ENVIRONMENTAL PROTECTION AGENCY
REGION 1 – NEW ENGLAND
5 POST OFFICE SQUARE, SUITE 100
BOSTON, MASSACHUSETTS 02109-3912

September 29, 2023

John Turbeville, Environmental and Facility Manager

Ashcroft Incorporated

250 East Main Street

Stratford, CT 06614

Re: U.S. EPA-Region 1 Inspection Report of Ashcroft, Inc., August 2-3, 2023

Dear Mr. Turbeville:

In accordance with current policy, I am providing you with a copy of the final inspection report summarizing observations made during the August 2-3, 2023 inspection of your facility.

This inspection was conducted under the authority of RCRA.

Please contact me at Linda Brolin or brolin.linda@epa.gov if you have any questions.

Sincerely,

Linda Brolin, Environmental Engineer
Waste and Chemical Compliance Section

cc: Joseph Schiavone, CTDEEP

Disclaimer: Unless otherwise noted, this report describes conditions at the facility/property as observed by EPA inspector(s), and/or through records provided to and/or information reported to EPA inspector(s) by facility representatives and as understood by the inspector(s). This report may not capture all operations or activities ongoing at the time of the inspection. This report does not make final determinations on potential areas of concern. Nothing in this report affects EPA's authorities under federal statutes and regulations to pursue further investigation or action.

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BOSTON, MASSACHUSETTS 02109-3912

RCRA Compliance Inspection of:

Ashcroft, Inc.

250 East Main Street

Stratford, CT 06614

August 2-3, 2023
Date of Inspection

September 29, 2023
Date Inspection Report Approved

September 29, 2023
Date Inspection Report Finalized

September 29, 2023
Date Inspection Report Transmitted to Facility

Linda Brolin, Environmental Engineer
Waste and Chemical Compliance Section

MARY ODONNELL Digitally signed by MARY ODONNELL Date: 2023.09.29 12:33:44 -04'00'

Mary Jane O'Donnell, Manager
Waste and Chemical Compliance Section

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RCRA HAZARDOUS WASTE INSPECTION REPORT

I. GENERAL INFORMATION

a. **Facility Name:** Ashcroft Inc. ("Ashcroft" or the "Facility")

b. **Inspection Date:** August 2-3, 2023

c. Inspection Type: RCRA Compliance Evaluation Inspection (CEI)

d. **EPA Inspectors:** Linda Brolin, Environmental Engineer
Cheryl Wilkinson, Life Scientist
Ryan Maisano, Physical Scientist

e. **EPA ID Number:** CTD001840974

f. **NAICS:** 334513, 334519 - Pressure gauge manufacturer

g. **Street Address:** 250 East Main St. Stratford, CT 06614-5145

h. **Mailing Address:** 250 East Main St. Stratford, CT 06614-5145

i. **Facility Contacts:** John Turbeville, Environmental & Facility Manager
Ashcroft Inc.
Email: john.turbeville@ashcroft.com
Phone: 203-385-0356

j. **Generator Status (per RCRAInfo):** LQG

k. **Date first notified as a generator (per RCRAInfo):** 8/18/1980

l. **Date of most recent notification in RCRAInfo:** 1/20/2022

m. **Current Property Owner:** Ashcroft Holdings, Inc.

n. **Current Operator:** Ashcroft Holdings, Inc.

o. **Wastes generated (per most recent RCRAInfo notification)**: D001, D007, F006

Report Attachment:

ATTACHMENT 1 – Digital photo log of photos taken by EPA inspectors throughout the inspection.

II. FACILITY DESCRIPTION

Ashcroft, Inc. (the "Facility") is a large quantity generator which is a pressure and temperature instrument manufacturer (NAICS 334513, 334519). They make analog and digital pressure and temperature instruments.

