



State of Ohio Environmental Protection Agency
Southwest District

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Ted Strickland, Governor
Lee Fisher, Lt. Governor
Chris Korleski, Director

December 16, 2008

Mr. Rob Koehler
SUMCO Phoenix Corporation - Cincinnati
537 Grandin Road
Maineville, Ohio 45039-9772

**Re: SUMCO Corporation – Cincinnati – Lower Little Miami – IU Inspection
CEI - OH0105783; 1IN00174*ED
NOTICE OF VIOLATION**

Dear Mr. Koehler:

On December 4, 2008, I conducted the annual industrial user (IU) pretreatment inspection. In addition, I also conducted a compliance evaluation inspection (CEI) for the facility's NPDES permit. The facility was represented by Bill Romaine and Stephanie Parfitt. The facility is considered to be a significant industrial user because it is regulated under the Electrical and Electronic Components Categorical Standard Subpart B, 40 CFR 469.20.

From July 2007 through June 2008, there were 73 minutes of pH excursions below 5.0 SU, and a total of 17 excursions. The bulk of these excursions were in June 2008, and were a result of a lightning strike and the installation of a new silicon etching station. The violations from July 2007 through December 2007 were addressed in the Notice of Violation (NOV) dated March 11, 2008. This letter will serve as the NOV for the first half of 2008. The facility will receive an overall rating of satisfactory for its pretreatment permit. Ratings for the CEI are all satisfactory.

Brief Description of Facility

SUMCO Phoenix Corporation – Cincinnati grows, cuts and finishes silicon crystals for use by the semi-conductor industry. With the growth in the market for electric regulators for electric vehicles, the need for arsenic crystals is growing. In addition, the facility is also producing semiconductors for the solar energy market.

Regulated Wastewater Flows

The wastewater from the facility is generated in a number of ways. The first source is from the acid etches. Etches are used throughout the cutting and finishing process. These acidic wastewaters drain to one of the two plant neutralization plants. Wastewaters containing high amounts of solids are generated during the slicing and grinding processes at the facility. In addition to the acid etches, there are also caustic etches and ammonium



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hydroxide cleaning stations. These flows are also directed to the plant neutralization processes.

The modifications made to the facility's pH neutralization have greatly reduced the number of pH violations. For the first half of 2008, the pH violations occurred in June. These related to the replace of a silicon etching station, a lightning strike, and operator error. Each of the excursions was addressed in the report submitted with the facility's 4519s. The sampling results from the second half of 2008 are due on January 20, 2009, and will be evaluated at that time. There has been a downward trend in the number of pH violations at the facility. It should be noted that the facility continuously monitors its pH at two separate locations.

The arsenic precipitation system is currently in batch operation. The chemistry and loading requirements for the treatment system have been worked out. The treatment was able to reduce the amount of arsenic. The facility is now looking into putting some automation into the treatment system. A permit to install would be submitted for these changes.

Sampling

The facility is doing continuous pH monitoring of its effluent at two sampling locations. The arsenic sampling has shown the facility's discharge to be in compliance with the facility's discharge limit.

Indirect Discharge Permit Violations

The following violations were noted:

<u>Parameter</u>	<u>Outfall</u>	<u>Code</u>	<u>Date</u>	<u>Reported</u>	<u>Permit Limit</u>
pH, Min.	002	00402	6/2/2008	4 SU	5.0 SU
pH, Min.	002	00402	6/10/2008	3.4 SU	5.0 SU
pH, Min.	002	00402	6/12/2008	3.6 SU	5.0 SU
pH, Min.	002	00402	6/13/2008	3 SU	5.0 SU
pH, Min.	002	00402	6/14/2008	4.1 SU	5.0 SU
pH, Min.	001	00402	6/15/2008	3.6 SU	5.0 SU
pH, Min.	002	00402	6/16/2008	0.4 SU	5.0 SU
pH, Min.	002	00402	6/18/2008	1 SU	5.0 SU
pH, Min.	002	00402	6/19/2008	3.9 SU	5.0 SU
pH, Min.	002	00402	6/21/2008	3.6 SU	5.0 SU
pH, Min.	002	00402	6/22/2008	4.7 SU	5.0 SU

The facility does continuous pH monitoring at two separate outfall locations. The reasons for these violations as well as the corrective actions were provided with the facility's

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monitoring report. Please note that failure to comply with the facility's discharge limits is a violation of Ohio Revised Code (ORC) 6111.

