

RCRA Inspection Report

1) Inspector and Author of Report

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Chemical Safety and Land Enforcement Branch
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U.S. Environmental Protection Agency, Region 4
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2) Facility Information

Techtrix, Inc.
525 Plainview Street
Gadsden, Alabama 35901-2027
Etowah County
EPA ID No.: ALD982167678
NAICS: 332813 Electroplating, plating, polishing, anodizing, and coloring

3) Responsible Officials

Pamela Beavers, Plant Manager
Office: (256) 543-2424
Cell: (256) 365-6458
Email: pamelabeavers@outlook.com

4) Inspection Participants

Pam Beavers	Techtrix, Inc.
Carl Weaver	Techtrix, Inc.
Alan Newman	EPA, Region 4
Corey Holmes	Alabama Department of Environmental Management (ADEM)

5) Date(s) of Inspection

July 27, 2022, 12:15 p.m. – 5:00 p.m. C.D.T. and July 28, 2022, 7:30 a.m. – 4:30 p.m. C.D.T

6) Previous Inspection History

Techtrix Inc. was inspected by EPA and ADEM on March 22-23, 2021. There were multiple violations noted in the June 1, 2021, Opportunity to Show Cause letter from EPA. Techtrix and EPA entered into a RCRA 7003 AOC to address the imminent and substantial endangerment that existed at the facility at the time of the March 2021 inspection. Techtrix and EPA continue to meet regularly to address the ongoing issues at Techtrix.

7) **Applicable Regulations**

Alabama Hazardous Waste Management and Minimization Act of 1978, Ala. Code § 22-30-1 *et seq.*, and rules 335-14-1 to 335-14-17 (2016 and 2018) of the Alabama Department of Environmental Management (ADEM) Administrative Code (ADEM Admin. Code).

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 ADEM Admin. Code r. 335-14-3-.01(5)(a) [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 Section 22-30-12(b) of the AHWMA, Ala. Code § 22-30-12(b) [Section 3005 of RCRA, 42 U.S.C. § 6925], and without complying with ADEM Admin. Code r. 335-14-3-.01(6) and (7) [40 C.F.R. § 262.16(b) or §262.17(a)], except as required in ADEM Admin. Code r. 335-14-3-.01(5)(a)7. and 8. [40 C.F.R. § 262.15(a)(7) and (8)], provided that the generator complies with the satellite accumulation area conditions listed in ADEM Admin. Code r. 335-14-3-.01(5)(a) [40 C.F.R. § 262.15(a)] (hereinafter referred to as the "SAA Permit Exemption").

Pursuant to ADEM Admin. Code r. 335-14-3-.01(7) [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 Section 22-30-12(b) of the AHWMA, Ala. Code § 22-30-12(b) [Section 3005 of RCRA, 42 U.S.C. § 6925], provided that the generator complies with the conditions listed in ADEM Admin. Code r. 335-14-3-.01(7) [40 C.F.R. § 262.17] (hereinafter referred to as the "LQG Permit Exemption").

Pursuant to ADEM Admin. Code r. 335-14-11-.02(1)(a)244. [40 C.F.R. § 273.9], a small quantity handler of universal waste (SQHUW) is a universal waste handler who does not accumulate 5,000 kilograms or more of universal waste (batteries, pesticides, mercury-containing equipment, lamps, or aerosol cans, calculated collectively) at any time.

Techtrix and EPA entered into a RCRA § 7003 Administrative Order on Consent (AOC) on September 14, 2021, to address an imminent and substantial endangerment at the facility.

8) **Purpose of Inspection**

The purpose of this inspection was to conduct an unannounced compliance evaluation inspection to determine Techtrix Inc.'s compliance with the applicable requirements of RCRA, the corresponding ADEM regulations, and the AOC. This was an EPA lead inspection.

9) **Facility Description**

Techtrix, Inc. (Techtrix or Facility) was founded in 1987 and operates as an electroplating and metal finishing shop. The Facility occupies an 80,000 square foot building and employs approximately ten employees. The facility operates twelve plating lines and a no discharge

wastewater treatment system. Techtrix provides zinc, cadmium, copper, tin, nickel, gold, and silver electroplating services. The Facility also performs additional finishing services such as electroless nickel, alodine anodize, zinc phosphate, manganese phosphate, endurion, passivation, and selection brush plating.

