

RCRA Inspection Report

1) Inspector and Author of Report

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2) Facility Information

H & S Swansons Tool Company
9000 68th Street
Pinellas Park, Florida 33782-4499
Pinellas County

EPA ID No.: FLD982160723

3) Responsible Officials

Mr. Anthony Tagler
Maintenance Coordinator
H & S Swansons Tool Company
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Pinellas Park, Florida 33782-4499
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4) Inspection Participants

Anthony Tagler, H & S Swansons Tool Company
Jordan Swift, H & S Swansons Tool Company
Tim Brush, H & S Swansons Tool Company
Walter Hukalowicz, H & S Swansons Tool Company
Kiana Sladicki, Florida Department of Environmental Protection, Southwest District
Alex Miranda, Florida Department of Environmental Protection, Southwest District
William Kappler, U. S. EPA, Region 4

5) Date and Time of Inspection

March 31, 2021, at 9:22 a.m.

6) **Applicable Regulations**

Chapter 403 of the Florida Statutes, Fla. Stat. § 403.702 *et seq.*, [Resource Conservation and Recovery Act Sections 3002 - 3005, (42 U.S. Code - Annotated U.S.C.A. 6925 and 6927)], the Florida Hazardous Waste Regulations 62.710.210 -.901, and 62-730 *et seq.* of the Florida Administrative Code Annotated (Fla. Admin. Code Ann.) [40 Code of Federal Regulations (C.F.R.) Parts 260-270, 273, and 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.

7) **Purpose of Inspection**

On March 26, 2021, inspectors from the U.S. Environmental Protection Agency, Region 4, and the Florida Department of Environmental Protection, Southwest District (FDEP) contacted H & S Swansons Tool Company, for an opening conference call to discuss a RCRA compliance evaluation inspection (CEI). Inspectors introduced themselves, and the EPA inspector explained the purpose of the RCRA CEI, including notification procedures due to the Covid-19, the date and time of the RCRA inspection, EPA health and safety procedures, general areas for inspection, the EPA equipment to be used, RCRA records needed for review, confidential business information (CBI), and small business resources information. H & S Swansons Tool Company explained their operational status, health and safety procedures, and record review information. A face mask, social distancing, hand-washing practices, and small groups are observed at the facility. The facility requires a temperature check for all visitors using a non-contact digital thermometer.

On March 26, 2021, the EPA sent an email to the H & S Swansons Tool Company, to confirm the date and time of the RCRA inspection, the EPA inspector business card, and a list of the RCRA records needed for review. H & S Swansons Tool Company submitted RCRA records in an email to the EPA on March 29, 2021, consisting of; the 2019 biennial report, a hazardous waste contingency plan, a record of the arrangements with the local authorities, and a wastewater discharge control plan.

On March 31, 2021, inspectors from the EPA and the FDEP conducted an announced CEI at H & S Swansons Tool Company, (hereinafter, "H & S" or the "facility") to determine the compliance status with the RCRA and the State of Florida regulations. This was an EPA-lead inspection. Inspectors arrived at H & S and were greeted by facility representatives. The inspectors introduced themselves, showed credentials, exchanged business cards, and explained the purpose of the visit during an entrance briefing. The temperature of each inspector was checked by the facility using a non-contact digital thermometer.

8) **Facility Description**

H & S is located at 9000 68th Street North, Pinellas Park, Pinellas County, Florida. The facility has been at this location since 1983 and consists of 3.5 acres of property. The property is owned by H & S. The facility employs approximately 95 people and operates Monday through Friday

and alternating Saturdays, 24 hours per day, on two 12-hour shifts. The facility consists of one building. The City of Pinellas Park provides potable water service and domestic waste service. The primary NAICS code for the facility is 32710 Machine Shops, 332812 Metal Coating, and 332813 Plating.

The facility operates a wastewater pretreatment facility (WWPTF) to treat rinse water, cleaning solutions and corrosive solutions generated from hexavalent and trivalent plating, chromate conversion coating, anodizing, passivation and chemical etching in the Chem Film/Chromate Room.

H & S notified of its regulated waste activity (8700-12) to FDEP on February 13, 2020, as a large quantity generator of hazardous waste (LQG) and a small quantity handler of universal waste (SQHUW).

9) **General Process Description**

The facility's operations are conducted in three main areas. In the northwest area of the property, there is a Scrap Metal Processing and 90-Day or Less Accumulation Area. The facility's building has two large manufacturing floors, consisting of the East Manufacturing Floor and the South Manufacturing Floor.

