

RCRA Compliance Evaluation Inspection Report

1) Inspector and Author of Report

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2) Facility Information

Fort Walton Machining Inc.
635 Anchors St NW
Fort Walton Beach, Florida 32548
Okaloosa County

EPA ID No. FLR000168047
Latitude: 30.42228
Longitude: -86.65729
NAICS Code: 332813 – Electroplating, Plating, Polishing, Anodizing, and Coloring
SIC: 3471 – Electroplating, Plating, Polishing, Anodizing, and Coloring
Website: <https://www.fwmachining.com>

3) Responsible Officials

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Facilities, Maintenance & EHS Manager
Fort Walton Machining Inc.
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4) Inspection Participants

Jed Griffith, Facilities, Maintenance & EHS Manager, Fort Walton Machining Inc.
Carl Moss, EHS Specialist, Fort Walton Machining Inc.
Ethan F. Salley, Florida Department of Environmental Protection
Morgan Tomas, Florida Department of Environmental Protection
Anna List, Florida Department of Environmental Protection
Stephanie Kindos, Florida Department of Environmental Protection
Parvez Mallick, U.S. Environmental Protection Agency, Region 4

5) **Date of Inspection**

July 13, 2023, 10:30 a.m.

6) **Applicable Regulations¹**

Resource Conservation and Recovery Act (RCRA) Sections 3002 (42 U.S. Code – Annotated U.S.C.A. §§ 6925 and 6927), Chapter 403 of the Florida Statutes, Fla. Stat. § 403.702 *et seq.*, and rules 62.710.210 -.901, and 62-730 *et seq.* of the Florida Administrative Code Annotated (Fla. Admin. Code Ann.) [40 Code of Federal Regulation (C.F.R.) Parts 260 - 270, 273, 278, & 279].

As the State’s authorized hazardous waste program operates in lieu of the federal RCRA program, the citations of those authorized provisions alleged herein will be to the authorized State program; however, for ease of reference, the federal citations will follow in brackets.

Pursuant to Florida Administrative Code Annotated (F.A.C.) Chapter 62-730.160(1), [40 C.F.R. § 262.15(a)], a generator may accumulate as much as 55 gallons of non-acute hazardous waste in containers at or near the point of generation where wastes initially accumulate, which is under the control of the operator of the process generating the waste, without a permit or without having interim status, as required by Chapter 403 of the Florida Statutes, Fla. Stat. § 403.702 *et seq.*, [Section 3005 of RCRA, 42 U.S.C. § 6925], and without complying with F.A.C. Chapter 62-730.160(1), [40 C.F.R. § 262.16(b) or § 262.17 (a)], except as required in F.A.C. Chapter 62-730.160(1), [40 C.F.R. § 262.15(a)(7) and (8)], provided that the generator complies with the satellite accumulation area (SAA) conditions listed in F.A.C. Chapter 62-730.160(1), [40 C.F.R. § 262.15(a)] (hereinafter referred to as the “SAA Permit Exemption”).

Pursuant to Florida Administrative Code (F.A.C.) Chapter 62-730.160(1) [40 C.F.R. § 262.17], a generator of 1,000 kilograms or greater of hazardous waste in a calendar month is a large quantity generator (LQG) and may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status, as required by Chapter 403 of the Florida Statutes, Fla. Stat. § 403.702 *et seq.*, [Section 3005 of RCRA, 42 U.S.C. § 6925], provided that the generator complies with the conditions listed in F.A.C. Chapter 62-730.160(1) [40 C.F.R. § 262.17] (hereinafter referred to as the “LQG Permit Exemption”).

Pursuant to Florida Administrative Code (F.A.C.) Chapter 62-730.160(1) [40 C.F.R. § 262.17 (f)], a large quantity generators may accumulate on site hazardous waste received from very small quantity generators under control of the same person (as defined in § 260.10 of this chapter), without a storage permit or interim status and without complying with the requirements of parts 124, 264 through 268, and 270 of this chapter, and the notification requirements of section 3010 of RCRA, provided that they comply with the following conditions in Florida Administrative Code (F.A.C.) Chapter 62-730.160(1) [40 C.F.R. § 262.17(f)]. “Control,” for the purposes of this section, means the power to direct the policies of the generator, whether by the ownership of stock, voting rights, or otherwise, except that contractors who operate generator

¹ As the State’s authorized hazardous waste program operates in lieu of the federal RCRA program, the citations of those authorized provisions will be to the authorized State program. However, for ease of reference, the federal citations will follow in brackets.

facilities on behalf of a different person shall not be deemed to “control” such generators.

