

*Resource Conservation and Recovery Act (RCRA) Compliance Evaluation Inspection (CEI)*  
*Quality Electroplating Corp.*  
 PRD090592544

US Environmental Protection Agency – Region 2  
 Caribbean Environmental Protection Division  
 Response and Remediation Branch



*Resource Conservation and Recovery Act (RCRA)*  
 Compliance Evaluation Inspection (CEI)

<b>Facility Name:</b>		<b>Quality Electroplating Corp.</b>					
<b>EPA ID Number:</b>		<b>PRD090592544</b>					
<b>Completion Date:</b>		<b>March 30, 2023</b>					
Generator Status in Record:		Large Quantity Generator					
RCRA Permitted:		No					
Corrective Action:		No					
Project ID		CEPD-RCRA-08-0090					
Basis for Inspection:		Core Program (Conducted during the COVID-19 pandemic timeframe.)					
<b>Facility Personnel:</b>							
Name:	Title:	Email:	Phone:	Attend to:			
				OM <sup>1</sup>	FW <sup>2</sup>	DR <sup>3</sup>	CM <sup>4</sup>
Ms. Jeannette Miranda	ES <sup>5</sup> Manager	<a href="mailto:jeannettemirandapr@hotmail.com">jeannettemirandapr@hotmail.com</a>	787-743-0825	√	√	√	√
<b>EPA Personnel:</b>							
Inspector's Name		EPA Region 2-CEPD	Enforcement Officer	phone/email			
Ms. Rosana Caballer-Cruz		EPA Region 2-CEPD	Enforcement Officer	787-977-5880/ <a href="mailto:caballer.rosana@epa.gov">caballer.rosana@epa.gov</a>			
Status:	FINAL						
EPA Inspector Signature/Date	X ROSANA CABALLER-CRUZ <small>Digitally signed by ROSANA CABALLER-CRUZ                  Date: 2023.05.23 07:56:28 -04'00'</small>						
Supervisor Signature/Date	X DAVID CUEVAS-MIRANDA <small>Digitally signed by DAVID CUEVAS-MIRANDA                  Date: 2023.05.23 08:04:49 -04'00'</small> David N. Cuevas Miranda, Ph.D.						

<sup>1</sup> Opening Meeting

<sup>2</sup> Facility Walkthrough

<sup>3</sup> Documents Review. For additional information related to this item, please refer to Section 3 and 5 of this Report.

<sup>4</sup> Closing Meeting

<sup>5</sup> Acronym usually stands for Environmental and Safety.

## 1 FACILITY SUMMARY

Facility Physical Location: (Municipality, PR, zip code)	SAKURA STATE RD 1 KM 34.2 - VILLA BLANCA IND PARK, CAGUAS, PUERTO RICO 00725.	
Geographical Coordinates:	18.246527, -66.039503	
Facility Information:	PALL LIFE SCIENCES PUERTO RICO, LLC	
	787-743-0825	
	Mailing address: P.O. BOX 6570, CAGUAS, PUERTO RICO 00726.	
NAICS:	332813 - ELECTROPLATING, PLATING, POLISHING, ANODIZING, AND COLORING	
Previously inspected:	YES	
Area:	THREE (3) BUILDINGS	
Employees	APPROXIMATELY 80	
HW <sup>6</sup> transferred via pipeline?	YES <sup>7</sup>	
UST <sup>8</sup> available at the facility?	NO <sup>9</sup>	
NRC <sup>10</sup> orientation provided?	YES	

## 2 INTRODUCTION

On March 30, 2023, a Resource Conservation and Recovery Act (RCRA) Compliance Evaluation Inspection (inspection) was conducted at Quality Electroplating Corp. (the facility), pursuant to Section 3007 of RCRA. As part of the inspection, I explained to the facility representative that an opening meeting, walkthrough, and document review, would be conducted to evaluate the facility's compliance with the requirements that govern hazardous waste generators, universal waste handlers, and used oil generators, as applicable.

According to records, the facility has been inspected by the EPA prior to this inspection. I arrived at the facility around 9:30 am, nevertheless, Ms. Jeannette Miranda, Environmental and Safety Manager, was not available at the facility. Hence, security personnel called her and notified about this CEI. She arrived at the facility around 10:15 am. The weather conditions that remained through the CEI were a mostly cloudy day, hot temperature, and with humidity.

### 2.1 FACILITY PHYSICAL DESCRIPTION AND OPERATION

Quality Electroplating Corp has been at this location for approximately forty-two (42) years. The facility is dedicated to the manufacturing of metal parts or pieces requested by each of its clients. According to the facility representative, one of their major clients is Eaton and GE.

<sup>6</sup> Acronym stands for hazardous waste.

<sup>7</sup> Information provided by the facility representative. According to her, this occurs from the manufacturing process area to the Wastewater Treatment Plant (WWTP).

<sup>8</sup> Acronym stands for underground storage tanks.

<sup>9</sup> Information provided by the facility representative.

<sup>10</sup> Acronym stands for National Response Center.

The facility consists of three (3) buildings. The buildings and the lot are owned by Quality Electroplating Corp. and the area consists of approximately 133,000 ft<sup>2</sup>. Approximately 80 employees work at this facility, in two (2) different shifts, from 6:00 am to 11:30 pm.