The facility is located at 250 East Main Street Stratford, CT. There is one 320,000 square foot building that includes the following areas: Office Space, Fabricating; Assembly; Calibration of product; Packaging, Shipping and Receiving Department. There are 18 SAAs and one Hazardous Waste Storage Area Shed.

The Facility's Contingency Plan was last updated on September 1, 2022. The facility notified initially on August 18, 1980. According to the most recent biennial report, the waste codes generated are the following: D001, D007 and F006.

III. INSPECTION IN-BRIEF

EPA inspectors arrived at the Facility at 250 Main St Stratford, CT at 9:20 am on August 2, 2023. The EPA inspection team ("inspection team") consisted of Linda Brolin, Cheryl Wilkinson, and Ryan Maisano. The inspection team signed into the Visitor Log and were led to the Conference Room by John Turbeville, Environmental and Facility Manager. The inspection team presented their EPA credentials to facility contacts and gave out business cards at this time. The inspection team also gave the facility the Small Business form and the CBI forms. The following personnel were present at the in-brief:

EPA:	Linda Brolin, Environmental Engineer Cheryl Wilkinson, Life Scientist Ryan Maisano, Physical Scientist
Facility:	John Turbeville, Environmental and Facility Manager

Linda Brolin explained the inspection process to the facility representatives. John Turbeville provided copies of the facility layout. John Turbeville explained the facility has one 90-day area, which they call the HWSA shed and 18 Satellite accumulation areas (SAAs). Nine of the SAAs are solvent soaked rags that are sent out to be laundered and 6 SAAs are lead refuse from soldering.

The site consists of five buildings, and one half buried, closed wastewater treatment tank. The Main building is 320,000 square feet. The site is located on 33 acres. There is a former water treatment building that is no longer used. There is a Number 6 Fuel Oil storage Building that is

no longer used. There is also a Flammable Shed that is no longer used. And there is one HWSA building.

There are approximately 400 employees, with about 180 that are union employees. The facility operates three eight-hour shifts, five-days a week. The hours of operation are 7 am-3:30 pm; 3:30 pm-11:30 pm; and 11:30 pm-7 am. There is overtime on weekends, depending on need. John Turbeville's hours are 6:30 am-4:00 pm.

They are a Pressure and Temperature Instrument manufacturer. Analog and digital devices are built on site.

John Turbeville, Facilities Manager explained the following processes that are done at the facility:

- Fabricating
- Assembly
- Calibration of products

After the processes are complete the next steps are final inspection and packing.

John Turbeville explained that Ashcroft took over the site in 2005 and that Nagano Keiki owns the Company and the land.

Main Building

The Main Building is broken up into Building A and Building B. Building A is where temperature and pressure switches are made. Building B is where pressure transducers are made. Buildings A and B are further broken down by numbered areas, which they refer to as departments.

- The 2nd floor is mainly offices. There is a boiler also located on the second floor.
- They are soldering circuit boards in Building A and B. There is some lead in the solder. They use wipes or brushes to clean the parts. The following hazardous waste is generated: scrap solder, rags, and brushes that is potentially contaminated with lead. The hazardous waste is collected in 20-gallon step cans with a bag liner. The solvent-soaked rag and brushes with acetone are used in Building B. The solvent-soaked rags with alcohol and IPA are used in Building A. In the Painting Area (Department 171) they use paint thinner and other non-hazardous solvents. They have an aerosol can crusher where they puncture the aerosol cans. The empty cans are sent out for recycling of scrap metal.
- In Department 158, TCE was formerly used for the Navy. It is not used now. It has been replaced with a non-hazardous solvent. It gets the oil out of the inside of gauge for clients that need the oil removed from it. Department 158 makes temperature products. In the Oxygen Clean Room (177) they make temperature products such as the Bello gauge.
- Department 184 is for the process gauge assembly and the calibration for gauges used in oil fields.
- Department 127 manufactures bronze pressure gauges. Depending on what the gauge is placed in, the material of the gauge has to change. For example, bronze cannot be used in

an oil gauge. Pressure gauges are made from the following materials: bronze, stainless steel, regular steel, inconel steel, monel steel, and Hastelloy steel.