Techtrix is a large quantity generator of hazardous waste, a small quantity handler of universal waste, and generator of used oil. Techtrix's most recent notification of hazardous waste activity was submitted on March 14, 2022. The facility is accessed through a foyer and a locked door.

The following wastes are generated at the Facility:

Number	Waste Stream Description	Reason for Hazardous Waste Determinations	EPA Waste Codes
1	Spent Bright Dip (alkaline)	Reactivity, Toxicity, and Corrosivity	D002, D006, D007, D008, D011, F007, F009 *D003 – as appropriate
2	Spent Bright Dip (acid)	Reactivity, Toxicity, and Corrosivity	D002, D006, D007, D008, D011, F007, F009 *D003 – as appropriate
3	Plating Bath Residues from Plating Tanks Containing Cyanides	Toxicity and Corrosivity	F007, F008, or F009) Characteristic Waste D002 *D003 – as appropriate
4	Debris (including plant cleanup: plastic, cardboard, paper, and or rags) from plant without cyanides	Toxicity	D002, D007, D008, D011 *D002 – as appropriate
5	Cadmium Salt Solids bottom of Vats	Electroplating parts Cyanide/Alkaline (D002) salts	D006, D007, D008, D011, F008
6	Spent Bright Dip (acid) (Chrome Baths)	Toxicity and Corrosivity	D002 and D007
7	Filter Cakes from the treatment of electroplating bathes	Corrosivity	F006
8	Filter Cakes from the treatment of Waste Streams #1 and 2	Corrosivity	F006 and F008

10) Opening Conference

On July 27, 2022, EPA inspector Alan Newman accompanied by ADEM inspector Corey Holmes arrived at Techtrix at approximately 12:15 p.m. Pamela Beavers, Plant Manager, immediately received the inspectors. The inspectors introduced themselves, showed their credentials to Pamela Beavers, and explained the purpose of the visit. The inspectors described the anticipated use of equipment (digital camera) during the inspection and provided a request for records. The inspectors discussed the company's ability, pursuant to 40 C.F.R. § 2.203, to assert a business confidentiality claim for information submitted to the EPA. The company did not assert a business confidentiality claim. The inspection participants also discussed health and safety protocols and required personal protective equipment before Pamela Beavers led the inspectors on a tour of the Facility operations.

Pamela Beavers provided an overview of the facility's history and current operations during the opening conference. The facility was operating multiple designated central accumulation areas (CAAs), several satellite accumulation areas (SAAs), and a wastewater treatment plant (WWTP). The company does 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. The EPA inspector did not provide a copy of the agency's information sheet for small businesses, which can be found at <https://www.epa.gov/sites/production/files/2017-06/documents/smallbusinessinfo.pdf>.

11) **Findings**

As the inspection team toured the facility, it was noted that there did not appear to be any waste directly on the floor or on the ground or concrete outside the building as required by Paragraph 76 of the AOC. The inspection team noted that containers previously in poor condition had been either repacked or disposed of as required by Paragraph 77 of the AOC. There did not appear to be any ongoing releases of hazardous waste or conditions that would potentially lead to a release.

The inspection team noted that the security measures required in Paragraph 78 of the AOC had been implemented including additional fencing, warning signs, and secured entry.

In accordance with Paragraphs 80, 81, 82, and 88 the inspection team reviewed the submitted Operations and Management Plan, Disposal Work Plan, and Usable Material Disposition Plan. Techtrix appears to be abiding by these plans and their proposed modifications. The proposed modification to the Disposal Work Plan is being negotiated with EPA. Techtrix continues to implement these plans.

- **Chemical Storage Area and Former Expired Chemical Storage Area**

Techtrix was storing usable chemicals in multiple adjacent areas separated by chain-link fences. The supplies were separated into alkaline cleaners, brighteners and additives, and acids (Photos 3-7). The Chemical Storage Area contains supply chemicals in containers in good condition that were labeled as to their contents. The Former Expired Chemical Storage Area held expired chemicals, chemicals in containers in poor condition, and open containers during the March 2021 inspection. This area has been remediated such that all chemicals in this area are in containers in good condition that are labeled and are purported to be usable (Photos 8-11).

- Tote Storage and Cyanide Storage

Adjacent to the Former Expired Chemical Storage Area, Techtrix was storing products to be used in the plating process in totes (Photo 11). There was one blue former chicken incubator with two doors used to store cyanide products. This Cyanide Storage Area has been remediated to remove compromised containers and clean up spilled material (Photos 11-12).

