



RCRA Compliance Inspection Report

Westak of Oregon

Forest Grove, OR

ORD980980353

August 6, 2024

JONATHAN
MASTERS

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Report Date

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Peer Review Signature

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Disclaimer

This report is a summary of observations and information gathered from the facility at both the time of the inspection and the following off-site records review. The information provided does not constitute a final decision on compliance with RCRA regulations, nor is it meant to be a comprehensive summary of all activities and processes conducted at the facility.

Section A: Basic Facility and Inspection Information

Facility Information

Handler Name: Westak of Oregon

Handler ID Number: ORD980980353

Facility Contact/Title: Ellen Jackson; Engineering Manager
Judith Juarez; Production Manager

Facility Location Address: 3941 24th Avenue
Forest Grove, OR 97116

Facility Mailing Address: 3941 24th Avenue
Forest Grove, OR 97116

Contact Phone Number: (503) 359-3046

Contact Email Address: ejackson@westak.com
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Inspection Information

Inspection Type: RCRA Compliance Evaluation Inspection (CEI)

Inspection Date: August 6, 2024

Arrival Time: 9:00 a.m.

Departure Time: 1:30 p.m.

Inspection Team: Kyle Masters, RCRA Inspector
Eric Kelley, Inspector, Oregon Department of Environmental Quality

Section B: General Facility Information

Owner/Operator Information

According to the 2023 Biennial Report received into RCRAInfo on 2/20/2024, the legal owner is listed as Westak, Inc, located at 1116 Elko Drive, Sunnyvale, California. The report lists Westak of Oregon as the legal operator, and Ellen Jackson certified the report with the title of Senior Compliance Manager. The report also lists Ellen Jackson as the site contact person. The Site Identification Form lists the land owner of the location as Edgar Westervelt of TakWest, which shares an address, noted above, with Westak, Inc in California. The form lists the legal owner of the company Louise Crisham, also at that address, with the title of Chief Executive Officer. The form says the site operator is Victor Hemingway, the Vice President of Operations. Ramon Mefford, Purchasing Representative, is the fee contact.

Background and Activities

I obtained the following information from the company's website prior to the inspection, and from these site representatives who participated during the opening and closing conferences, and during the inspection:

- Ellen Jackson, Engineering and Compliance Manager
- Judith Juarez, Production Manager

Westak manufactures printed circuit boards used by customers across a variety of industries, including aerospace and defense, medical and instrumentation, and consumer and industrial electronics.^a The company began circuit board manufacturing in 1972 and currently operates two production facilities; both the Sunnyvale California and Forest Grove Oregon locations. The company also operates a logistics center in Forest Grove, less than one half mile from the manufacturing plant.^b

The Oregon Department of Environmental Quality (ODEQ) sent Westak of Oregon a Warning Letter on February 13, 2020. The letter served to inform Westak of violation determinations stemming from the previous inspection, conducted by ODEQ on January 9, 2019. The letter notifies the site of these violations:

- Failing to label or mark a container of hazardous waste in a satellite accumulation area as hazardous waste.
- Failure to adequately train site personnel.
- Failure to include evacuation routes in the contingency plan.

The letter also informed Westak, regarding their precious metal waste sent off-site for metal reclamation, that they must label containers of this waste as “hazardous waste,” count and report the waste, and not store the waste on-site for over a calendar year.

Ms. Jackson told the inspection team she has worked for Westak at the site for 38 years. Ms. Juarez stated she began working at the site 24 years ago. Westak currently employs approximately 60 full-time employees across two shifts, Monday through Friday. The site will add swing shifts as necessary, Ms. Jackson told us. She also told us that while the site works with many industries as clients, approximately 50% of their recent workload was for defense contractors.

Section C: Regulatory Information

Regulatory Status

Westak discharges treated wastewaters to the local sanitary sewer in accordance with their discharge permit, overseen by Clean Water Services^c. Westak also operates with an air quality permit, issued by ODEQ, for their electroplating operations. Ms. Jackson told us they discharge approximately 51-81 thousand gallons of treated water daily.

According to [ECHO](#),^d the site operates in accordance with ODEQ’s general industrial stormwater permit, number ORR110061. Westak also reported four chemicals for the Toxic Release Inventory program, Section 313 of the Emergency Planning and Community Right to Know Act. In 2023, they reported releases for these chemicals (with weight in pounds): copper (20,601); copper compounds (36,896); lead compounds (4,363); nitrate compounds (5,566). These releases took the form of off-site transfers to the publicly owned treatment works. The site carries the North American Industrial Classification System (NAICS) code of 334412, “Bare Printed Circuit Board Manufacturing.”