- Department 171 is for Fabricating, Machining, and Finishing which includes the following: Powder coating and spray painting, Machining, press room, Aqueous cleaners, acid tanks for pickling (hydrochloric acid, nitric acid, and sulfuric acid) are used. There is a small-scale wastewater system which generates F006 sludge. The F006 sludge is stored in a 55-gallon SAA container. The F006 sludge is sent off as hazardous waste. Acid tanks are drained at times and sent out, which is done about once a year. The water rinses in the pickling line are sent through the WWT system. The treated wastewater is discharged to the sewer system. John Turbeville said he is applying for SIU. They are currently a CIU.
- Near the D13 door, there is a chip spinner, a used oil tank, and an evaporator. Outside the D13 door, there are two above ground used oil tanks. The evaporator is used for the aqueous coolant and other aqueous waste streams around the facility. The water is evaporated off and the resultant concentrated material is collected in the used oil tank and managed as used oil. The coolant used in the evaporator is Hangsterfer's 555 coolant with water (water soluble oil concentrate). The chip (excess metal scrap) spinner is used to spin oil off chips, then the used oil is pumped to the used oil storage tanks. Chips are then sent off as metal scrap. The used oil has been tested for the halogen content.
- The types of steel used the facility are stainless steel (contains hexavalent chrome) and inconel and monel, which contain nickel. Bronze steel, which contains zinc and copper. Hastelloy is a specialty steel that is similar to stainless steel.
- Ashcroft does not machine a lot of specialty metals. Waste is sent out as corrosive and metals.
- Department 146 is for hand welding operations for the analog pressure gauges.
- Department 145 is the Fabricating Department where they take long lengths of metal tubing and flatten it to form a "C" shape, which is called tube fabrication.
- Department 128 is the Chemical Seals Department for acid gauges. They chemically seal the gauge, using glycerin or silicone. The gauge isolators use a diaphragm for pressurization, which protects the gauge. The gauge is filled with liquid, they sell liquid filled gauges with silicone or glycerin, which dampen the vibration.
- Department 580 is part of Chemical Seals Department.
- The Pretreatment tanks are located in Department 580. Pretreatment is for the alkaline rinse waters. There is no hazardous waste generated.
- Department 191 is the Temperature Product line. There was no hazardous waste generated in this area.
- Department 738 is the Shipping and Receiving Department. There was no hazardous waste generated in this area. They use spray foam for packing.
- Department 540 is the Maintenance Department, where solvent soaked rags are generated.
- Department 189 is the Analog Gauge Department. Solvent soaked rags are generated in this area. They clean the dials with denatured alcohol.
- The remainder of the building is office space.

In Building A and B, there are also labs. There is an Engineering lab and an Electronic Lab on-site, in addition to other labs. The Breakdown Lab is where they test the products for the lifecycle. The Quality Control Lab is where they do the calibrations. There is no hazardous

waste generated in the labs. There used to be a Chemistry lab, but now there is no use of chemicals and there are only empty sample bottles. There is a tabletop spectrometer to check water samples. They use an outside laboratory for their pretreatment program.

The Universal waste generated includes light bulbs, batteries, electronics (computers), and used electronics.

There is Non-hazardous waste drum storage area located at the back room near door D20.

Clean Harbors is their waste hauler for non-hazardous and hazardous waste pick- ups.

Ashcroft uses Walden Engineering for EHS compliance. They perform the hazardous waste training and OSHA training for the company. The Contingency plan was written by Walden Engineering. Walden Engineering does not manage any waste on site.

There are no hazardous waste tanks on site.

There have been no spills of hazardous waste.

There was a No 6 fuel oil spill in 2010.