7) **Purpose of Inspection**

The purpose of this inspection was to conduct an unannounced compliance evaluation inspection (CEI) to determine Fort Walton Machining Inc. facility’s compliance with the applicable requirements of RCRA and the corresponding State of Florida regulations. This was an EPA and FDEP joint inspection.

8) **Facility Description**

Fort Walton Machining Inc. manufactures and surface treats custom designed, precision machined parts for the aerospace, defense and medical industries. Fort Walton Machining, Inc. has two locations in Ft. Walton Beach, Florida. The subject of this inspection is the Metal Finishing Division that is located at 635 Anchors St NW. Fort Walton Machining Inc. Metal Finishing Division (“MFD” or “the facility”) has operated from this location since 2010. The facility occupies 42,000 square feet building and connected to City of Ft. Walton Beach water and sewer. MFD currently has 75 employees working two shifts from approximately 7:30 am to 11:30pm.

MFD provides precision surface treatments e.g., anodizing, assemblies and testing, chem-film, passivation, prime & paint, non-destructive testing (NDT). MFD features a custom chemical finishing line with dual PLC controlled hoists, a 400-ft. conveyor drying paint line, a 40-ft. gas curing oven, and four paint booths. The hoists for chemical finishing line communicate to a centralized computer for traceability and batch time runs. Support activities include wastewater pre-treatment and a process control laboratory.

The facility’s most recent, March 31, 2022, notification of hazardous waste activities (EPA Form 8700-12) to FDEP indicated that MFD notified as a large quantity generator (LQG) of hazardous waste. Hazardous wastes are primarily generated from paint room, environmental area, and maintenance shop. RCRA regulated hazardous waste streams generated for off-site treatment/disposal include spent acid and alkaline wastes (D002 and D007), waste flammable liquids (D001 and F003), waste sulfuric acid (D002), paint waste (D001, D007, D008, D035, F003, and F005), waste barium chloride (D005 and U095), waste cyanide (D003 and P098), chrome plating waste (F019), and filter cake (D007, F006). FWM manages their aerosols, wipes, and blast media waste as hazardous.

9) **Previous Inspection History**

The facility was previously inspected by FDEP on March 26, 2019, as a LQG and was in compliance with RCRA regulations. The EPA and FDEP inspection on May 23, 2012, found two violations.

10) **Opening Conference**

On July 13, 2023, the EPA inspector Parvez Mallick, accompanied by FDEP inspectors Ethan F. Salley, Morgan Tomas, Anna List, and Stephanie Kindos, conducted an unannounced CEI at

Fort Walton Machining Inc., Ft. Walton Beach, Florida to determine the compliance status of the facility with the RCRA and the State of Florida regulations. Inspectors arrived at Fort Walton Machining Inc. and was greeted by, Jed Griffith, Facilities, Maintenance & EHS Manager, Fort Walton Machining Inc. The inspectors introduced themselves, showed credentials, exchanged business cards, and explained the purpose of the visit during an opening conference.

Fort Walton Machining Inc. staff provided an overview of the facility's history and current operations during the opening conference. The inspectors described the possible use of a digital camera during the inspection and the facility's ability, pursuant to 40 C.F.R. § 2.203, to assert a business confidentiality claim for information submitted to the EPA. The facility did not assert a business confidentiality claim. Fort Walton Machining Inc. does not appear to meet the Small Business Regulatory Enforcement Fairness Act's classification of a "small business," which is generally set by the Small Business Administration using the business' SIC/NAICS code and annual receipts or number of employees. Health and safety protocols and required personal protective equipment were discussed with Jed Griffith and Carl Moss, who led the inspectors on a tour of the facility's operations. The inspectors stated that digital images/pictures will be taken during the inspection and are used to document conditions observed during civil inspections and investigations. Inspection pictures also assess a regulated entity's ability to maintain compliance.

11) **Inspection Observations**

The information in this RCRA inspection report is based on the EPA's July 13, 2023, RCRA CEI. The following areas were visually inspected: Chemical Process Department, Paint Department (and Mixing Room), Masking Department, Quality Assurance Department, and the Exterior 90-Day Hazardous Waste Storage Area. The inspection concluded with a records review and closing interview.