Site Hazardous Waste Information

According to the 2023 Hazardous Waste Annual Report submitted to ODEQ on 02/20/2024, Westak reported generating over 80,000 pounds of hazardous waste (two waste streams) that were managed

^a [WESTAK CIRCUITS - Home](#)

^b [Locations - WESTAK CIRCUITS](#)

^c [Home - Clean Water Services](#)

^d Enforcement and Compliance History Online, EPA’s public-facing website for environmental compliance history

off-site, and an additional 14.8 million gallons (two waste streams) treated on-site and discharged through their on-site wastewater treatment unit. The four reported hazardous waste streams in 2023 included:

1. Contaminated rinse water (treated) (hazardous waste code D002). According to the report, Westak manages the waste on-site through discharge to sewer without prior accumulation or storage (H150). They reported 14,834,993 gallons of this waste.
2. Treated acidic solution (hazardous waste code D002). Westak also managed this waste on-site through discharge to sewer (H150). They reported 3,801 gallons of this waste.
3. Sludge (filter cake) (D002, F006). This waste was managed off-site through metals recovery including retorting, smelting, and chemical recovery (etc.) (H010). Westak reported eight off-site shipments totaling 79,782 pounds
4. Gold cyanide (plating solution) (D003, F007). This waste plating solution was also managed off-site through metals recovery (H010). Westak sent one shipment off-site, a total of 220 gallons.

Section D: Description of Inspection

Purpose of Inspection

This was a Resource Conservation and Recovery Act (RCRA) inspection conducted pursuant to Oregon's federally authorized RCRA program which is found at OAR chapter 340. The facility was inspected in accordance with OAR chapter 340, divisions 100 to 106, 109, 111, 113, 120, 124 and 142 which incorporates by reference, hazardous waste management regulations of the federal program, included in 40 C. F. R. Parts 260 to 268, 270, 273 and Subpart A and Subpart B of Part 124 into the Oregon Administrative Rules. The inspection was conducted as a core program requirement for fiscal year 2024. I inspected the site to ensure compliance with large quantity generator, universal waste and used oil standards.

Inspection Entry and Opening Conference

The inspection was unannounced. On August 6, 2024, I, EPA Inspector Masters, along with Inspector Kelley (ODEQ) arrived at the site at approximately 9:00 a.m. We introduced ourselves to each other and proceeded to enter the building at 3941 24th Avenue. We stepped into the main lobby and found it empty. The lobby sits below a second, mezzanine-type, floor with additional staff workspaces. A Westak employee saw us waiting and we asked if we could speak with Ellen Jackson. Ms. Jackson came up from the basement and we introduced ourselves. She led us back downstairs, to the manufacturing office for our opening conference. She introduced us to Ms. Judith Juarez, Ms. Clara Arroyo, and Ms. Sylvia Sanchez.

I began the opening conference and presented my credentials to the Westak representatives while explaining my intent to conduct an unannounced hazardous waste compliance inspection of the Westak site in Forest Grove (Westak, or "site"). I explained the inspection would be EPA-led and I would serve as the lead inspector. Inspector Kelley served as an observer. I also explained the inspection would consist of an opening conference, a site tour, a records check and a closing conference. I told them I would email a formal records request after the on-site portion of the inspection for a more involved records review. I explained the records I requested would consist of records the regulations require generators to keep and maintain, and possibly additional records based on our observations. At this time I asked if Mr. Dennis Hammer would join the inspection. Ms. Jackson told us Mr. Hammer recently retired, and Mr. Victor Hemingway had taken up similar duties. Mr. Hemingway later participated in select portions of the inspection as his schedule allowed.

We continued the opening conference by discussing current site-specific operations and practices. Ms. Jackson confirmed the site operates as a large quantity generator of hazardous waste. Ms. Jackson

and Ms. Juarez then provided us with an expansive overview of the site's manufacturing processes. They verbally took us through the printed circuit board (PCB) manufacturing process step-by-step, going from initial parts and design receipt, drilling, soldering, coating, and etching, through inspection, to final finishing and testing. Ms. Jackson also described for us the different wet chemical plating processes they employ depending on the conductivity requirements of the final product, namely electrolytic gold, gold immersion or electroless copper and nickel.

Ms. Jackson told us the site has been engaging with Clean Water Services extensively as they had a split sample result over their permitted limit for copper in their wastewater. She also told us they operate with a continuous discharge. I asked to review a current version of the quick reference guide portion of their site-specific contingency plan. Ms. Jackson told me they did not have a current guide for review. She did share a copy of the contingency plan with me at that time.

Ms. Jackson also told us the site used to retain Hallmark as their vendor for precious metal waste reclamation, though they switched to Aura. Aura accepts scrap boards, solid metals, and liquid metals. Westak also uses World Resources as another waste vendor. I asked the Westak staff to walk myself and Inspector Kelley through the processes Ms. Jackson previously outlined. They agreed, and we began the site tour.