H & S conducts the machining and painting of aluminum castings for various types of industries and operations in the aerospace, electronics, and the military. The aluminum casting (casting) contributes approximately 90 percent of H & S products. Metals such as titanium, cast iron, steel, and chromium are also processed at the facility. Facility operations include a large manufacturing area (machine shop) where the casting is milled, tapped, turned, and broached from a variety of machines to meet customer specifications prior to transfer to other manufacturing operations. The casting is then placed in temporary storage until it is processed in a parts washer and "Vibra Burr" process. The casting is tumbled in a plastic or ceramic stone system using a non-hazardous alkaline cleaner to remove metal burrs and residues that adhere to the casting when removed from the mold. Some castings are also submerged into vats containing a rust inhibitor in an adjacent area. The casting is then checked for quality control and then moved into another manufacturing area where additional tooling (including a drill line area) is conducted. The assembly of the casting is conducted in a dry process operation. Non-aluminum castings are degreased in a parts washer containing petroleum naphtha.

The Pad Marking Room is where marks on a metal aircraft instrumentation panel is applied with dyes and/or paints. Some castings require a fluorescent marking. The fluorescent dye powder is mixed and thinned with a clear lacquer. Lacquer thinner is also applied on equipment using cleaning pads. Waste swabs, mixing sticks, gloves, pads (waste debris) are used in the processes. Waste debris containing liquid is accumulated in a container in this area as hazardous waste and consolidated into a 55-gallon container with similar hazardous waste in the Paint Department.

Some castings after tooling, drilling, and assembly are processed in the Chem Film/Chromate Room. Chromate conversion coating, sulfuric acid anodizing, etching and passivation are conducted in this area.

There are 32 process tanks in this area, including cleaners, dyes, etches, passivation, sealers, chromate solutions and associated rinses. The rinses use deionized (“DI”) water generated by the facility from city water. The facility conducts Type I and Type II chromate conversion coating, Type I and Type II anodizing, and Type II and Type VII passivation. The rinse water, cleaning solutions and some corrosives solutions are discharged to the on-site wastewater pretreatment system. The remaining chemicals removed from the tanks are accumulated in containers as hazardous waste and transferred to the outdoor 90-Day or Less Accumulation Area for off-site shipment. After the casting is processed in this area, it may go to the paint shop to be painted depending on customer specifications.

Both chromate conversion coating processes begin by cleaning in a caustic tank, rinsing in a static rinse, then etched in a caustic bath, and then another static rinse. The casting is then dipped in a nitric acid deoxidizer then in a flow rinse and then a spray rinse with DI water. The casting to be conversion coated is then dipped in the hexavalent chromate tank, then static rinsed and then a warm water rinse.

A casting that is anodized is dipped in a sulfuric acid anodizing tank, then rinsed in a double fall rinse and then in a DI spray rinse. The casting is then either; dyed, rinsed, sealed with nickel acetate and rinsed, or if not dyed, it is dipped in a dichromate sealer and then rinsed in a chromate rinse process. A casting that is heat sensitive is processed in a cold etch tank and rinsed. Castings are also processed in a small passivation tank and in a de-smut tank.

A masking material is then applied to the casting and transferred to the Paint Department for painting with or without conversion coating in two cross-draft spray booths. Most of the painting, mixing and paint gun cleaning occurs in the larger spray booth. There is also one powder coat booth.

Rinse water and chemical cleaning solutions generated in the Chem Film/Chromate Room are pumped to an outdoor wastewater pretreatment system (WWPTS) constructed with separate sumps to manage chromium and nonchromium wastewater. The WWPTS is constructed inside a containment dike and the chromium and non-chromium pretreatment systems are separated by a containment wall. Rinse water that does not contain chromium is discharged to sump one and rinse water containing chromium is discharged to sump two. The WWPTS has two 500-gallon and two 1,200-gallon tanks for hexavalent chromium and trivalent chromium wastewater and containerized products of C5 coagulant, polymer, and nitric acid used in the treatment process.

