and getting authorization to release memorandums
j. Verbal communications
k. Pass on information for AUS and GM personnel
l. Daily Activity Reports – Review every D.A.R. before the Officer leaves to assure you answer any questions you may have.
    i. Supervisor
    ii. Unit 11
    iii. Unit 12
    iv. Unit 10
    v. Fire Officer

Supervisor Trainer/ Dates Trained:

Trainer: Jack Hurley Date: 4-9-24

Trainer: _____ Date: _____

VI. Ensure Compliance with AUS General Orders and Regulations, Attendance policy, Disciplinary Actions, Overtime Equalization and Appearance Standards.

a. AUS Security Officer Handbook and Human Resources related
b. AUS Attendance Policy
c. AUS Overtime Equalization policy
d. Employees' First Report requirements
e. Supervisor's Investigation report forms
f. Filling posts for Late and Absentee employees
g. Employee lunches and breaks
h. Disciplinary guidelines
    i. Coaching and Counseling officers
    ii. Documenting Discipline - Filling out a disciplinary form.
    iii. Delivering the Disciplinary form

Supervisor Trainer/ Dates Trained:

Trainer: Jack Henry Date: 4-9-24

Trainer: _____ Date: _____

VII. Ensure Implementation of and assist in enforcement and reporting of violations of
    i. GM Policies and Procedures.

b. Global Security Manual – all applicable Security and Fire sections
c. Emergency procedures (ERP) - Take Shelter, Severe Weather,
    i. Evacuations and Snow Removal
d. Local Plant Procedures – Overview
    i. All Plant and Security procedure books
    ii. Overview Identification and Access system - Badging
    iii. Visits by outside agencies and law enforcement
    iv. Plant Lock and Key policy and Safety lock program policy
    v. ISO 14001 and ISO 9002 – ISO Menu on computer
    vi. Medical Emergencies on non-production days
    vii. Local GM hourly Time and Attendance procedures
    viii. Plant Time Clock operations
    ix. Obtaining timecards and weight scale tickets.
    x. FWA Towing procedure
e. Local Health and Safety programs (Confined Space, Fire Protection program, CPPRP and Environmental checks, etc.)
f. Supervisor's role in editing GM procedure books and requesting updates to local procedures.

Supervisor Trainer/ Dates Trained:

Trainer: Jack Henry Date: 4-9-24

Trainer: _____ Date: _____

VIII. AUS Scheduling and Billing - Overview

a. Introduction to Scheduling
b. Baseline hours and Baselines-not covered
c. Billable and un-billable overtime
d. Conditions for Service Requests
e. Forms – Sign-in payroll and Daily Assignment Sheet
f. Change of Shift Agreements, Personal and vacation day requests/approvals

Supervisor Trainer/ Dates Trained:

Trainer: _____ Date: _____
Trainer: JACK HENRY Date: 4/10/24

IX. Miscellaneous Information

a. Special Keys- Key room - gray cabinet
b. Meter calibration
c. Body shop Safety Locks for cells- Replacement procedure
d. Emergency Notifications-phone list
e. Environmental checks
f. CIS Access on 2nd &3rd shift, & on non-production days when not manned
g. Processed Fluids Bldg. sump alarm
h. Fueling car and truck
i. Accessing filing cabinets in copier area (Clerk Area in Security)
j. Evidence room procedure
k. Red Cross cabinet

Supervisor Trainer/ Dates Trained:

Trainer: Jack Henry Date: 4/10/24
Trainer: _____ Date: _____

ADDITIONAL / REMEDIAL TRAINING

Site Specific OJT General Assembly

AUS Security Solutions

Training Topic(s) to be Covered: General Assembly Floor Officer
Location of Training: Fort Wayne Assembly GMC