Inspection Summary

Both Ms. Jackson and Ms. Juarez accompanied us throughout the inspection. During the inspection I looked at the site's processes, in addition to hazardous waste management practices, generation points, and accumulation areas. I looked for wastes that site representatives had not yet identified or characterized as hazardous. I also observed the site's universal waste and used oil management. During the inspection I observed Westak operations in these areas:

- Receiving and Dry Goods
- Imaging
- Hazardous Waste Room/Spent Chemical Storage (Gold Room)
- Laminating
- L.P.I. (Liquid Photo Imaging)
- Wastewater Treatment Area/Waste Treatment
- A.O.I. (Automatic Optical Inspection) / Inspection
- Drilling Fabrication
- Plasma
- Plating1 and 2 / Wet Process Area
- Hazardous Waste Storage Shed/Shed 2 (Central Accumulation Area (CAA))
- West Dock/Chemical Storage (HazMat Storage)

I only discuss those areas in which we observed potential compliance concerns or noted other pertinent issues in this inspection report.

Near the Receiving and Dry Goods area, we saw two cubic-yard boxes (**Photo 1**). Ms. Jackson told us that site staff store off-spec PCBs, segregated broadly by type, in these boxes prior to off-site shipment for recycling. We saw signage above to boxes asking staff to sort the PCBs appropriately. I looked inside the boxes and saw the accumulated PCBs (**Photo 2**).

Inside the Hazardous Waste (Gold)/Spent Chemical Room we saw a 55-gallon drum marked "cleaner – S" and labeled as corrosive hazardous waste. The drum also bore the accumulation start date "08052024." When we entered the room, we saw one of the drum's bungs was open. Ms. Jackson screwed on the bung lid as we discussed operations in the area (**Photo 3**). Nearby we saw two drums labeled "Gold Solution," one of which also sat open (**Photo 4**). The placards on the drums also state

the waste stream is largely exempt from most hazardous waste provisions as the material is recyclable for precious metal recovery. By the gold solution drums we saw an eyewash station with a nearly blank test record card that recorded one inspection on “12/26/23” (**Photo 5**).

On the floor of the spent chemical room, we also saw two openings in the concrete floor with opened pipe connections (**Photo 6**). Ms. Jackson told us the room’s older name, the Gold Room, referenced the room’s prior service as a plating area for Westak operations. The plumbed openings feed into the site’s wastewater treatment unit, she told us. Between the two drums of gold solution and the wall of the room we saw two 5-gallon buckets and approximately four 1-gallon cans stored (**Photo 7**). Ms. Jackson told us the materials are leftover primers and epoxies used in a recent on-site construction project. I confirmed with Ms. Jackson and Ms. Juarez that the Gold Room is no longer used as an operations room at the site, and operators store waste inside it.

In the wastewater treatment unit area, the Waste Treatment room, I saw where plumbed lines entered the room from the plating shop next door (**Photo 8**). Ms. Jackson explained the layout of the wastewater treatment unit to us. Wastewaters from the plating area flow directly into a trench which sits below the normal grade of the room (**Photo 9**). Those waters get pumped (**Photo 11**) into a series of pH adjustment tanks (**Photo 12**), then into the reaction tanks for metals treatment, and then into clarifiers before flowing into the sampling vault and discharging to sewer. Nonmetal-bearing waters flow directly into a separate pH adjustment-only system (**Photo 10**). Tank bottoms are removed and conveyed into a series of three filter presses. We saw one press each with a tray collecting the compressed sludge labeled as a hazardous waste accumulation container (**Photo 13**).

Outside the wastewater treatment unit, by the wet process area, I saw several indentations in the concrete floor that appeared corroded. Some held small pools of water. I placed pH test paper into one of these indentations and recorded a result of approximately 5 pH (**Photo 14**). We walked through several areas of the facility, including the Compressor Room and the Inspection/AOI area, and then entered the Lamination area. In this area we saw two 55-gallon drums in a satellite accumulation area (**Photo 15**). The far drum sat closed and labeled as corrosive hazardous waste with an accumulation start of that day. Ms. Jackson said it appeared staff in the area just swapped out the full drum. I noted the new drum was labeled as hazardous waste, but a hazard indicator was not visible. A nozzle had been placed in the drum’s open bung though it was not immediately apparent waste was actively entering the drum as no staff were visible in the immediate area.

We continued our tour and entered the Drilling and Fabrication areas. I looked inside a storage cabinet and saw an assortment of aerosol cans. I saw one aerosol can, “CRC 3-36,” missing the actuator, or spray tip (**Photo 16**). The can felt more than half full, and the hazard pictograms on the back indicate the material flashed at relatively low temperatures. I told Ms. Jackson I thought this appeared to be a waste aerosol can.

Next, we moved into the Plating/Wet Process areas (One and Two). In an indented, apparently corroded, divot in the concrete floor, similar to Photo 14, I again saw water accumulating. I took another pH test paper sample, and the pH appeared of a value of 9 (**Photo 17**). Between plating lines I saw an open blue container labeled “Non-hazardous Waste” containing a bright blue hardened material (**Photo 18**). Ms. Jackson told me the material was a dry foam the site uses and Westak manages its spent foam as non-hazardous based on generator knowledge. After walking through the plating area we went to the L.P.I. area. I saw a work bench used to mix inks. On the bottom shelf I saw a printed sign telling area operators to place expired inks on the bottom shelf. On that shelf I saw two open cups of discarded inks drying (**Photo 19**).