- Central Accumulation Areas (CAAs)

Techtrix was storing hazardous waste tote containers in multiple CAAs. The chart below details the locations and volumes at the time of the inspection.

Central Accumulation Area	Number of Containers of Hazardous Waste	Oldest Accumulation Start Date
CAA 1	29 - 250-gallon totes	3/20/2020
Bay Door CAA	45 - 250-gallon totes	3/20/2020
Solid Hazardous Waste CAA	10 - 250-gallon totes 8 - 55-gallon containers 1 - Supersack	3/20/2020
Former Non-Hazardous Waste CAA	58 – 250-gallon totes 1 - Supersack	3/20/2020
CAA 2	75 – 25-gallon totes	1/19/2020
Compressor Room CAA	26 – 250-gallon totes 1 Supersack of Solids	

The inspection team noted that Techtrix was storing hazardous waste containers in CAA 1 that in some cases had labels that were failing to adhere to the containers, not turned toward the aisle for inspection, and/or were not labeled with an accumulation start date (Photo 13). Facility personnel stated that the labels falling off was a due to the variable humidity in the storage areas. The secondary containment in this area appeared to be worn and did not appear to be impervious.

The inspection team noted that containers at the Bay Door CAA were stored with insufficient aisle space and not turned toward the aisle for inspection (Photo 14). There was no impervious coating on the secondary containment in this area. Some of the labels did not include an accumulation start date.

The inspection team noted that containers in the Solids Hazardous Waste CAA did not have sufficient aisle space and in some cases had labels that were failing to adhere to the containers. (Photo 15).

The inspection team noted in the Former Non-hazardous Waste CAA some containers were open, not labeled with hazardous waste labels, were not labeled with accumulation start dates,

and/or in some cases had labels that were failing to adhere to the containers. The secondary containment in this area was not coated with an impervious coating (Photos 16, 18-20).

The inspection team observed Techtrix storing hazardous waste containers in CAA 2, and noted the following:

- Labels were failing to adhere to some of the containers;
- Labels not turned toward the aisle for inspection; and
- Secondary containment coating has been in disrepair since the March 2021 CEI (Photo 17).

Techtrix was storing hazardous waste in the area designated as the Compressor Room CAA. Techtrix did not have sufficient aisle space on the day of the inspection.

Pursuant to ADEM Admin. Code r. 335-14-3-.01 (7)(a)5.(i) [40 C.F.R. § 262.17(a)(5)(i)], which is a condition of the LQG Permit Exemption, a generator must mark or label its containers with the following: the words “Hazardous Waste”; an indication of the hazards of the contents; and the date upon which each period of accumulation begins clearly visible for inspection on each container.

Pursuant to ADEM Admin. Code r. 335-14-3-.01(7)(a)1.(viii) which incorporates ADEM Admin. Code r. 335-14-6-.09(6)(a), and is a condition of the LQG Permit Exemption, container storage areas must meet the following requirements: (a) Container storage areas must have a containment system that is designed and operated in accordance with 335-14-6-.09(6)(b), except as otherwise provided by 335-14-6-.09(6)(c).

(b) A containment system must be designed and operated as follows:

- 1. A base must underlie the containers which is free of cracks or gaps and is sufficiently impervious to contain leaks, spills, and accumulated precipitation until the collected material is detected and removed;**
- 2. The base must be sloped or the containment system must be otherwise designed and operated to drain and remove liquids resulting from leaks, spills, or precipitation, unless the containers are elevated or are otherwise protected from contact with accumulated liquids;**
- 3. The containment system must have sufficient capacity to contain 10% of the volume of containers or the volume of the largest container, whichever is greater. Containers that do not contain free liquids need not be considered in this determination;**
- 4. Run-on into the containment system must be prevented unless the collection system has sufficient excess capacity in addition to that required in 335-14-6-.09(6)(b)3. to contain any run-on which might enter the system; and**
- 5. Spilled or leaked waste must be removed from the sump or collection area in a timely manner not to exceed 24 hours after detection. Accumulated precipitation must be removed in as timely a manner necessary to prevent overflow of the collection system.**

Pursuant to ADEM Admin. Code r. 335-14-3-.01(7)(b) [40 C.F.R. § 262.17(b)], an LQG who accumulates hazardous waste for more than 90 days is an operator of a storage facility and is subject to the requirements of ADEM Admin. Code r. 335-14-1 to 335-14-9 [40 C.F.R. Parts 124, 264 through 268 and Part 270].

