

October 22, 2014

Mr. Jay Gill  
Treoil Industries  
61-8355 Delsom Way  
Delta BC V4C 0A 9 Canada

**Re: Dangerous Waste Compliance Inspection on September 2, 2014 at Treoil Industries,  
4242 Aldergrove, Ferndale, WA 98242 - RCRA Site ID: N/A Facility Site ID: 2919**

Dear Mr. Gill:

Ecology's Hazardous Waste and Toxics Reduction Program recently conducted a Dangerous Waste compliance inspection at your facility. The Dangerous Waste Regulations<sup>1</sup> establish a safe and responsible system to manage dangerous waste. I have listed the violations at Treoil in the enclosed Notice to Comply. You must complete the actions needed to correct these violations and return the enclosed completed **Compliance Certificate** within 30 days of receipt of this letter to the address above.

Failure to comply with these requirements within 30 days could result in an administrative order and a penalty of up to \$10,000 per day for each violation.

If you have any questions, or need clarification of the information in this inspection report, please contact me at (425) 649-7277 or cwil461@ecy.wa.gov.

Sincerely,



Chris Wilkerson  
Hazardous Waste Compliance Inspector  
Hazardous Waste and Toxics Reduction Program

Enclosures: Photo Log  
*Designating Dangerous Waste*

cc: Bill Angel, Whatcom County Health  
Garry Montgomery, Bellmont Group LLC

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<sup>1</sup> Authority: WAC 173-303 and RCW 70.105.080

**Washington State Department of Ecology Hazardous Waste and Toxics Reduction Program**

RCRA Site ID: N/A	Facility Name: Treoil	Inspection Date: September 2, 2014
Generator Status: LQG	Facility Address: 4242 Aldergrove Rd, Ferndale	Date Report Sent: October 22, 2014

**NOTICE TO COMPLY**

Site Contact Name and Title: Jay Gill	Inspector Name: Chris Wilkerson
Site Phone Number: (604) 589-6866	Inspector Phone Number: (425) 649-7277
Site Contact Email Address: jsgill02@telus.ne	Inspector Email Address: <a href="mailto:cwil461@ecy.wa.gov">cwil461@ecy.wa.gov</a>
Site Website:	Back-up Inspector Name: Mary O'Herron

**Notes:**

1. A re-inspection can occur at any time to verify the correction of the violations listed below.
2. Ecology may take formal enforcement action even if the violations are corrected.

<b>WAC 173- 303-</b>	<b>Summary of Violations Including Observations</b>	<b>Actions Needed</b>
070(3)	<p>Numerous tanks and containers of undesignated wastes were observed throughout the facility including:</p> <ul style="list-style-type: none"><li>• Eastern Facility Boundary<ul style="list-style-type: none"><li>➤ Blue 55-gallon drum labeled "Guardol" of unknown waste (photographs 2, 510 and 511).</li><li>➤ Tank labeled "Thickener Tank" of unknown black waste (photographs 3, 512-514).</li><li>➤ Three totes of contaminated suspected tall oil waste (photographs 5, 520-523).</li><li>➤ A 55-gallon steel drum with unknown black residue suspected to be tall oil wastes (photograph 6, and 525).</li><li>➤ A green 55-gallon poly drum closed top with an unknown waste (photographs 7, 8, 528, 529).</li><li>➤ A tank with unknown contents, apparently leaking (photograph 9).</li><li>➤ Two 55-gallon drums of unknown wastes (photograph 532).</li></ul></li></ul>	<p>When returning the enclosed Compliance Certificate, provide documentation that the solid wastes listed have been designated. The documentation shall include, at a minimum, copies of the analytical results of designation testing and/or justification for any determinations that are based on generator knowledge as defined in WAC 173-303-040.</p> <p>This documentation shall also include a list of all materials determined to be valuable products and not solid wastes.</p>



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WAC 173- 303-	Summary of Violations Including Observations	Actions Needed
	<ul style="list-style-type: none"> <li>• Northern Facility Boundary <ul style="list-style-type: none"> <li>➤ A tank with unknown contents (photograph 11 and 533).</li> <li>➤ A tank with unknown contents (photograph 534).</li> <li>➤ A hopper with unknown contents (photograph 641).</li> </ul> </li> <li>• Plant Perimeter <ul style="list-style-type: none"> <li>➤ A 5-gallon poly container of unknown liquid waste (photograph 12).</li> <li>➤ A red 55-gallon steel closed top drum of unknown liquid (photograph 13, 536, 538).</li> <li>➤ Two tanks with unknown contents (photograph 14).</li> <li>➤ Four tanks with unknown contents (photograph 539-542).</li> <li>➤ An unknown white powder residue in an old piece of equipment (photograph 16, 544).</li> <li>➤ A 55-gallon drum of unknown liquid (photograph 16).</li> <li>➤ A black liquid in a tank along the edge of the main plant (photograph 17, 550).</li> <li>➤ An unknown black liquid in an open blue 55-gallon drum (photograph 18, 555).</li> <li>➤ Five Totes of unknown wastes (photographs 543-546).</li> <li>➤ Five 55-gallon drums of unknown wastes (546-551).</li> <li>➤ A 55-gallon drum of unknown waste (photo 552).</li> <li>➤ Two tanks with unknown contents placarded UN1230 (photographs 558-559).</li> <li>➤ Several tanks with unknown contents (photograph 644).</li> </ul> </li> </ul>	

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WAC 173- 303-	Summary of Violations Including Observations	Actions Needed
	<ul style="list-style-type: none"> <li>• Fabrication Building Exterior <ul style="list-style-type: none"> <li>➤ Eleven totes of black waste reported as tall oil or tall oil derivatives (photographs 19, 20, 560-566, 568-570, 698-701).</li> <li>➤ An unknown 5-gallon cylinder (photograph 567).</li> <li>➤ A 55-gallon drum of unknown waste (photograph 21 and 566).</li> </ul> </li> <li>• Fabrication Building <ul style="list-style-type: none"> <li>➤ Two cylinders of an unknown waste (photograph 22).</li> <li>➤ Four 1-gallon jugs of an unknown red liquid (photograph 23).</li> <li>➤ A 55-gallon drum of an unknown black liquid (see photograph 24).</li> <li>➤ Approximately eleven 55-gallon drums of spill clean-up debris (photographs 25, 26, 580).</li> <li>➤ Two 55-gallon drums of unknown wastes (photographs 581-582).</li> <li>➤ Approximately ten drums of refractory waste (photographs 27, 31, 37, 583, 585-588).</li> <li>➤ Two 5-gallon poly buckets of "Econoset 50TC" waste (photograph 28).</li> <li>➤ A pile of refractory waste debris (photographs 29, 593-596).</li> <li>➤ Numerous 5-gallon poly buckets contaminated with unknown black liquids (photographs 30, 592).</li> <li>➤ Sediment and liquid accumulated in the Fabrication building trench drain sump (photograph 34, 605, 606).</li> <li>➤ A cylinder of oxygen gas (photograph 35).</li> <li>➤ A cylinder of an unknown waste (photograph 36, 590).</li> <li>➤ Approximately ten 30-gallon fiber</li> </ul> </li> </ul>	

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	<p>drums with unknown contents on the mezzanine (photographs 32, 599-601).</p> <ul style="list-style-type: none"> <li>➤ A 55-gallon drum and boxes of unknown waste (photograph 610).</li> </ul> <ul style="list-style-type: none"> <li>• Western Facility Boundary <ul style="list-style-type: none"> <li>➤ Three blue poly drums of unknown liquid: one 55-gallon and two 30-gallon (photograph 38).</li> <li>➤ A green 55-gallon poly drum with an unknown liquid waste (photograph 39, 612, 613).</li> <li>➤ Twelve 55-gallon drums of suspected tall oil spill cleanup debris (photographs 41-43, 617-619, and 623-629).</li> <li>➤ Two poly and two steel 55-gallon drums of unknown liquid waste (photograph 44, 630).</li> <li>➤ Two shipping containers full of unknown waste and numerous drums of suspected biological oils (photograph 46, 631).</li> <li>➤ Three 55-gallon open topped drums of an unknown waste (photograph #47).</li> <li>➤ A steel tote of an unknown liquid waste (photograph 48, 633, 634).</li> </ul> </li> <li>• Laboratory <ul style="list-style-type: none"> <li>➤ Ten 1-gallon poly containers of "Specialty Polymers" (photograph 49, 640).</li> <li>➤ An approximately 1-liter glass container of an unknown liquid (photograph 49).</li> <li>➤ A small open metal container of an unknown white powder (photograph 50).</li> <li>➤ A 1-liter poly container of an unknown black liquid (photograph 50).</li> </ul> </li> </ul>	

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	<ul style="list-style-type: none"> <li>➤ A 5-gallon white poly bucket labeled “glycerin” (photograph 51).</li> <li>➤ A 1-liter poly container of an unknown liquid (photograph 51).</li> <li>➤ A 1-gallon poly container of an unknown orange liquid (photograph 52).</li> <li>➤ Numerous containers of expired lab chemicals (photographs 53, 54, and 56).</li> <li>➤ A 5-gallon glass container of an unknown liquid (photograph 55).</li> <li>➤ A 1-gallon container labeled sulfuric acid (photograph 53).</li> <li>➤ Four 1-gallon containers labeled 2-Propanol (photograph 55).</li> <li>➤ A 100-pound container labeled calcium hypochlorite (photograph 57).</li> <li>➤ A container labeled potassium dichromate (photograph 53).</li> <li>• Control Building <ul style="list-style-type: none"> <li>➤ A 5-gallon red gasoline container (photograph 58, 672).</li> <li>➤ A 1-gallon glass container of an unknown yellow liquid (photograph 58, 672).</li> <li>➤ Three 1-gallon glass containers of unknown liquids (photograph 59).</li> <li>➤ A 2-liter poly container of an unknown blue liquid (photograph 60).</li> <li>➤ A 1-liter poly container of an unknown green liquid (photograph 61).</li> <li>➤ A 5-gallon white poly bucket of an unknown waste (photograph 63).</li> <li>➤ Numerous small (approximately 1-gallon or less) unmarked or reused containers of unknown waste (photographs 64, 65, 679-682).</li> <li>➤ Two 5-gallon poly containers labeled “hydrazine,” another two 5-gallon poly</li> </ul> </li> </ul>	