NPDES Compliance Evaluation Inspection

The discharge from 004 was free from color and turbidity. This was condensate from the buildings dehumidifier. There was no discharge from either outfall 002 or 003. The facility is in compliance with its NPDES permit for the time period of December 1, 2007 through December 1, 2008.

The discharge from the cooling towers is not being discharged via the facility's NPDES permit. The reverse osmosis (RO) reject water is also being discharged to the sanitary sewer. This is being done because the chlorine was being concentrated in the RO reject water by the carbon filters, and was not in compliance with the facility's NPDES permit limit.

There is a covered hazardous waste storage area. The containment sump for any spills would be discharged to the sanitary sewer as long as the permit limits are met. Spill kits have been placed by the Plant 1 neutralization area, and by the outfalls to the pond. The storm drains in the facility have been painted blue with a fish stenciled near them to indicate they go to the on-site pond. In addition, the area behind the facility has been paved.

The assistance provided by your staff was appreciated. Should you have any additional question, feel free to contact me at 937.285.6108.

Sincerely,



Marianne Piekutowski
District Pretreatment Coordinator
Division of Surface Water

Enclosures

Cc: Ryan Laake, DSW/CO
Bill Romaine, SUMCO Phoenix
David Walling, Warren County



State of Ohio Environmental Protection Agency
Southwest District Office

NPDES Compliance Inspection Report

Section A: National Data System Coding					
Permit #	NPDES#	Month/Day/Year	Inspection Type	Inspector	Facility Type
11N00174*CD	OH0105783	12/4/2008	C	S	8

Section B: Facility Data		
Name and Location of Facility Inspected	Entry Time	Permit Effective Date
SUMCO USA 537 Grandin Road Maineville, Ohio 45039	9:20 am	11/1/2003
	Exit Time	Permit Expiration Date
	1:00 pm	5/31/07
Name(s) and Title(s) of On-Site Representatives	Phone Number(s)	
Bill Romaine, Environmental Manager Stephanie Parfitt, EHS Technician	513.583.2776	
Name, Address and Title of Responsible Official	Phone Number	
Rob Koehler, Plant Operations Manager SUMCO USA 537 Grandin Road Maineville, Ohio 45039		

Section C: Areas Evaluated During Inspection (S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)					
<input checked="" type="checkbox"/>	Permit	N	Flow Measurement	N	Pretreatment
N	Records/Reports	N	Laboratory	N	Compliance Schedule
N	Operations & Maintenance	<input checked="" type="checkbox"/>	Effluent/Receiving Waters	S	Self-Monitoring Program
S	Facility Site Review	N	Sludge Storage/Disposal	N	Other
N	Collection System				

Section D: Summary of Findings (Attach additional sheets, if necessary)
See attached report.

Inspector	Reviewer
 Marianne Piekutowski Division of Surface Water Southwest District Office Date: 12/16/08	 Martyn Burt Compliance & Enforcement Supervisor Division of Surface Water Southwest District Office Date: 12/16/08

Sections E thru K: Complete on all inspections as appropriate
Y – Yes, N – No, N/A – Not Applicable, N/E – Not Evaluated

Section E: Permit Verification

Inspection observations verify the permit

- (a) Correct name and mailing address of permittee Y
- (b) Correct name and location of receiving waters..... Y
- (c) Product(s) and production rates conform with permit application (Industries)..... NA
- (d) Flows and loadings conform with NPDES permit..... Y
- (e) Treatment processes are as described in permit application... Y
- (f) New treatment process(es) added since last inspection..... N
- (g) Notification given to State of new, different or increased discharges..... N
- (h) All discharges are permitted..... Y
- (i) Number and location of discharge points are as described in permit..... Y

Comments/Status:

Section F: Permit Verification

- (a) Any significant violations since the last inspection..... N
- (b) Permittee is taking actions to resolve violations..... NA
- (c) Permittee has a compliance schedule..... N
- (d) Compliance schedule contained in
- (e) Permittee is meeting compliance schedule..... NA

Comments/Status:

Section G: Operation & Maintenance

Treatment Works:

Treatment facility properly operated and maintained

- (a) Standby power available.....generator or dual feed NA
- (b) Adequate alarm system available for power or equipment failures.. NA
- (c) All treatment units in service other than backup units..... NA
- (d) Operator holds unexpired license of class required by permit..... NA
Class: I
- (f) Routine and preventative maintenance schedule/performed
on time..... NA
- (g) Any major equipment breakdown since last inspection..... NA
- (h) Operation and maintenance manual provided and maintained.... NA
- (i) Any plant bypasses since last inspection..... NA
- (j) Regulatory agency notified of bypasses..... NA
On MORs and/or Spill Hotline (1-800-282-9378)
- (k) Any hydraulic and/or organic overloads since last inspection..... NA

Collection System:

- (a) Percent combined system: %
- (b) Any collection system overflows since last inspection..... NA
(CSO and/or SSO)
- (c) Regulatory agency notified of overflows (SSOs)..... NA
- (d) CSO O&M plan provided and implemented..... NA
- (e) CSOs monitored and reported in accordance with permit..... NA
- (f) Portable pumps used to relieve system..... NA
- (g) Lift station alarms provided and maintained..... NA
- (h) Are lift stations equipped with permanent standby power
or equivalent..... NA
- (i) Is there an inflow/infiltration problem (separate sewer system),
or were there any major repairs to collection system since
last inspection..... NA
- (j) Any complaints received since last inspection of basement flooding NA
- (k) Are any portions of the sewer system at or near capacity..... NA

Comments/Status:

Treatment Works: The facility has the ability to dechlorinate the discharge, but since the discharge is going to the sanitary sewer, this is not being done.

Section H: Sludge Management

- (a) Sludge management plan (SMP)
Submitted date: Approval #: Not submitted N/A X
- (b) Sludge management plan current..... NA
(c) Sludge adequately disposed..... NA
 (Method:)
(d) If sludge is incinerated, where is ash disposed of
(e) Is sludge disposal contracted..... NA
 (Name:)
(f) Has amount of sludge generated changed significantly since
 last inspection..... NA
(g) Adequate sludge storage provided at plant..... NA
(h) Land application sites monitored and inspected per SMP..... NA
(i) Records kept in accordance with State and Federal law..... NA
(j) Any complaints received in last year regarding sludge..... NA
(k) Is sludge adequately processed (digestion, pathogen control)..... NA

Comments/Status:

Section I: Self-Monitoring Program

Flow Measurement:

- (a) Primary flow measuring device operated and maintained..... Y
Type of device: Ultrasonic & Parshall flume Ultrasonic & Weir Weir
Calculated from influent Other X(Specify:Paddle style meter in RO
reject water)
(b) Calibration frequency adequate Y
 (Date of last calibration: NA)
(c) Secondary instruments operated and maintained..... Y
(d) Flow measurement equipment adequate to handle full range
 of flows..... Y
(e) Actual flow discharged is measured..... Y
(f) Flow measuring equipment inspection frequency
 X Daily Weekly monthly other

Comments/Status:

The paddle wheel in the RO reject water does not require any calibration after the initial set up. The flow rate for the emergency cooling water is an engineering estimate based on the time and the number of machines in emergency mode. The valves are locked out so there is no discharge.*

c) The facility can look at its feed water rates.

Section I: Self-Monitoring Program (cont.)

Sampling:

- (a) Sampling location(s) are as specified by permit..... Y
- (b) Parameters and sampling frequency agree with permit..... Y
- (c) Permittee uses required sampling method..... Y
- (d) Sample collection procedures are adequate..... Y
 - (i) Samples refrigerated during compositing..... Y
 - (ii) Proper preservation techniques used..... NA
 - (iii) Containers and sample holding times prior to analysis conform with 40 CFR 136.3..... Y
- (e) Monitoring records (i.e., flow, pH, DO) maintained for a minimum of three years including all original strip chart recordings (i.e, continuous monitoring instrumentation, calibration and maintenance records)..... Y
- (f) Adequate records maintained of sampling date, time, location, etc.. Y

Laboratory:

General

- (a) EPA approved analytical testing procedures used (40 CFR 136.3).. Y
- (b) If alternate analytical procedures are used, proper approval has been obtained..... N
- (c) Analyses being performed more frequently than required by permit. N
- (d) If (c) is yes, are results in permittee's self-monitoring report..... N
- (e) Commercial laboratory used..... Y
Parameters analyzed by commercial lab: TDS, Toxicity

Lab name: DataChem, Pace Analytical

Quality Control/Quality Assurance

- (f) Quality assurance manual provided and maintained..... NE
- (g) Satisfactory calibration and maintenance of instruments/equipment. NE
- (h) Adequate records maintained..... NE
- (i) Results of latest USEPA quality assurance performance sampling program: Satisfactory Marginal Unsatisfactory

Date:

Comments/Status:

QA/QC (f-i) The contract lab maintains these documents.