Pursuant to ADEM Admin. Code r. 335-14-3-.01(7)(a)1.(iv) [40 C.F.R. § 262.17(a)(1)(iv)], which is a condition of the LQG Permit Exemption, a container holding hazardous waste must always be closed during accumulation, except when it is necessary to add or remove waste.

Pursuant to ADEM Admin. Code r. 335-14-3-.01(7)(a)6 [40 C.F.R. § 262.17(a)(6)], which incorporates ADEM Admin. Code r. 335-14-3-.14(6) [40 C.F.R. § 262.255], and is a condition of the LQG Permit Exemption, a generator is required to maintain aisle space to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment to any area of facility operation in an emergency, unless aisle space is not needed for any of these purposes.

The inspection team noted that the fire extinguishers were not marked as up to date, but other records show that they had been recently inspected as required. The Alodine Line which was leaking during the previous inspection was no longer leaking. The solids that had collected under the plating lines have been removed and sent off for disposal. Techtrix has established procedures to regularly remove accumulated solids from underneath the lines, and manage them as hazardous waste.

- Wastewater Treatment Plant

Techtrix was operating ten (10) tanks for storage and treatment of solid and liquid plating wastes on the day of the inspection. Techtrix closed operations for Tank 9 and cut it up and placed the pieces into a supersack. This container was labeled as hazardous waste and placed into the Solids Hazardous Waste CAA. Techtrix formerly used these tanks in concert to remove metals and ship off the liquids as non-hazardous waste. The tanks had fallen into disrepair and began to be used as storage tanks for all manner of waste generated at the facility as noted in the March 2021 CEI. After the March 2021 CEI, Techtrix removed the liquids from the tanks and placed them in 250-gallon plastic totes and began negotiations with EPA and ADEM to either eventually bring certain tanks back online to treat the waste generated at Techtrix or close and remove certain tanks. To that end at the time of this inspection, three tanks had been cleaned out (Tanks 3, 5, and 8), and renumbered. Techtrix was beginning testing to restart the wastewater treatment process. The other tanks were in different stages of cleanout as noted below:

Tank Number (Old Number)	Status Notes:	Accumulation Start Date	Photos
1	Contains between 1/3 to 1/2 full of hazardous waste solids	3/20/2020	21
2	Contains 1/8 full of hazardous waste solids	3/20/2020	21-22
WWTP #1 (Tank 3)	Liquids from four totes partially treated.	7/21/2022	23-25
4	Contains 1/8 full of hazardous waste solids	3/20/2020	24
WWT #2 (Tank 5)	Empty		24, 26-27
6	Contains 1/8 full of hazardous waste solids	3/20/2020	23
7	Contains 7/8 full of hazardous waste solids	3/20/2020	23
WWT #3 (Tank 8)	Empty – awaiting second cleanout		23-24, 28
9	This tank was emptied and cut up and placed into supersacks for disposal. This tank is no longer in service.	N/A	N/A
10	This tank has been cut in half and is used to accumulate hazardous waste solids from tank cleanouts.	3/20/2020	29
11	Contains 1/8 full of hazardous waste solids.	9/2020	30-31

Tanks 1 and 2 were located side by side along the back wall of the facility. Both tanks were labeled as hazardous waste, with an indication of the hazard, and with accumulation start dates of March 30, 2020 (>90 days). The liquids removed from these tanks had been stored in totes in one of the CAAs. There were two plastic 55-gallon containers in this area being used to accumulate solids from tank cleanout activities (Photo 21-22). Techtrix personnel stated that Tank 2, once cleaned out would be cut up and disposed of as hazardous waste. These accumulation containers were labeled and in good condition. Techtrix has cut the lids off two poly containers for ease of placing the solids in the container. The tops were lying on top of the containers and making contact all the way around.

Techtrix selected Tank 3 located between Tanks 4 and 5 to be the initial treatment tank for their wastes. Techtrix had removed the liquids and solids from this tank and placed the waste in containers. Techtrix had cut holes in the tank to remove the solids (Photo 25). The tank was refurbished and readied to serve as a treatment tank for liquids. Techtrix renamed Tank 3 to WWT #1. Techtrix began treating hazardous waste liquids in WWT #1 by adjusting pH and converting Chrome 6 to Chrome 3 in June 2022. Techtrix was dual treating in WWT #1 and in the laboratory. Their efforts were to refine the process to remove metals from the liquid wastes.