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	<p>containers labeled "morpoline," and an unlabeled 5-gallon poly container of unknown waste (photograph 67).</p> <ul style="list-style-type: none"> <li>➤ Numerous waste laboratory chemicals in two cardboard boxes (photograph 68).</li> <li>➤ Six 5-gallon white poly buckets of an unknown waste (photograph 69).</li> <li>➤ Approximately thirteen 55-gallon steel drums of unknown wastes (photographs 70, 71, 675-679).</li> <li>➤ Numerous laboratory and expired products stored on wooden shelf (see photograph 72).</li> <li>➤ Four 1-gallon containers of waste paint (photograph 62).</li> <li>➤ A 1-gallon poly container labeled sulfuric acid (photograph 64).</li> <li>➤ A 5-gallon poly bucket labeled "Chemax-480" (photograph 66).</li> <li>➤ A 5-gallon steel drum labeled xylene (photograph 67).</li> <li>➤ A 1-gallon poly container labeled hydrochloric acid (photograph 680).</li> <li>➤ A pallet of numerous 50-pound bags of potassium hydroxide pellets (photograph 73, 689, 690).</li> <li>➤ A pallet of numerous 50-pound bags of sodium hydroxide pellet (photograph 73, 689, 690).</li> </ul> <ul style="list-style-type: none"> <li>• Processing Plant and Tanks <ul style="list-style-type: none"> <li>➤ Numerous tanks and drums exist on the property both within the processing plant and scattered throughout the grounds. The contents of each tank must be identified and designated.</li> </ul> </li> <li>• Incinerators <ul style="list-style-type: none"> <li>➤ At least three incinerators were observed on the property on the</li> </ul> </li> </ul>	

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WAC 173- 303-	Summary of Violations Including Observations	Actions Needed
	<p>Eastern Boundary, Processing Plant Perimeter, and within the Fabrication building. The contents of each incinerator must be designated. See photographs 33, 524, and 537.</p> <ul style="list-style-type: none"> <li>• Unidentified Wastes <ul style="list-style-type: none"> <li>➤ Also due to the size of the facility and the large quantity and diversity of wastes and equipment onsite, our inspection was unable to identify every waste stream at the facility. Despite not being identified during the inspection, Treoil is responsible for designation and management of <u>all</u> waste streams at the facility.</li> </ul> </li> </ul> <p><b>WAC 173-303-170(1) and by reference 070(3): Sites must properly designate solid waste prior to disposal. Sites must follow proper procedures when determining if a solid waste is also a dangerous waste or an extremely hazardous waste.</b></p>	

## Washington State Department of Ecology Hazardous Waste and Toxics Reduction Program

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### Concerns and Suggestions

#### **Planning for Successful Waste Management**

Successful identification, designation, packaging, and disposal of all hazardous wastes at this facility will be a considerable challenge. This task is compounded by the diversity of wastes, the quantity of discarded equipment and non-hazardous waste also onsite, and the abandoned nature of the facility. I strongly encourage you to create a detailed plan to govern this cleanup operation. Consider if the use of an outside professional environmental consultant would benefit you in this endeavor.

In addition, I strongly suggest that you consult with me as you encounter and confront challenges at this site. My advice will help ensure that your waste management activities operate under the law. I may also prevent wasted resources on inadequate actions that will not satisfy the requirements of the violations cited in this report.

#### **Waste Designation**

All waste streams generated at your facility must be properly designated. Inadequate designation creates risks and results in improper disposal of dangerous wastes.

To properly designate waste streams, take the following steps:

- Evaluate each waste stream for both federal and state dangerous waste characteristics including ignitability, corrosivity, reactivity, toxicity, and persistence. You may accomplish this with a combination of generator knowledge and laboratory testing.
- Maintain records of this designation process including test results, waste analyses, or other determinations (i.e. generator knowledge) made for designating dangerous waste.
- Once you have properly designated each waste you may choose to consolidate dangerous wastes with similar waste codes to facilitate storage and disposal. It is essential that you have accurate designation information for each waste stream before combining them.

You may find that a small amount of laboratory testing could lead to significant savings in waste disposal costs. Ecology has numerous publications and personnel available to assist with designation. Please do not hesitate to contact me with questions or for clarification of the waste designation requirements.

For more information, refer to the publication *Designating Dangerous Waste* at:

<http://www.ecy.wa.gov/biblio/96436.html>

#### **Management of Non-hazardous Industrial Wastewater**

Treoil is generating wastewater from cleaning equipment, tanks, etc. Based on knowledge of the wastes onsite, tall oil and biodiesel processing wastes, much of this wastewater will designate as non-hazardous wastewater. Any discharge of water that does not meet Water Quality Standards to surface or ground water is prohibited. Please contact Stephanie Barney of Washington State Department of Ecology (Ecology) Bellingham Field Office for assistance with the management of wastewater:

**Washington State Department of Ecology Hazardous Waste and Toxics Reduction Program**

RCRA Site ID: N/A	Facility Name: Treoil	Inspection Date: September 2, 2014
Generator Status: LQG	Facility Address: 4242 Aldergrove Rd, Ferndale	Date Report Sent: October 22, 2014

Stephanie Barney  
Washington State Department of Ecology  
1440 10<sup>th</sup> Street, Suite 102  
Bellingham, WA 98225  
360-715-5233  
[Bars461@ecy.wa.gov](mailto:Bars461@ecy.wa.gov)

**Management of Solid Waste**

Significant quantities of non-hazardous solid waste are onsite. Proper management and disposal offsite of this waste would improve safety, water quality, and hygiene. In addition, clearing space currently occupied would create workspace to facilitate hazardous waste packaging and management.

**Management of Tall Oil and Tall Oil Processing Wastes**

Considerable quantities of tall oil, tall pitch, tall rosin, wastewater contaminated with tall oil, and other tall oil production wastes currently exist at the facility. Treoil is required to designate these wastes as a violation in this report. Based on sampling performed in 2000 by the EPA, tall oil rosin has previously been designated as a Washington state toxic (WT02) waste based on its toxicity to fish.



**Washington State Department of Ecology Hazardous Waste and Toxics Reduction Program**

RCRA Site ID: N/A	Facility Name: Treoil	Inspection Date: September 2, 2014
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**COMPLIANCE CERTIFICATE**

Complete and return this page, within 30 days of the receipt of the letter. Include all supporting documentation such as photos, copies of manifests/disposal records and receipts.

**Note:** You may request an extension before this Compliance Certificate is due. You must make this request in writing and include the reason for the extension and propose a new date of completion. Send it to:

Chris Wilkerson  
Washington State Department of Ecology  
Hazardous Waste and Toxics Reduction Program  
3190 160<sup>th</sup> Ave SE  
Bellevue, WA 98008

Summary Of Hazardous Waste Violation Compliance Actions Taken				
Violation Code WAC 173-303-	Documentation provided			Notes
	Photo	Paperwork	Statement	
070(3)				

1. I certify that the violations noted on the Notice to Comply page have been corrected.
2. I personally examined any attached documentation submitted as proof of compliance and I believe the information to be true, accurate, and complete.
3. I am aware:
  - There are significant penalties for submitting false information and/or for non-compliance with regulations.
  - My signature **certifies compliance** with every regulation noted on the Notice to Comply page.
4. I declare that under penalty of perjury the foregoing certification is true and correct.

Signature:	Printed Name:
Position/Title:	Date:

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### INSPECTION NARRATIVE

#### **Facility Description**

Treoil historically produced products derived from tall oil, including tall pitch and tall oil rosin. Commercial production of these materials ceased prior to 2006. Tall oil, also known as liquid rosin, is a resinous yellow-black oily liquid composed of a mixture of rosins, fatty acids, sterols, high-molecular alcohols, and other alkyl chain materials. Tall oil is obtained as a byproduct in the treatment of pine pulp. The site is contaminated by wastes from the process and is listed on Ecology's Confirmed and Suspected Contaminated Sites List (CSCSL).

The facility has also been involved in attempted commercial enterprises to produce biodiesel from waste biological oils, construction of incineration units, and research on processing ore for precious and semi-precious metal production. The Department of Ecology Hazardous Waste Compliance Unit (Ecology) last conducted an inspection of this facility on July 11, 2006. A violation for failure to designate their waste was issued based on this inspection; Treoil failed to return to compliance after this inspection.

This inspection was prompted by a request for assistance by Whatcom County Health Department that is documented in ERTS<sup>2</sup> 648824.

#### **Pre-Inspection Interview**

Mary O'Herron and I (Chris Wilkerson) of Ecology arrived on site at 11:30 a.m. and made contact with site hazardous waste contact Jay Gill. Bill Angel of Whatcom County Public Health Department also accompanied us on the inspection. Mr. Gill invited Garry Montgomery of Bellmont Group along as an advisor.

We first discussed the current status of the site. Mr. Gill stated that no commercial activity is currently being conducted at the facility. He stated that the site has electricity and water utility connections active. He stated that no hazardous waste has been disposed of offsite in the history of the facility. He stated that in the last few years people have resided on the site but it is currently unoccupied. He also stated that a friend of his, Frank Kanderl, has been allowed to store equipment on the site. Mr. Gill also stated that Mr. Kanderl does some machining onsite and processing of old equipment to salvage parts or scrap metal. Mr. Gill also stated that Mr. Kanderl is helping him clean some areas of the facility; however, he is not employed for this work.

I explained to Mr. Gill that this inspection was going to be focused only on hazardous waste management.

#### **Facility Inspection**

<sup>2</sup> ERTS: Environmental Report Tracking System

**Washington State Department of Ecology Hazardous Waste and Toxics Reduction Program**

RCRA Site ID: N/A	Facility Name: Treoil	Inspection Date: September 2, 2014
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All information recorded below is based on my own observations unless stated to be the statement of Mr. Gill or another member of the inspection team.

Facility Exterior

Two large tanks were observed lying on their sides along the facility driveway entrance. Both of these tanks were open and appeared to be empty. These tanks are depicted in photographs 501, 703, and 704.

Southern Facility Boundary

We observed a trailer covered with a grey tarp covering unidentified equipment parked along the fence line on the southern facility boundary. It is unknown if any wastes or hazardous materials were stored under the tarp (see photograph 502).

East Facility Boundary

We first inspected a row of equipment, tanks, and containers on the eastern edge of the facility property line. This area is documented in photographs 1-9, 12, and 503, 505-533. See the Notice to Comply section for a list of wastes in this area identified as requiring designation.

Two shipping containers were present near the facility entrance. Mr. Gill explained that these containers held equipment belonging to his friend, Frank Kanderl. We opened one container and saw machining equipment. No wastes were observed in these shipping containers.

Directly outside of the shipping container were an air conditioning unit and refrigerator. The refrigerator was overgrown with blackberries. I explained to Mr. Gill that both of these pieces of equipment might contain refrigerant and require proper recycling.