Participant: 1st Name: Kevin Last Name: Wilkens KW M.I. ___

Supervisor: 1st Name: Andrew Last Name: Mergy M.I. ___

Start Date: 11-14-23 **End Date:** _____

Training Subject	Trainee Initials	Training Officers Initials	Date Trained/ Review
Daily Checks – 1st, 2nd and 3rd Shift	KW	AM	11-14-23
Mechanical Room Pump Room – Diesel & Jockey	KW	AM	11-14-23
Company Car Garage	KW	AM	11-14-23
GA Paint Kitchen – Fire doors; Ground wires; Purge; Fire Cabinets	KW	AM	11-14-23
Training Center – Admin -- UAW			
Transformer Rooms on Roof of GA 1,2,3	KW	AM	11-14-23
Data Gathering Panels (DGP) – Amp Racks	KW	AM	11-14-23
Administration – Penthouse, Air Handling Units, Roof, Unlocks, Mail Room, Vaults, Department Areas			
GMIT – CO2 Sys, Panel, Heat Detectors, Aborting CO2 Sys, Sub-Floor Access, Manual Discharge of CO2 Sys	KW	AM	11-14-23
Engineering Mezz – Elevator, Stair Access	KW	AM	11-14-23
UAW Offices	KW	AM	11-14-23
Operations Support Center	KW	AM	11-14-23
Maintenance Mezz	KW	AM	11-14-23
Conveyor Pits – entry – Metering	KW	AM	
Overhead Conveyor Decks	KW	AM	11-14-23
Key Round Patrol General Assembly	KW	AM	11-14-23
VIN Labels	KW	AM	11-14-23
Radio Operations	KW	AM	11-14-23
Material Sequencing Additions – NLOC & SLOC	KW	AM	11-14-23
Fork Truck Repair General Assembly	KW	AM	11-14-23
Fuel fill -- No hot work.	KW	AM	11-14-23
Maintenance Shops	KW	AM	11-14-23
Nerve Center CC-45 SLOC	KW	AM	11-14-23
Windshield Install – Robot Cell Zones SLOC	KW	AM	11-14-23
Frame Pad	KW	AM	11-14-23
Chassis, Motor, Trim, Final, Final Repair, Care Line			
Roof Access Locations F11, F18, F40	KW	AM	11-14-23
Emergency Vehicles – Ambulance, C/S Cart, Spill Cart, Golf Cart	KW	AM	11-14-23
First Aid Jump Kit and AED	KW	AM	11-14-23
L-dock, Tire conveyor	KW	AM	11-14-23
Toe-In Pits, Roll Test, Water Test	KW	AM	11-14-23
Overhead Door Entrances and Egress procedure	KW	AM	11-14-23

Site Specific OJT General Assembly

Training Subject	Trainee Initials	Training Officers Initials	Date Trained/ Review
Audit Room (Rubber Room) OSC	KW	AM	11-14-23
ERP and Procedure books – review and familiarize	KW	AM	11-14-23
Evacuation & Take Shelter Areas	KW	AM	11-14-23
Unlocks Requiring GM Supervisor & Committeeman	KW	AM	11-14-23
Regular Unlocks	KW	AM	11-14-23
Safety Lock Removal Procedures	KW	AM	11-14-23
Responding to Emergencies -- Safety First	KW	AM	11-14-23
Turnstiles (Main, SLOC, Care Line)	KW	AM	11-14-23

I have received the training as listed above. I understand the performance expectations, job requirements and General Post Orders. All my questions have been answered to my satisfaction.

Participants Name (Print)	Participants Signature	AUS Number	Contract Number	Years on Account
KEVIN WILKES	[signature]	9563137	637516	New Hire

Supervisor's 40 Hour Training Program

Supervisor in Training: Kevin Wilken

Date Start: 9-26-23 Date Completed: 9-29-23

I. Daily Shift Operations

- ✓ a. Monitoring conditions on the shift
  - ✓ i. Post visits
  - ✓ ii. Officer Uniform Inspections
  - ✓ iii. Equipment (automobile, radios, uniforms)
- ✓ b. Time control sign in sheet
- ✓ c. Differences in Shift operations for all three shifts (shift duties)
- ✓ d. Checking Security posts
  - i. Appearance Scorecard questions
- ✓ e. Coordination with GM management on various issues
- ✓ f. Environmental Checks

Supervisor Trainer/ Dates Trained:

Trainer: Grayson Denton Date: 9-26-23

Trainer: [signature] Date: 9-29-23

II. Evaluation, training and supervision of shift officers

a. Performance and Appearance of Officers
b. Annual Training
c. Pre-assignment training
d. Weekly Emergency Preparedness Drills
e. Supervising Floor and Post training

Supervisor Trainer/ Dates Trained:

Trainer: Jack Neary Date: 9-26-23

Trainer: [signature] Date: 9-29-23

III. Safety

- ✓ a. Plant wide Safety meetings
- ✓ b. Plant Safety walks
- ✓ c. Shift Safety meetings
- ✓ d. GM and UAW Safety personnel
- ✓ e. Local Safety procedures (Big Safety book)
- ✓ f. Review confined space procedures

Supervisor Trainer/ Dates Trained:

Trainer: Grayson Denton Date: 9-26-23

Trainer: [signature] Date: 9-29-23

IV. Fire Prevention and Chapter 7 Hot Work – Supervisor's role

- ✓ a. Cutting and welding review
- ✓ b. Fire Inspection (AUS's' SOP's and Policies for Fire Protection, Fire Prevention and Emergency Response)
- ✓ c. Cypress
  - i. alarms and proprietary system
  - ii. battery back-up
- ✓ d. Miscellaneous – Admin. Key rounds and Watch tour patrol auditing

Supervisor Trainer/ Dates Trained:

Trainer: Grayson Denton Date: 9-26-23

Trainer: [signature] Date: 9-29-23

V. Report Guidelines

- ✓a. Make sure that every report answers **Who** was involved, **What** Happened, **Where** did it happen, **When** did it happen, **Why** did it happen, **How** did it happen.
- ✓b. Different types of report forms and Online reporting, AIMS
- ✓c. Evaluating and correcting reports
- ✓d. Global Incident Notification and Reporting Matrix
- ✓e. Local AIMs Routing Matrix
- ✓f. Reporting via email
- ✓g. Access to report files and authorization to release reports
- ✓h. Employee Relations and reports
- ✓i. Composing and getting authorization to release memorandums
- ✓j. Verbal communications
- ✓k. Pass on information for AUS and GM personnel
- ✓l. Daily Activity Reports – Review every D.A.R. before the Officer leaves to assure you answer any questions you may have.
  - ✓i. Supervisor
  - ✓ii. Unit 11
  - ✓iii. Unit 12
  - ✓iv. Unit 10
  - ✓v. Fire Officer

Supervisor Trainer/ Dates Trained:

Trainer: ~~Grayson~~ Denton Date: 9-26-23

Trainer: _____ Date: 9-26-23

VI. Ensure Compliance with AUS General Orders and Regulations, Attendance policy, Disciplinary Actions, Overtime Equalization and Appearance Standards.

a. AUS Security Officer Handbook and Human Resources related
b. AUS Attendance Policy
c. AUS Overtime Equalization policy
d. Employees' First Report requirements
e. Supervisor's Investigation report forms
f. Filling posts for Late and Absentee employees
g. Employee lunches and breaks
h. Disciplinary guidelines
   i. Coaching and Counseling officers
   ii. Documenting Discipline - Filling out a disciplinary form.
   iii. Delivering the Disciplinary form

Supervisor Trainer/ Dates Trained:

Trainer: Jack Henry Date: 9-27-23

Trainer: _____ Date: 9-24-23

VII. Ensure Implementation of and assist in enforcement and reporting of violations of
   i. GM Policies and Procedures.

b. Global Security Manual – all applicable Security and Fire sections
c. Emergency procedures (ERP) - Take Shelter, Severe Weather,
   i. Evacuations and Snow Removal
d. Local Plant Procedures – Overview
   i. All Plant and Security procedure books
   ii. Overview Identification and Access system - Badging
   iii. Visits by outside agencies and law enforcement
   iv. Plant Lock and Key policy and Safety lock program policy
   v. ISO 14001 and ISO 9002 – ISO Menu on computer
   vi. Medical Emergencies on non-production days
   vii. Local GM hourly Time and Attendance procedures
   viii. Plant Time Clock operations
   ix. Obtaining timecards and weight scale tickets.
   x. FWA Towing procedure
e. Local Health and Safety programs (Confined Space, Fire Protection program, CPPRP and Environmental checks, etc.)
f. Supervisor's role in editing GM procedure books and requesting updates to local procedures.