Techtrix selected Tank 5 to serve as the thickening tank for solids removed during the treatment process. Techtrix had removed the liquids and solids from this tank and placed the waste in containers. Techtrix had cut holes in the tank to remove the solids (Photos 26-27). Techtrix renamed Tank 5 to WWT #2.

Techtrix selected Tank 8 to serve as the treated liquids holding tank. This tank was cleaned out and evaluated. The evaluation determined that a more aggressive cleanout was necessary. This tank was labeled and in good condition. Techtrix renamed Tank 8 to WWT #3.

Tectrix containerized all liquid waste from Tanks 4, 6, 7, and 11 and placed the containers in one of the CAAs. Each tank is scheduled to have the solids removed in due course. Each tank was labeled as hazardous waste, with an indication of the hazard, and marked with an accumulation start date of March 20, 2020 (>90 days).

Techtrix excised horizontally the top of Tank 10 to accumulate solids from cleanouts of other tanks. This tank was covered with a blue tarp and was labeled as hazardous waste, with the indication of the hazard, and marked with an accumulation start date of March 20, 2020 (>90 days).

Facility personnel stated that the rusting green tank in Photo 31 was empty. The filter press appeared to be in good condition and was purported to be ready for service (Photo 32). Techtrix replaced the old leaking boiler with a new one (Photo 33).

There was no current engineer certification for any of the tanks regarding their ability to manage waste.

Pursuant to ADEM Admin. Code r. 335-14-3-.01(7)(b) [40 C.F.R. § 262.17(b)], an LQG who accumulates hazardous waste for more than 90 days is an operator of a storage facility and is subject to the requirements of ADEM Admin. Code r. 335-14-1 to 335-14-9 [40 C.F.R. Parts 124, 264 through 268 and Part 270].

- Plating Lines

The inspection team toured the plating lines and noted much improved housekeeping (Photo 34). Techtrix was accumulating plating line debris in an SAA near one of the plating lines (Photo 35). This container was in good condition and labeled. The bung on this container was open. Containers of hazardous waste must be closed except when adding or removing waste. The cadmium plating line tanks which formerly held waste had been cleaned out (Photos 36-38). The inspection team noted a 5-gallon open plastic container holding plating line filters on one of the plating lines (Photo 39). Techtrix personnel stated that these filters were still usable.

Pursuant to ADEM Admin. Code r. 335-14-3-.01(5)(a)4. [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.

- Laboratory

Techtrix operates a laboratory to determine the amount of chemicals to use to treat waste on site. The laboratory was in good order and neat. Techtrix was accumulating laboratory waste in one SAA that was labeled, in good condition and closed (Photos 40-41).

- Outside of Production Building

No waste debris was being stored outside the production area on day of inspection.

- Red Building

There was no waste in the red building on the day of the inspection (Photos 42-43).

- Records Review

The inspection team reviewed the following records: CAA weekly inspection records from March 2021 through July 2022, hazardous waste manifests March 2021 to July 2022, universal waste shipping documents, land disposal restriction forms, training records, the contingency plan, the quick reference guide, the waste minimization plan, biennial report, and notification for hazardous waste activity.

The inspection team inquired about how inspections were being conducted. Facility personnel stated that when remedial actions during an inspection are needed, they are taken immediately. EPA asked why these remedial actions were not documented in the inspection records. Techtrix personnel stated that they would begin adding this information when appropriate.

Pursuant to ADEM Admin. Code r. 335-14-3-.01(7)(a)(1)(v) [40 C.F.R. § 262.17(a)(1)(v)], which is a condition of the LQG Permit Exemption, a generator is required to, at least weekly, inspect central accumulation areas. The large quantity generator must look for leaking containers and for deterioration of containers caused by corrosion or other factors. The large quantity generator must record inspections in an inspection log or summary. He must keep these records for at least three years from the date of inspection. At a minimum, these records must include the date and time of the inspection, the name of the inspector, a notation of the observations made, and the date and nature of any repairs or other remedial actions.

The current contingency plan and quick reference guide do not accurately reflect the maximum amount of waste being stored on site nor does it accurately detail the amount and locations of emergency equipment located throughout the facility. Please update these plans to include accurate information.