Numerous other pieces of solid waste were present in this area including steel cables, tires, empty steel drums, broken equipment, etc. A blue 55-gallon steel closed top drum was present in this area. This drum lacked any labels and the contents were unknown. Next to the drum was an open tank labeled "Thickener Tank" and "Caution Caustic." This tank contained an unknown black liquid.

Along the eastern edge of the property was an approximately 20,000-gallon tank. Mr. Gill stated that this tank contained tall oil rosin. The tank was rusting and had an open vent on the top. This tank had no secondary containment.

Three 275-gallon totes were also present in this area. These totes contained a black liquid, which Mr. Gill stated was tall oil. These totes had holes cut in the top and black residue staining along their sides indicating they had previously spilled. Also in this area was an open 55-gallon drum, which contained a black oily residue.

A 55-gallon green poly drum of an unknown liquid was present in this area. This container was

**Washington State Department of Ecology Hazardous Waste and Toxics Reduction Program**

RCRA Site ID: N/A	Facility Name: Treoil	Inspection Date: September 2, 2014
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closed and in fair condition but was unlabeled. Among the vegetation in this area were four 5-gallon poly buckets, which contained soil and pieces of metal equipment. We observed a water hydrant in this area and Mr. Gill stated that site is served by City of Bellingham water.

A tank was present in this area. This tank appeared to be empty and the valves were open. A black residue was present in the valve. A blue 55-gallon steel closed top drum was stored in the grass next to this tank. This drum had a manufactures label stating it contained "Guardol," however, Mr. Gill stated that many product containers were repurposed at the site to hold tall oil or tall oil derived products and wastes.

Also along the tree line was a grey piece of equipment, which Mr. Gill stated, was an incinerator manufactured at the facility. It was unknown if the incinerator contained any waste.

A loaded dump truck was parked in the northeast corner of the facility. It is unknown what the contents of the truck's bed were.

#### Northern Facility Boundary

Thick blackberry vegetation prevented a close examination of the area, which forms the northern facility boundary. We were able to observe two tanks at the northern edge of the facility; however, we were unable to access them. The tank's contents are unknown. (see photographs 10, 11, 533, 534, 642, and 643). This area also contained a piece of equipment which contained four white hopper style tanks, it is unknown if these tanks were empty (see photograph 641).

#### Plant Perimeter

The border forming the perimeter of the processing plant contained numerous tanks, drums, totes, buckets, and other containers of waste. This area is depicted in photographs 13-18, 535-559, 644, and 659. See the Notice to Comply section for a list of wastes in this area requiring designation.

Five tanks were present in the vegetation on the north side of the plant perimeter. It was difficult to access these tanks due to the vegetation. It was unknown if these tanks were empty or may contain waste.

A 5-gallon poly bucket in this area was open and full of contaminated rainwater. A red 55-gallon steel closed top drum was also stored in this area. This drum was closed and secure and marked with a handwritten label as "K15/40"; however, Mr. Gill stated that the drum likely contained tall oil or a tall oil derivative.

Along the edge of the secondary containment, for the main plant was located an open topped metal tank. This tank contained a black liquid, which Mr. Gill stated was tall oil or tall oil derivatives plus rainwater.

Adjacent to this tank was an inverted piece of equipment, which contained an unknown white

## Washington State Department of Ecology Hazardous Waste and Toxics Reduction Program

RCRA Site ID: N/A	Facility Name: Treoil	Inspection Date: September 2, 2014
Generator Status: LQG	Facility Address: 4242 Aldergrove Rd, Ferndale	Date Report Sent: October 22, 2014

powder. Mr. Gill touched this white powder, rubbed it on his fingers, and smelled it to attempt to identify; I cautioned Mr. Gill that interacting with an unknown waste is dangerous and asked him to stop. Also next to the tank was an open 55-gallon blue poly drum, which contained more tall oil waste. Behind this drum was a closed 55-gallon steel drum with unknown contents.

A red incinerator was also present in this area. It is unknown if the incinerator is empty or may contain waste.

Several more totes of tall oil or tall oil derivatives were observed both inside and outside of the plants secondary containment sump. This sump was heavily contaminated with suspected spilled tall oil or tall oil derivatives.

At the south edge of the plant perimeter were two silver horizontal tanks, which were marked with a UN 1230 flammable placard (methanol). It is unknown if these tanks were empty.

### Fabrication Building Exterior

This area is depicted in photographs 19-22, 504, and 560-574. Numerous 275-gallon totes were present in this area. These totes were marked with a variety of product labels including sulfuric acid, lube oil, hydrochloric acid, biodiesel, etc; again, Mr. Gill stated that they all contained tall oil or tall oil derived products. Several of the totes were open.

Outside of the Fabrication Building was a steel tank covered with plywood. Stormwater from the building's roof was collecting in this tank.

A pile of rusted equipment and drums were also present along the eastern perimeter of this building. An unknown 5-gallon cylinder and a 55-gallon drum with unknown contents were present among this equipment. See the Notice to Comply section for a list of wastes in this area requiring designation.

### Fabrication Building

The interior of the building was dark and very cluttered with waste and broken and discarded equipment. Photographs 22-37, 575-610 document waste inside this building. See the Notice to Comply section for a list of wastes requiring either designation in this area.

The amount of waste and equipment in this building was nearly overwhelming and very challenging to document. In addition, due to the very cluttered nature of this location, a high potential exists for additional hazardous wastes to be discovered while cleaning waste out of this area.

Inside the Fabrication Building were approximately eleven drums, which contained refractory waste, which Mr. Gill stated, were from the manufacture of incineration units. A stack of insulation for these units was also present in this area. Several drums, which appeared to contain tall oil spill cleanup debris, were also present in this area. Additional wastes included totes of

## Washington State Department of Ecology Hazardous Waste and Toxics Reduction Program

RCRA Site ID: N/A	Facility Name: Treoil	Inspection Date: September 2, 2014
Generator Status: LQG	Facility Address: 4242 Aldergrove Rd, Ferndale	Date Report Sent: October 22, 2014

tall oil, cylinders of unknown wastes, and smaller containers of unknown waste. A trench drain in this building contained several inches of sediment along with water contaminated with a visible sheen. Another incinerator, which Mr. Gill stated was manufactured at the facility, was present in this area; it was unclear if this incinerator was empty or may have contained waste.

### West Property Boundary

The Western Property Boundary is documented in photographs 37-48, and 611-638. See the Notice to Comply section for a list of wastes in this area requiring designation or disposal as hazardous waste.

In the southwest corner of the property were two trailers, which based on the 2006 Ecology hazardous waste inspection were previously used as residential units but were currently unoccupied. We did not inspect the interior of these trailers. Outside of this trailer were three blue poly drums with unknown liquids.

North of the trailer was a green 55-gallon poly drum which also contained an unknown liquid. This container was closed and secure. Three more totes of suspected tall oil or tall oil derivatives were present along the western fence line. These totes were closed and secure. Similar to totes in other areas, they were labeled with old product labels from the repurposed totes original contents.

Also along the western fence line were two shipping containers. Mr. Gill stated that these shipping containers have been onsite since at least 2006. He stated that they held drums of yellow oil (biological oils). I opened one of the containers and observed that while the bottom of the container held drums the top was covered with an assortment of other solids wastes including an unknown white powder. Mr. Gill touched the powder; I again cautioned him not to touch unknown wastes.

Surrounding the shipping containers were approximately eleven 55-gallon drums, which Mr. Gill stated contained tall oil spill cleanup debris. Several smaller 5-gallon containers of unknown wastes were also sitting atop the drums. One of the drums of tall oil debris was fallen over and had ruptured and spilled. Another of the drums in this area was open and approximately half-full of liquid tall oil or tall oil derivatives.

In the vegetation along the western fence were five tanks small tanks of approximately 500-2,000 gallons. Mr. Gill stated that these tanks were empty.

Also in this area was a 275-gallon tote of an unknown waste. This tote had a simple plastic bag taped on as a closure. This tote lacked any labels.

### Laboratory

The laboratory area is illustrated in photographs 49-57 and 638-640. See the Notice to Comply section for a list of wastes in this area requiring either designation or disposal as hazardous

## Washington State Department of Ecology Hazardous Waste and Toxics Reduction Program

RCRA Site ID: N/A	Facility Name: Treoil	Inspection Date: September 2, 2014
Generator Status: LQG	Facility Address: 4242 Aldergrove Rd, Ferndale	Date Report Sent: October 22, 2014

waste. The laboratory consisted of two converted mobile homes. Both trailers were in obvious disrepair with damaged roofs. The westernmost trailer was empty except for some wood debris, scrap piping, and torn carpet.

The other trailer contained numerous expired waste laboratory chemicals. These wastes included ten 1-gallon containers of a “specialty polymer” stored beneath the sink. Several cardboard boxes of chemicals and glassware were in this area. An extremely deteriorated shelf was in this area, which stored approximately thirty containers of laboratory chemicals. One of the shelves had a hole rusted completely through the shelf. A 100-pound container of calcium hypochlorite was also stored in this area. Due to the precarious storage arrangement, age of the containers, and the evidence of deterioration on the containers, I did not perform an inventory of all wastes in this area.

### Control Building

The Control Building is depicted in photographs 58-73, 672-690. Similar to the Fabrication Building, the Control Building was also very cluttered with wastes, debris, and equipment. This made a complete inventory of all wastes and hazards in this area beyond the scope of this inspection. See the Notice to Comply section for a list of wastes observed in this area requiring either designation or disposal as hazardous waste.

We entered the building from the eastern door. We first observed a storeroom too full of solid waste and discarded equipment to enter and inspect. Adjacent to this room were a series of rooms which all contained scattered small containers of unlabeled and unknown wastes, small containers of discarded laboratory chemicals such as hydrochloric or sulfuric acid, and several 55-gallon drums of unknown waste.

The northern half of this building was also very full of waste and discarded equipment. This area was too full for a complete inventory during the course of this inspection. Example wastes in this area included pallets of sodium hydroxide and potassium hydroxide. Numerous 55-gallon drums of unknown waste were also present in this area. Finally, a shelf containing approximately fifty small containers of discarded laboratory chemicals were also present in this area.

### Processing Plant

The plant is depicted in photographs 551-559, 641-671, and 691-697. See the Notice to Comply section for a list of wastes observed in this area requiring either designation or disposal as hazardous waste.