Rinse water from sump two is then pumped to the 500-gallon tank and treated to reduce hexavalent chrome to trivalent chrome. The wastewater is then pumped to the 1,200-gallon equalization tank with rinse water from sump one. The wastewater is then pumped to a treatment tank and coagulant is added and the pH is maintained. The wastewater is then pumped to a treatment tank for further mixing and pH adjustment. The wastewater is then gravity fed to a clarifier for polymer addition to precipitate the metals. The clarified wastewater is over-flowed to a treatment tank for final pH adjustment, prior to discharge to the sanitary sewer. Solids accumulated in the clarifier are pumped to a holding tank and then processed in a plate and frame filter press. Filtrate is then gravity fed back to a sump for retreatment. Dried filter solids are emptied into a hopper and then transferred into a one cubic yard container and accumulated, prior to off-site shipment.

Due to unexpected circumstances, the EPA and FDEP inspectors were not able to visit the South Manufacturing Floor during this inspection.

10) **Previous Inspection History**

H & S was last inspected by the FDEP on October 2, 2018. The facility was cited for not giving adequate hazardous waste training, not maintaining and operating the facility to minimize the possibility of a fire, explosion, or any unplanned sudden, or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water, not complying with used oil standards, not submitting a biennial report, not maintaining the hazardous waste manifest for three years, not marking the accumulation start date on containers, not marking satellite and 90-day containers with the words hazardous waste, not keeping containers closed, not using containers in good condition, not conducting weekly container inspections, not storing containers less than 50 feet from the facility property line, the contingency plan was not updated, not maintaining waste determination records, not maintaining land disposal restriction records for three years, and not complying with universal waste standards. The issues were resolved by a Consent Agreement and penalty.

H & S has never previously been inspected by the EPA for compliance with the RCRA and the State of Florida hazardous waste regulations.

11) **Findings**

The information in this RCRA inspection report is based on the EPA's March 31, 2021, RCRA CEI.

90 Day or Less Accumulation Area

The 90-Day or Less Accumulation Area (90-Day) is in the rear of the building and is constructed with a concrete pad, that slopes toward the surrounding pavement. The concrete pad is surrounded on one side and in the rear of the pad by a four to five-foot high cinder block containment wall. A metal roof is constructed over a portion of the pad. The inspector observed Danger and Caution signs posted in this area. The property behind the facility's fence line is owned by H & S (Photograph 1).

Six 55-gallon containers were observed accumulating hazardous waste in the 90-Day. The containers were on wooden pallets, closed, in good condition, labeled with the words hazardous waste, labeled with corrosive and flammable hazard indicators and marked with the date March 30, 2021. Seven containers accumulating used oil were also observed in this area. The containers were closed and labeled with the words used oil. The used oil tank observed during FDEP's October 2, 2018 inspection was no longer on-site. The concrete pad appeared in good condition.

Aluminum scrap is accumulated in a large dumpster for off-site recycling. Used oil from the dumpster is accumulated in a concrete sump. The used oil from the sump is pumped to a filter and recycling system to filter solids from the liquid. The solids are managed as nonhazardous waste.

The 90-Day is equipped with spill control and personnel protective equipment and fire extinguishers. Communications are conducted by radio and cell phone. An eye wash and shower station were observed 75 yards from the 90-Day, next to the paint shed.

East Manufacturing Floor - Machine and Tooling Area

The facility receives aluminum and steel bar stock in this area for processing in machines to produce specific castings for the customer. Coolant and used oil generated during the machining and tooling operation is accumulated in containers for off-site shipment.

East Manufacturing Floor - Chem Film/Chromate Room

The aluminum casting is masked and is either sent directly for painting or chemically processed in the Chem Film/Chromate Room.

A total of 32 chemical and rinse process tank are in this room. The chemicals consist of caustics, cleaning solutions, dyes, etches, passivation, sealers, chromate solutions and various rinse systems. The facility processes city water to produce deionized (“DI”) water for its rinse systems. The facility operates chemical tanks for chromate conversion coating, anodizing and passivation. The rinse waters, caustics and cleaning solutions are discharged to the on-site wastewater pretreatment system and spent chemical removed from the tanks is accumulated as hazardous waste in containers for off-site shipment to a RCRA destination facility. After the casting is processed in this area it may be transferred to the paint shop for painting.

Chromate Conversion Coated

In this process the casting is first cleaned in a caustic tank, then static rinsed, then dipped in a sodium hydroxide tank, then in a static rinse, then processed in a nitric acid deoxidizer tank and then flow rinsed and spray rinsed with DI water. The casting for Type I conversion coating is dipped in a hexavalent chromate tank, then static rinsed and then a warm water rinse. The casting for Type II conversion coating is dipped in a trivalent tank and rinsed.