The waste that is placed in the evaporator is neutralized if necessary. Anything going into evaporator is checked for pH. The pH is adjusted if corrosive. This has only been done once in about 20 years. The pH of the waste is usually around 9.

The inspection team asked what PPE is needed for the walk thru. John Turbeville stated that safety glasses are needed.

Photographs as part of the inspection were discussed.

The in-brief discussion ended around 11:30 am with the requests of the documents to be reviewed after the walk through. The inspection team broke for lunch.

The inspection team returned at about 12:40 pm. Then the inspection team conducted the walk-through portion of the inspection with John Turbeville.

IV. FACILITY TOUR

This section consists of observations by EPA Inspectors during the physical tour of the Facility. Please see Attachment 1 for a digital photo log of photos taken throughout the inspection.

The tour of the Facility took place on August 2-3, 2023. The following personnel were present for all or part of the tour:

EPA:	Linda Brolin Cheryl Wilkinson Ryan Maisano
Facility:	John Turbeville, Environmental and Facilities Manager

Day 1 – August 2, 2023 12:50 pm.

Walk through with John Turbeville, Ashcroft and Cheryl Wilkinson, Ryan Maisano, and Linda Brolin, EPA.

Main Building

Department 158 Military Gauge Cell
The inspection team observed the following container in SAA#6:
One 5-gallon container, labeled, hazardous waste, solvent soaked rags, located under the bench. The container was closed.

Department 178
Department 178 is the former TCE area. There is a still located here, that is used to recover solvent. They used to use TCE, but they no longer use TCE. Mr. Turbeville was unsure when they stopped using TCE "probably around end of last year." They now use Tergo, a solvent product made by Hubbard-Hall. The used Tergo is recycled in the still.

The inspection team observed the following container in the SAA:
One 5-gallon red steel closed step can, labeled Non-Hazardous waste solvent-soaked rags (Tergo)

Department 158
The inspection team observed the following container in SAA #9:
One 20-gallon closed red step can, with a Hazardous waste label, solvent-soaked rags with IPA.

The rags get laundered by Unifirst in Stratford, CT according to John Turbeville.

Department 184 Assembly Catalog, Calibrate and Assembly
In this area the facility does the dial printing of the gauges. They use air, water and oil to test the gauges.

The inspection team observed the following containers in SAA #10:

One 20-gallon closed red step can, labeled Hazardous Waste, solvent-soaked rags, solvent used denatured alcohol.

One 55-gallon black steel drum, labeled Universal Waste, waste ink cartridges.
Two 5-gallon clear poly containers, labeled Non-Hazardous waste, Used Ink. One container was closed and one container was open with a funnel.

One 55-gallon black steel drum, labeled Non-Hazardous waste, Used ink bottles.

Department 177
There is a dust collector for the grinding of metal parts. The inspection team asked for a waste determination on the contents of the dust collector. The facility has multiple dust collectors around the site, which collect dust from cutting and grinding of metal.

Department 146
The inspection team observed the following closed container in SAA#12:

One 20-gallon red step can, labeled "Hazardous waste, oil and kerosene rags", located under the conveyor belt.

Department 171

This area is called the Acid Pickling Area. The acid pickling tanks are tanks of cleaners and acid located in this area (from right to left): Alkaline cleaner, Luster clean 11L, Cold water rinse, Deoxidizer 13L (Hydrofluoric acid), Hydrochloric acid, Bright dip, Cold water rinse, Hot water rinse. The rinsewater is discharged to the Wastewater treatment plant. Mr. Turbeville explained that the Alkaline cleaner, and Luster clean when dilute enough goes into the evaporator when spent. Mr. Turbeville also explained that dilute enough is a pH between 2 and 12.5. Spent acids and material, not dilute enough would be put in drums.

The inspection team observed the following containers in the SAA:

There was one 55-gallon container, labeled hazardous waste, waste acid. The container was closed.