The plant contained approximately 20 tanks ranging in volume between 200,000 to 1,000 gallons, but most appeared to be around 30,000 gallons. It was unclear which tanks were full or empty. The original piping, cracking towers, catwalks, and other equipment from previous tall oil and biodiesel production remained in place. The area also had two large secondary containment sumps, both of which were full of black liquid waste, which appeared to be spilled

**Washington State Department of Ecology Hazardous Waste and Toxics Reduction Program**

RCRA Site ID: N/A	Facility Name: Treoil	Inspection Date: September 2, 2014
Generator Status: LQG	Facility Address: 4242 Aldergrove Rd, Ferndale	Date Report Sent: October 22, 2014

tall oil or tall oil derivatives, biodiesel production wastes, and stormwater. The soil and concreted pad were also contaminated with tall oil, tall oil derivatives, and biodiesel production wastes. Approximately twenty 55-gallon drums, a few totes, and more than twenty 5-gallon buckets of unknown wastes were scattered about the plant.

Part of the concrete was covered with a layer of sawdust on top of spilled tall oil wastes. Mr. Gill explained that a friend of his, whom he allowed to store equipment on the site, Mr. Frank Kanderall, were performing some cleanup of spilled tall oil and tall oil derivatives at the facility. This included recovering spilled tall oil and placing it into drums. Mr. Kanderall was reportedly also working to bulk biodiesel production wastes into a single tank. I explained to Mr. Gill that the amount of work needed to clean the plant was considerable and would require far more resources than just the work of Mr. Kanderall.

#### Sampling

Two samples of wastes were taken at the facility. The first was a suspension of brown liquid and viscous globs, which Mr. Gill reported were wastes from biodiesel production. This waste was accumulated in an open 5-gallon bucket, but Mr. Gill explained that the bucket had been filled from an adjacent 1,000-gallon tank. This area and the container are depicted in photographs 696-697.

A second sample was taken from a tote of a black viscous material Mr. Gill reported as tall oil pitch. This tote was stored outside of the Fabrication Building. This tote is depicted in photographs 698-701.



Both of these samples are being held in storage at the Department of Ecology's Bellevue office and have not been analyzed for toxicity at the time the completion of this report.





**Photo Log**



**Photographer:** Chris Wilkerson



**Witness:** Mary O'Herron

Area & Description	Photographs
<p>#1</p> <p>Location: Eastern Facility Boundary</p> <p>The air conditioner in the foreground of this photograph and the refrigerator in the background (under blackberry) may contain hazardous waste refrigerant gases or contaminated compressor oils.</p>	
<p>#2</p> <p>Location: Eastern Facility Boundary</p> <p>This photograph depicts a 55-gallon drum of an unknown liquid.</p>	


Area & Description	Photographs
<p>#3</p> <p>Location: Eastern Facility Boundary</p> <p>This tank in this photograph contains a residue of an unknown black liquid and rainwater. The side of the tank (not pictured) read "Thickener Tank" and "Caustic."</p>	 <p>A photograph showing a rectangular metal tank with a central vertical pipe. The tank contains a dark, viscous liquid residue. The surrounding area is overgrown with green vegetation. A timestamp "09/02/2014 12:06" is visible in the bottom right corner.</p>
<p>#4</p> <p>Location: Eastern Facility Boundary</p> <p>This photograph a tank which Mr. Gill stated contained rosin.</p>	 <p>A photograph of a large, cylindrical metal tank standing outdoors. The tank is heavily rusted and has a set of stairs leading up to its top. It is surrounded by dense green trees and bushes. A timestamp "09/02/2014 12:12" is visible in the bottom right corner.</p>





Area & Description	Photographs
<p>#5</p> <p>Location: Eastern Facility Boundary</p> <p>This photograph depicts a tote of waste suspected to be contaminated tall oil or tall oil distillates. Note the top is cut open and waste has spilled on the container and ground.</p>	 <p>09/02/2014 12:16</p>
<p>#6</p> <p>Location: Eastern Facility Boundary</p> <p>This photograph shows a 55-gallon drum of waste suspected tall oil or tall oil distillates or spill cleanup debris.</p>	 <p>09/02/2014 12:20</p>



Area & Description	Photographs
<p>#7</p> <p>Location: Eastern Facility Boundary</p> <p>This photograph depicts a 55-gallon drum of an unknown liquid.</p>	
<p>#8</p> <p>Location: Eastern Facility Boundary</p> <p>This photograph depicts the same 55-gallon drum of an unknown liquid as photograph #7.</p>	





Area & Description	Photographs
<p>#9</p> <p>Location: Eastern Facility Boundary</p> <p>This photograph shows a tank with unknown contents. Note that the port in the bottom appeared to be leaking a black viscous material.</p>	 A photograph showing a close-up of a rusted metal tank. There are three ports visible: one at the top, one in the middle, and one at the bottom. The bottom port is leaking a black viscous material. The photo is dated 09/02/2014 12:23.



Area & Description	Photographs
<p>#10</p> <p>Location: Northern Facility Boundary</p> <p>This photograph shows another tank at the facility with unknown contents.</p>	
<p>#11</p> <p>Location: Northern Facility Boundary</p> <p>This photograph shows another tank at the facility with unknown contents.</p>	






Area & Description	Photographs
<p>#12</p> <p>Location: Plant Perimeter</p> <p>This photograph shows a 5-gallon poly container of unknown contents and contaminated rainwater.</p>	 <p>A photograph showing a 5-gallon poly container filled with dark, contaminated rainwater. The container is sitting on the ground next to a large, empty metal drum. The ground is covered with dry leaves and some green vegetation. A timestamp in the bottom right corner reads "09/02/2014 12:29".</p>
<p>#13</p> <p>Location: Plant Perimeter</p> <p>This photograph depicts a 55-gallon drum of an unknown liquid.</p>	 <p>A photograph depicting a 55-gallon drum of an unknown liquid. The drum is partially obscured by a red fire hose and some foliage. The drum is situated outdoors, and the surrounding area is covered with dry leaves and some green vegetation. A timestamp in the bottom right corner reads "09/02/2014 12:33".</p>



Area & Description	Photographs
<p>#14</p> <p>Location: Plant Perimeter</p> <p>This photograph depicts two more tanks with unknown contents.</p>	 <p>A photograph showing two large, dark, cylindrical tanks, likely storage tanks, partially obscured by trees and foliage. The tanks are situated in a wooded area. A timestamp in the bottom right corner reads "09/02/2014 12:35".</p>
<p>#15</p> <p>Location: Plant Perimeter</p> <p>This photograph depicts two totes of suspected tall oil or tall oil derivatives.</p>	 <p>A photograph showing two large white totes (tanks) with metal frames, situated outdoors near industrial equipment. A blue and white rope is coiled on top of the foreground tote. A timestamp in the bottom right corner reads "09/02/2014 12:36".</p>








Area & Description	Photographs
<p>#16</p> <p>Location: Plant Perimeter</p> <p>This photograph depicts a 55-gallon drum of an unknown liquid in the background. An unknown white waste is also stuck in the pipe of a piece of contaminated equipment in the foreground.</p>	
<p>#17</p> <p>Location: Plant Perimeter</p> <p>This photograph shows an open topped tank of suspected tall oil or tall oil distillates contaminated with rainwater.</p>	

Area & Description	Photographs
<p>#18</p> <p>Location: Plant Perimeter</p> <p>This photograph depicts a 55-gallon drum of an unknown liquid.</p>	
<p>#19</p> <p>Location: Fabrication Building Exterior</p> <p>This photograph depicts five more totes of tall oil, tall oil distillates, or tall oil wastes.</p>	
<p>#20</p> <p>Location: Fabrication Building Exterior</p> <p>This photograph depicts three more totes of tall oil or tall oil distillates or tall oil wastes.</p>	







Area & Description	Photographs
<p>#21</p> <p>Location: Fabrication Building Exterior</p> <p>This photograph depicts a 55-gallon drum of an unknown liquid (center green drum). The open blue drum at the right of the frame contained black oil suspected as tall oil.</p>	 <p>A photograph showing two large metal drums outdoors. The central drum is green and appears to be a 55-gallon drum. To its right is a blue drum. The drums are surrounded by overgrown vegetation. A timestamp '09/02/2014 12:50' is visible in the bottom right corner of the photo.</p>
<p>#22</p> <p>Location: Fabrication Building</p> <p>This photograph depicts two cylinders of an unknown gas.</p>	 <p>A photograph showing two gas cylinders indoors. One cylinder is orange with a red top, and the other is dark grey with a brown top. They are positioned next to a white wall. A cardboard box with 'WITH CARE' and 'CHI TER' is visible in the background. A timestamp '09/02/2014 12:53' is visible in the bottom right corner of the photo.</p>



Area & Description	Photographs
<p>#23</p> <p>Location: Fabrication Building</p> <p>This photograph depicts four 1-gallon poly containers of an unknown liquid.</p>	 A photograph showing four red 1-gallon plastic jugs with blue caps arranged in a row on a concrete floor. A timestamp in the bottom right corner reads "09/02/2014 12:56".
<p>#24</p> <p>Location: Fabrication Building</p> <p>This photograph depicts a 55-gallon drum of unknown black liquid waste.</p>	 A photograph of a 55-gallon metal drum, painted blue with a yellow top. The drum is heavily rusted and sits on a wooden pallet. A timestamp in the bottom left corner reads "09/02/2014 12:57".
<p>#25</p> <p>Location: Fabrication Building</p> <p>This photograph is an overview shot of eleven open top 55-gallon drums of suspected soil contaminated with spilled tall oil or tall oil distillates. Some of the drums also contained other common solid wastes (trash) placed on top of the soil.</p>	 An overview photograph of eleven open-top 55-gallon drums in a storage area. The drums are various colors (blue, green, black) and are arranged in rows. A timestamp in the bottom right corner reads "09/02/2014 13:00".

Area & Description	Photographs
<p>#26</p> <p>Location: Fabrication Building</p> <p>This photograph depicts the interior of one of the drums shown in photograph #25.</p>	 A photograph showing the interior of a dark, cylindrical drum. The drum is filled with various pieces of debris, including a white foam block, a blue and white box labeled 'Evolve', and a red and white box labeled 'THREAT CHARGES'. A timestamp '09/02/2014 13:00' is visible in the bottom right corner.
<p>#27</p> <p>Location: Fabrication Building</p> <p>This photograph depicts four 55-gallon drum of refractory insulation waste.</p>	 A photograph showing four 55-gallon drums filled with white, fluffy refractory insulation waste. The drums are arranged in a row, and a bright light source is visible in the background, illuminating the scene. A timestamp '09/02/2014 13:01' is visible in the bottom right corner.