## 2.2 AERIAL PHOTOGRAPH

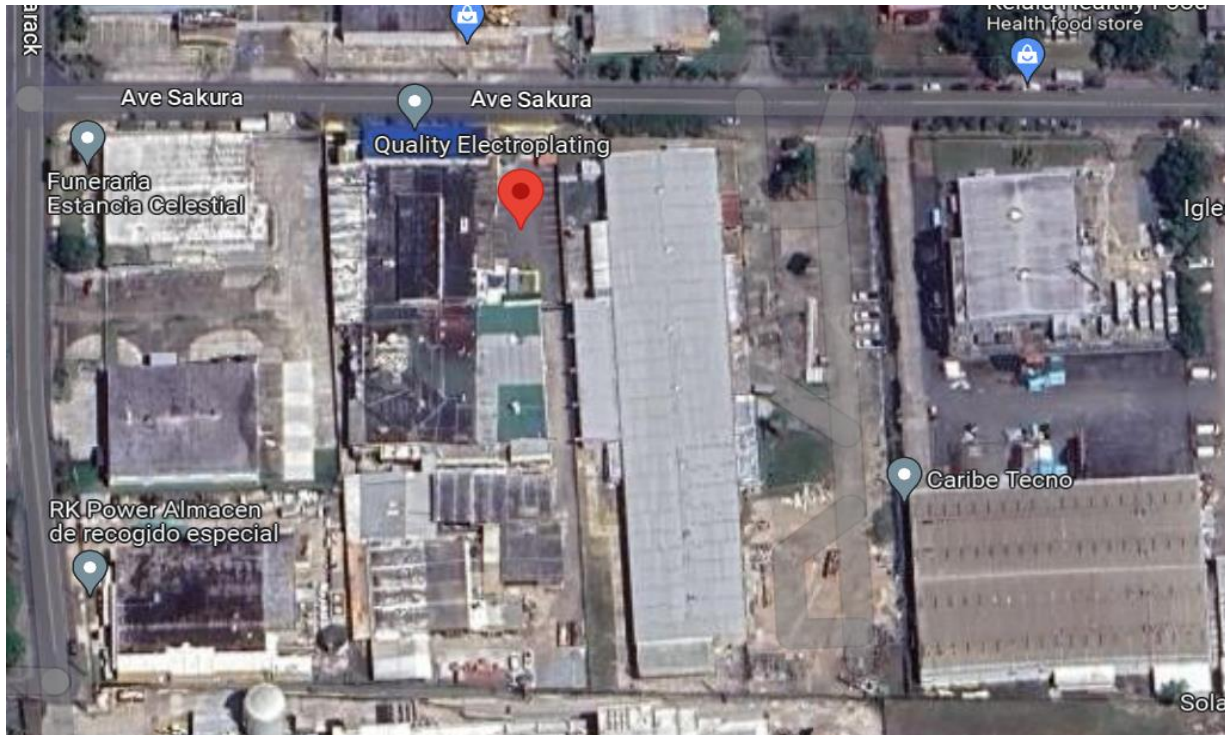


Figure 1: Facility Location

## 2.3 SOLID AND HAZARDOUS WASTE GENERATION

According to the facility representative, they are currently generating mainly zinc, chromium, silver, and sludge (F006). Ms. Miranda told me that they have available one (1) 90-day hazardous waste accumulation area, one (1) aerosol can container, and the electroplating sludge generated at the WWTP. The hauler company for their hazardous waste is Juan Hernández<sup>11</sup>, and the last disposal was conducted on February 15, 2023. Also, I asked the facility representative about their universal waste and used oil generation, handling, and/or disposal activities. She replied that they are currently generating used oil<sup>12</sup> and spent paint filters and fluorescent lamps as universal waste<sup>13</sup>. Information related to any spills and/or chemical releases in their facility was asked, as well. According to her, spills nor chemical releases in their facility have occurred. Finally, I provided Ms. Miranda with an orientation and information related to NRC, such as but not limited to the phone number.

<sup>11</sup> World Resources Company recycles the sludge (F006).

<sup>12</sup> The hauler Company is Oil and Energy.

<sup>13</sup> The hauler company is Sterycycle.

### 3 OPENING MEETING

I met at the facility with Ms. Jeannette Miranda, ES<sup>14</sup> Manager, for the opening meeting. I identified myself as an EPA RCRA enforcement officer and told the facility representative that the purpose of my visit was to conduct a CEI at the facility to evaluate its hazardous waste, universal waste, and used oil management practices and compliance. In addition, I told her that RCRA, universal wastes, and/or used oil documents would be requested as part of this CEI. As part of the inspection, I mentioned to the facility representative that I needed to take photos related to any RCRA-related issues. Ms. Miranda permitted me to take photos during the inspection. Finally, I also explained that we needed to visit the waste generation areas in the facility.

### 4 FACILITY WALKTHROUGH

Just after the opening meeting, we started the facility walkthrough. The areas inspected were Manufacturing Area, 90-day Hazardous Waste Accumulation Area (HWAA), and the WWTP<sup>15</sup> Area. The observations for the areas inspected are described below:

#### 4.1 MANUFACTURING AREA

Description of the Area	This was the first area inspected. For inspection purposes, the latter was segregated into two (2) subareas: (a) TIN SUBAREA and (b) MECHANICAL SHOP SUBAREA. Information on each one is as follows.
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##### 4.1.1 TIN SUBAREA

Here, one (1) 55-gallon steel container was observed with a flammable liquid label (Picture #1). I asked Ms. Miranda about this container since, at the time of the inspection, it was being used to store sand in order to dry the pieces already manufactured. As a result, I asked her how this sand is handled and disposed of and if any hazardous waste determination has been made. She replied that, by knowledge, they have determined that the content in this container was not hazardous waste, and they dispose of the latter as regular waste. Also, she told me that this was not the correct container to store the sand and requested one of her employees to change the container.

I told the facility representative the following:

1. Request of information – additional information would be requested related to the

<sup>14</sup> Acronym usually stands for Environmental Health and Safety.

<sup>15</sup> Acronym stands for Wastewater Treatment Plant.

information discussed before.

#### 4.1.2 MECHANICAL SHOP SUBAREA

Also identified as a maintenance area, here, a 30-gallon container was observed. The latter was labeled as Empty Aerosol cans and was observed open, with mixed regular waste<sup>16</sup> and aerosol cans (Picture #2), A pictographic label and/or indication of the hazard was not observed. The container was observed dirty, as well. I asked the facility representative about the hauler company that provides the pickup services. She replied that Stericycle is the hauler company that collects this container. She also mentioned that this container would be collected by the hauler company as universal waste. Nevertheless, at the time of the inspection, the container was not observed labeled as universal waste. In addition, according to information gathered at this subarea, it seems that the facility personnel are treating this subarea as a Satellite Accumulation Area (SAA). As a result, I shared with her information related to the SAA requirement during the CEI and, in addition, told her that additional information would be sent to her for future reference<sup>17</sup>.