Supervisor Trainer/ Dates Trained:

Trainer: Jack Henry Date: 9-28-23

Trainer: _____ Date: 9-29-23

VIII. AUS Scheduling and Billing - Overview

a. Introduction to Scheduling
b. Baseline hours and Baselines-not covered
c. Billable and un-billable overtime
d. Conditions for Service Requests
e. Forms – Sign-in payroll and Daily Assignment Sheet
f. Change of Shift Agreements, Personal and vacation day requests/approvals

Supervisor Trainer/ Dates Trained:

Trainer: Grayson Denton Date: 9-29-23
Trainer: _____ Date: 9-29-23

IX. Miscellaneous Information

✓a. Special Keys- Key room - gray cabinet
✓b. Meter calibration
c. Body shop Safety Locks for cells- Replacement procedure
✓d. Emergency Notifications-phone list
✓e. Environmental checks
✓f. CIS Access on 2nd &3rd shift, & on non-production days when not manned
✓g. Processed Fluids Bldg. sump alarm
✓h. Fueling car and truck
✓i. Accessing filing cabinets in copier area (Clerk Area in Security)
j. Evidence room procedure
✓k. Red Cross cabinet

Supervisor Trainer/ Dates Trained:

Trainer: Grayson Denton Date: 9-26-23
Trainer: _____ Date: 9-29-23

Site Specific OJT General Assembly

AUS Security Solutions

Training Topic(s) to be Covered: General Assembly Floor Officer
Location of Training: Fort Wayne Assembly GMC

Participant: 1st Name: Mark Last Name: Stoffner M.I. S.

Supervisor: 1st Name: Kevin Last Name: Wilkes M.I. ___

Start Date: 5/19/24 **End Date:** 5/19/24

Training Subject	Trainee Initials	Training Officers Initials	Date Trained/ Review
Daily Checks – 1st, 2nd and 3rd Shift		KW	5-19-24
Mechanical Room Pump Room – Diesel & Jockey		KW	5-19-24
Company Car Garage		KW	5-19-24
GA Paint Kitchen – Fire doors; Ground wires; Purge; Fire Cabinets		KW	5-19-24
Training Center – Admin -- UAW		KW	5-19-24
Transformer Rooms on Roof of GA 1,2,3		KW	5-19-24
Data Gathering Panels (DGP) – Amp Racks		KW	5-19-24
Administration – Penthouse, Air Handling Units, Roof, Unlocks, Mail Room, Vaults, Department Areas		KW	5-19-24
GMIT – CO2 Sys, Panel, Heat Detectors, Aborting CO2 Sys, Sub-Floor Access, Manual Discharge of CO2 Sys		KW	5-19-24
Engineering Mezz – Elevator, Stair Access		KW	5-19-24
UAW Offices		KW	5-19-24
Operations Support Center		KW	5-19-24
Maintenance Mezz		KW	5-19-24
Conveyor Pits – entry -- Metering		KW	5-19-24
Overhead Conveyor Decks		KW	5-19-24
Key Round Patrol General Assembly		KW	5-19-24
VIN Labels		KW	5-19-24
Radio Operations		KW	5-19-24
Material Sequencing Additions – NLOC & SLOC		KW	5-19-24
Fork Truck Repair General Assembly		KW	5-19-24
Fuel fill – No hot work.		KW	5-19-24
Maintenance Shops		KW	5-19-24
Nerve Center CC-45 SLOC		KW	5-19-24
Windshield Install – Robot Cell Zones SLOC		KW	5-19-24
Frame Pad		KW	5-19-24
Chassis, Motor, Trim, Final, Final Repair, Care Line		KW	5-19-24
Roof Access Locations F11, F18, F40		KW	5-19-24
Emergency Vehicles – Ambulance, C/S Cart, Spill Cart, Golf Cart		KW	5-19-24
First Aid Jump Kit and AED		KW	5-19-24
L-dock, Tire conveyor		KW	5-19-24
Toe-In Pits, Roll Test, Water Test		KW	5-19-24
Overhead Door Entrances and Egress procedure		KW	5-19-24

Site Specific OJT General Assembly

Training Subject	Trainee Initials	Training Officers Initials	Date Trained/ Review
Audit Room (Rubber Room) OSC		KW	5-19-24
ERP and Procedure books – review and familiarize		KW	5-19-24
Evacuation & Take Shelter Areas		KW	5-19-24
Unlocks Requiring GM Supervisor & Committeeman		KW	5-19-24
Regular Unlocks		KW	5-19-24
Safety Lock Removal Procedures		KW	5-19-24
Responding to Emergencies – Safety First		KW	5-19-24
Turnstiles (Main, SLOC, Care Line)		KW	5-19-24

I have received the training as listed above. I understand the performance expectations, job requirements and General Post Orders. All my questions have been answered to my satisfaction.