Chemical Process Department - The Chemical Process Department houses Non-Destructive Testing, plating lines, the wastewater pre-treatment system (WWTS), and the process control laboratory.

Non-Destructive Testing (NDT)

The inspectors proceeded to the NDT area. Fluorescent penetrant inspection (FPI) is a non-destructive test. FPI is a type of dye penetrate inspection in which a fluorescent dye is applied to the surface of a non-porous material in order to detect defects that may compromise the integrity or quality of the part in question. The FPI is a test that ensures all components are free from defects such as cracks, laps, and porosity. According to the facility representative, MFD uses a non-hazardous penetrant and rinse water profile is non-hazardous. The rinse water from the NDT area is piped to an evaporator. No hazardous waste was observed during the inspection.

The following satellite accumulation area containers were observed near the plating line:

- One 55-gallon container of cadmium wipes debris from brush plating. The container was closed, marked "Hazardous Waste," and with an indication of the hazards of the contents;
- One closed 25-gallon container of waste cadmium liquid marked "Hazardous Waste," and with an indication of the hazards of the contents;
- One 55-gallon container of empty unpunctured aerosols cans.

The inspectors observed one closed cubic yard gaylord box of filter cake (D007, F006) stored near the WWTS less than 90-day storage area #4. The gaylord box was closed, marked “Hazardous Waste,” dated 5/12/23, and lacked an indication of the hazards of the contents.

Pursuant to F.A.C. Chapter 62-730.160(1), [40 C.F.R. § 262.17(a)(5)(i)(B)], which is a condition of the LQG Permit Exemption, a generator must mark or label its containers with an indication of the hazards of the contents (examples include, but are not limited to, the applicable hazardous waste characteristic(s) (*i.e.*, ignitable, corrosive, reactive, toxic); hazard communication consistent with the Department of Transportation requirements at 49 CFR part 172 subpart E (labeling) or subpart F (placarding); a hazard statement or pictogram consistent with the Occupational Safety and Health Administration Hazard Communication Standard at 29 CFR 1910.1200; or a chemical hazard label consistent with the National Fire Protection Association code 704).

The inspectors observed a filter press catch pan stored under the filter press sludge machine. The catch pan was empty at the time of the inspection. The inspectors stated that the catch pan should be marked with the words “Hazardous Waste” and with an indication of the hazards of the contents.

The inspection proceeded to the WWTS area. At the time of the inspection, the inspectors observed a 4,200-gallon tank containing spent/contaminated sulfuric which is repurposed by the facility in other plating process. Following the records review, the inspectors discussed the speculative accumulation rule for the reuse of the sulfuric acid used in the facility. Pursuant to 40 C.F.R. § 261.1(c)(8), a material is “accumulated speculatively” if it is accumulated before being recycled. A material is not accumulated speculatively, however, if the person accumulating it can show that the material is potentially recyclable and has a feasible means of being recycled; and that during the calendar year (commencing on January 1) - the amount of material that is recycled, or transferred to a different site for recycling, equals at least 75 percent by weight or volume of the amount of that material accumulated at the beginning of the period. Materials must be placed in a storage unit with a label indicating the first date that the material began to be accumulated. If placing a label on the storage unit is not practicable, the accumulation period must be documented through an inventory log or other appropriate method. In calculating the percentage of turnover, the 75 percent requirement is to be applied to each material of the same type (*e.g.*, slags from a single smelting process) that is recycled in the same way (*i.e.*, from which the same material is recovered or that is used in the same way). On July 20, 2023, MFD submitted a speculative accumulation log sheet for sulfuric acid inventory.

The inspectors proceeded to the plating lines. The plating line is equipped with a series of tanks. Beneath each plating tank is a concrete secondary containment structure which was observed to contain several inches of rinse water (Photos #1-2). The facility indicated that excess rinse water will be processed through the WWTS. It appears that MFD has been using the plating tanks containment system as a hazardous waste storage tank. This area is being used for primary containment of hazardous waste. Primary containment structures are subject to tank/secondary containment requirements in 40 C.F.R. Part 265, Subpart J. During the inspection, the inspectors informed the MFD representative that the containment area cannot be used to store plating waste rinsewater from the plating process. On July 20, 2023, MFD submitted pictures showing that secondary containment system has been cleaned and emptied of plating rinse

water.