As part of the observations made in this subarea, in various instances, I observed that containers with pictographic labels, identifying as flammable and/or corrosive, were being used for purposes other than storing hazardous waste. I asked the facility representative about this observation, and she confirmed that the current use of such containers was not related to hazardous waste purposes. In addition, pictographic labels were also observed placed on heavy equipment, such as the lifter observed in this subarea.

I told the facility representative the following:

1. Request of information – As discussed in the Tin Subarea, additional information related to the use of containers labeled as hazardous waste for not hazardous waste (storing/handling) purposes would be requested.
2. Request of information – Information related to the use of a pictographic label in heavy equipment, such as the lifter observed in this area.
3. Open container – A 30-gallon container with regular waste mixed with aerosol cans was observed open.
4. SAA – Information related to how the facility personnel handles this subarea would be requested in order to properly identify this subarea, whether it is an SAA or not.

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<sup>16</sup> Ms. Miranda agreed with this observation during the CEI.

<sup>17</sup> For additional information of this item, please refer to Section 7.2 of this Report.

## 4.2 90-DAY HAZARDOUS WASTE ACCUMULATION AREA (HWAA)

Description of the Area	This was the second area inspected. Located outside the facility building, in the rear area, it is used to store the hazardous waste generated at the facility. At the time of the inspection, the area was observed open since one representative was working within. Mr. Osvaldo Lopez, Facility Operator, was the representative that was working <sup>18</sup> and joined us at the inspection at this area. For inspection purposes, this area was segregated into eight (8) subareas.
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The area consists of a concrete floor and half concrete walls (lower)/half galvalume wall (upper) and ceiling. The area was labeled as hazardous waste and the phone number and schedule are available (Picture #3). Emergency equipment, such as an eyewash station, fire extinguisher<sup>19</sup>, and mainline phone<sup>20</sup>, were also observed. The area was observed without aisle space<sup>21</sup>, I asked Mr. Lopez about an alarm. He showed me the alarm and, according to him, it is operational and functional. Also, I asked about the log and the number of employees that are authorized to work in this area. According to them, this area's log is available at the WWTP area, and currently two (2) additional employees are granted to access this area.

For inspection purposes, this area was segregated into eight (8) subareas: (a) SAA HW-1 SUBAREA, (b) SAA HW-2 SUBAREA, (c) BAGS SUBAREA, (d) CHARACTERIZATION IN PROGRESS SUBAREA, (e) AEROSOL CAN CONTAINER SUBAREA, (f) USED OIL SUBAREA, (g) SILVER SLUDGE SUBAREA, and (h) EPOXY SUBAREA. Information on each one is as follows:

### 4.2.1 SAA HW-1 SUBAREA

Here, one (1) cardboard container was observed with approximately 30 lamps (Picture #4). The container was observed open and with a corrosive pictographic label. Nevertheless, a hazardous waste label or hazardous waste or universal waste markings were not observed. The container was not observed dated, as well, and both containers and lamps were observed dirty and with spider webs. I asked them about the lamps, and they told me that these were not fluorescent lamps, that they were LED lamps. According to the facility representatives, they told me that although their hauler company is Stericycle, the hauler company have told them that they do not pick up this type of waste. I told them that additional information on the latter would be requested.

### 4.2.2 SAA HW-2 SUBAREA

<sup>18</sup> At the time of the inspection, as a result of lack space at the facility's 90-Day HWAA, I observed Mr. Lopez walking above the bags (approximately 2,000 lbs bags which contains F006) that were observed this area.

<sup>19</sup> Last inspection in January 2023. Nevertheless, the equipment was labeled for a monthly inspection cycle.

<sup>20</sup> This equipment was observed well-dirty. According to Mr. Lopez, it is operational and functional.

<sup>21</sup> For additional information, please refer to Section 4.2, footnote 18 and Section 4.2.3 of this Report.

Here, five (5) 55-gallon blue plastic containers were observed. Four (4) of them were placed above a wood panel and one was observed above the concrete floor. The one on the concrete floor was observed labeled as hazardous waste, nevertheless, a pictographic label or indication of the hazard were not observed. It was closed and dated 3/12/2023.

The other four (4) 55-gallon containers above the wood panel were observed without labels, with no pictographic label or indications of the hazard, and no information related to the date. In addition, although four (4) of them were closed, one of them was observed swollen (Picture #5). I asked the facility representatives about the four containers in order to obtain additional information about them. When I asked why these four containers did not have a hazardous waste label, pictographic label and/or indication of the hazard, and no information related to the date available, Mr. Lopez told me that he uses the information available in the container observed above the concrete floor to then fill out the information of the other four (4) at a later date. When I asked about the swollen container and why it was in such condition, they replied that they did not know. Then, Mr. López attempted to open the swollen container to release pressure from one of the small holes available in the container's lid. By the time of this action, we were very close to it, and I told Mr. Lopez that this was not a safe action to do. Nevertheless, he continued to open the container. Just after, I started to hear what appeared to be the release of the gas<sup>22</sup> that had been accumulating in this container. This action was taken in front of me and front of Ms. Miranda, the facility's Environmental & Safety Manager.

#### 4.2.3 BAGS SUBAREA

Here, a lack of aisle space between the approximately thirty-two (32)<sup>23</sup> 2,000-lb bags was observed. By the time I gained access to the facility's 90-day HWAA, as a result of the lack of space, Ms. Miranda and I observed Mr. Lopez walking above the mentioned bags. Then, when I was inspecting this subarea, I asked the facility representatives about these bags, and Ms. Miranda told me that all the bags observed contained F006 (Picture #6). Due to a lack of aisle space, I was able to access only one of the bag's labels. It was labeled as hazardous waste, with the facility's EPA ID No., and also the F006 code and the hazardous waste solids, with a date of 2/15/2023. I asked the facility representatives if this information is accurate for the other bags. Ms. Miranda told me that the bags have different dates. I was not able to access nor confirm this information as a result of the lack of aisle space in this subarea.

In addition, a 55-gallon white plastic container was observed. The latter was identified as Used Oil and was observed closed, labeled and according to the facility representatives, it was full. I asked the facility representatives about this container. They told me that this container was placed at this location approximately one week ago and, according to Mr. Lopez, it was

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<sup>22</sup> I used this term in order to describe the sound of the release of the swollen container. Is important to highlight that this action was taken in a swollen 55-plastic container, not labeled, without a pictographic label or indication of the hazard in place and with no information related of why this container swollen. In addition, this action was taken without any proper safety precautions nor protocols and without the consideration that the three of us were nearby the swollen container.