Area & Description	Photographs
<p>#28</p> <p>Location: Fabrication Building</p> <p>This photograph shows two 5-gallon poly containers or waste Econoset 50 TC.</p>	 <p>A photograph showing two stacked white 5-gallon poly containers. The top container has a yellow label with the text "ECONOSET 50 TC" and other illegible text. The bottom container is partially visible. The containers are on a concrete floor. A timestamp "09/02/2014 13:03" is visible in the bottom right corner of the photo.</p>
<p>#29</p> <p>Location: Fabrication Building</p> <p>This photograph depicts a pile of mixed solid wastes and loose refractory insulation waste.</p>	 <p>A photograph showing a pile of mixed solid wastes and loose refractory insulation waste. The waste includes cardboard boxes, plastic bags, and loose insulation material. A timestamp "09/02/2014 13:05" is visible in the bottom left corner of the photo.</p>


Area & Description	Photographs
<p>#30</p> <p>Location: Fabrication Building</p> <p>This photograph depicts a 5-gallon poly container of an unknown black liquid.</p>	 <p>09/02/2014 13:09</p>
<p>#31</p> <p>Location: Fabrication Building</p> <p>This photograph depicts two 55-gallon open drums of refractory waste.</p>	 <p>09/02/2014 13:11</p>


Area & Description	Photographs
<p>#32</p> <p>Location: Fabrication Building</p> <p>The numerous containers in the mezzanine area were not inspected directly due to safety concerns. Their contents are unknown.</p>	 A photograph showing a cluttered industrial mezzanine area. Numerous large, light-colored cylindrical containers are stacked on shelves and the floor. Various other items, including boxes, pipes, and equipment, are scattered throughout the space. A timestamp in the bottom right corner reads "09/02/2014 13:13".
<p>#33</p> <p>Location: Fabrication Building</p> <p>This photograph depicts an incinerator reportedly manufactured at the site in the past. It is unknown if the incinerator is empty.</p>	 A photograph of a large, rusted metal structure, identified as an incinerator. The structure is composed of several large, circular or cylindrical components stacked vertically. It appears to be made of heavy metal and is heavily corroded. A timestamp in the bottom right corner reads "09/02/2014 13:14".





Area & Description	Photographs
<p>#34</p> <p>Location: Fabrication Building</p> <p>This photograph depicts waste accumulated in the floor drain of the Fabrication shop. The drain contained sludge, water, and sheen.</p>	



Area & Description	Photographs
<p>#35</p> <p>Location: Fabrication Building</p> <p>The cylinder in this photograph is marked as containing oxygen. The totes were stated to contain tall oil or tall oil distillates.</p>	

Area & Description	Photographs
<p>#36</p> <p>Location: Fabrication Building</p> <p>This photograph depicts an unknown gas cylinder.</p>	




Area & Description	Photographs
<p>#37</p> <p>Location: Fabrication Building</p> <p>This photograph depicts three containers accumulating refractory waste.</p>	 A photograph showing three large, dark-colored metal drums or containers stacked in a corner of a building. The containers are filled with a light-colored, granular material, identified as refractory waste. A timestamp '09/02/2014 13:19' is visible in the bottom right corner of the photo.





Area & Description	Photographs
<p>#38</p> <p>Location: Western Facility Boundary</p> <p>This photograph depicts two 30-gallon drums and one 55-gallon drum unknown liquids.</p>	 <p>A photograph showing three blue drums (two 30-gallon and one 55-gallon) and a white bucket containing a pink liquid. The drums are situated outdoors on a wooden surface, with a white corrugated metal wall in the background. A timestamp '09/02/2014 13:23' is visible in the bottom right corner of the photo.</p>
<p>#39</p> <p>Location: Western Facility Boundary</p> <p>This photograph depicts a 55-gallon drum of an unknown liquid.</p>	 <p>A photograph of a green 55-gallon drum standing in a grassy area. The drum is positioned in front of a white corrugated metal wall. A timestamp '09/02/2014 13:25' is visible in the bottom right corner of the photo.</p>




Area & Description	Photographs
<p>#40</p> <p>Location: Western Facility Boundary</p> <p>This photograph shows three more totes of tall oil or tall oil distillates.</p>	 A photograph showing three large, white, rectangular totes (drums) stacked in a row. They are located in an outdoor area with gravel ground and some vegetation. In the background, there are trees and a building. A timestamp "09/02/2014 13:27" is visible in the bottom right corner.
<p>#41</p> <p>Location: Western Facility Boundary</p> <p>This photograph shows three compromised drums of tall oil spill cleanup debris.</p>	 A close-up photograph of three large, cylindrical drums. One drum is white and appears to be damaged or compromised, with debris and leaves around it. Another drum is orange. A timestamp "09/02/2014 13:30" is visible in the bottom right corner.





Area & Description	Photographs
<p>#42</p> <p>Location: Western Facility Boundary</p> <p>This photograph shows three 55-gallon drums of tall oil spill cleanup debris.</p>	 A photograph showing three 55-gallon drums (two black, one white) standing outdoors near a chain-link fence and dense green foliage. The ground is covered with fallen leaves. A timestamp "09/02/2014 13:32" is visible in the bottom right corner.
<p>#43</p> <p>Location: Western Facility Boundary</p> <p>The six 55-gallon drums in this photograph contain tall pitch spill cleanup debris. The five smaller containers contain unknown wastes. The cargo container in the background reportedly contains biological oils stored here since at least 2006.</p>	 A photograph showing a collection of waste containers: six large 55-gallon drums (various colors like blue, orange, and grey) and five smaller white plastic containers. They are situated outdoors near a brown metal wall. A timestamp "09/02/2014 13:33" is visible in the bottom right corner.
<p>#44</p> <p>Location: Western Facility Boundary</p> <p>This photograph depicts two 55-gallon poly containers of an unknown liquid and two 55-gallon steel containers of an unknown waste.</p>	 A photograph showing four 55-gallon containers: two white polyethylene drums and two rusty steel drums. They are located outdoors near green bushes and trees. A timestamp "09/02/2014 13:35" is visible in the bottom right corner.




Area & Description	Photographs
<p>#45</p> <p>Location: Western Facility Boundary</p> <p>This photograph depicts an open topped drum of tall oil or tall oil derivatives.</p>	 A photograph showing a large, dark, cylindrical metal drum lying on its side. The drum is open at the top, and a dark, viscous liquid is visible inside. A metal rod or pipe is inserted into the liquid. The drum is situated outdoors on a grassy area. A timestamp "09/02/2014 13:35" is visible in the bottom right corner of the photo.
<p>#46</p> <p>Location: Western Boundary Shipping Container</p> <p>This photograph depicts the interior of the cargo container depicted in photograph #43. This container was very full which prohibited the close inspection of the contents interior.</p>	 A photograph showing the interior of a shipping container. The container is filled with various items, including cardboard boxes, plastic containers, and other debris. A large, orange, cylindrical object is visible on the right side. A timestamp "09/02/2014 13:39" is visible in the bottom right corner of the photo.





Area & Description	Photographs
<p>#47</p> <p>Location: Western Facility Boundary</p> <p>This photograph depicts three drums of unknown wastes.</p>	 A photograph showing three large metal drums (two green, one black) standing in a field of tall grass and weeds. A person wearing a blue protective suit is partially visible on the right side of the frame. A timestamp "09/02/2014 13:41" is visible in the bottom right corner of the photo.
<p>#48</p> <p>Location: Western Facility Boundary</p> <p>This photograph depicts a tote of an unknown liquid. The lid was closed with plastic sheeting rather than a manufactured cap (not pictured).</p>	 A photograph of a large, rectangular metal tote filled with a liquid. The tote is covered with a blue plastic sheeting. It is situated in a field of tall grass and weeds. A timestamp "09/02/2014 13:43" is visible in the bottom right corner of the photo.
<p>#49</p> <p>Location: Laboratory</p> <p>The ten 1-gallon containers contain unspecified "specialty polymers" wastes left over from past product development. The 1-liter glass container (lower right) holds an unknown waste.</p>	 A photograph of an open white laboratory storage cabinet. Inside, there are several white plastic jugs of various sizes and one small glass container. The floor of the cabinet is dark and appears to be made of wood or a similar material. A timestamp "09/02/2014 13:49" is visible in the bottom right corner of the photo.

Area & Description	Photographs
<p>#50</p> <p>Location: Laboratory</p> <p>The metal container on the left contains an unknown white powder, the middle container is empty, and the right contains an unknown black liquid waste.</p>	 <p>A photograph showing three containers on a light green shelf. On the left is a small, rusted metal can containing a white powder. In the middle is a clear glass jar, which is empty. On the right is a tall, clear plastic bottle with a yellow cap, containing a dark, opaque black liquid. A yellow and white striped paper is partially visible behind the bottle. A timestamp '09/02/2014 13:50' is visible in the bottom right corner of the photo.</p>
<p>#51</p> <p>Location: Laboratory</p> <p>The 5-gallon poly contains waste glycerin. The smaller poly container above holds an unknown waste.</p>	 <p>A photograph of a large, white, 5-gallon polyethylene bucket sitting on a dark wooden floor. Inside the bucket is a smaller, white, cylindrical poly container. The bucket has a label that reads 'TREOIL INDUSTRIES LTD', '4442 ALDERGROVE RD', 'PERRIN, LA 70450', and 'PHTH 8/30'. The smaller container inside is partially filled with a yellowish, translucent liquid. A timestamp '09/02/2014 13:50' is visible in the bottom right corner of the photo.</p>







Area & Description	Photographs
<p>#52</p> <p>Location: Laboratory</p> <p>This photograph depicts 1-gallon poly container of an unknown waste.</p>	 A photograph of a 1-gallon orange poly container filled with an orange liquid, sitting on a white lab bench. A window is visible in the background. A timestamp "09/02/2014 13:52" is in the bottom right corner.
<p>#53</p> <p>Location: Laboratory</p> <p>This photograph depicts numerous containers of waste expired laboratory chemicals. Note that the chemicals are in old and rusted containers. A partial list of example chemicals in this pile include:</p> <ul style="list-style-type: none"><li>• Sulfuric acid</li><li>• Potassium dichromate</li><li>• Triethanolamine</li></ul>	 A photograph showing a pile of old, rusted chemical containers (jugs and cans) inside cardboard boxes. A timestamp "09/02/2014 13:53" is in the bottom right corner.
<p>#54</p> <p>Location: Laboratory</p> <p>This photograph depicts more cardboard boxes of waste laboratory chemicals, glassware and other laboratory debris.</p>	 A photograph showing several cardboard boxes filled with various pieces of laboratory waste, including glassware and chemical containers. A timestamp "09/02/2014 13:53" is in the bottom right corner.