Pursuant to F.A.C. Chapter 62-730.160(1), [40 C.F.R. § 262.17(a)(5)(ii)], which is a condition of the LQG Permit Exemption, a large quantity generator accumulating hazardous waste in tanks must do the following: (A) Mark or label its tanks with the words “Hazardous Waste”; (B) Mark or label its tanks with an indication of the hazards of the contents (examples include, but are not limited to, the applicable hazardous waste characteristic(s) (*i.e.*, ignitable, corrosive, reactive, toxic); hazard communication consistent with the Department of Transportation requirements at 49 CFR part 172 subpart E (labeling) or subpart F (placarding); a hazard statement or pictogram consistent with the Occupational Safety and Health Administration Hazard Communication Standard at 29 CFR 1910.1200; or a chemical hazard label consistent with the National Fire Protection Association code 704); (C) Use inventory logs, monitoring equipment or other records to demonstrate that hazardous waste has been emptied within 90 days of first entering the tank if using a batch process, or in the case of a tank with a continuous flow process, demonstrate that estimated volumes of hazardous waste entering the tank daily exit the tank within 90 days of first entering; and (D) Keep inventory logs or records with the above information on site and readily available for inspection.

In the Paint Department, the inspectors observed one closed cubic yard gaylord box of paint filters and paint debris (D001, D007, D008, D035, F003, and F005) marked “Hazardous Waste” dated 5/9/23 and lacked an indication of the hazards of the contents.

Pursuant to F.A.C. Chapter 62-730.160(1), [40 C.F.R. § 262.17(a)(5)(i)(B)], which is a condition of the LQG Permit Exemption, a generator must mark or label its containers with an indication of the hazards of the contents (examples include, but are not limited to, the applicable hazardous waste characteristic(s) (*i.e.*, ignitable, corrosive, reactive, toxic); hazard communication consistent with the Department of Transportation requirements at 49 CFR part 172 subpart E (labeling) or subpart F (placarding); a hazard statement or pictogram consistent with the Occupational Safety and Health Administration Hazard Communication Standard at 29 CFR 1910.1200; or a chemical hazard label consistent with the National Fire Protection Association code 704).

The Paint Department houses three paint booths, a preparation room, and a mixing room. The inspectors observed the following SAA waste containers in this area:

- Three paint booths each had one closed 5-gallon container of waste solvent paint debris marked “Hazardous Materials” and with no indication of the hazards of the contents;
- One open 15-gallon container of waste liquid from the paint gun washer marked “Hazardous Waste” with an indication of the hazards of the contents;
- One open 55-gallon container of waste paint/thinners marked “Hazardous Waste” with an indication of the hazards of the contents (Photo #3); and
- One open 15-gallon container of solvent wipes/paint debris illegible markings of “Hazardous Waste” with no indication of the hazards of the contents.

Pursuant to F.A.C. Chapter 62-730.160(1) [40 C.F.R. § 262.15(a)(5)], which is a condition of the SAA Permit Exemption, a generator must mark or label its containers with the

following: (i) The words “Hazardous Waste”; (ii) An indication of the hazards of the contents (examples include, but are not limited to, the applicable hazardous waste characteristic(s) (*i.e.*, ignitable, corrosive, reactive, toxic); hazard communication consistent with the Department of Transportation requirements at 49 CFR part 172 subpart E (labeling) or subpart F (placarding); a hazard statement or pictogram consistent with the Occupational Safety and Health Administration Hazard Communication Standard at 29 CFR 1910.1200; or a chemical hazard label consistent with the National Fire Protection Association code 704).

Pursuant to F.A.C. Chapter 62-730.160(1) [40 C.F.R. § 262.15(a)(4)], which is a condition of the SAA Permit Exemption, a container holding hazardous waste must be closed at all times during accumulation, except: (i) when adding, removing, or consolidating waste; or (ii) when temporary venting of a container is necessary (A) for the proper operation of equipment, or (B) to prevent dangerous situations, such as build-up of extreme pressure.

The Masking Department contained the following SAA waste containers:

- Two closed 5-gallon containers of waste solvent paint debris marked “Hazardous Materials” and with no indication of the hazards of the contents;
- One closed 55-gallon container of solvent wipes/paint debris “Hazardous Waste” with an indication of the hazards of the contents; and
- One closed 55-gallon container of lead and chromium waste debris marked “Hazardous Waste” with an indication of the hazards of the contents.