<sup>23</sup> This information was provided by the facility representatives.

misplaced since it should be at the used oil area.

#### 4.2.4 CHARACTERIZATION IN PROGRESS SUBAREA

Here, a 55-gallon blue plastic container was observed. The latter had the hazardous waste label on it and the following information was available, as well: methylene chlorine, date on 3/18/2023. Nevertheless, a pictographic label and/or hazard information was not available. Also, the container was observed open and with its lid broken (Picture #7). I told them that additional information on the latter would be requested.

#### 4.2.5 AEROSOL CAN CONTAINER SUBAREA

Here, a 20-gallon<sup>24</sup> blue steel container was observed. At the time of the inspection, the latter was labeled as hazardous waste and was observed empty and with dust (Picture #8).

#### 4.2.6 USED OIL SUBAREA

Here, one (1) 55-gallon plastic container and one (1) 55-gallon blue steel container were observed. At the time of the inspection, the 55-gallon plastic container was empty, while the 55-gallon blue steel container was observed labeled as used oil, and was labeled as non-regulated waste, as well (Picture #9).

#### 4.2.7 SILVER SLUDGE SUBAREA

Here, according to Mr. Lopez, the container<sup>25</sup> observed in this area contains silver sludge. Nevertheless, at the time of the inspection, the latter was not labeled, no pictographic label and/or indication of the hazard was available, and the date was not available, as well (Picture #10). In addition, the container was observed open and dirty. When I asked about this container, they told me that it was misplaced in this area and that it was for silver recycling<sup>26</sup>. I asked if a hazardous waste determination was conducted, and they replied that such a determination had not been conducted. I told them that additional information on the latter would be requested.

#### 4.2.8 EPOXY SUBAREA

This was the last subarea identified. Here, two (2) containers<sup>27</sup> with epoxy resin were observed. At the time of the inspection, one of them was observed in bad condition, corroded and with dust (Picture #11). At the time of the inspection, it was not clear if these containers were in use or to be discarded.

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<sup>24</sup> Approximately.

<sup>25</sup> Capacity of the container not available.

<sup>26</sup> The facility representatives told me that they recycle it with Roldan Refining.

<sup>27</sup> Capacity of the container not available.

I told the facility representative the following:

1. Request of information – Additional information would be requested related to the approximately 30 lamps observed in an open cardboard box, the swollen 55-gallon container, the protocol taken towards the swollen 55-gallon container, about the 55-gallon blue plastic observed at the characterization in progress area, about the misplaced container with silver sludge, and the two (2) containers with epoxy resin observed.
2. Open containers - Some containers in this area were not observed closed, such as at the SAA HW-1 subarea, at the characterization in progress subarea, and the silver sludge subarea.
3. Condition of the containers- Some of the containers in this area were not observed in good condition. Some were dirty, and corroded, the lid broken, and one swollen container was observed.
4. Labeling- Some containers in this area were observed without the hazardous waste label, such as at the SAA HW-1 subarea, SAA HW-2 subarea, and at the silver sludge subarea.
5. Lack of pictographic label or indication of the hazard - Some containers in this area were observed without the pictographic label nor the indication of the hazard, such as at the Mechanical shop subarea, the SAA HW-2 subarea, the characterization in progress subarea, and the silver sludge subarea.
6. Lack of date – Some containers in this area were observed without the date, such as at the SAA HW-1 subarea, SAA HW-2 subarea<sup>28</sup>, and at the silver sludge subarea.
7. Lack of aisle space – This condition was observed especially in the bags subarea, where approximately 32-2,000 lbs bags were observed without any aisle space. Inspection and information of each bag were not able to be conducted as a result of lack of space.
8. Misplacement of containers- One used oil container was observed misplaced at the bags subarea<sup>29</sup>, while the container which contains silver sludge, according to the facility representatives, was also misplaced.
9. Maintenance and operation of facility- At the time of the inspection, Mr. Lopez, without any previous notice or any safety protocol, took an unplanned and unwarranted action with a swollen 55-plastic container, that was not labeled, without a pictographic label or indication of the hazard and with no information whatsoever of why this container was

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<sup>28</sup> Four (4) containers.

<sup>29</sup> This information was confirmed by the facility representatives.

swollen. In addition, this action was taken without any proper safety precautions nor protocols and without the consideration that the three of us were nearby the swollen container. In addition, the lack of labels, pictographic labels nor an indication of the hazards, dates, and condition of some of the containers observed and misplaced containers could redound in eventualities in this facility.

10. Hazardous waste determination – during the CEI, information related to the determination of the misplaced container which contains silver sludge was discussed.

### 4.3 IN-FRONT OF FLAMMABLE (CAGE-LIKE) AREA

Description of the Area	This area was found as part of the CEI. The latter consists of a hallway-like area just in front of the flammable cage-like area. This area was not part of the original walkthrough. It was found while we were walking from the 90-day HWAA to the WWTP Area.
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While walking from the 90-day HWAA to the WWTP Area, I observed an area with concrete floor and ceiling with approximately thirteen (13) 1-gallon paint containers. These containers were observed corroded and with dust (Picture #12). This observation was made in front of a cage-like area, which has a fence as a physical barrier, identified as “Inflamable”<sup>30</sup>. According to Ms. Miranda, all the containers observed were in use. In addition, a piece of mechanical equipment was observed within this area. At the time of the inspection, it appears that a leak<sup>31</sup> was observed on the area’s concrete floor. Spill equipment, such as absorbent material, was not observed nearby this equipment (Picture #13).

I told the facility representative the following:

1. Request for information – As discussed in this area, additional information related to the observations made in this area would be requested.

### 4.4 WWTP AREA

Description of the Area	This was the last area inspected. This area is used to collect the facility’s used water and sanitary water in order to be treated before discharging them to PRASA <sup>32</sup> . Here is where the sludge (F006) <sup>33</sup> is generated and collected in the 2,000 lbs bags to then be moved to the 90-day HWAA.
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<sup>30</sup> Spanish word for flammable.