One 5-gallon closed, black bag, labeled hazardous waste, trichloroethylene rags.
Mr. Turbeville explained that they stopped using TCE in all areas of the facility, except Department 110 approximately one year prior to the inspection. Department 110 stopped using TCE approximately two months after the rest of the facility stopped using it, which was approximately last November.

In the back of the Acid Pickling Area, the inspection team observed, one 5-gallon gray container with a hazardous waste label, "Alkaline Cleaner". The container was closed. Mr. Turbeville was unsure how long the container had been there. Also, there was one 2-3-gallon white container labeled, Hazardous waste, Kester flux 2331-2x. The container was closed. Mr. Turbeville didn't know how long it had been there. There was also one 30-gallon blue container labeled, Hazardous waste, Burt filters, F006. The container was closed.

There is a blue holding tank for the batch wastewater treatment system. The clean water goes through the filters. The filters capture the heavy metals (copper, nickel, zinc, and total chrome). The filters go out as hazardous waste. The sludge goes to the filter press associated with the batch wastewater treatment system located in the same Department. There is a container under the filter press labeled, Hazardous waste, waste sludge. According to Mr. Turbeville, they generate about one drum per year of waste sludge.

There was a 20-gallon red container labeled Non-hazardous waste, oily rags.
There was one 5-gallon blue container, with a Hazardous waste label, trichloroethylene that was located on a spill containment pallet.

There were also various products in this area such as sulfuric acid, and muriatic acid.

Department 171 also has two sand blasters. They have a Torit dust collection system located outside. There was one 55-gallon drum located under the Torit system that was not labeled. Mr. Tuberville provided a waste profile for the sand blasting material that shows it was State regulated waste.

The inspection team observed the following containers in the following SAAs:

SAA #13:
Located at the back of Department 171, to the left of a flammable cabinet, there was an aerosol can puncture station, equipped with a carbon filter. There was one 55-gallon closed container, labeled Hazardous waste, waste paint. According to John Turbeville, the filter for the aerosol can puncture station is replaced once per year.

SAA #14
To the right of the flammable cabinet, there was one 55-gallon black steel drum labeled, Hazardous waste, paint thinner, with a closed funnel in the bung.

SAA#11 was located in Department 171 (but belongs in Department 184), there was one 20-gallon red step can container, labeled Hazardous waste, solvent-soaked rags. The container is closed. They use acetone to clean off glue.

<u>Main Building Department 171 Spray Paint/Case Prep Area</u>
There was a spray paint preparation area where the facility uses water-based enameled paint which is non-hazardous. The inspection team observed the following containers in this area:

Three 5-gallon containers, labeled, non-hazardous waste, waste paint.
One 55-gallon black drum, labeled non-hazardous waste, waste paint.
One 55-gallon black drum, labeled non-hazardous waste, paint filters.

<u>Main Building A</u>
The parts washer, Branson Omni 2000 was located in this area. The parts washer uses the following products: Oakite 700 and Aquaease L5-931. The rinsewater goes to the pretreatment system. When the parts cleaner is spent, John Turbeville said that a waste determination would be made before they would ship out the spent solution. To his knowledge they just add product to the parts washer. John Turbeville stated that the parts washer solution has not been disposed of in years.

<u>Pressure Switch Department 196</u>
The inspection team observed the following containers in the following SAAs:

SAA #17: one 5-gallon red step can, hazardous waste label, solvent soaked rags, IPA. The container was closed.

SAA #16: one 5-gallon yellow closed step can, hazardous waste label, lead waste, lead refuse. The container was closed.

One 5-gallon container of non-hazardous oily rags.

High Accuracy Analog Gauge Department
In this area, they clean the inside of high precision gauges using Tergo. The lead is from soldering.

The inspection team observed the following containers in the following SAAs:

One 5-gallon blue steel container with a non-Hazardous waste label, waste Tergo

SAA #15 one 20-gallon closed red step can, Hazardous waste label, lead refuse.