Section J: Effluent/Receiving Water Observations

Outfall Number	Oil sheen	Grease	Turbidity	Visible Foam	Visible Floating Solids	Color	Other
002	None	None	None	None	None	None	None
003	None	None	None	None	None	None	None
004	No	No	No	No	No	None	None

Comments/Status:

There were no discharges from 002 and 003. There was a small discharge from 004. This was some condensate from the dehumidifier.

Section K: Multimedia Observations

- (a) Are there indications of sloppy housekeeping or poor maintenance in work and storage areas or laboratories..... N
- (b) Do you notice staining or discoloration of soils, pavement or floors.. N
- (c) Do you notice distressed (unhealthy, discolored, dead) vegetation.. N
- (d) Do you see unidentified dark smoke or dust clouds coming from sources other than smokestacks..... N
- (e) Do you notice any unusual odors or strong chemical smells..... N
- (f) Do you see any open or unmarked drums, unsecured liquids, or damaged containment facilities..... N

If any of the above are observed, ask the following questions:

- (1) What is the cause of the condition?
- (2) Is the observed condition or source a waste product?
- (3) Where is the suspected contaminant normally disposed?
- (4) Is this disposal permitted?
- (5) How long has the condition existed and when did it begin?

Comments/Status:

Permit # : 1IN00174*CD
NPDES # : OH0105783



State of Ohio Environmental Protection Agency
Southwest District Office

Pretreatment Compliance Inspection Report

Section A: National Data System Coding					
Permit #	NPDES#	Month/Day/Year	Inspection Type	Inspector	Facility Type
1DP00028*DP	OHP000149	12/03/2008	I	S	1

Section B: Facility Data		
Name and Location of Facility Inspected	Entry Time	Permit Effective Date
SUMCO USA 537 Grandin Road Maineville, Ohio 45039	9:20 am	02/01/2007
	Exit Time	Permit Expiration Date
	1:00 pm	01/31/2012
Name(s) and Title(s) of On-Site Representatives	Phone Number(s)	
Bill Romaine, Environmental Manager	513.583.2776	
POTW Receiving Discharge	Categorical Standard(s) or Other Classification	
Warren Co. Lower Little Miami WWTP	40 CFR 469.20	

Section C: Areas Evaluated During Inspection	
Standard	Result
S Pretreatment	

Section D: Summary of Findings (Attach additional sheets if necessary)	
See attached report.	

Inspector	Reviewer
 Marianne Piekutowski Division of Surface Water Southwest District Office Date: 12/16/08	 Martyn Burt Compliance & Enforcement Supervisor Division of Surface Water Southwest District Office Date: 12/16/08

INDUSTRIAL USER INSPECTION CHECKLIST

Facility: **SUMCO USA – Cincinnati Plant**

Date of inspection: **December 4, 2008**

OH Number: **OHP000149**

IDP Number: **1DP00028*DP**

Facility Representative: **Bill Romaine, Stephanie Parfitt**

Inspector(s): **Mari Piekutowski**

COMPLIANCE

1. Date of last pretreatment inspection: **December 10, 2007**

2. Has the facility been in compliance with its permit limits since the last inspection? Y/N
If no, explain:

The facility has continuous pH monitoring. There have been fifteen excursions for a total of fifty-five (55) minutes of violations during the first half of 2008. This report will serve as the Notice of Violation for these excursions.

3. Is the facility in compliance with all other requirements?
Sampling procedures Y/N/NA
Reporting (late reporting, failure to report, etc) Y/N/NA
Compliance schedules Y/N/NA
Submitted BMR and 90 day compliance reports Y/N/NA
Any other requirements Y/N/NA

If any of the above five answers is no, explain:

4. Was the facility required to perform any actions as a result of the last inspection? Y/N
Explain any unresolved actions:

FACILITY OPERATIONAL CHARACTERISTICS

5. Number of Employees: **540**

6. Shifts/Day: **2**

7. Production Days/Year: **~360**

8. Hours/shift: **12**

9. Any production changes since the last inspection? Y/N
If yes, explain:

10. General facility description and operations:

Grow, cut and finish silicon crystals for use by the semi-conductor industry, and for the green energy sector for solar energy.