Pursuant to ADEM Admin. Code r. 335-14-3-.01(7)(a)6 [40 C.F.R. § 262.17(a)(6)], which incorporates ADEM Admin. Code r. 334-14-3-.14(10) [40 C.F.R. § 262.262(b)], and is a condition of the LQG Permit Exemption, a large quantity generator that is 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 following elements: 2. The estimated maximum amount of each hazardous waste that may be present at any one time; and 4. A map of the facility showing where hazardous wastes are generated and accumulated, and routes for accessing these wastes.

Techtrix was not able to produce training records that showed job titles for each position and job descriptions and the name of each employee filling each job.

Pursuant to ADEM Admin. Code r. 335-14-6-.01(7) [40 C.F.R. § 262.17(a)(7)(iv)], which is a condition of the LQG Permit Exemption, (iv) the generator must maintain training records that include, among others: the job title for each position at the facility related to hazardous waste management, and the name of the employee filling each job; a written job description for each position; a written description of the type and amount of both introductory and continuing training that will be given to each person filling a position; and records documenting that the training required has been given to and completed by Facility personnel.

- Maintenance Storage Area

Techtrix was storing fourteen universal waste lamps on a table in the Maintenance Storage Area. These lamps were labeled, “Blown Bulbs – Discard” (Photos 1-2); these lamps were not labeled with either with the words universal waste or with the date of accumulation. These lamps were not secured in a closed container (Photo 1), that would prevent the release of any component of the universal waste.

Pursuant ADEM Admin. Code r. 335-14-11-.02(4)(d) [40 C.F.R. § 273.13(d)], a SQHUW must manage universal waste lamps in a way that prevents releases of any universal waste or component of a universal waste to the environment.

Pursuant to ADEM Admin. Code r. 335-14-11-.02(5)(e) [40 C.F.R. § 273.14(e)], a SQHUW must label or mark each lamp or container of lamps clearly with one of the following phrases: “Universal Waste-Lamp(s),” or “Waste Lamp(s),” or “Used Lamps.”

Pursuant to ADEM Admin. Code r. 335-14-11-.02(6)(a and c) [40 C.F.R. § 273.15(a) and (c)], a SQHUW may accumulate universal waste no longer than one year and must be able to demonstrate the length of time that the universal waste has accumulated from the date that it became a waste or was received.

12) Closing Conference

The inspectors conducted the exit meeting at 3:00 pm with Pamela Beavers and Carl Weaver. During this meeting, the inspectors discussed the status of the Order and Techtrix's compliance with the order. The inspectors also stated their preliminary conclusions of the inspection on other matters noted during the inspection.

13) List of Appendices

Appendix 1 - Photo Log:
43 Photos taken by Alan Newman
Photos taken with Lumix Digital Camera
EPA Property Tag: S75870

14) **Signed**

ALAN NEWMAN

Alan Newman
Environmental Engineer

 Digitally signed by ALAN NEWMAN
Date: 2022.11.14 13:10:37 -05'00'

Date

Concurrence

ARACELI CHAVEZ

Araceli B. Chavez
Chief
RCRA Enforcement Section

 Digitally signed by ARACELI CHAVEZ
Date: 2022.11.14 13:31:21 -05'00'

Date

Appendix 1

Photo Log:

Photos taken by Alan Newman
Photos taken with Lumix Digital Camera
EPA Property Tag: S75870



Photo 1: Universal Waste lamps.



Photo 4: Chemical Storage.

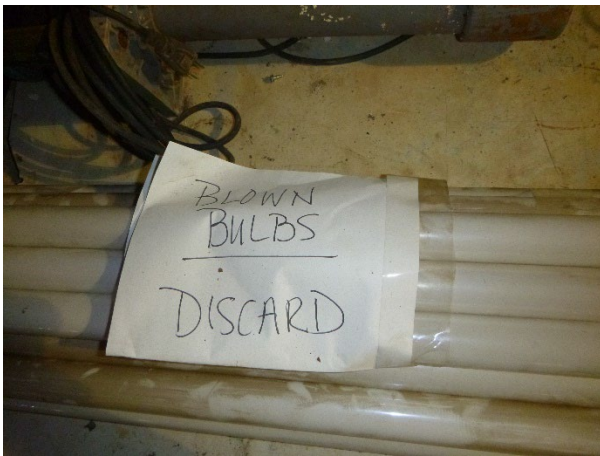


Photo 2: Universal Waste lamps.



Photo 5: Chemical Storage.