There is a 55-gallon container attached to two grinders that collects the dust. There is no label visible on this container. Mr. Turbeville explained that the dust in these containers is sent out as scrap metal for recycling.

Former Flammable Shed Building
At the time of the inspection, there was nothing being stored in this building.

Former Wastewater Treatment Plant
The WWTP has not been used since 2009 according to John Turbeville. There are still tanks in the building, of which one contains caustic material, the remainder were empty. Mr. Turbeville explained that the facility continues to use the caustic material in this caustic tank. The inspection team observed a cabinet of old aerosol cans. There was also a one-gallon container of mineral spirits on the steps to the building. Mr. Turbeville explained they can still use the material in the Press area.

Hazardous Waste Storage Area
The HWSA pad was locked. John Turbeville had the key. There was a concrete floor, which is sloped into the area for spill containment. There is a spill kit in area. The following signs were posted, “Danger HWSA Unauthorized Personnel Keep Out” and two “No smoking”. Cell phones are used for the communication device. The emergency phone number listing was posted. There was also a first aid kit, fire extinguisher, an eye wash station, and an emergency fire blanket.

The following drums were located in the HWSA:
There were four drums labeled, hazardous waste, Electrolytic Cut off saw solution, dated 6/27/2023.

There was one 55-gallon drum labeled, non-hazardous waste, purge water, pending analysis. The former owner of the property is responsible for ground water monitoring.

Former No 6 Fuel Oil Building
This building is no longer used. It has been closed for approximately five years according to John Turbeville.

The following containers were observed in this building:
One 3-gallon Formula 2985 potassium hydroxide with about 1 gallon inside the container and one 5-gallon container of Roto extend duty fluid. The 5-gallon container of Roto extend duty fluid was dented.

The walkthrough on 8/2/2023 ended at approximately 3:15 pm and the inspection team went back to the Conference Room at about 3:25pm and departed the facility at about 3:45pm.

Day 2 - August 3, 2023
The inspection team arrived at the facility at approximately 8:35 am, signed into the facility and were met by John Turbeville who brought us to the conference room.

John Turbeville stated that he had found the waste profile for the first dust collector that collects dust from buffing the metal parts. This container was collecting the dust from the Torit system. The waste is a State regulated waste, CR05. John explained that the buffer grinders in the other areas, when spent material accumulates, it is sent out as scrap metal.

The inspection team discussed the areas that need to be inspected: Department 540 Maintenance; Department 189 Uni gauge; Building B – two departments; Evaporator; Chip spinner, Old Chemistry Lab and Universal Waste.

Walk through - 9:00 am

Walk through with John Turbeville, Ashcroft and Cheryl Wilkinson, Ryan Maisano, and Linda Brolin, EPA.

Main Building Department 177

The inspection team observed the following containers in this area:
One cubic yard container labeled, Universal waste, used electronics, dated: 2/13/2019, that contained one printer, one monitor and one CPU. Mr. Turbeville explained that the electronics in this container have only been there since the last shipment of e-waste, which was last month. Mr. Turbeville explained the most recent shipment of Universal waste was in July 2023. The inspection team requested a copy of the Bill of Lading for this last shipment of Universal waste. John Turbeville stated that they come 2-3 times per year.

Near Department 184 – Non-Hazardous Waste Room.

The inspection team observed the following containers in this area:

One 5-gallon container, open, labeled, Universal waste, waste batteries, 4/18/2023.

One 5-gallon container, open, labeled, Universal waste, waste batteries, 3/1/2023.

One 5-gallon container, open, labeled, Universal waste, waste batteries, 4/15/2023 (container C).

One 55-gallon container, closed, labeled, non-hazardous waste, laser welder filters, no date.

One 55-gallon container, closed, labeled, non-hazardous waste, aluminum oxide and wood, no date.

One 55-gallon container, open, labeled, non-hazardous waste, electronic waste containing wire cords, no date.