We continued our tour and entered the Hazardous Waste Storage Shed/Shed 2 (Central Accumulation Area). We saw a 55-gallon drum labeled universal waste aerosol cans. Ms. Jackson told us Westak does not puncture aerosols. We also saw two 55-gallon drums labeled as used oil. These drums sat against the wall of the CAA. We also saw a binder holding records on top of some drums. In the

binder we saw a bill of lading showing a shipment to Aura II Inc located in Milwaukee, WI (**Photo 20**). The bill of lading showed that on 9-19-2023 Westak shipped:

- Three boxes of gold trim
- Two boxes of tin lead
- Two boxes of aluminum
- Two boxes of copper trim
- Five drums of roter dust
- One drum of solder dross

The four 55-gallon drums under the records binder bore markings indicating they contained used oil. One drum read, “used twice,” another, “used once,” and a third, “use Fri night only. Do not use! Bad oil.” On the drums I saw a manufacturers label indicating the material’s brand name and use, “Therminol 55 Heat Transfer Fluid” (**Photo 21**). I asked if the site planned to dispose of the material and Ms. Jackson told me Westak awaited pickup date confirmation from their recycler. I did not see labels or markings reading “used oil” on the drums (**Photo 22**). I looked at recent CAA weekly inspection logs kept in the shed and noted that not all weeks included the signature of the facility’s inspector.^e

Next to, and behind, the four drums of apparent used oil, I saw one approximately two-cubic yard fiber container (super sack) containing spent filter press sludge. The container lacked a hazardous waste label, major hazard indicator, and an accumulation start date (**Photo 23**). Mr. Alfonso Elizarraras, who joined the inspection party in the shed, reapplied a placard with the missing details, which had fallen on the floor (**Photo 24**). On a shelf behind the super sack we saw an assortment of universal waste containers. I saw two closed fiber boxes labeled as universal waste lamps, one with an accumulation start date of “8-1-23,” and the other of “04-10-23,” indicating on-site storage for over a year (**Photo 25**). I also saw a similar container with the start date reading “6-1-25” (**Photo 26**). I pointed out the likely typo and Mr. Elizarraras said he would correct it. Nearby I saw another fiber box labeled universal waste lamps with a start date of “5-11-23” (**Photo 27**).

In another part of the shed I saw the sludge dryer holding sludge in its hopper (**Photo 28**). I also saw an open super sack receiving sludge out of the dryer (**Photo 29**). A placard, like what we saw on the other super sacks, reading hazardous waste with an accumulation start date “7-31-24” appeared hooked to the sludge dryer itself (**Photo 30**). I did not see similar markings, or a label, on the super sack.

We left the main CAA, the Hazardous Waste Storage Shed, and reentered the main building by the West Dock, Chemical Storage areas. By the west dock we saw two approximately 55-gallon drums marked “Do Not Use” and “Return to Vendor – Tritex” (**Photo 31**). The containers also had their original product labels reading, “Circuposit™ 3350 R-1 Electroless Copper.”

We continued to the rest of the chemical storage rooms, starting the in the flammables room. In this room I saw an approximately 5-gallon blue poly container labeled, “F Ronastan™ EC Part A” and “Consignment” (**Photo 32**). The consignment label was stamped “Sep 03 2022.” I asked Ms. Jackson if Westak routinely sells chemicals on consignment to other sites, and she said they do.

Next to the Ronastan I saw a pile of aluminum foil trays, and ingots (**Photo 33**). Ms. Jackson told me they collect their scrap solder and melt it into the ingots/brick-forms. I asked Ms. Jackson about this process, and she showed me an electric pot with a sign next to it reading, “Hazardous Waste Satellite Accumulation Container Content: Solder” (**Photo 34**). Next to the pot we saw a blue poly 55-gallon drum with a piece of plywood on top and a sign identical to the one next to the pot (**Photo 35**). We

^e Weekly inspections are discussed more in the Records Review section of this report.

lifted the plywood and saw an accumulation of lead debris inside the drum (**Photo 36**). A painted metal sheet next to the drum read "Hazardous Waste D008" (**Photo 37**).

We then went into the acids chemical storage room. I saw another container of the Circuposit, like Photo 31. This container appeared approximately 5-gallons in size and was marked "Open" with a consignment label (**Photo 38**). The consignment label had a time stamp which appeared to read "Jul 2022" though it was difficult to read.

We walked into the oxidizers storage room. In the room I saw an approximately 15-gallon fiber drum with the original manufacturer's label reading "Entek Microtech ME-1020." The drum was marked "OD 1 Loose" (**Photo 39**). The bottom ring of the drum looked unlatched. I saw an accumulation of white powder on floor of the room. I told Ms. Jackson and Ms. Juarez it appeared that a spill of the material occurred, and staff had not responded.