Area & Description	Photographs
<p>#55</p> <p>Location: Laboratory</p> <p>This photograph shows four 1-gallon poly containers of 2-propanol. The 1-gallon glass container on the left contains an unknown waste.</p>	 <p>A photograph showing four 1-gallon poly containers on a shelf. The containers are arranged in a row. The one on the far left is a dark glass bottle, and the others are white plastic jugs. They are sitting on a shelf that has some debris and a piece of paper on it. A timestamp in the bottom right corner of the photo reads '09/02/2014 13:53'.</p>

Area & Description	Photographs
<p>#56</p> <p>Location: Laboratory</p> <p>This shelf holds numerous containers of expired waste laboratory chemicals. Note that the shelf has begun to rust and deteriorate.</p>	






Area & Description	Photographs
<p>#57</p> <p>Location: Laboratory</p> <p>This container holds 100 pounds of calcium hypochlorite. Note the container is deteriorating.</p>	
<p>#58</p> <p>Location: Control Building</p> <p>The red poly container on the left of frame contains old gasoline. Note a white rag is stuffed into the spout instead of a regular cap. The glass container on the right contains an unknown liquid waste.</p>	




Area & Description	Photographs
<p>#59</p> <p>Location: Control Building</p> <p>This photograph shows three 1-gallon glass containers of unknown liquid waste.</p>	 <p>A photograph showing three 1-gallon glass containers filled with a brown, opaque liquid. They are sitting on a white surface, possibly a sink or counter. There are some papers and other items in the background. A timestamp in the bottom right corner reads "09/02/2014 14:15".</p>
<p>#60</p> <p>Location: Control Building</p> <p>This photograph depicts a 2-liter poly container of an unknown liquid waste.</p>	 <p>A photograph showing a 2-liter plastic bottle filled with a blue liquid. It is on a wooden shelf next to a box of Mr. Coffee and a glass. There are other items on the shelf, including a black container and a roll of tape. A timestamp in the bottom right corner reads "09/02/2014 14:17".</p>

Area & Description	Photographs
<p>#61</p> <p>Location: Control Building</p> <p>This photograph shows a 1-liter poly container of an unknown liquid waste.</p>	









Area & Description	Photographs
<p>#62</p> <p>Location: Control Building</p> <p>This photograph shows four 1-gallon containers of waste flammable paint.</p>	 <p>The photograph shows four 1-gallon containers of waste flammable paint. In the foreground, there is a white container with a blue label and a red container with a yellow label. Behind them are two more containers, one white and one blue. The containers are stacked and surrounded by other debris, including plastic bags and a metal grate. A timestamp '09/02/2014 14:20' is visible in the bottom right corner of the image.</p>

Area & Description	Photographs
<p>#63</p> <p>Location: Control Building</p> <p>This photograph shows a 1-gallon container of flammable paint and a 5-gallon poly container of an unknown waste.</p>	
<p>#64</p> <p>Location: Control Building</p> <p>This photograph shows a shelf with numerous small containers of waste. While many of these were unlabeled unknowns, a partial list of example wastes includes:</p> <ul style="list-style-type: none"><li>• Sulfuric acid</li><li>• Glacial acetic acid</li></ul>	

Area & Description	Photographs
<p>#65</p> <p>Location: Control Building</p> <p>This photograph shows a table laden with numerous small containers of unknown wastes.</p>	
<p>#66</p> <p>Location: Control Building</p> <p>This photograph shows a 5-gallon poly container of waste "Chemax-480."</p>	
<p>#67</p> <p>Location: Control Building</p> <p>This photograph depicts two 5-gallon poly containers labeled "hydrazine," another two 5-gallon poly containers labeled "morpoline," an unlabeled 5-gallon poly container of unknown waste, and a 5-gallon steel container of waste xylene.</p>	



Area & Description	Photographs
<p>#68</p> <p>Location: Control Building</p> <p>This photograph shows two cardboard boxes of expired waste laboratory chemicals. A partial list of example chemicals included:</p> <ul style="list-style-type: none"><li>• Copper Sulfate</li><li>• Copper Chloride</li><li>• Sodium Bromide</li></ul>	
<p>#69</p> <p>Location: Control Building</p> <p>The seven white 5-gallon poly containers in this photograph contain an unknown waste. It is believed that the blue 55-gallon drum in the background being used as a table is empty.</p>	
<p>#70</p> <p>Location: Control Building</p> <p>The drums in this photograph were difficult to access due to so much clutter and equipment. Their contents are unknown.</p>	




Area & Description	Photographs
<p>#71</p> <p>Location: Control Building</p> <p>This photograph shows more drums of unknown waste. The green piece of equipment in the background is reportedly an old boiler.</p>	 <p>09/02/2014 14:39</p>
<p>#72</p> <p>Location: Control Building</p> <p>This photograph depicts a shelf of expired waste laboratory chemicals, paint, and unlabeled unknown wastes. An example chemical on this list was polydimethylsiloxane.</p>	 <p>09/02/2014 14:39</p>
<p>#73</p> <p>Location: Control Building</p> <p>This photograph shows two pallets of solid caustic waste; the pallet on the left holds sodium hydroxide while the right contains potassium hydroxide.</p>	 <p>09/02/2014 14:41</p>



**Photo Log Part 2**

**Photographer:** Mary O'Herron

**Witness:** Chris Wilkerson

Area & Description	Photographs
<p>#501</p> <p>Location: Facility Exterior</p> <p>This photograph shows Mr. Gill's vehicle.</p>	
<p>#502</p> <p>Location: Southern Facility Boundary</p> <p>This photograph shows a parked trailer which held unidentified materials under a grey tarp.</p>	
<p>#503</p> <p>Location: Eastern Facility Boundary</p> <p>The two shipping containers in this photograph were reported by Mr. Gill to contain equipment owned by a Mr. Frank Kanderall.</p>	

#504

Location: Fabrication Building Exterior

The totes in this photograph reportedly contain tall oil or tall oil derivatives.



#505

Location: Eastern Facility Boundary

This water hydrant is active and pressurized and the facility is served by the local water utility.



#506

Location: Eastern Facility Boundary

The blue tarp in this photograph covered a pile of cable.





#507

Location: Eastern Facility Boundary

The white 5-gallon poly buckets in this photograph contained soil and pieces of metal equipment.



Photographs 508 and 509 were out of focus and discarded.

#510

Location: Eastern Facility Boundary

The drum in this photograph contained an unknown waste.



#511

Location: Eastern Facility Boundary

This photograph shows a close-up of a product label on the drum from photograph #510.

Note: Mr. Gill reported that containers often were repurposed at the facility and that old product labels were not removed or updated.



#512

Location: Eastern Facility Boundary

This photograph shows the interior of an open topped metal tank. The liquid in the bottom appeared to be rainwater contaminated with tall oil.



#513

Location: Eastern Facility Boundary

This photograph shows the open top of the tank in photograph #512.





#514

Location: Eastern Facility Boundary

The tank in #512 was labeled on the side as "THICKENER TANK" and "Caution Caustic." It is unknown if the waste inside was actually caustic.



#515

Location: Eastern Facility Boundary

This photograph depicts another pile of discarded cable.





#516

Location: Eastern Facility Boundary

This photograph shows a patch of soil with suspected contamination from tall oil or tall oil derivatives.



#517

This photograph shows a small pile of approximately eight discarded tires.



#518

Location: Eastern Facility Boundary

This tank reportedly holds tall oil rosin.



#519

Location: Eastern Facility Boundary

This photograph shows a hole near the top of the tank shown in photograph #518.



#520

Location: Eastern Facility Boundary

The three totes in this photograph reportedly contain tall oil or tall oil derivatives.





#521

Location: Eastern Facility Boundary

The top of the totes in photograph #520 had holes cut into the top of the tote.



#522

Location: Eastern Facility Boundary

Another view of the top of the totes shown in photograph #520.



#523

Location: Eastern Facility Boundary

A third view of the top of the totes shown in photograph #520.



#524

Location: Eastern Facility Boundary

Mr. Gill stated that this unit is an incinerator manufactured at the facility. It is unknown if the unit is empty.



#525

Location: Eastern Facility Boundary

This photograph illustrates an open 55-gallon drum of suspected tall oil wastes.



#526

Location: Eastern Facility Boundary

This photograph shows a tank. It is suspected that this tank was empty due to its open valves (not pictured).





#527

Location: Eastern Facility Boundary

Another view of the tank pictured in photograph #526.  
Note the holes in the top of the tank.



#528

Location: Eastern Facility Boundary

The drum in this photograph contained an unknown waste.  
The trailer in the right corner of the frame contained scrap wood.



#529

Location: Eastern Facility Boundary

Another view of the drum depicted in photograph #528.



#530

Location: Eastern Facility Boundary

This photograph provides another view of the side of the tank depicted in photograph #526.



#531

Location: Eastern Facility Boundary

This photograph shows two trucks at the facility. It is unknown what is in the bed of the truck.



#532

Location: Eastern Facility Boundary

This photograph shows two more drums of unknown wastes and some more discarded equipment.





#533

Location: Northern Facility Boundary

This tank was difficult to access due to thick vegetation.  
The tank's contents are unknown.



#534

Location: Northern Facility Boundary

This tank was also difficult to access due to thick  
vegetation. The tank's contents are unknown.



#535

Location: Plant Perimeter

These drums were empty and had their bottoms perforated  
for use as a sieve.



#536

Location: Plant Perimeter

The drums in the foreground of this photograph were empty. The red drum in the background contained an unknown waste.



#537

Location: Plant Perimeter

The red piece of equipment in this photograph is another incinerator manufactured at the facility. It is unknown if it is empty.



#538

Location: Plant Perimeter

A close up of the drum pictured in photograph #536. The hand written label says "K 15/40." The contents of the drum are unknown.

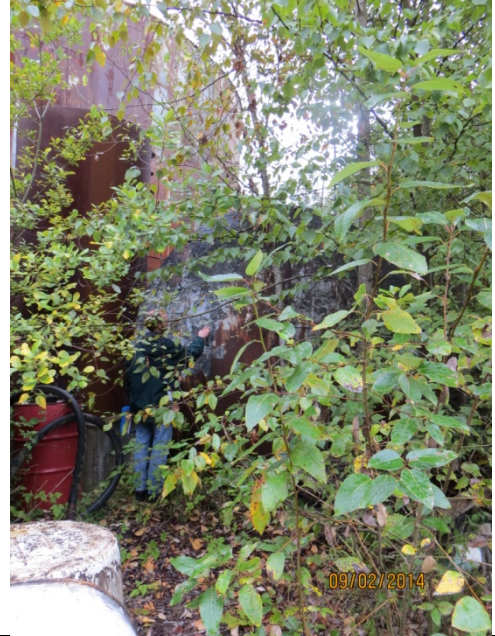




#539

Location: Plant Perimeter

In the vegetation at the north end of the plant perimeter were four tanks with unknown contents.



#540

Location: Plant Perimeter

This photograph provides another view of one of the tanks depicted in photograph #539.