<sup>31</sup> Appears to be oil, but this information was not confirmed or denied by the facility representative.

<sup>32</sup> Acronym stands for Puerto Rico Aqueduct and Sewer Authority.

<sup>33</sup> For additional information of this item, please refer to Section 4.2.3 of this Report.

The facility representative told me that one (1) F006 hazardous waste point of generation is available in this area (Picture #14). Here, is where the sludge (F006) is generated and collected to then be transferred to the facility sludge dryer (Picture #15). After drying it, the outcome is collected into the 2,000 lb bags<sup>34</sup> to finally be transferred to the facility's 90-day HWAA for storing and disposal activities. At the time of the inspection, I observed one (1) open bag connected to the facility's equipment<sup>35</sup>. Near the latter, I observed an additional bag with sludge content and one (1) metal container<sup>36</sup> with sludge content, as well (Picture #16). At the time of the inspection, it was not clear if this metal container and the additional bag with sludge content was part of the facility's F006 hazardous waste point of generation previously identified by the facility representative. Just after, we moved from the point of generation to the sludge dryer area<sup>37</sup>. Here, the facility representative told me that the dryer equipment was not operational and functional. Nevertheless, sludge content was observed in the dryer equipment (Picture #15).

I told the facility representative the following:

1. Request of information – As discussed, additional information related to the sludge drying process would be requested, such as, but not limited to information on how the representatives transfer the sludge generated at the facility's point of generation to the sludge dryer equipment, information related to the metal container with sludge content observed nearby the point of generation area, how long the equipment has been out of service, information related to the WWTP permit and sludge dryer process, among others.

## 5 DOCUMENTS

### 5.1 DOCUMENT REQUEST

I explained to the facility representative that, as part of the CEI activities, a request and evaluation of documents would be conducted. I asked her for the following documents for review: (1) biennial report (2) job description, (3) HWAA inspection information, (4) training records (5) contingency plan (6) waste minimization plan, and (7) manifests. Almost all the documents requested were available for review<sup>38</sup>. Information related to each document is

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<sup>34</sup> These are the bags that were observed at the facility's 90-Day HWAA. For additional information of this item, please refer to Section 4.2.3 of this Report.

<sup>35</sup> This is the area identified by the facility as the F006 hazardous waste point of generation area.

<sup>36</sup> The size of the container was not available nor provided by the facility representatives (unknown).

<sup>37</sup> The facility representatives transfer the sludge collected in the bag to the sludge dryer equipment. The sludge dryer equipment was observed inside the same building.

<sup>38</sup> Information related to the trainings, training presentation and waste minimization plan were requested for review at the facility. The documents were not available at the time of the inspection. As a result, the information was requested during the closing meeting and at the email sent on March 31<sup>st</sup>, 2023, to Ms. Miranda. The due date for the later was April 14, 2023. The facility representative did not provide the information by the time agreed.

presented below:

<b>Documents Requested</b>	<b>Requested during CEI</b>	<b>Available during CEI?</b>	<b>Description</b>
1. Biennial Report	YES	YES	The 2021 Biennial Report document was available for review. It was signed by Ms. Miranda on February 17, 2022. and submitted before the due date of March 1 <sup>st</sup> , 2022.
2. HWAA inspection information	YES	YES	The documents' timeline evaluated was from January 5, 2023, to March 30, 2023.
3. Job Description	YES	YES	One (1) document was provided for evaluation.
4. Training Records	YES	NO	The document was not available for review.
5. Contingency Plan	YES	YES	One (1) document was provided for evaluation.
6. Waste Minimization Plan	YES	NO	The document was not available for review.
7. Manifests	YES	YES	One (1) binder was provided for evaluation. The time frame evaluated was from February 11, 2020, to March 23, 2023.

## 5.2 DOCUMENTS REVIEW

### 5.2.1 BIENNIAL REPORT:

The Biennial Report was prepared by Ms. Miranda and includes information related to the facility's NAICS information<sup>39</sup>, the location of the facility using the GPS<sup>40</sup>, and information related to the document's certification.

### 5.2.2 HWAA INSPECTION INFORMATION:

The document evaluated was from the 90-day HWAA. According to Ms. Miranda, the inspection of this area is commonly conducted on Wednesdays and/or Thursdays and the last inspection was conducted on March 29, 2023. As part of the evaluation of this document, I told Ms. Miranda about the information recorded at the log versus the observations made during the CEI. I told her that there were discrepancies between the observations I made and the information available in the facility's log. For example, some of the observations raised during

<sup>39</sup> For additional information, please refer to Section 1 of this Report.

<sup>40</sup> Acronym stands for Global Positioning System.

the CEI were the lack of aisle space and the lack of labeling. Nevertheless, the log states that aisle space was available, and that containers were labeled. In addition, although Ms. Miranda told me that the inspection was conducted the day before our CEI, March 29, 2023, the date that appeared in the logbook was March 30, 2023, the date of the CEI. I asked Ms. Miranda who is conducting the inspections at their 90-day HWAA, and she replied that she conducts the latter<sup>41</sup>.

### 5.2.3 JOB DESCRIPTIONS:

The document, identified as Environmental Manager WWTP, was evaluated. According to the information gathered, the last revision was conducted in July 2007 and the hazardous waste training information was included. After evaluation, the documents provided include the hazardous waste component.

### 5.2.4 TRAINING RECORDS:

The document was not available for review at the facility. It was requested during the closing meeting and on March 31st, 2023, via email. The document was not provided for evaluation.

### 5.2.5 CONTINGENCY PLAN:

The last version of the ICP was in 2022 and was certified by Ms. Miranda. This document includes the facility's emergency coordinators list, the emergency contact numbers for personnel outside the facility staff, the emergency equipment location, diagram, and the use, the NRC No, the location of the fire extinguishers, and the protocol of how the facility provides the Contingency Plan copy to the state and federal agencies. Nevertheless, it was discussed with the facility representatives the following: the quick reference guide was not available for review, the evacuation maps and routes were not available for review, the first responder's certification/evidence was not available for review and the location of the other emergency equipment available in the facility were not available for review. Information and Regulation references were shared with the facility representatives as part of the document review section.

### 5.2.6 WASTE MINIMIZATION PLAN:

The document was not available for review at the facility. It was requested during the closing meeting and on March 31st, 2023, via email. The document was not provided for evaluation.