Pursuant to F.A.C. Chapter 62-730.160(1) [40 C.F.R. § 262.15(a)(5)], which is a condition of the SAA Permit Exemption, a generator must mark or label its containers with the following: (i) The words “Hazardous Waste”; (ii) An indication of the hazards of the contents (examples include, but are not limited to, the applicable hazardous waste characteristic(s) (*i.e.*, ignitable, corrosive, reactive, toxic); hazard communication consistent with the Department of Transportation requirements at 49 CFR part 172 subpart E (labeling) or subpart F (placarding); a hazard statement or pictogram consistent with the Occupational Safety and Health Administration Hazard Communication Standard at 29 CFR 1910.1200; or a chemical hazard label consistent with the National Fire Protection Association code 704).

The Quality Assurance Department contained the following SAA waste containers:

- One closed 55-gallon container of corrosive “conversion coating touch-up” waste marked “Hazardous Materials” and with an indication of the hazards of the contents;
- One closed 55-gallon container of solvent wipes/paint debris “Hazardous Waste” with an indication of the hazards of the contents;
- One closed 55-gallon container of waste blast media with hexavalent chrome marked “Hazardous Waste” and with an indication of the hazards of the contents;
- One closed 55-gallon container of expired sealant waste marked “Hazardous Waste” and with an indication of the hazards of the contents;
- Two closed 5-gallon containers of waste solvent paint debris marked “Hazardous Materials” and with no indication of the hazards of the contents.

Pursuant to F.A.C. Chapter 62-730.160(1) [40 C.F.R. § 262.15(a)(5)(ii)], which is a condition of the SAA Permit Exemption, a generator must mark or label its containers with the following: An indication of the hazards of the contents (examples include, but are not limited to, the applicable hazardous waste characteristic(s) (*i.e.*, ignitable, corrosive, reactive, toxic); hazard communication consistent with the Department of Transportation requirements at 49 CFR part 172 subpart E (labeling) or subpart F (placarding); a hazard statement or pictogram consistent with the Occupational Safety and Health Administration Hazard Communication Standard at 29 CFR 1910.1200; or a chemical hazard label consistent with the National Fire Protection Association code 704).

The inspectors proceeded to a less than 90-day storage area #5 located in the Paint Booth #5. There was one closed cubic yard gaylord box of solvent wipes/paint debris marked “Hazardous Waste” dated 5/9/23 and with an indication of the hazards of the contents (Photo #4). In addition, there was a 5-gallon SAA container of waste solvent paint debris marked “Hazardous Waste” and with no indication of the hazards of the contents.

Pursuant to F.A.C. Chapter 62-730.160(1) [40 C.F.R. § 262.15(a)(5)(ii)], which is a condition of the SAA Permit Exemption, a generator must mark or label its containers with the following: An indication of the hazards of the contents (examples include, but are not limited to, the applicable hazardous waste characteristic(s) (*i.e.*, ignitable, corrosive, reactive, toxic); hazard communication consistent with the Department of Transportation requirements at 49 CFR part 172 subpart E (labeling) or subpart F (placarding); a hazard statement or pictogram consistent with the Occupational Safety and Health Administration Hazard Communication Standard at 29 CFR 1910.1200; or a chemical hazard label consistent with the National Fire Protection Association code 704).

The inspectors observed a closed 55-gallon container of expired sealant waste marked “Hazardous Waste” and with an indication of the hazards of the contents in the Shipping Storage Area.

The inspection then proceeded to the less than 90-day storage area #2 located outside. The storage area was closed, locked, and secured. There was a closed cubic yard box of expired paint waste marked “Hazardous Waste,” dated 6/28/23, and with an indication of the hazards of the contents. The 90-day storage area #2 had a “No Smoking” and other emergency signage posted. Across from the less than 90-day storage area #2 was a freestanding container building with a built-in secondary containment. This building is used as a less than 90-day storage area #3 and contained two 55-gallon containers. One closed 55-gallon container contained waste blast media with hexavalent chrome marked “Hazardous Waste,” dated 6/7/23, and with no indication of the hazards of the contents; and the second 55-gallon container contained waste paint and thinner marked “Hazardous Waste,” dated 6/15/23, and with an indication of the hazards of the contents.

Pursuant to F.A.C. Chapter 62-730.160(1), [40 C.F.R. § 262.17(a)(5)(i)(B)], which is a condition of the LQG Permit Exemption, a generator must mark or label its containers with an indication of the hazards of the contents (examples include, but are not limited to, the applicable hazardous waste characteristic(s) (*i.e.*, ignitable, corrosive, reactive, toxic); hazard communication consistent with the Department of Transportation requirements at 49 CFR part 172 subpart E (labeling) or subpart F (placarding); a hazard statement or

pictogram consistent with the Occupational Safety and Health Administration Hazard Communication Standard at 29 CFR 1910.1200; or a chemical hazard label consistent with the National Fire Protection Association code 704).