#541

Location: Plant Perimeter

This photograph shows the top of the tanks depicted in photograph #539.



#542

Location: Plant Perimeter

Another view of the tanks depicted in photograph #539.



#543

Location: Plant Perimeter

These two totes reportedly contain tall oil or tall oil derivatives wastes. The contents of the tanks in the background of this photograph are unknown but reportedly contain tall oil or tall oil derivatives.





#544

Location: Plant Perimeter

The piece of equipment in the foreground of this frame contained an unknown white powder waste. The totes on the right and the 55-gallon drum in the background contain unknown wastes.



#545

Location: Plant Perimeter

The tote in this photograph contains waste tall oil or tall oil derivatives. Note the hole in the top of the tote.



#546

Location: Plant Perimeter

The totes and drums depicted in this photograph are located within the secondary containment of the main plant. They reportedly contain tall oil or tall oil derivatives.



#547

Location: Plant Perimeter

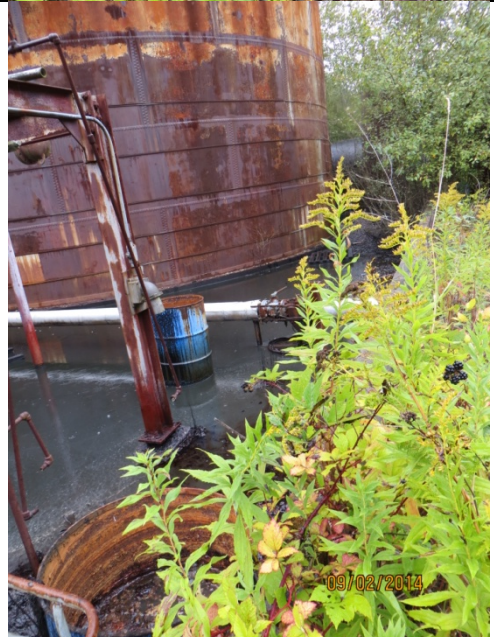
Another view of a 55-gallon drum of waste located within the secondary containment of the main plant. Also note that several inches of spilled tall oil and contaminated storm water area also inside of the secondary containment.



#548

Location: Plant Perimeter

This photograph also depicts the drum and secondary containment area shown in photograph #547.





#549

Location: Plant Perimeter

This photograph shows the accumulation of sludge and debris within the plant secondary containment.



#550

Location: Plant Perimeter

The tank in the foreground of this photograph contains waste tall oil or tall oil derivatives and contaminated storm water.



#551

Location: Plant Perimeter

Another photograph showing the containers depicted in photograph #546.



#552

Location: Plant Perimeter

The contents of the drum in this photograph are unknown.





#553

Location: Plant Perimeter

The tank on the left part of the frame in this photograph contained accumulated rainwater.



#554

Location: Plant Perimeter

The two 55-gallon drums in this photograph contain unknown waste.



#555

Location: Plant Perimeter

The open 55-gallon drum in this photograph contained several inches of tall oil or tall oil derivatives.



#556

Location: Plant Perimeter

This photograph depicts two 5-gallon poly containers sitting inside the contaminated secondary containment of the main plant.



#557

Location: Plant Perimeter

Another view of the containers depicted in photograph #556.





#558

Location: Plant Perimeter

These two tanks are marked with a flammable placard UN1230 (methanol). The contents of the tanks are unknown.



#559

Location: Plant Perimeter

This photograph shows the flammable placard on the tanks depicted in photograph #558.



#560

Location: Fabrication Building Exterior

The eight totes depicted in this photograph reportedly contain tall oil or tall oil derivatives. The contents of the tank are unknown.



#561

Location: Fabrication Building Exterior

An additional row of six totes of tall oil wastes was stored on the north side of the Fabrication Building.



#562

Location: Fabrication Building Exterior

This photograph shows a close up of an old product label on a tote of waste tall oil.



#563

Location: Fabrication Building Exterior

This photograph shows a close up of an old product label on a tote of waste tall oil.





#564

Location: Fabrication Building Exterior

This photograph shows a close up of an old product label on a tote of waste tall oil.



#565

Location: Fabrication Building Exterior

This photograph shows a close up of an old product label on a tote of waste tall oil.



#566

Location: Fabrication Building Exterior

This photograph depicts a 55-gallon drum of an unknown liquid (green drum). The blue drum at the left of the frame contained black oil suspected as tall oil.





#567

Location: Fabrication Building Exterior

This cylinder contains an unknown waste.



#568

Location: Fabrication Building Exterior

This photograph shows the open top of a tote depicted in photograph #560.



#569

Location: Fabrication Building Exterior

This photograph shows a close up of an old product label on a tote of waste tall oil.



#570

Location: Fabrication Building Exterior

This photograph shows a close up of an old product label on a tote of waste tall oil.



#571

Location: Fabrication Building Exterior

The tank in this photograph collected rainwater from the building roof.



#572

Location: Fabrication Building Exterior

A second photograph showing the tank depicted in photograph #571.





#573

Location: Fabrication Building Exterior

The two drums in this photograph contain wood scraps and pieces of scrap metal.



#574

Location: Fabrication Building Exterior

This photograph depicts the southern edge of the Fabrication building.



#575

Location: Fabrication Building Interior

The drums in the foreground of this photograph contain household trash (food and consumables packaging).





#576

Location: Fabrication Building Interior

The totes in the background of this photograph reportedly contain waste tall oil.



#577

Location: Fabrication Building Interior

Another view of the totes depicted in photograph #576.



#578

Location: Fabrication Building Interior

Another view of the totes depicted in photograph #576.



#579

Location: Fabrication Building Interior

This photograph shows a box of sawdust utilized as spill absorbent.



#580

Location: Fabrication Building Interior

The six drums depicted in this photograph contain tall oil spill cleanup debris.



#581

Location: Fabrication Building Interior

These drums contain unknown wastes.



#582

Location: Fabrication Building Interior

Another view of the drums depicted in photograph #581.





#583

Location: Fabrication Building Interior

This container holds a mixture of waste refractory material and spilled tall oil cleanup debris.



#584

Location: Fabrication Building Interior

This photograph shows spilled refractory dust on the floor.



#585

Location: Fabrication Building Interior

These drums were reported to contain raw materials for the construction of refractory insulation but their exact contents are unknown.



#586

Location: Fabrication Building Interior

A close up of the label of one of the drums pictured in photograph #585.



#587

Location: Fabrication Building Interior

These containers contain waste from the construction of incinerator insulation.



#588

Location: Fabrication Building Interior

These containers contain waste from the construction of incinerator insulation.



#589

Location: Fabrication Building Interior

This photograph shows waste refractory materials.





#590

Location: Fabrication Building Interior

The cylinder in this photograph contains an unknown waste.



#591

Location: Fabrication Building Interior

The contents of these boxes are unknown. The blue tank in the center of the picture is reportedly an empty compressor.



#592

Location: Fabrication Building Interior

Most of these 5-gallon poly buckets were empty but contaminated with tall oil residues.



#593

Location: Fabrication Building Interior

The poly containers to the right of the frame are depicted clearly in photograph #28 and contain waste” Econoset 50.” The bags in the background contain waste insulation.



#594

Location: Fabrication Building Interior

This photograph shows a pile of discarded insulation.



#595

Location: Fabrication Building Interior

This photograph also shows a pile of waste insulation.



#596

Location: Fabrication Building Interior

The grey bricks in this photograph are discarded insulation waste.



#597

Location: Fabrication Building Interior

These containers and this area held a variety of wastes from insulation construction.



#598

Location: Fabrication Building Interior

The contents and purpose of this piece of equipment are unknown.





#599

Location: Fabrication Building Interior

The contents of these fiber containers are unknown.



#600

Location: Fabrication Building Interior

This photograph is too dark to see clearly, but it is attempting to provide another image of the containers in photograph #601.



#601

Location: Fabrication Building Interior

This photograph shows the containers with unknown contents from photographs #599 and 600 with better lighting.



#602

Location: Fabrication Building Interior

This photograph depicts an incinerator reportedly manufactured at the facility. It is unknown if this incinerator is empty.



#603

Location: Fabrication Building Interior

The contents or purposes of this piece of equipment are unknown.



#604

Location: Fabrication Building Interior

This photograph shows a pallet of materials used to construct refractory insulation for incineration units manufactured at the plant.



#605

Location: Fabrication Building Interior

The trench drain pictured in this photograph contained sediment and water with a visible sheen.





#606

Location: Fabrication Building Interior

A close up of the contaminated water and sediment in the trench drain pictured in photograph #607.



#607

Location: Fabrication Building Interior

This photograph shows wooden frames and other pieces of discarded equipment.



#608

Location: Fabrication Building Interior

This photograph shows more wooden frames pictured in photograph #607.



#609

Location: Fabrication Building Interior

The equipment in this photograph may contain hazardous components such as gasoline, lead acid batteries, or motor oil.



#610

Location: Fabrication Building Interior

The contents of this drum and these cardboard boxes are unknown.



#611

Location: Western Facility Boundary

This piece of equipment is reportedly operational.



#612

Location: Western Facility Boundary

The contents of this drum are unknown.





#613

Location: Western Facility Boundary

This photograph shows a second view of the container shown in #612.



#614

Location: Western Facility Boundary

This photograph shows an area of soil suspected to be contaminated with tall oil or tall oil derivatives.



#615

Location: Western Facility Boundary

The totes depicted in this photograph reportedly contain tall oil or tall oil derivatives.



#616

Location: Fabrication Building Exterior

The totes in this photograph reportedly contain discarded tall oil or tall oil derivatives.



#617

Location: Western Facility Boundary

These containers reportedly contain tall oil spill cleanup debris.



#618

Location: Western Facility Boundary

These drums reportedly contain tall oil spill cleanup debris.





#619

Location: Western Facility Boundary

This container of tall oil spill cleanup debris has fallen over and the base of the container has corroded and failed.



#620

Location: Western Facility Boundary

This piece of equipment was reportedly a filter constructed at the facility for tall oil wastewater processing.



#621

Location: Western Facility Boundary

These drums reportedly contain tall oil spill clean up debris.





#622

Location: Western Facility Boundary

This photograph shows an area of soil suspected to be contaminated with tall oil or tall oil derivatives.



#623

Location: Western Facility Boundary

This shipping container reportedly holds drums of biological oil.



#624

Location: Western Facility Boundary

These drums reportedly contained tall oil spill cleanup debris.



#625

Location: Western Facility Boundary

These drums reportedly contained tall oil spill cleanup debris.



#626

Location: Western Facility Boundary

This container holds waste tall oil or tall oil derivatives.