Participants Name (Print)	Participants Signature	AUS Number	Contract Number	Years on Account
Noah Shoff		a7185911	637516	New Hire

Supervisor's 40 Hour Training Program

Supervisor in Training: Mark Shoffner

Date Start: 4-17-24 Date Completed: 4-24-24

I. Daily Shift Operations

a. Monitoring conditions on the shift
   i. Post visits
   ii. Officer Uniform Inspections (Post inspections)
   iii. Equipment (automobile, radios, uniforms)
b. **Time control sign in sheet**
c. Differences in Shift operations for all three shifts (shift duties)
d. Checking Security posts
   i. Post Inspection Reporting
e. Coordination with GM management on various issues
f. Environmental Checks

Supervisor Trainer/ Dates Trained:

Trainer: Jailene Ortiz Jailene Ortiz Date: 4/18/24

Trainer: Mark Shoffner Date: 4-24-24

II. Evaluation, training and supervision of shift officers

a. Performance and Appearance of Officers
b. Annual Training
c. Pre-assignment training
d. Weekly Emergency Preparedness Drills
e. Supervising Floor and Post training

Supervisor Trainer/ Dates Trained:

Trainer: Jailene Ortiz Date: 4/18/24

Trainer: Mark Shoffner Date: 4-24-24

III. Safety

a. Plant wide Safety meetings
b. Plant Safety walks
c. Shift Safety meetings
d. GM and UAW Safety personnel
e. Local Safety procedures (Big Safety book)
f. Review confined space procedures

Supervisor Trainer/ Dates Trained:
Trainer: Jailene Ortiz Date: 4/18/24
Trainer: [signature] Date: 4.24.24

IV. Fire Prevention and Chapter 7 Hot Work – Supervisor's role

a. Cutting and welding review
b. Fire Inspection (AUS's' SOP's and Policies for Fire Protection, Fire Prevention and Emergency Response)
c. Cypress
    i. alarms and proprietary system
    ii. battery back-up
d. Miscellaneous – Admin. Key rounds and Watch tour patrol auditing

Supervisor Trainer/ Dates Trained:
Trainer: Jailene Ortiz Date: 4/18/24
Trainer: _____ Date: _____

V. Report Guidelines

a. Make sure that every report answers **Who** was involved, **What** Happened, **Where** did it happen, **When** did it happen, **Why** did it happen, **How** did it happen.
b. Different types of report forms and Online reporting, AIMS
c. Evaluating and correcting reports
d. Global Incident Notification and Reporting Matrix
e. Local AIMs Routing Matrix
f. Reporting via email
g. Access to report files and authorization to release reports
h. Employee Relations and reports
i. Composing and getting authorization to release memorandums
j. Verbal communications
k. Pass on information for AUS and GM personnel
l. Daily Activity Reports – Review every D.A.R. before the Officer leaves to assure you answer any questions you may have.
    i. Supervisor
    ii. Unit 10
    iii. Unit 11
    iv. Unit 12
    v. Fire Officer

Supervisor Trainer/ Dates Trained:

Trainer: Jailene Ortiz Date: 4/19/24

Trainer: [signature] Date: 4.24.24

VI. Ensure Compliance with AUS General Orders and Regulations, Attendance policy, Disciplinary Actions, Overtime Equalization and Appearance Standards.

a. AUS Security Officer Handbook and Human Resources related
b. AUS Attendance Policy
c. AUS Overtime Equalization policy
d. Employees' First Report requirements
e. Supervisor's Investigation report forms
f. Filling posts for Late and Absentee employees
g. Employee lunches and breaks
h. Disciplinary guidelines
    i. Coaching and Counseling officers
    ii. Documenting Discipline - Filling out a disciplinary form.
    iii. Delivering the Disciplinary form

Supervisor Trainer/ Dates Trained:

Trainer: Jailene Ortiz Date: 4/19/24

Trainer: [signature] Date: 4.24.24

VII. Implementation of and assist in enforcement and reporting of violations of

i. Ensure GM Policies and Procedures.