12) Records Review

After the walkthrough, the inspectors requested and reviewed the facility's applicable manifests, waste profiles, Land Disposal Restriction (LDR) notification forms, weekly inspections, contingency plan, training records, arrangement with the local authorities, biennial report, and employee training records. Unless otherwise specified, all records and documents reviewed were considered satisfactory at the time of inspection.

The facility uses A.R. Paquette & Company (FLD982105884), Freehold Cartage Inc. (NJD0541261264), Tradebe Transportation (INR000123497) as transporters and the designated facility is Veolia ES Technical Solutions (TXD000838896).

The facility maintains a contingency plan (CP) that includes emergency contact information, an evacuation map, emergency response and preparedness procedures, arrangements with local authorities, and emergency equipment descriptions and locations. The CP was last revised on January 12, 2023.

Spill kits, eye wash and shower stations, fire alarms, and fire extinguishers are available on-site and the facility conducts routine inspections, testing, and maintenance of all communications systems, fire protection equipment, spill control equipment, and decontamination equipment. The facility uses 2-way radio throughout the facility capable of summoning assistance.

The facility conducts weekly inspections of hazardous waste containers in the CAA. The container inspection log included the date and time of inspection, the name of the staff member conducting the inspection, any corrective actions taken, and the total number of bins in the CAA. Weekly inspection records are maintained for at least three years as per F.A.C. Rule 62-730.160 (3).

The inspectors reviewed the facility's annual hazardous waste trainings of all staff in contact with hazardous materials and hazardous wastes. This training includes understanding and recognition of hazardous wastes. Documentation of job titles and position descriptions for personnel involved with hazardous waste management are managed on-site. Biennial report for the facility's hazardous waste activities in 2021 was available to review on-site. The biennial report was submitted to FDEP on March 31, 2022.

13) Closing Conference

Upon conclusion of the inspection, a closing conference was conducted in the presence of Jed Griffith and Carl Moss representing MFD. The facility was informed of the preliminary findings at the time of the inspection.

14) **Conclusion**

Based on the CEI conducted on July 12, 2023, MFD was inspected as a large quantity generator of hazardous waste and a small quantity handler of universal waste. MFD provided photos of corrective actions taken in SAAs and CAAs on July 20, 2023, and July 31, 2023, and other compliance issues corrected after the inspection on August 1, 2023, and September 14, 2023. Based on the information provided during and following the inspection, the facility has returned to compliance.

15) **Signed**

PARVEZ MALLICK Digitally signed by PARVEZ
MALLICK
Date: 2023.09.18 15:36:05 -04'00'

Parvez Mallick
Environmental Engineer
RCRA Enforcement Section

Date

16) **Concurrence**

ARACELI CHAVEZ Digitally signed by ARACELI
CHAVEZ
Date: 2023.09.18 16:53:40 -04'00'

Araceli B. Chavez
Chief
RCRA Enforcement Section

Date

Fort Walton Machining Inc.
FLR000168047
July 13, 2023
RCRA CEI Photographs
Photographs by Morgan Tomas, Florida Department of Environmental Protection



Photo #1 – Several inches of plating rinse water stored in the secondary containment.



Photo #2 – Several inches of plating rinse water stored in the secondary containment.



Photo #3 – Open 55-gallon container of Paint waste in the paint mix room.

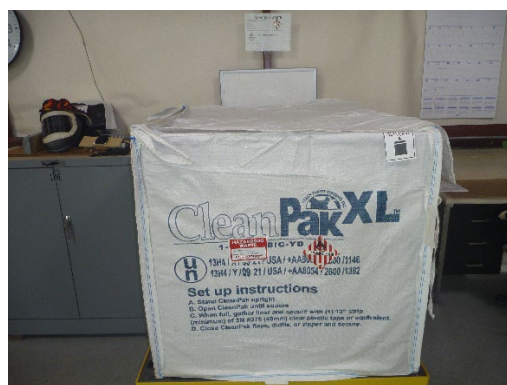


Photo #4 – One cubic yard box of solvent wipes/paint debris stored in the less than 90-day hazardous waste storage area #5.