Sulfuric Acid Anodizing

In this process the casting is first dipped in a sulfuric acid anodizing tank, then rinsed in a double fall rinse and then in a final DI spray rinse. The casting is then either dyed in a black, blue, or purple dye solution tank, rinsed, sealed with nickel acetate, and then rinsed. A casting that is not dyed is dipped in a dichromate sealer tank and then rinsed in the chromate rinse system. A casting that is heat sensitive is dipped in a cold etch tank and rinsed. Castings are also dipped in a small passivation tank and a de-smut tank.

Passivation

In this process Type 1 and Type VII passivation is conducted. The casting is dipped in a corrosive solution tank and rinsed in a DI water system.

The containment area under the process baths are cleaned out using a shop vac and the waste is accumulated in containers with other hazardous waste.

A 30-gallon step can (step can) was observed outside the entrance to the Chem Film/Chromate Room. The step can was accumulating contaminated paper towels and gloves. The step can was closed, marked with the waste codes D007, F019 and labeled as hazardous waste. The step can

was labeled with a Class 9 DOT label, which is not an indication of the ignitable, corrosive, reactive, or toxic hazard accumulating in it (Photograph 2). The hazardous waste in the step can is transferred to a 55-gallon container in the Paint Department. On March 31, 2021, Mr. Tagler emailed the EPA and FDEP a photograph documenting that corrosive and flammable solid labels were placed on the step can.

¹Pursuant 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 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 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 is required to mark or label its containers with an indication of the hazards of the contents.

East Manufacturing Floor - Paint Department

The casting is painted in this area with or without processing in the Chem Film/Chromate Room. Two 30-gallon step cans (step cans) were observed in this area. The step cans were accumulating contaminated paper towels and gloves. The step cans were closed, marked with the waste codes D007, F019 and labeled as hazardous waste. The step cans were labeled with a Class 9 DOT label, which is not an indication of the ignitable, corrosive, reactive, or toxic hazard accumulating in it (Photographs 3 and 4). The hazardous waste in the step cans is accumulated for approximately one month prior to transferring the content to a 55-gallon container in the Paint Department. The 55-gallon container was initially designated as a satellite accumulation area (SAA) but changed to a 90-Day or Less Accumulation Area during the inspection. On March 31, 2021, Mr. Tagler emailed the EPA and FDEP a photograph documenting that corrosive and flammable solid labels were placed on the 30-gallon step cans.

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 is required to mark or label its containers with an indication of the hazards of the contents.

The hazardous waste is transferred from the three 30-gallon step cans to the 55-gallon container for consolidation. The 55-gallon container in the Paint Department was observed connected to a compactor. The 55-gallon container was closed, marked with the waste codes D007, F019, labeled as hazardous waste and labeled with an indication of the hazards of the contents. The

¹ “FDEP’s newly adopted Generator Improvements Rule (GIR) regulations have been authorized by EPA, effective May 10, 2019. For ease of reference and for consistency with the State Inspection Report, this CEI Report will cite to the Florida and federal hazardous waste regulations as amended by the GIR.

container was not marked with a date (Photograph 5). Inspectors explained the point of generation for the hazardous waste transferred to this 55-gallon container was at the three 30-gallon step cans and an accumulation start date is required to be clearly marked on the 55-gallon container. The container must be inspected weekly. H & S marked the container with a date at the time of this inspection and will begin conducting weekly inspections.

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 any 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 conditions listed in F.A.C. Chapter 62-730.160(1), [40 C.F.R. § 262.15(a)].

West Side of the East Manufacturing Floor - Wastewater Pretreatment System

The wastewater pretreatment system (WWPTS) is outdoors on the west side of the East Manufacturing Floor. The system is constructed to pretreat hexavalent chromium wastewater and trivalent chromium wastewater. The WWPTS is constructed inside a concrete containment dike and the two systems are separated by a containment wall. This system is constructed with two 500-gallon and two 1,200-gallons. Product of C5 coagulant, polymer, and nitric acid are used directly from containers for treatment of the wastewater.