b. Global Security Manual – all applicable Security and Fire sections
c. Emergency procedures (ERP) – ***Review the Reporting Matrix document.***
    i. Evacuations
    ii. Take Shelter
    iii. Hazardous Chemical spills on property reporting
    iv. Medical ALL UNITS reporting procedure.
    v. Medical Emergencies on non-production days
d. Local Plant Procedures – Overview
    i. SOP manual review
    ii. Overview Identification and Access system - Badging
    iii. Visits by outside agencies and law enforcement
    iv. Plant Lock and Key policy and Safety lock program policy
    v. ISO 14001 and ISO 9002 – ISO Menu on computer
    vi. Local GM hourly Time and Attendance procedures
    vii. Plant Time Clock operations
    viii. Obtaining timecards and weight scale tickets.
    ix. FWA Towing procedure

e. Local Health and Safety programs (Confined Space, Fire Protection program, CPPRP and Environmental checks, etc.)
f. Supervisor's role in editing GM procedure books and requesting updates to local procedures.

Supervisor Trainer/ Dates Trained:

Trainer: Jailene Ortiz Date: _____
Trainer: _____ Date: _____

VIII. AUS Scheduling and Billing - Overview

a. Introduction to Scheduling
b. Baseline hours and Baselines-not covered
c. Billable and un-billable overtime
d. Conditions for Service Requests
e. Forms – Sign-in payroll and Daily Assignment Sheet
f. Change of Shift Agreements, Personal and vacation day requests/approvals

Supervisor Trainer/ Dates Trained:

Trainer: Jailene Ortiz Date: 4/19/24
Trainer: Mark Schaffer Date: 4.24.24

IX. Miscellaneous Information

a. Special Keys- Key room - gray cabinet
b. Meter calibration
c. Body shop Safety Locks for cells- Replacement procedure
d. Emergency Notifications-phone list
e. Environmental checks
f. CIS Access on 2nd &3rd shift, & on non-production days when not manned
g. Processed Fluids Bldg. sump alarm
h. Fueling car and truck
i. Accessing filing cabinets in copier area (Clerk Area in Security)
j. Evidence room procedure
k. Red Cross cabinet

Supervisor Trainer/ Dates Trained:

Trainer: Jailene Ortiz Date: 4/24/24
Trainer: _____ Date: _____

General Motors

Certificate of Completion

is hereby granted to

Glenn Perham

to certify that he/she has completed to satisfaction

RCRA Training

Completed Refresher Course on 11/1/2023

Cylinder Diameter= 126 Inches
Cylinder Length= 352 Inches

When Tank Depth Equals	Then Tank Volume Equals		
0.00 Inches	0.00 U S gallons	38.00 Inches	4,829.30 U S gallons
1.00 Inches	22.752 U S gallons	39.00 Inches	5,006.20 U S gallons
2.00 Inches	64.198 U S gallons	40.00 Inches	5,184.30 U S gallons
3.00 Inches	117.65 U S gallons	41.00 Inches	5,363.70 U S gallons
4.00 Inches	180.70 U S gallons	42.00 Inches	5,544.10 U S gallons
5.00 Inches	251.92 U S gallons	43.00 Inches	5,725.70 U S gallons
6.00 Inches	330.35 U S gallons	44.00 Inches	5,908.30 U S gallons
7.00 Inches	415.27 U S gallons	45.00 Inches	6,091.80 U S gallons
8.00 Inches	506.10 U S gallons	46.00 Inches	6,276.20 U S gallons
9.00 Inches	602.40 U S gallons	47.00 Inches	6,461.50 U S gallons
10.00 Inches	703.78 U S gallons	48.00 Inches	6,647.60 U S gallons
11.00 Inches	809.90 U S gallons	49.00 Inches	6,834.50 U S gallons
12.00 Inches	920.47 U S gallons	50.00 Inches	7,022.00 U S gallons
13.00 Inches	1,035.30 U S gallons	51.00 Inches	7,210.20 U S gallons
14.00 Inches	1,154.00 U S gallons	52.00 Inches	7,399.00 U S gallons
15.00 Inches	1,276.60 U S gallons	53.00 Inches	7,588.30 U S gallons
16.00 Inches	1,402.70 U S gallons	54.00 Inches	7,778.10 U S gallons
17.00 Inches	1,532.20 U S gallons	55.00 Inches	7,968.30 U S gallons
18.00 Inches	1,665.00 U S gallons	56.00 Inches	8,158.90 U S gallons
19.00 Inches	1,800.90 U S gallons	57.00 Inches	8,349.90 U S gallons
20.00 Inches	1,939.80 U S gallons	58.00 Inches	8,541.20 U S gallons
21.00 Inches	2,081.50 U S gallons	59.00 Inches	8,732.70 U S gallons
22.00 Inches	2,226.00 U S gallons	60.00 Inches	8,924.40 U S gallons
23.00 Inches	2,373.00 U S gallons	61.00 Inches	9,116.20 U S gallons
24.00 Inches	2,522.60 U S gallons	62.00 Inches	9,308.20 U S gallons
25.00 Inches	2,674.60 U S gallons	63.00 Inches	9,500.20 U S gallons
26.00 Inches	2,828.80 U S gallons	64.00 Inches	9,692.20 U S gallons
27.00 Inches	2,985.30 U S gallons	65.00 Inches	9,884.10 U S gallons
28.00 Inches	3,143.90 U S gallons	66.00 Inches	10,076.00 U S gallons
29.00 Inches	3,304.60 U S gallons	67.00 Inches	10,268.00 U S gallons
30.00 Inches	3,467.20 U S gallons	68.00 Inches	10,459.00 U S gallons
31.00 Inches	3,631.70 U S gallons	69.00 Inches	10,650.00 U S gallons
32.00 Inches	3,797.90 U S gallons	70.00 Inches	10,841.00 U S gallons
33.00 Inches	3,965.90 U S gallons	71.00 Inches	11,032.00 U S gallons
34.00 Inches	4,135.60 U S gallons	72.00 Inches	11,222.00 U S gallons
35.00 Inches	4,306.80 U S gallons	73.00 Inches	11,412.00 U S gallons
36.00 Inches	4,479.60 U S gallons	74.00 Inches	11,601.00 U S gallons
37.00 Inches	4,653.70 U S gallons	75.00 Inches	11,790.00 U S gallons

76.00 Inches	11,978.00 U S gallons
77.00 Inches	12,166.00 U S gallons
78.00 Inches	12,353.00 U S gallons
79.00 Inches	12,539.00 U S gallons
80.00 Inches	12,724.00 U S gallons
81.00 Inches	12,909.00 U S gallons
82.00 Inches	13,092.00 U S gallons
83.00 Inches	13,275.00 U S gallons
84.00 Inches	13,456.00 U S gallons
85.00 Inches	13,637.00 U S gallons
86.00 Inches	13,816.00 U S gallons
87.00 Inches	13,994.00 U S gallons
88.00 Inches	14,171.00 U S gallons
89.00 Inches	14,347.00 U S gallons
90.00 Inches	14,521.00 U S gallons
91.00 Inches	14,694.00 U S gallons
92.00 Inches	14,865.00 U S gallons
93.00 Inches	15,034.00 U S gallons
94.00 Inches	15,202.00 U S gallons
95.00 Inches	15,369.00 U S gallons
96.00 Inches	15,533.00 U S gallons
97.00 Inches	15,696.00 U S gallons
98.00 Inches	15,856.00 U S gallons
99.00 Inches	16,015.00 U S gallons
100.00 Inches	16,172.00 U S gallons
101.00 Inches	16,326.00 U S gallons
102.00 Inches	16,478.00 U S gallons
103.00 Inches	16,627.00 U S gallons
104.00 Inches	16,774.00 U S gallons
105.00 Inches	16,919.00 U S gallons
106.00 Inches	17,061.00 U S gallons
107.00 Inches	17,199.00 U S gallons
108.00 Inches	17,335.00 U S gallons
109.00 Inches	17,468.00 U S gallons
110.00 Inches	17,598.00 U S gallons
111.00 Inches	17,724.00 U S gallons
112.00 Inches	17,846.00 U S gallons
113.00 Inches	17,965.00 U S gallons
114.00 Inches	18,080.00 U S gallons
115.00 Inches	18,190.00 U S gallons
116.00 Inches	18,297.00 U S gallons
117.00 Inches	18,398.00 U S gallons
118.00 Inches	18,494.00 U S gallons
119.00 Inches	18,585.00 U S gallons
120.00 Inches	18,670.00 U S gallons
121.00 Inches	18,748.00 U S gallons
122.00 Inches	18,820.00 U S gallons
123.00 Inches	18,883.00 U S gallons
124.00 Inches	18,936.00 U S gallons
125.00 Inches	18,978.00 U S gallons
126.00 Inches	19,000.00 U S gallons