### 5.2.7 MANIFESTS:

At the time of the inspection, the manifests evaluated were signed and appeared to be in

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<sup>41</sup> As expressed in Section 2 of this Report, Ms. Miranda was not at the facility when I arrived around 9:30 am. She arrived at the facility around 10:15 am and, since then, she escorts me during all the CEI. During the CEI, she did not conduct an inspection at the 90-day HWAA.

compliance with the 45-day timeframe. The representatives, who signed the mentioned documents, were Ms. Miranda and Mr. Lopez, respectively. Nevertheless, one (1) manifest was observed without the Certification of receipt of hazardous materials. As a result, additional information related to the latter was requested to the facility representatives.<sup>42</sup>

## 6 CLOSING MEETING

On March 30, 2023, the closing meeting was conducted with the facility representative, at the facility. I indicated that the purpose of the closing meeting was to inform her about the CEI observations raised. As part of the closing meeting, I told Ms. Miranda that additional information would be sent for their reference and that additional information would be requested. The latter was sent, as agreed, on March 31<sup>st</sup>, 2023<sup>43</sup>. For more information, please refer to Section 8 and Section 9 of this Report.

## 7 POTENTIAL AREAS OF CONCERN

### 7.1 GENERATORS

On February 17, 2022, the facility notified of its hazardous waste activities as a Large Quantity Generator. Based on the observations and information gathered during the inspection, the following areas of concern were identified:

#### 7.1.1. SUBPART A- STANDARDS APPLICABLE TO GENERATORS OF HAZARDOUS WASTE

i. According to 40 CFR § 262.17(a)(1)(ii), which states that *“if a container holding hazardous waste is not in good condition, or if it begins to leak, the large quantity generator must immediately transfer the hazardous waste from this container to a container that is in good condition, or immediately manage the waste in some other way that complies with the conditions for exemption of this section...”*

At the time of the inspection, the facility failed to comply with this requirement in the 90-day HWAA. Here, some of the containers observed were not in good condition, such as dust in the containers, corrosion, a broken lid, and one (1) swollen container.

ii. According to 40 CFR § 262.17(a)(1)(iv)(A), which states that *“A container holding hazardous waste must always be closed during accumulation, except when it is necessary to add or remove waste.”*

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<sup>42</sup> Manifest No. 024071848 JJK, signed by Ms. Miranda on March 23, 2023. The latter is still under the 45-day timeframe limit.

<sup>43</sup> Ms. Miranda did not confirm the reception of the email and did not provide the information requested, as agreed, by April 14, 2023.

At the time of the inspection, the facility failed to comply with this requirement in the Manufacturing Area and at the 90-day HWAA. At the Manufacturing Area, a 30-gallon container with regular waste mixed with aerosol cans was observed open while during the inspection of the SAA HW-1 subarea, the characterization in progress subarea, and the silver sludge subarea, some of the containers were not observed closed.

iii. According to 40 CFR § 262.17(a)(5)(i)(A), which states that *“A large quantity generator must mark or label its containers with the following: (A) The words “Hazardous Waste...””*.

At the time of the inspection, the facility failed to comply with this requirement in the 90-day HWAA. Here, some containers were without the hazardous waste label, such as at those observed at the SAA HW-1 subarea, the SAA HW-2 subarea, and the silver sludge subarea

iv. According to 40 CFR § 262.17(a)(5)(i)(B), which states that *“an indication of the hazards of the contents (examples include, but are not limited to, the applicable hazardous waste characteristic(s) (i.e., ignitable, corrosive, reactive, toxic); hazard communication consistent with the Department of Transportation requirements at 49 CFR part 172 subpart E (labeling) or subpart F (placarding); a hazard statement or pictogram consistent with the Occupational Safety and Health Administration Hazard Communication Standard at 29 CFR 1910.1200; or a chemical hazard label consistent with the National Fire Protection Association code 704)...”*

At the time of the inspection, the facility failed to comply with this requirement in the Mechanical shop subarea and at the 90-day HWAA. At the Mechanical shop subarea, a 30-gallon container was observed labeled as Empty Aerosol cans, but without the pictographic label nor the indication of the hazard. At the 90-day HWAA, several containers were without the pictographic label nor the indication of the hazard, such as the ones observed at the SAA HW-2 subarea, at the Characterization in progress subarea, and the Silver sludge subarea.

v. According to 40 CFR § 262.17(a)(5)(i)(C) which states that *“The date upon which each period of accumulation begins clearly visible for inspection on each container.”*

At the time of the inspection, the facility failed to comply with this requirement in the 90-day HWAA. Here, some containers were without the date, such as the ones observed at the SAA HW-1 subarea, SAA HW-2 subarea, and the silver sludge subarea.

vi. According to 40 CFR § 262.17(a)(7)(iv)(D) which states that *“Records that document that the training or job experience, required under paragraphs (a)(7)(i), (ii), and (iii) of this section, has been given to, and completed by, facility personnel.”*

At the time of the inspection, the facility failed to comply with this requirement. The documents related to the training provided to the facility’s employees were requested during the documents review section in the CEI and, on a later day, via email, for review. The documents were not provided nor available for evaluation.

vii. According to 40 CFR § 262.251, which states that *“A large quantity generator must*

*maintain and operate its 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 which could threaten human health or the environment”.*

At the time of the inspection, the facility failed to comply with this requirement at the 90-day HWAA. Here, Mr. Lopez, without any previous notice or any safety protocol, took an unplanned action with a swollen 55-plastic container, not labeled, without a pictographic label or indication of the hazard in place, and with no information related to why this container was swollen and opened, even when it was told, for safety precautions, to not do so. In addition, this action was taken without any proper safety precautions nor protocols and without the consideration that the three of us were nearby the swollen container. This action occurred in front of Ms. Miranda, Environmental and Safety Manager. In addition, the lack of labels, pictographic labels nor an indication of the hazards, dates, and condition of some of the containers observed and misplaced containers could redound in eventualities in this facility.

viii. According to § 262.255 which states that *“The large quantity generator must 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.”*