One 55-gallon container, gray steel, closed, labeled, non-hazardous waste, alcohol and water, no date.

One 55-gallon container, gray steel, closed, labeled, non-hazardous waste, waste HDS, no date This is a non-hazardous solvent.

One 55-gallon container, black steel drum, closed, labeled, non-hazardous waste, pig mats, oily, CR05, no date.

There was one open one-ft by one-ft. box with walkie talkie batteries. At the time of the inspection, John Turbeville put these batteries into Container C noted above.

There was one open one-ft by one-ft. box with walkie talkie chargers. John Turbeville explained that the facility had an event where they were going to use the walkie talkies in July 2023, but the walkie talkies and the batteries did not work anymore, so they decided to dispose of them.

Department 540 Main Building

The inspection team observed the Chip spinner which spins off oil and the oil, which is pumped to the outside used oil tanks. According to John Turbeville, the used oil tank is 300 - 500 gallons. The metal chips are put in a black bin next to the chip spinner and go out as scrap metal.

There were five vacuum drums that are used to pump out coolant and used oil from the different machines. These vacuums do not have filters.

There is also a compactor for compacting the used oil contaminated solids.

To the left of the oil tank is the water evaporator. The waste left after evaporation is managed as used oil. The facility tests the pH of the material prior to adding the material to the evaporator. If the pH is close to 2 or 12.5, they would add acid or base to neutralize the material. John Turbeville explained that the material usually has a pH of around 9.

The facility has been using the same oils and cleaners for 40 years.

Maintenance Department 540

The inspection team observed the following containers in this area:
SAA#19
One 20-gallon red step can, labeled Non-Hazardous waste, oily rags.
One 20-gallon red step can, labeled Hazardous waste, solvent soaked rags – blue rags only. The container was closed.

Department 189
Ethanol is used for cleaning the dials with rags in this area.

The inspection team observed the following containers in this area:
SAA#18:
One 20-gallon red step can, labeled "Hazardous waste, solvent soaked rags". The container was closed.

Old Chem Lab
This Lab is still used by John Turbeville and the Metallurgist. They make up phosphate ester flux to remove solder from the boards. The inspection team observed some chemicals in a chemical hood, which are still being used.

Under the sink, the inspection team observed one 2-liter glass container labeled, "Acetone" and "Used". The label did not have the words "Hazardous waste".

Also, there was one 2-liter glass bottle ammonium hydroxide. John Turbeville explained that he doesn't remember the last time it was used and will ask the Metallurgist the last time it was used. Mr. Turbeville stated the Metallurgist explained that he has not used the bottle of used acetone in a long time.

Building B - Department 135
The inspection team observed the following container in this area:
SAA#3:

One 20-gallon red step can, labeled, hazardous waste, lead refuse. The container was closed.

Building B - Department 110
The inspection team observed the following container in this area:
SAA#1:
One 20-gallon red step can, labeled, hazardous waste, lead refuse. The container was closed.

This concluded the walk-through portion of the inspection. The inspection team went back to the conference room at about 10:10 am.

V. RECORDS REVIEW

The inspection team reviewed all documents on-site on August 3, 2023, following the walk-through portion of the inspection.

Waste Determination

The inspection team reviewed the waste determination for the spent buffing compound, from buffing metal parts. The determination was made by process knowledge and analytical data. The determination was that it was state regulated waste, CR05.

The inspection team reviewed the SDS for the ink used.

Manifests/LDRs

The inspection team reviewed hazardous waste manifests and land disposal restriction notifications (LDRs) from shipments made by Ashcroft Inc. during 2022-2023.

The manifest 018845746FLE dated 6/20/2023 did not have the final destination facility copy of the manifest.

The inspection team reviewed the manifest for the most recent shipment of electronic waste, to show the inspection team that the e-waste in the container has not been in there since the date on the label, which was 2019. The manifest showed electronic waste was shipped out on July 6, 2023.