After completing the on-site tour, we returned to the Manufacturing Office and I reviewed additional weekly inspection logs, training records, and waste characterization information regarding the hardened foam we saw in the Plating/Wet Process Area. I reiterated to Ms. Jackson and Ms. Juarez that I would conduct a more detailed off-site records review.

Closing Conference

At approximately 1:15 PM, the inspection team initiated the closing conference. We walked upstairs into a conference room. Mr. Victor Hemingway, Vice President of Operations, joined us. I thanked Ms. Jackson, and Ms. Juarez, and the other site representatives, for their time showing us around the manufacturing floor, and in answering our questions. I recapitulated our site tour and observations from the walkthrough. I stated again that I would email a request for records within a few working days and that I would refrain from addressing all potential areas of concern until I reviewed those records and could document my observations in an inspection report. I did address these areas of concern during the closing conference:

- Open hazardous waste container in the Gold Room
- Failure to appropriately manage a waste aerosol we saw in the Drilling area
- Missing hazardous waste labels and hazard indicators in the CAA/Hazardous Waste Storage Shed
- Missing Used Oil labels in the CAA
- Storage of universal waste lamps over one year
- Inadequate contingency plan/missing quick reference guide.

We again thanked all the Westak representatives for their cooperation and departed at approximately 1:30 p.m.

Records Review

On August 6, 2024, I emailed my records request to Ms. Jackson and asked for a complete submission by close of business on August 13, 2024. Ms. Jackson began to send me records on August 9 and completed the document submission on August 12 over the course of multiple emails. The Document Log, Attachment B, lists the records I requested.

The following list includes my observations of the records and focuses on compliance concerns and other pertinent issues:

- As noted above, Westak lacked a quick reference guide at the time of the inspection. Ms. Jackson sent a quick reference guide after the inspection. The document's revision history records the date of "8-7-2024" as the creation date. The guide references the locations of nearby fire hydrants, though no flow data is given.

- Contingency planning and procedures are listed across three documents: “SER110 – Emergency Contingency Plan;” “SER111 – Contingency Plan Quick Reference Guide;” and “SER120 – General Information, Emergency Contact Numbers.” Based on my review of these documents I note the following:
 - The plans fail to record the location of any spill control equipment at the site, or a description of the kit’s capabilities, i.e. aqueous spills, acids, or absorption capability. Also missing, exact locations of overhead sprinkler system and its flow capabilities.
 - While the documents discuss evacuation procedures, no primary or secondary evacuation routes are listed.
 - The plans list the names, locations, and telephone numbers of local emergency response teams. However, they do not describe the arrangements agreed to between the site and those teams.
- The training plan submitted by Westak does not include written job descriptions for each position managing hazardous waste or describe the amount and type of training given to each employee in those hazardous waste management positions.
- The weekly inspection logs contain pre-printed inspection dates with no signatures for the person conducting the inspections. Ms. Jackson signs as a reviewer and approver. In November 2023, the inspection log records Mr. Elizarraras inspected the site on November 10, 2023. However, Ms. Jackson appeared to sign off and approve the inspection’s findings on November 7, 2023. Many months’ worth of inspection records note the shower in the gold room as malfunctioning. The logs do not record a remedial action for the shower. Regarding the May 2024 inspection log, Ms. Jackson signed the last week on August 6, and though the second and third weeks were not signed at all, she wrote that the inspections occurred. The inspection logs indicate an inspection on July 3, and the subsequent inspection on July 12 for nine days between inspection in July 2024.

Areas of Concern

The following areas of concern are based on my observations made during the inspection, conversations with facility representatives and review of facility records. These areas of concern are not compliance determinations of violations of the pertinent regulations. I identify the following concerns based on my review to date:

1. Westak failed to appropriately label containers of hazardous waste with accumulation start dates, hazardous waste labels, and/or major hazard/risk indicators in the Hazardous Waste Storage Shed:
 - Two supersacks, at least one cubic yard in size, were missing the required markings and labels (Photos 23 and 29)
 - One 55-gallon drum accumulating lead debris (solder) lacked an accumulation start and was erroneously labeled as a satellite accumulation area (Photo 35)
 - Approximately three dozen ingot-shaped bricks and aluminum trays filled with melted down scrap lead stored prior to off-site disposal that were sitting in the flammables chemical storage area lacked any hazardous waste signage (Photo 33).
2. Westak failed to keep containers of hazardous waste closed except when adding or removing waste:
 - In the Hazardous Waste Storage Shed, one supersack, at least one cubic yard in size, partly filled with listed sludge, sat open (Photo 29).
 - In the Gold Room, one 55-gallon drum labeled hazardous waste and “cleaner – S” was open when we first saw it (Photo 3).
3. Westak failed to label containers of used oil:

- Four 55-gallon drums marked “Bad Oil” in the Hazardous Waste Storage Shed lacked used oil labels (Photos 21 and 22)
- 4. Westak failed to label and manage a universal waste aerosol can found in the Drilling area (Photo 16).
- 5. Westak exceeded the one-year universal waste accumulation limit for waste lamps stored in the Hazardous Waste Storage Shed/CAA:
 - One box marked “8-1-23” (Photo 25)
 - One box marked “4-10-23” (Photo 25)
 - One box marked “5-11-23” (Photo 27)
- 6. Westak treats hazardous waste without a permit in a satellite accumulation area by melting down waste solder debris, changing its physical properties, and storing prior to off-site disposal, or reclamation (Photo 34).
- 7. Westak may speculatively accumulate materials prior to possible re-sale; one approximately 5-gallon container of “Circuposit™ 3350 M-1 Electroless Copper” labeled “Consignment” with a date of July 2022 (Photo 38), and “F Ronastan™ EC Part A” and “Consignment” with a date stamped “Sep 03 2022,” (Photo 32) indicating on-site storage for nearly two years.
- 8. Westak failed to respond to a spill of hazardous material and manage the resulting waste in a timely manner. In the oxidizers chemical storage room, I saw an approximately 15-gallon fiber drum of “Entek Microtech ME-1020” marked “OD 1 Loose” (Photo 39). I saw the bottom drum ring appeared loose, and a white powder spread over the floor of the area.
- 9. Westak does not list the accumulated and treated lead solder debris on its biennial report.
- 10. Westak fails to document off-site shipment of solder dross using the hazardous waste manifest, EPA Form 8700-22 (Photo 20).
- 11. Westak’s standardized weekly inspection logs do not record the inspector’s signature, and Ms. Jackson, the reviewer, often signed the log many days after the recorded inspection. The log records an inspection on November 10, 2023, though Ms. Jackson approved the inspection three days prior. Ms. Jackson approved two May 2024 inspections in August. Additionally, a gap of 9 days occurred between inspections from July 3 – July 12, 2024.
- 12. Westak operates with an inadequate contingency plan. The plan submitted after the inspection lacked evacuation routes and agreement information between the site and first responders. The site lacked a quick reference guide at the time of the inspection.
- 13. The submitted training plan fails to clearly state trainings required for each position managing hazardous waste, the job title, and description of each position.