At the time of the inspection, the facility failed to comply with this requirement at the 90-day HWAA. Here, approximately thirty-two (32) 2,000-lb bags were observed without any aisle space. As a result, an inspection was not able to be conducted thru all the available bags and the information on each bag was not able to be gathered, as well. In addition, as a result of lack of space, I observed Mr. Lopez walking above some of the 2,000 lbs bags while he was working at the 90-day HWAA.

ix. According to 40 CFR § 262.256(b), which states that *“The large quantity generator shall maintain records documenting the arrangements with the local fire department as well as any other organization necessary to respond to an emergency. This documentation must include documentation in the operating record that either confirms such arrangements actively exist or, in cases where no arrangements exist, confirms that attempts to make such arrangements were made.”*

At the time of the inspection, the facility failed to comply with this requirement. The documents related to the first responder’s confirmation and/or evidence of first responders were requested during the documents review section in the CEI and, on a later day, via email, for review. The documents were not provided nor available for evaluation.

x. According to 40 CFR § 262.261(e), which states that *“The plan must include a list of all emergency equipment at the facility (such as fire extinguishing systems, spill control equipment, communications and alarm systems (internal and external), and decontamination equipment), where this equipment is required. This list must be kept up to date. In addition, the plan must include the location and a physical description of each item on the list, and a brief outline of its capabilities.”*

At the time of the inspection, the facility failed to comply with this requirement. The documents related to the additional emergency equipment available at the facility were requested during the documents review section in the CEI and, on a later day, via email, for review. The documents were not provided nor available for evaluation.

xi. According to 40 CFR § 262.261(f), which states that *“The plan must include an evacuation plan for generator personnel where there is a possibility that evacuation could be necessary. This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes (in cases where the primary routes could be blocked by releases of hazardous waste or fires).”*

At the time of the inspection, the facility failed to comply with this requirement. The documents related to the evacuation map and routes were requested during the documents review section in the CEI and, on a later day, via email, for review. The documents were not provided nor available for evaluation.

xii. According to 40 CFR § 262.262(b), which states that *“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...”*

At the time of the inspection, the facility failed to comply with this requirement. During the documents review section, the quick reference guide was not available for review. The quick reference guide was also requested on a later day, via email, for review. The document was not provided nor available for evaluation.

## 8 FOLLOW-UP ACTIONS

As expressed in Section 6 of this Report, an email to the facility representative was sent on March 31<sup>st</sup>, 2023. The email included direct links which provide information related to the RCRA Regulation (40 CFR §§ 260 to 265), Universal Waste (40 CFR § 273), and Used Oil (40 CFR § 279), among other direct links with specifics, such as aerosol cans, satellites accumulation areas (SAAs), aisle space, etc. In addition, the EPA Form 8700-12, and one page with additional links which provide direct links for specific items for the RCRA Regulation were sent for their future reference. The facility representative, Ms. Miranda, did not confirm the reception of the email and did not provide the information requested, as agreed, by April 14, 2023<sup>44</sup>.

### 7.1 REQUESTS

Information Requested	Reason
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<sup>44</sup> For additional information related to this item, please refer to the Attachment identified as OTHER: EMAIL SENT TO FACILITY REPRESENTATIVE ON MARCH 31<sup>ST</sup>, 2023.

<ol style="list-style-type: none"> <li>1. Training Records - Certification evidence of Mr. Osvaldo López (2020, 2021, 2022, and 2023, if available)</li> <li>2. Training Records - Certification evidence of Ms. Jeannette Miranda (2020, 2021, 2022, and 2023, if available)</li> <li>3. The two (2) additional employees who were informed during the CEI that have access to the 90-Day HWAA.</li> </ol>	<ul style="list-style-type: none"> <li>- This information was requested to confirm that the person(s) who signed during the mentioned time frame was certified and willing to sign the facility's manifests.</li> </ul>
<ol style="list-style-type: none"> <li>4. Training Presentation</li> </ol>	<ul style="list-style-type: none"> <li>- To evaluate the presentation that is provided to the employees who works with hazardous wastes at the facility.</li> </ul>
<ol style="list-style-type: none"> <li>5. Waste Minimization Plan (WMP)</li> </ol>	<ul style="list-style-type: none"> <li>- The document was not available for review during the CEI.</li> </ul>
<ol style="list-style-type: none"> <li>6. Contingency Plan</li> </ol>	<ul style="list-style-type: none"> <li>- Additional information was requested in order to complete the evaluation of said document<sup>45</sup>.</li> </ul>

## 7.2 INFORMATION PROVIDED TO THE FACILITY REPRESENTATIVE

Information Requested	Link	Enclosed
1. RCRA (Hazardous Waste)	√	
2. Summary of Requirements for Very Small Quantity Generators (VSQGs)	√	
3. Summary of Requirements for Small Quantity Generators (SQGs)	√	
4. Summary of Requirements for Large Quantity Generators (LQGs)	√	
5. Universal Waste	√	
6. Used Oil	√	
7. Aerosol cans	√	
8. Satellite Accumulation Areas	√	
9. Condition of containers	√	
10. Aisle space	√	
11. Alternative Standards for Episodic Generation	√	
12. National Response Center	√	
13. Hazardous Waste Generator Regulations Compendium	√	
14. Defining Hazardous Waste	√	
15. P-waste	√	
16. EPA Form 8700-12	√	√

<sup>45</sup> For additional information, please refer to Section 9 of this Report, OTHER: EMAIL SENT TO FACILITY REPRESENTATIVES ON MARCH 31<sup>ST</sup>, 2023.