Inspection Logs

The inspection team asked for the HWSA inspection logs for July 2021 - July 2023. Kevin Rodgerson conducted the weekly inspections and John Turbeville signed as inspector and Manager for 4/22/22-4/29/22. Dave Tait conducted the weekly inspections in 2023. At the time of the inspection, there was no record of weekly inspections of the Hazardous waste storage area for the following weeks: 12/11/2022 and 12/18/2022.

Training/Job Descriptions

The inspection team asked for the Facility's RCRA training certificates and training logs for 2020-2022. The facility conducts Hazardous waste Management Training and also conducts DOT training. The following individuals had Hazardous waste management training and DOT training on 8/18/2022: Vincent Manieri, Carl Rychlik, Harrison Bromberger, Tom Marsala; John Turbeville, Richard Ung, Kevin Rodgerson, Antonio Scapellato, Dave Tait, and Aimee Apatow.

Contingency Plan

The inspection team reviewed Facility's Contingency plan revised September 1, 2022. The Emergency Coordinator is Aimee Apatow and the Alternate Emergency Coordinator is John Turbeville. The plan includes Emergency Procedures, Emergency Equipment List, Evacuation plan. On 9/7/2022, the Contingency Plan was emailed to the local authorities.

VI. INSPECTION OUTBRIEF

An out-brief conference was conducted on August 3, 2023, prior to leaving the facility. The following personnel were present for the closing conference:

EPA:	Linda Brolin
	Cheryl Wilkinson
	Ryan Mai
Facility:	John Turbeville

EPA then relayed the following areas of concern that arose from observations throughout the inspection.

Areas of Concern:

1. In the WW Area D-171, there was one 5-gallon container, labeled hazardous waste trichloroethylene, located on a spill pallet with products. TCE has not been used by the facility since end of 2022.
2. There was one small, closed black bag, labeled, Hazardous waste, trichloroethylene rags, with no date, at the Pickling Area SAA. TCE has not been used at the facility since end of 2022.
3. In the back of the pickling area there was a 5-gallon alkaline cleaner with a hazardous waste label that was closed and not dated. Mr. Turbeville was unsure how long it had been there.
4. In the back of the pickling area, there was a 2-3-gallon container of hazardous waste, Kester FLUX that was not dated, and Mr. Turbeville was unsure how long it had been there.
5. There was lack of aisle space for one container in the HWAA. The label of one of the four containers located on a pallet was not fully visible.
6. There were three open, one-gallon UW containers of batteries.
7. There was one open, unlabeled box of Universal waste walkie talkie batteries.
8. There was one unlabeled box of Universal Waste used electronics (walkie talkie chargers)
9. The dust collector, located outside D171, did not have a State Regulated label for the CR05 waste.
10. In the former WWT Building, which was shut down in 2009, there were numerous aerosol cans, and one 1-gallon can of mineral spirits that need waste determinations.

11. In the former Chemistry lab, there was one container with “Used” and “Acetone” on it that Mr. Turbeville explained hasn’t been used in a long time.
12. In the former Chemistry lab, there was one container of ammonium hydroxide that Mr. Turbeville, nor the Metallurgist remember the last time they used it.
13. In the former # 6 Fuel Oil Building, which has been closed for about 5 years, there was one 3-gallon container of potassium hydroxide, corrosive decal, with approximately one gallon in the bottle.
14. For manifest 018845746FLE dated 6/20/2023, there was no destination facility copy of the manifest in the file.
15. The Weekly inspection log for the less than 90-day area was missing the weeks of December 11, 2022, and December 18, 2022.

After discussing the above areas of concerns, the inspection team reviewed the broad spectrum of all possible post-inspection follow-ups, including both informal and formal notices.

Following this discussion, the inspection team left the premises at approximately 12:15 pm, concluding the on-site portion of the inspection.