Hazardous waste solids generated from the treatment process are filtered in a plate and frame press. The dried hazardous waste solids are discharged from the plate and frame press to a 64-gallon metal hopper on wheels that can be removed from its stand using a forklift. Jordan Swift explained the hazardous waste is transferred from the hopper to a one-cubic yard container, sometimes several times per day during its daily operation. The hopper was observed labeled with the words hazardous waste, marked with the waste codes D007, F019, but it was open with a shovel inserted in the hopper and it was not labeled or marked with an indication of the hazard (Photograph 6). Hazardous waste was not being added or removed from the hopper at the time of this CEI. H & S closed the hopper (Photograph 9). The one-cubic yard container was observed closed, labeled with the words hazardous waste, and marked with the waste codes D007, F019, but it was not marked with an accumulation start date and not labeled or marked with an indication of the hazard (Photograph 7). H & S marked the container with the date March 30, 2021 (Photograph 8). H & S marked the hazardous waste labels on the hopper and one-cubic yard container with the word "Toxic" as an indication of the hazard at the time of the inspection. On April 5, 2021, Mr. Tagler emailed the EPA and FDEP photographs documenting a toxic label was placed on the one-cubic yard container. The EPA and FDEP recommended to H & S to maintain a log of the waste entering and being removed from the hopper to ensure the 55-gallon capacity is not exceeded.

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 generator is required to keep containers of hazardous waste closed at all times during accumulation, except when adding, removing, or

consolidating waste; or when temporary venting of a container is necessary for the proper operation of equipment, or to prevent dangerous situations, such as build-up of extreme pressure.

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 is required to mark or label its containers with an indication of the hazards of the contents.

Pursuant to Florida Administrative Code (F.A.C.) Chapter 62-730.160(1) [40 C.F.R. § 262.17], a LQG 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 F.A.C. Chapter 62-730.160(1), [40 C.F.R. § 262.17(a)(5)(i)(A)], which is a condition of the LQG Permit Exemption, a generator must mark or label the date upon which each period of accumulation begins clearly visible for inspection on each container.

12) Waste Management Practices

H & S operates approximately five SAAs and one 90-Day or Less Accumulation Area. Hazardous waste is generated from the machining, chemical plating, and painting of aluminum and steel castings. Waste corrosives, dyes and solvents from chemical plating operations, waste paint and solvents and paint filters from painting operations, waste parts washing fluid, waste debris from the application of chemicals, and hazardous waste debris from chemical plating and painting operations generate D001, D002, D005, D007, D008, D018, D035, D039, D040, F002, F003, F005 hazardous waste. Waste rinse water, corrosives and cleaning solutions from the chemical plating processes is pretreated in the wastewater system generating D007, F019 hazardous waste solids. Dry waste debris used in the processes to apply chemicals are dried immediately after use before disposal and managed in the regular trash. Other wastes generated consist of waste cutting and machinery oils, oil filters, and waste coolant from process machinery.

The facility prepares the hazardous waste for packaging and on-site management, prior to shipping the hazardous waste using the manifest system to a treatment, storage, or disposal facility (TSDF).

H & S used the following transporters in 2018 through 2021.

Heritage Crystal Clean, LLC - EPA ID ILR000130062
NEIER, Inc. – IND984868406

H & S used the following TSDFs in 2018 through 2021.

Giant Resource and Recovery, Sumter - EPA ID SCD036275626
Heritage Environmental Services – IND093219012
Petro- Chem Processing Group – MID980615298

13) **Record Review**

Manifests

At the time of the CEI inspectors reviewed the facility's paper manifests for the shipment of hazardous waste from October 2018 to March 2021. The EPA inspector accessed RCRAInfo prior to the CEI and found there were no hazardous waste manifests for review in the EPA's E-Manifest Record System.

Universal Waste

Universal waste lamps are transported by Heritage Crystal Clean. The most recent shipment of universal waste four-foot lamps was on September 30, 2020. Universal waste batteries are transported to Batteries Plus.

Contingency Plan

Inspectors reviewed the facility's contingency plan (Plan). The Plan was revised on May 9, 2020. The Plan describes emergency procedures, spill procedures, evacuation procedures, information on emergency coordinators, spill control and personnel protective equipment and arrangements with local authorities. A Quick Reference Guide was not observed.

Pursuant to F.A.C. Chapter 62-730.160(1) [40 C.F.R. § 262.262(b)(5)], which is a condition of the LQG Permit Exemption, a large quantity generator that first becomes subject to these provisions after May 30, 2017 or a large quantity generator that is otherwise amending its contingency plan must at that time submit a quick reference guide of the contingency plan to the local emergency responders identified at paragraph (a) of this section or, as appropriate, the Local Emergency Planning Committee. The quick reference guide must include the elements outlined in 40 CFR 262.262.