17. One page with additional links which provide direct links for specific items for the RCRA Regulation	√	√
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9 ATTACHMENTS

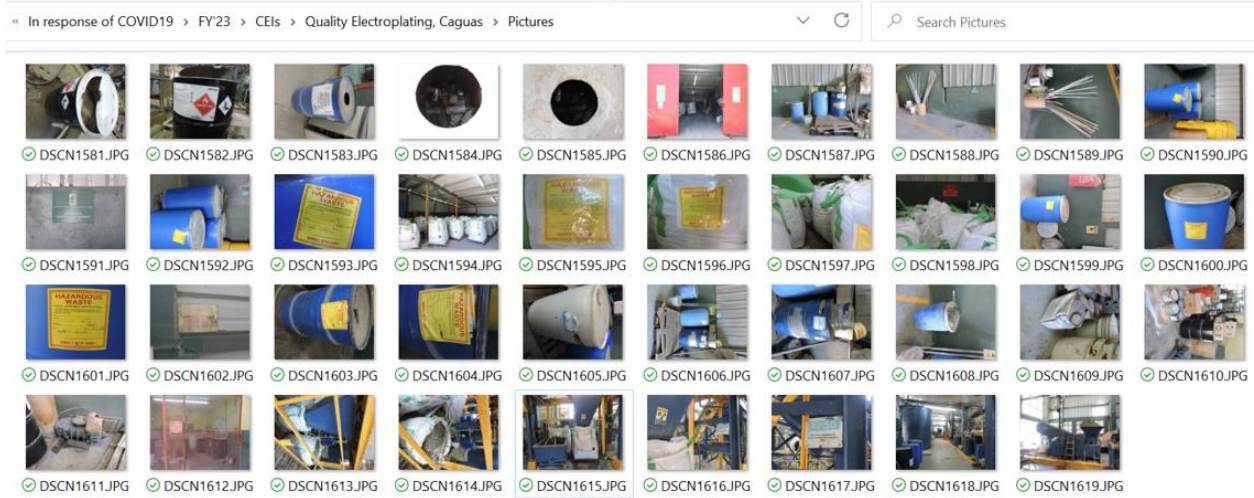
I. CAMERA ROLL

II. APPENDIX 1: SITE PICTURES

III. OTHER: EMAIL SENT TO FACILITY REPRESENTATIVES ON MARCH 31<sup>ST</sup>, 2023.

Resource Conservation and Recovery Act (RCRA) Compliance Evaluation Inspection (CEI)  
Quality Electroplating Corp.  
PRD090592544

ATTACHMENT I: CAMERA ROLL





Picture 1 — Tin Subarea— Here, one (1) 55-gallon steel container was observed with a flammable liquid label. This container was being used to stored sand in order to dry the pieces already manufactured.



Picture 2 — Mechanical Shop Subarea— Here, a 30-gallon container was observed. The latter was labeled as Empty Aerosol cans and was observed open, with regular waste mixed with aerosol cans.



Picture 3 — 90-day Hazardous Waste Accumulation Area (HWAA) - Zoom-out of the area that is used to store the hazardous waste generated at the facility.



Picture 4 — SAA HW-1 subarea— Here, one (1) cardboard container was observed with approximately 30 lamps. The container was observed open, and with a corrosive pictographic label.



Title:  
Appendix 1—Facility Pictures  
EPA ID:  
PRD090592544

Facility:  
*Quality Electroplating Corp.*  
Project:  
CEPD-RCRA-08-0090

Pictures taken by:  
R. Caballer-Cruz  
Date:  
2023-03-30



Picture 5 — SAA HW-2 subarea— Here, five (5) 55-gallon blue plastic containers were observed. Just one of them was labeled as hazardous waste, nevertheless, a pictographic label nor indication of the hazard was not observed. One of them was observed swollen.



Picture 6— Bags subarea— Zoom-out of the subarea. Here, lack of space between the approximately 32 2,000-lbs bags were observed.



Picture 7 — Characterization in progress subarea—Here, a 55-gallon blue plastic container was observed. The container was observed open and with its lid broken.



Picture 8 — Aerosol can container subarea—Here, a 20-gallon blue steel container was observed. At the time of the inspection, the later was labeled as hazardous waste and was observed empty and with dust.



Title:  
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2023-03-30



Picture 9 — Used oil subarea—Here, the 55-gallon plastic container was empty, while the 55-gallon blue steel container was observed labeled as used oil, and was labeled as non-regulated waste, as well.



Picture 10— Silver sludge subarea— This container was not labeled, a pictographic label nor indication of the hazard was not available, and the date was not available, as well. Nevertheless, it was informed by the facility representatives that the latter contains silver sludge.



Picture 11 — Epoxy subarea—Here, two (2) containers with epoxy resin were observed. At the time of the inspection, one of them was observed in bad condition, corroded and with dust.



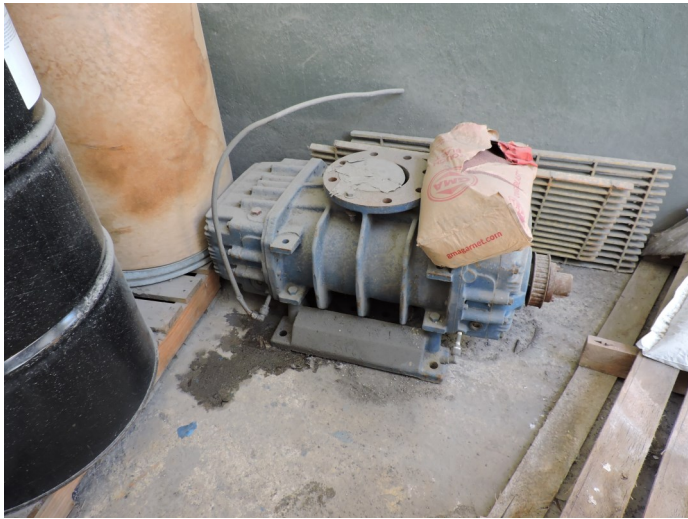
Picture 12 — In-front of flammable (cage-like) Area—While walking from the 90-day HWAA to the WWTP Area, I observed an area with concrete floor and ceiling with approximately thirteen (13) 1-gallon paint containers. These containers were observed corroded and with dust.



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Picture 13 — In-front of flammable (cage-like) Area— At the time of the inspection, it appears that a leak was observed at the area’s concrete floor. Spill equipment, such as absorbent material, was not observed nearby this equipment.

Picture 14 — WWTP Area— Picture of the facility’s F006 hazardous waste point of generation.



Picture 15 — WWTP Area—Here, is where the sludge (F006) is generated and collected to then be transferred to the facility dryer. The latter has been highlighted with a red circle.

Picture 16 — WWTP Area—Near the point of generation, I observed an additional bag with sludge content and one (1) metal container with sludge content, as well. At the time of the inspection, it was not clear if this metal container and the additional bag with sludge content is part of the facility’s F006 hazardous waste point of generation.



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