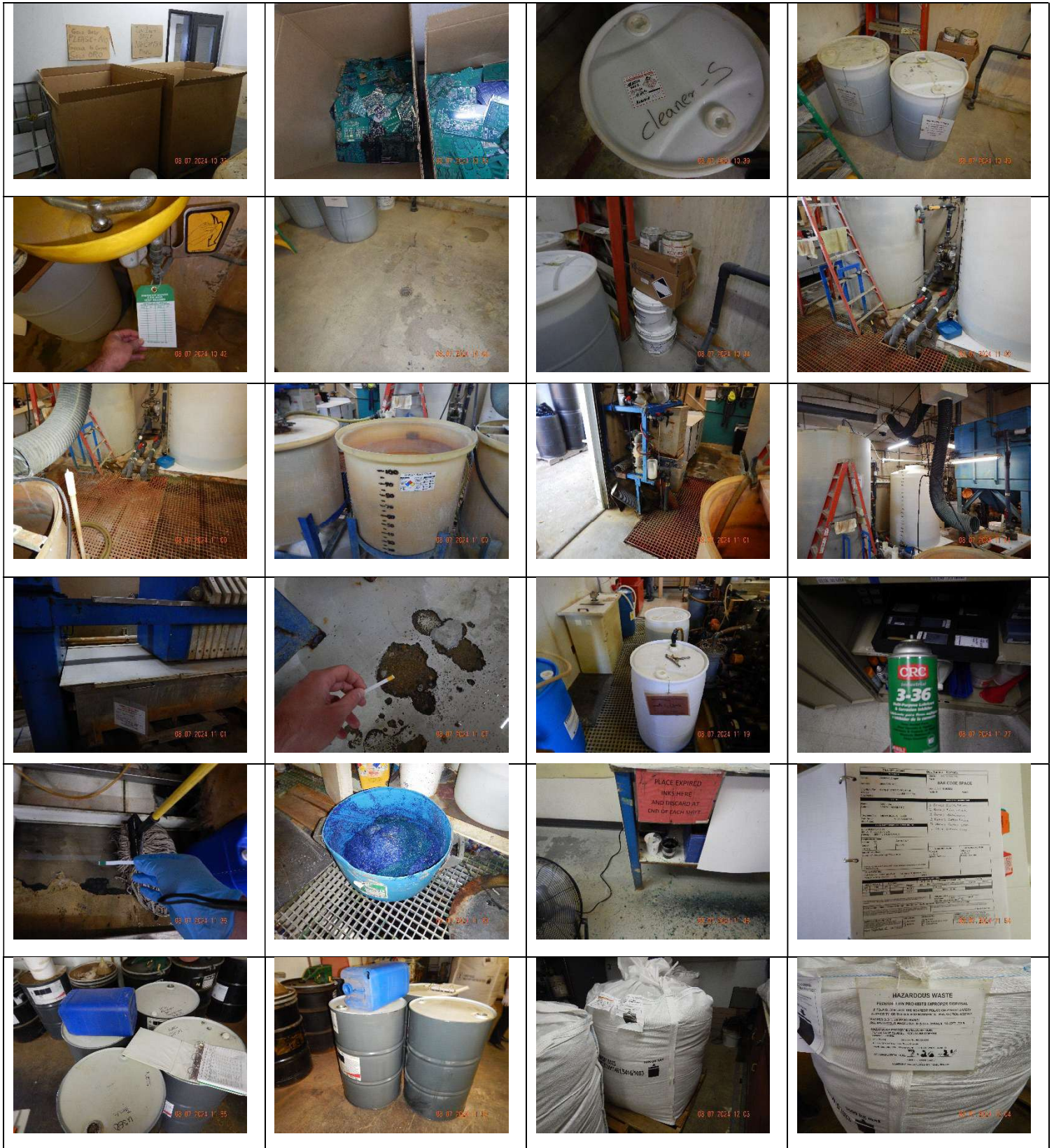
Attachment A: Photo Log

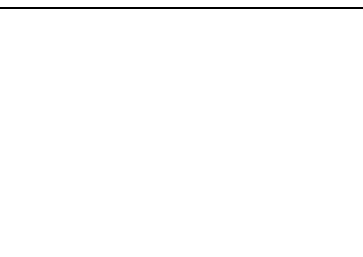
I took photographs 1-39 during the inspection with my EPA issued camera, a Nikon Coolpix AW120.^f

1. DSCN0732.JPG – In the Receiving/Dry Goods Area, two cubic yard boxes holding off-spec PCBs; Gold and Tin/Lead
2. DSCN0733.JPG – Interior of boxes holding off-spec PCBs; Gold(left) and Tin/Lead(right)
3. DSCN0734.JPG – In the HW Room, the top of 55-gallon drum labeled hazardous waste and “cleaner – S”
4. DSCN0735.JPG – In the HW Room, two 55-gallon drums holding gold solution; rightmost drum sitting open
5. DSCN0736.JPG – In the HW Room, test record card on an eye wash station
6. DSCN0737.JPG – Floor in the HW Room with opening in the floor and an exposed, open pipe
7. DSCN0738.JPG – In the HW Room, two 5-gallon pails and two 1-gallon cans holding variety of primers and epoxy
8. DSCN0739.JPG – In the wastewater treatment unit area, piping connecting above grade holding tanks to below grade treatment tanks (not pictured)
9. DSCN0740.JPG – Similar to Photo 8, zoomed out and showing more grating
10. DSCN0741.JPG – In the wastewater treatment unit area, above grade, open “Batch Treat Tank”
11. DSCN0742.JPG – In the wastewater treatment unit area, piping and pump used to convey wastewater
12. DSCN0743.JPG – Overview of wastewater treatment area
13. DSCN0744.JPG – Filter press in wastewater treatment area
14. DSCN0745.JPG – Accumulated wastewater in degraded concrete floor; pH test paper result approximately 5
15. DSCN0746.JPG – Lamination area, two 55-gallon drums; far drum labeled and dated, near drum recently placed into service.
16. DSCN0747.JPG – Drilling area, mostly full aerosol can miss its actuator (tip), not labeled as universal waste or hazardous waste
17. DSCN0748.JPG – In the Wet Process/plating area, accumulated wastewater in degraded patch of floor, pH result of approximately 9
18. DSCN0749.JPG – In the Wet Process/plating area, hardened blue dry foam in an open, approximately 10-gallon container labeled non-hazardous waste
19. DSCN0750.JPG – In the L.P.I. Room, two open and unlabeled, approximately 12-ounce cups holding material sitting under a shelf.
20. DSCN0751.JPG – Bill of Lading showing disposal of metal-bearing wastes dated “9/19/2023”
21. DSCN0752.JPG – In the Waste Treatment area (CAA), four 55-gallon drums with a variety of “used” markings, with the far labeled “Bad Oil.”
22. DSCN0753.JPG – Sideview of drums in Photo 21.
23. DSCN0754.JPG - In the Waste Treatment area (CAA), one closed approximately cubic yard-sized sack, without labels or markings, holding filter press sludge
24. DSCN0755.JPG – Placard reading “Hazardous Waste,” “Toxic,” and an accumulation start date of “7-26-24” placed on sack
25. DSCN0756.JPG – In the Waste Treatment area (CAA), two boxes of universal waste lamps with accumulation start dates of “8-1-23” and “4-10-23”
26. DSCN0757.JPG –In the Waste Treatment area (CAA, one box of universal waste lamps with accumulation start date of “6-1-25”
27. DSCN0758.JPG – In the Waste Treatment area (CAA, one box of universal waste lamps with accumulation start date of “5-11-23”
28. DSCN0759.JPG – Sludge in the hopper of a filter press in the Waste Treatment area (CAA)

^f The time and date stamp on the photographs taken with this camera are off by one day.