Photo 3: Chemical Storage.



Photo 6: Chemical Storage.



Photo 7: Chemical Storage.



Photo 10: Chemical Storage.



Photo 8: Chemical Storage.



Photo 11: Chemical Storage.



Photo 9: Chemical Storage.



Photo 12: Cyanide Storage Area



Photo 13: CAA 1.



Photo 16: Former Non-Hazardous Waste CAA.



Photo 14: Bay Door CAA.



Photo 17: CAA 2.



Photo 15: Solid Hazardous Waste CAA.



Photo 18: Former Non-Hazardous Waste CAA container without accumulation start date.



Photo 19: Former Non-Hazardous Waste CAA container without accumulation start date.



Photo 22: Tank cleanout solids collection containers near Tank 2.



Photo 20: Former Non-Hazardous Waste CAA container with label not turned toward aisle.

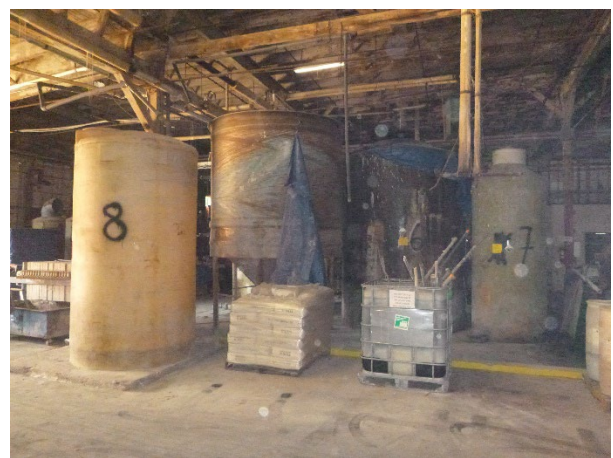


Photo 23: Tanks 3, 6, 7, and 8.



Photo 21: Tanks 1 and 2.



Photo 24: Tanks 3, 4, 5, and 8.



Photo 25: Tank WWT #1 (Tank 3).



Photo 28: Tank WWT #3 (Tank 8).



Photo 26: Tank WWT #2 (Tank 5).



Photo 29: Tank 10



Photo 27: Tank WWT #2 (Tank 5).



Photo 30: Tank 11.



Photo 31: Tank 11 and empty old equipment.



Photo 34: Aisle way in plant.



Photo 32: Filter Press.



Photo 35: SAA for plating line debris.



Photo 33: Old and New Boiler.



Photo 36: Cadmium Line.



Photo 37: Cadmium Line.



Photo 40: Laboratory.



Photo 38: Cadmium Line.



Photo 39: Reusable Filters for plating baths.

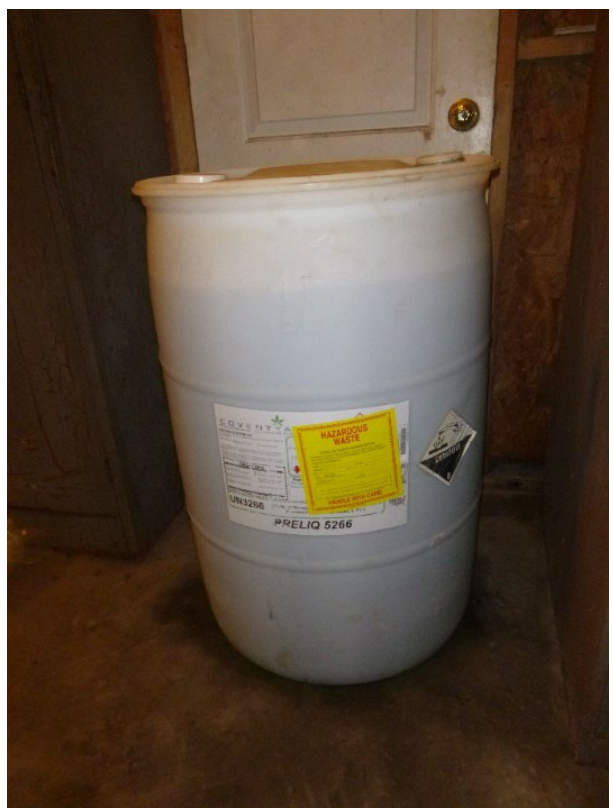


Photo 41: Laboratory SAA.



Photo 42: Red Building.



Photo 43: Red Building.