#627

Location: Western Facility Boundary

This container provides a second view of the container shown in photograph #626.





#628

Location: Western Facility Boundary

The contents of this drum are unknown.



#629

Location: Western Facility Boundary

These drums reportedly contain waste tall oil or tall oil derivatives.



#630

Location: Western Facility Boundary

The interior of the shipping container shown in photograph #623 held numerous drums, discarded equipment, and undesigned solid wastes.





#631

Location: Western Facility Boundary

This photograph shows the interior of the shipping container depicted in photograph #623.



#632

Location: Western Facility Boundary

These containers reportedly contain tall oil spill cleanup debris.



#633

Location: Western Facility Boundary

The tote in this photograph contains an unknown waste.



#634

Location: Western Facility Boundary

The top of the tote depicted in photograph #633 was closed with plastic sheet and a loose fitting plastic lid.



#635

Location: Western Facility Boundary

This photograph illustrates five 1000-2000 gallon tanks that were reportedly empty.





#636

Location: Western Facility Boundary

This photograph depicts another view of the tanks shown in photograph #635.



#637

Location: Western Facility Boundary

This sink appeared to contain uncontaminated stormwater.



#638

Location: Laboratory West

This photograph shows the interior of the western laboratory trailer. I did not observe any hazardous or undesignated wastes in this location.





#639

Location: Laboratory East

This photograph shows the interior of the eastern laboratory trailer. The shelf and boxes at the far end of the trailer contained numerous different discarded chemicals.



#640

Location: Laboratory East

The containers in this photograph were labeled "specialty polymers."



#641

Location: Northern Facility Boundary

The contents of the hopper shown in this photograph are unknown.



#642

Location: Northern Facility Boundary

The contents of the tank in this photograph are unknown.  
The vegetation limited access to this tank.



#643

Location: Northern Facility Boundary

This photograph provides another view of the tank depicted in photograph #642.



#644

Location: Plant Perimeter

The tanks in this photograph are situated along the northern edge of the plant's concrete pad. The contents of these tanks are unknown.





#645

Location: Processing Plant

This photograph depicts an area of soil suspected to be contaminated with spilled tall oil or tall oil derivatives. This area is located on the western side of the processing plant.



#646

Location: Exterior of Control Building

This photograph depicts an area of soil suspected to be contaminated with spilled tall oil or tall oil derivatives. This area is located to the west of the soil depicted in photograph #645 on the north side of the control building.



#647

Location: Exterior of Control Building

This photograph provides a closer view of the area of contamination documented in photograph #646. This area is located to the west of the soil depicted in photograph #645 on the north side of the control building.



#648

Location: Exterior of Control Building

This photograph provides another view of the area of contamination documented in photograph #646. This area is located to the west of the soil depicted in photograph #645 on the north side of the control building.



#649

Location: Exterior of Control Building

This photograph provides another view of the area of contamination documented in photograph #646. This area is located to the west of the soil depicted in photograph #645 on the north side of the control building.





#650

Location: Exterior of Control Building

This photograph illustrates an area that appears to be a dumpsite for contaminated water, tall oil, or tall oil derivatives.



#651

Location: Exterior of Control Building

This photograph provides another view of the area of contamination documented in photographs #645 and #646. This photograph shows the area connecting these two locations.



#652

Location: Processing Plant

This photograph depicts a concrete containment sump full of tall oil or tall oil derivatives.





#653

Location: Processing Plant

This photograph provides another view of the contaminated sump depicted in photograph #652.



#654

Location: Processing Plant

The three 55-gallon drums in the foreground of this photograph reportedly contain tall oil spill cleanup debris. The totes in the background reportedly contain either tall oil or tall oil derivatives or waste from biodiesel processing.



#655

Location: Processing Plant

This photograph shows an area of the plant's concrete pad that has recently been cleaned and pressure washed.



#656

Location: Control Building Exterior

This photograph illustrates a drainage path for stormwater flowing out of the processing plant. This area had visible contamination from tall oil or tall oil derivatives.





#657

Location: Processing Plant

This photograph depicts the interior of a small shed within the processing plant. The contents of the 55-gallon drum in the center of the frame are unknown. The 5-gallon bucket to the left of the frame appeared to contain tall oil spill cleanup debris.



#658

Location: Processing Plant

This photograph provides a second view of the room depicted in photograph #657.





#659

Location: Plant Perimeter

This photograph shows additional areas of soil suspected to be contaminated with tall oil or tall oil derivatives. The tanks in the background are also depicted in photograph #644.



#660

Location: Processing Plant

This photograph shows the exterior of the shed depicted in photograph #657. Note the black residue on the wall which appears to be residue from spilled tall oil or tall oil derivatives.



#661

Location: Processing Plant

This photograph shows an area of the concrete pad which is in the process of being cleaned. The yellow material on the ground is sawdust being used to absorb spilled tall oil or tall oil derivatives.



#662

This photograph was discarded due to being out of focus.

#663

Location: Processing Plant

The tote in this photograph contains an unknown liquid waste. This liquid was yellow and did not appear to be tall oil or tall oil derivatives.



#664

Location: Processing Plant

This photograph depicts the condition of piping and pipe insulation in the main processing plant.



#665

Location: Processing Plant

This photograph provides another view of the tanks depicted in photograph #644.





#666

Location: Processing Plant

This photograph provides another view of pipe insulation in the Processing Plant. It is unknown if this insulation is asbestos free.



#667

Location: Processing Plant

The contents of the 55-gallon drum depicted in this photograph area unknown.



#668

Location: Processing Plant

This photograph provides another view of the tote depicted in photograph #663. The contents of this tote are unknown.



#669

Location: Processing Plant

The tote depicted in this photograph reportedly contains waste from biodiesel production.





#670

Location: Processing Plant

This photograph shows a pump and connected hoses drawing waste products from biodiesel processing into the tote depicted in photograph #669.



#671

Location: Processing Plant

This photograph illustrates the open top of the tote depicted in photograph #669.



#672

Location: Control Building

The gas can and the 1-gallon glass container in this photograph contain unknown wastes.





#673

Location: Control Building

The quantity of solid waste and discarded equipment piled into this room prevented an accurate assessment of the potential for hazardous waste to be located in this room. Note the CRT monitor in the back of this room contains leaded glass and must be disposed of properly.



#674

Location: Control Building

The black tub in the bottom of the frame reportedly contains unprocessed ore previously utilized in research and development of precious metal extraction technology.



#675

Location: Control Building

This photograph shows two 55-gallon drums with unknown contents.



#676

Location: Control Building- Boiler Room

This photograph shows the interior of the Boiler Room. This room was very full and cluttered which prevented an accurate and timely inventory of all potential hazardous wastes in this room. The contents of the drums and cylinders depicted in this room are unknown.



#678

Location: Control Building –Boiler Room

This photograph provides a second view of the interior of the Boiler room.



#679

Location: Control Building

This photograph shows three 55-gallon drums with unknown wastes and several other one gallon glass and poly containers also with unknown wastes.



#680

Location: Control Building

This photograph shows a collection of small glass containers primarily holding unknown and unlabeled wastes. A 1-gallon poly container of waste hydrochloric acid is present on the left of the frame.



#681

Location: Control Building

This photograph provides another angle to the room depicted in photographs #679 and 680. Numerous containers of waste in various containers were present in this room.





#682

Location: Control Building

This photograph provides a second view of the area depicted in photograph #681.



#683

Location: Control Building

This photograph shows some equipment stored on the stairs.



#684

Location: Control Building

This photograph provides a close-up view of rice bowl and a chain depicted in photograph #683. This bowl did not appear to contain hazardous waste.



#685

Location: Control Building

The contents of the piece of equipment presented in this photograph are unknown.



#686

Location: Control Building

A second view of the equipment depicted in photograph #685.



#687

Location: Control Building

This photograph shows discarded baby car seat in the control building.



#688

Location: Control Building

This photograph shows the old control panel previously used to operate the plant. Thieves have scavenged parts of this panel for copper.



#689

Location: Control Building

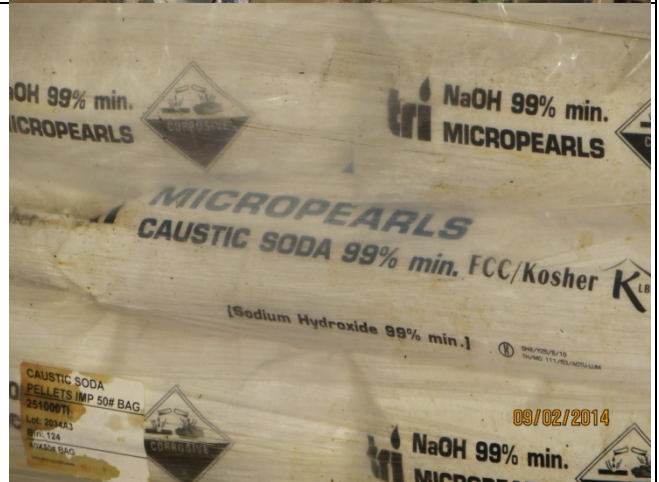
The pallet on the left of the frame holds fifty-pound sacks of sodium hydroxide; the right pallet contains sacks of potassium hydroxide.



#690

Location: Control Building

This photograph shows a close up of the label on the sacks shown in photograph #689.





#691

Location: Processing Plant

This photograph shows a concrete containment sump that reportedly contains waste products from biodiesel production.



#692

Location: Processing Plant

These two tanks reportedly contain waste products from biodiesel production.



#693

Location: Processing Plant

This photograph provides another view of the containment sump depicted in photograph #691.



#694

Location: Processing Plant

This photograph shows a collection of 5-gallon buckets which reportedly contain waste products from biodiesel production.



#695

Location: Processing Plant

A close-up of the buckets depicted in photograph #696.





#696

Location: Processing Plant

This photograph shows a bucket that reportedly contains biodiesel production waste that we sampled.



#697

Location: Processing Plant

Another view of the container depicted in photograph #696.





#698

Location: Fabrication Building Exterior

This photograph shows a tote which reportedly contains tall oil pitch which we sampled.



#699

Location: Fabrication Building Exterior

This photograph shows the interior of the tote depicted in photograph #698.



#700

Location: Fabrication Building Exterior

This photograph shows another view of the sampling process for this tote.



#701

Location: Fabrication Building Exterior

This photograph shows another view of the sampling process for this tote.



#702

Location: Facility Exterior

This photograph shows the railroad adjacent to the facility.





#703

Location: Facility Exterior

This photograph shows an empty tank stored along the driveway leading into the facility.



#704

Location: Facility Exterior

This photograph provides another view of two empty tanks located along the driveway leaving the facility.