29. DSCN0760.JPG - In the Waste Treatment area (CAA), one open approximately cubic yard-sized sack, without labels or markings, holding filter press sludge next to the filter press.
30. DSCN0761.JPG – Side view of container in Photo 29. With placard reading “Hazardous Waste” fixed to the side of the filter press dispenser hood.
31. DSCN0762.JPG – In the HazMat Storage area (chemical storage room by the West Dock), two approximately 15-gallon containers labeled “Do not use” and “Return to Vendor – Tritex”
32. DSCN0763.JPG - – In the HazMat Storage area (flammables chemical storage room), one 20-liter container with manufacturer’s label “F Ronastan™ EC Part A” also labeled, “Consignment.”
33. DSCN0764.JPG – Wider frame view of Photo 32 showing a large collection of lead debris (scrap solder).
34. DSCN0765.JPG – Electric pot used to melt solder debris into ingots and bricks shown in Photo 33.
35. DSCN0766.JPG – Next to solder pot, a blue, approximately 55-gallon container with plywood on top reading “Hazardous Waste Satellite Accumulation Container”
36. DSCN0767.JPG – View of drum in Photo 35, with plywood off the top showing accumulated solder.
37. DSCN0768.JPG – Sign next to the drum in Photos 35 and 36 reading “Hazardous Waste D008”
38. DSCN0769.JPG –In the HazMat Storage area (acids chemical storage room), one 20-liter container labeled, “Circuposit™ 3350 M-1 Electroless Copper” and “Open” and “Consignment” with a date label of July 2022
39. DSCN0770.JPG –In the HazMat Storage area (oxidizers chemical storage room), one approximately 15-gallon fiber drum labeled “Entek Microtech ME-1020” and marked “OD Loose” had a loose drum ring and white powder on the floor by the drum, apparently spilled.





Attachment B: Document Log

I submitted the following records request on the day of the inspection, August,6 2024. Ms. Ellen Jackson, of Westak, submitted the requested records by August 12. I requested these records:

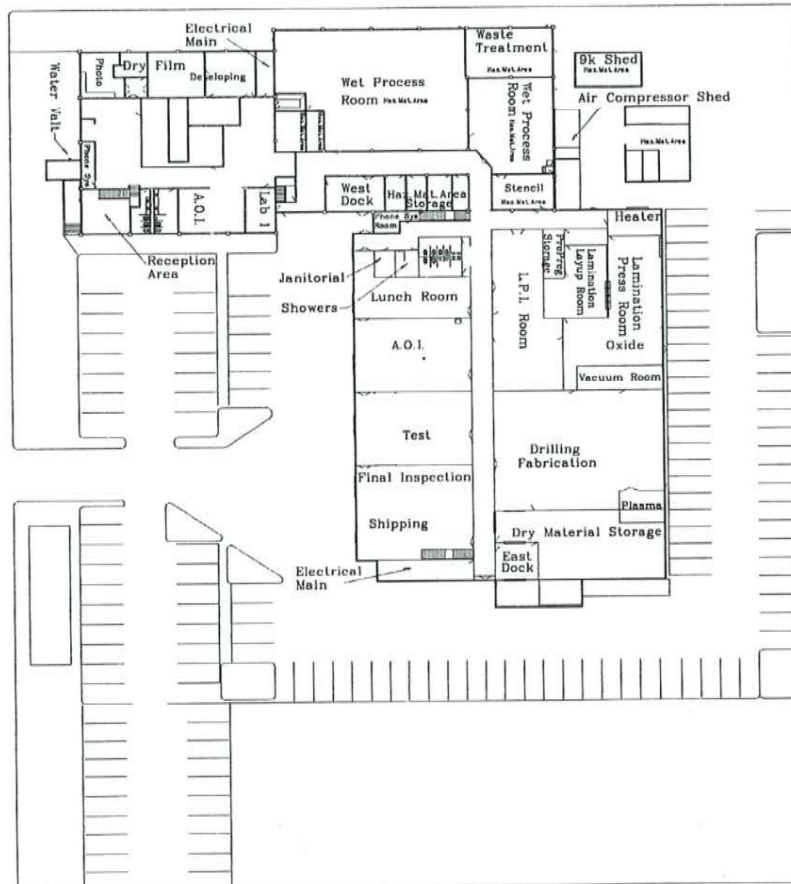
- Contingency plan including the quick reference guide
- Training plan
- Training records for these staff: Judith Juarez and Alfonso Elizarraras
- Weekly central accumulation area inspection logs for the previous 3 years (Aug 2021)
- Waste determination records for the epoxy and primer we saw in the old gold room, and any plating line filters (sometimes referred to “socks” due to their shape) used at the site

Attachment C: Site Maps

1. Site Plan found on Page 6 of the submitted Contingency Plan
2. Facility Map found on page 5 of the submitted Quick Reference Guide

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Westak Site Plan



UNCONTROLLED
DOCUMENT