FACILITY OPERATIONAL CHARACTERISTICS CONTINUED

11. Any change in materials used in production since the last inspection? Y/N
If yes, explain:

The facility is still producing mostly arsenic-doped crystals. The facility is producing more solar silicon so it has less of the arsenic dopant than the wafer silicon.

12. Any expansion or production increase expected within the next year? Y/N
If yes, explain:

WASTEWATER TREATMENT

13. Provide a schematic diagram and description of the wastewater treatment system:

See attached schematic.

The pH adjustment is done with the addition of acid and caustic. There is a three stage system for Plant 2 (approximately 75% of the flow), and a four stage system for Plant 1 (approximately 25% of the flow). The arsenic treatment system is currently operating.

14. Was a PTI issued for the treatment system? Y/N

15. Were there any modifications to the treatment system since the previous inspection? Y/N

If yes, was a PTI obtained? Y/N

PTI Number: Date:

16. What is the treatment mode of operation? Batch / Continuous / Combination

If batch, list the frequency and duration:

The facility is now collecting the concentrated acid dumps in a separate tank as well as the central scrubber discharge to neutralize each other prior to entering the Plant 2 neutralization system. This seems to be working well since the tweaking of the system has been completed.

17. Who is responsible for operating the treatment system?

There are four people (includes one supervisor) capable of operating the system. The Facility Operator is available at all times.

18. How often is the treatment system checked?

The system is monitored continuously. It is alarmed and linked to a pager system. It is inspected at least every 12 hours.

WASTEWATER TREATMENT CONTINUED

19. Is there an alarm system for the system? Y / ~~N~~
Explain:

There is an alarm for "Out-of-Range" on effluent and intermediary tanks. Level alarms in Plant 1.

20. Is there an operations and maintenance manual? Y / ~~N~~

There is an equipment manual and preventative maintenance program. The SOP is in final form.

21. Is an inventory of critical spare parts maintained? Y / ~~N~~

If yes, list:

pH controllers, probes and pre-amps. Most pumps are set as redundant. They conduct inspection rounds that utilize out-of-spec performance, and a maintenance report is generated automatically. Pumps are scheduled for a vibration analysis by an outside contractor.

22. Are there any bypasses in the system? Y / ~~N~~

If yes, describe the location:

Overflow in Plant 1 (would be caused by pump failure). Plant 2 can overflow if there is a drain blockage. All flows would go through the sampling location.

Have bypasses occurred since the last inspection? Y / ~~N~~

Was the POTW notified? *There are trigger points agreed upon with Warren Co. for notifications for pH spikes over thirty minutes.* Y / ~~N~~

23. Are residuals or sludges generated? Y / ~~N~~

Method of disposal:

Heritage takes the arsenic sludge. EEI is taking some of the non-hazardous sludges.

Frequency and amount of disposal:

Approximately 7,200 gallon and silicon sludge per month. Approximately 3,000 gallons of arsenic-silicon sludge. There is 7,400 gallons of liquid that is now run through a cyclone separator. This generates one to two yards of As/Si/Fe filter cake. The silica starts reacting with the iron when in solution. All of the silica has to react before the arsenic can be removed. The facility is recycling ~7,000 pounds a month of silicon.

Name of hauler/landfill/disposal facility:

EEI - Being treated at EEI facility on Spring Grove. There is also someone interested in recycling the grit from the wire saw slurry building.

Is any sludge generated subject to RCRA regulations? Y / ~~N~~

The wastewater has now passed the TCLP. It is now being taken to a secured landfill. The wax resin and IPA/Acetone solution are liquid hazardous waste. There is also hazardous waste generated from the arsenic crystal growing process. This would include part of equipment, PPE, plastic sheeting, tools used for clean up, air filters from HVAC, vacuum hoses, etc. The hazardous waste is taken by Ashland Environmental Services to Dayton and Heritage. The material then goes to a cement kiln. There is a program in place to reduce the acetone and wax resin. This program has plateaued.