PURGE THINNER RECLAIM TANK SYS[illegible] INSPECTION LOG

Month & Year: June 2024

Inspection Requirements

Marking a "Yes" in the table below indicates the items or areas inspected comply with the following requirements:

Tank, Supports, Foundation	Tank level: Note level of tank, in inches and see conversion chart on page 2 (max level is 126 inches or 19,000 gallons). Tank level is used as primary method to demonstrate compliance with 40 CFR 265.194(b)(2). Alarm: Green = Normal operating conditions, Yellow = Equiptment fault or failure Spills or leaks: No signs of leaks by dripping at valves, unions, welds, or cracks. Corrosion or fractures: No visible signs.
Containment Area	Spills or leaks: Containment/floor is free of chemical spills, no evidence of purge sheen or layering of liquids. Chemical containment: No chipping or cracking in chemical barrier (cement paint), no visible bare cement, no cracks in cement.
Product or Waste spill	Reclaim Purge Area, Process Fluids Area, Unloading/Loading Area: No evidence or concern for spill of product or waste materials.
Rainwater Accumulation	Fuel Island Pit: Check for accumulation of storm water in pit area. If rainwater is below grate over pit, mark 'Y' for no accumulation. If rainwater is above grate over pit, mark 'N' and file a work order with facility help desk to have the rainwater removed (3225). Record work order number as a Corrective Action.

INSPECTOR INFORMATION			TANK (including top), SUPPORTS, FOUNDATION AND ANCILLARY EQUIPMENT				CONTAINMENT AREA		PRODUCT OR WASTE SPILL			RAINWATER ACCUMULATION	COMMENTS / CORRECTIVE ACTION
DAY OF MONTH	TIME	INSPECTOR	TANK LEVEL (Inches)	ALARM FAULT (green - normal yellow - fault)	SPILLS OR LEAKS	CORROSION OR FRACTURES	SPILLS OR LEAKS	CRACKS	RECLAIM PURGE AREA	PROCESS FLUIDS AREA	UNLOADING / LOADING AREAS	FUEL ISLAND PIT	CORRECTIVE ACTION
1	2030	M Shaffner	32.9	[illegible]	N	N	N	N	N	N	N	N	N/A
2	2007	M Shaffner	31.6	Y	N	N	N	N	N	N	N	N	N/A
3	1814	J. Ortiz	31.2	Y	"	"	"	"	"	"	"	"	"
4	1721	J. Ortiz	33.2	Y	"	"	"	"	"	"	"	"	"
5	1943	J. Ortiz	37.9	Y	"	"	"	"	"	"	"	"	"
6	1825	J. Ortiz	9.7	Y	"	"	"	"	"	"	"	"	"
7	2048	J. Ortiz	14.5	Y	"	"	"	"	"	"	"	"	"
8	2024	M Shaffner	15.5	Y	N	N	N	N	N	N	N	N	N/A
9	2018	M Shaffner	15.5	Y	N	N	N	N	N	N	N	N	N/A
10	2010	J. Ortiz	17.6	Y	"	"	"	"	"	"	"	"	"
11	2112	M Shaffner	19.9	Y	N	N	N	N	N	N	N	N	N/A
12	2305	M Shaffner	23.6	Y	N	N	N	N	N	N	N	N	N/A
13	1815	M Shaffner	23.2	Y	N	N	N	N	N	N	N	N	N/A
14	2017	M Shaffner	28.0	Y	N	N	N	N	N	N	N	N	N/A
15	2150	M Shaffner	30.4	Y	N	N	N	N	N	N	N	N	N/A
16	1749	M. Shaffner	27.9	Y	N	N	N	N	N	N	N	N	N/A
17	1703	M Shaffner	28.8	Y	N	N	N	N	N	N	N	N	N/A
18													
19													
20													
21													
22													