Arrangements with Local Authorities

The arrangement with the local authorities was reviewed.

Personnel Training

Inspectors reviewed RCRA training given by Regulatory Compliance Associates to employees handling and managing hazardous waste. Training records for hazardous waste and DOT training were reviewed from 2018 to 2020. The hazardous waste training course for 2021 was given on February 23, 2021. Job titles and position descriptions were reviewed.

All facility personal that handle or manage hazardous waste must receive training within six months of hiring and annually thereafter. The H & S contingency plan described Mr. Ralph Haslage as a potential emergency coordinator contact and to act as the emergency coordinator if the primary emergency coordinator was not present. Mr. Haslage had not been given hazardous waste training on the Contingency Plan. On March 31, 2021 and April 9, 2021, Mr. Tagler emailed the EPA and FDEP a copy of a revised contingency plan documenting removal of Mr. Ralph Haslage from the contingency plan.

Pursuant to F.A.C. Chapter 62-730.160(1) [40 C.F.R. § 262.17(a)(7)(i)(A)], which is a condition of the LQG Permit Exemption, Facility personnel must successfully complete a program of classroom instruction, online training (e.g., computer-based or electronic), or

on-the-job training that teaches them to perform their duties in a way that ensures compliance with this part. The large quantity generator must ensure that this program includes all the elements described in the document required under paragraph (a)(7)(iv) of this section.

Weekly Container Inspection Records

Inspectors reviewed the weekly container inspection records for the 90-Day Accumulation Area from October 2018, to March 2021. Future weekly container inspections will also be conducted in the Paint Department and WWPTS.

Biennial Report

The 2019 biennial report was submitted to FDEP on February 13, 2020.

Land Disposal Restriction Notice

The land disposal restriction documents were reviewed.

14) Exit-Briefing

Upon conclusion of the inspection, an exit briefing was conducted in the presence of H & S Swansons Tool Company representatives. The facility was informed of the findings at the time of the inspection.

15) Sampling Overview

Sampling was not conducted at this facility.

16) Conclusion/Summary of Violations

Based on the compliance evaluation inspection conducted on March 31, 2021, H & S Swansons Tool Company was inspected as a large quantity generator of hazardous waste and a small quantity handler of universal waste.

17) Signed

**WILLIAM
KAPPLER**

Digitally signed by WILLIAM
KAPPLER
Date: 2021.05.12 12:42:03 -04'00'

William Kappler
Physical Scientist

Date

18) Concurrence

**ARACELI
CHAVEZ**

Digitally signed by ARACELI
CHAVEZ
Date: 2021.05.10 14:26:48
-04'00'

Araceli B. Chavez
Chief
RCRA Enforcement Section

Date

H & S Swansons Tool Company
FLD982160723
March 31, 2021
RCRA CEI Photographs
Photographs by William Kappler
Camera Model: Samsung WB250F
Property Tag #: S75917



H & S Swansons Tool Company (H & S). 90-Day or Less Accumulation Area. Observed six 55-gallon containers accumulating hazardous waste. Photograph 1 taken at 9:47 a.m.



H & S. Chem Film/Chromate Room. Observed the 30-gallon step can had a Class 9 DOT label. Photograph 2 taken at 10:20 a.m.



H & S. Paint Department. Observed the 30-gallon step can had a Class 9 DOT label. Photograph 3 taken at 10:20 a.m.



H & S. Paint Department. Observed the 30-gallon step can had a Class 9 DOT label. Photograph 4 taken at 10:22 a.m.



H & S. Paint Department. Observed the 55-gallon container accumulating hazardous waste as a SAA container and not marked with a date. Hazardous waste generated at other points of generation. Photograph 5 taken at 10:29 a.m.



H & S. Wastewater Pretreatment System. Observed hopper was open and not marked or labeled with an indication of the hazard. Photograph 6 taken at 12:22 p.m.



H & S. Wastewater Pretreatment System. Observed a one-cubic yard container accumulating F019 solids. Not marked with a date and no indication of the hazard. Photograph 7 taken at 12:23 p.m.



H & S. Wastewater Pretreatment System. Observed a one-cubic yard container accumulating F019 solids. H & S marked the container with the date 3/30/21 and marked it with an indication of the hazard. Photograph 8 taken at 12:23 p.m.



H & S. Wastewater Pretreatment System.
H & S closed the hopper and marked it with
an indication of the hazard. Photograph 9
taken at 12:23 p.m.