PROCESS AND WASTEWATER INFORMATION

24. List all processes generating wastewater, current wastewater flows, and where applicable, production rates as well as values on which the permit limits are based:

REGULATED PROCESS	SAMPLE LOCATION	WASTEWATER FLOW (GPD)		PRODUCTION DATA (SPECIFY UNITS)	
		Permit	Current	Permit	Current
<i>Plant 1 pH Neutralization</i>	<i>End-of-Pipe</i>	<i>150,000</i>	<i>195,000</i>		
<i>Plant 2 pH Neutralization</i>	<i>End-of-Pipe</i>	<i>425,000</i>	<i>450,000</i>		
Total Regulated Process Flow		575,000	645,000		
Non-Contact Cooling		-	12-30,000¹	1 - Non-contact cooling water may be discharged via NPDES permit but is going to sanitary sewer. 2 - Discharge via sanitary sewer due to TRC limit in NPDES permit.	
Blowdown		16,500	65,000		
Reverse Osmosis		-	280,000²		
Demineralizer Regeneration					
Filter Backwash					
Compressor Condensate		14,000	10-12,000		
Storm Water					
Other Dilute Flows					
Unregulated Flows (provide list)					
Sanitary		10,000	10,000		
TOTAL FLOW			1,042,000		

25. For the above flows not discharged to the POTW, list point of discharge and permit (if any). *The non-contact cooling water, reverse osmosis reject water and carbon filter backwash may be discharged to waters of the State via an on-site pond. This is covered under an individual NPDES permit.*

The storm water flow is covered under the general industrial storm water permit. The facility maintains an SWP3.

SELF MONITORING

26. Sample location(s) described in the facility's permit:

Samples collected from the sampling manhole (SA-108) for Plant 1 and sampling manhole (SA-208) for Plant 2 located South of Plant 2 in the field at the fence line.

27. Is the facility sampling at the location(s) described in the permit? Y / ~~N~~
If no, describe the actual location:

The Plant 1 and 2 manholes are now both in the field. The pH probe for Plant 1 is in the roadway, and the pH probe for Plant 2 is in the beanfield.

28. Is the location(s) where the facility is sampling representative? Y / ~~N~~
If no, indicate a representative location:

The continuous pH monitoring occurs in the same manhole used for flow monitoring.

29. Is the flow measured or estimated? Measured / ~~Estimated~~

If measured, how often is the meter calibrated?

The flow is calculated. There is an agreement with Warren County that the flow to the sanitary is 60% of the incoming water. The flow meters at the facility have an in-house calibration once a quarter, and are certified once a year.

If estimated, describe method of estimation:

30. Is pH monitored continuously? Y / ~~N~~
If yes, how often is the meter calibrated?

The pH meter is calibrated every two weeks.

31. Does the facility collect its own samples? Y / ~~N~~
If no, specify the sample collector:

32. Are appropriate sampling procedures followed? Y / ~~N~~
Monitoring frequencies

Sample collection (grab for pH, O&G, CN, phenols, VOCs) Y / ~~N~~

Flow proportioned samples **Time proportional – aquliot every 21 minutes.** Y / ~~N~~

Proper preservation techniques **Sampler is being iced during collection.** Y / ~~N~~

Sample holding times Y / ~~N~~

Chain-of-custody forms Y / ~~N~~

33. Are samples analyzed in accordance with 40 CFR 136? Y / ~~N~~

34. Laboratory conducting analyses:

Data Chem, Pace Analytical (TTOs)

TOXICS MANAGEMENT

35. Are any listed toxic organics used in the facility? Y / ~~N~~
If yes, identify organics:
Phenol in epoxy and toluene in wax resin. There is no normal pathway to the sewer for these constituents.
36. Does the facility have a current toxic organic management plan(TOMP)? Y / N
If yes, is it being implemented? **The plan was submitted. Unsure of status.** Y / N
37. Has the facility had any uncontrolled releases or spills to the POTW since the previous inspection? If yes, please explain: ~~Y~~ / N
38. Does the facility need a spill prevention plan or slug discharge control plan? ~~Y~~ / N
If yes, does the facility have a written plan? Y / ~~N~~
39. Identify any potential slug load or spill areas:

REQUIRED FOLLOW-UP ACTIONS
