

RCRA Inspection Report

1) **Inspector and Author of Report**

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U.S. Environmental Protection Agency, Region 4
Enforcement and Compliance Assurance Division
Chemical Safety and Land Enforcement Branch
61 Forsyth Street, S.W.
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2) **Facility Information**

WIKA Instrument, LP
1000 Wiegand Blvd
Lawrenceville, Georgia 30043
Gwinnett County

EPA ID Number: GAD981282411
NAICS - 334513

3) **Responsible Officials**

Catherine Bochenek, EHS Director
WIKA Instrument, LP
cbochenek@wika.com

4) **Inspection Participants**

Christian Touchet
Brooke York
Catherine Bochenek
Rhonda Williams

Georgia Environmental Protection Division (GA EPD)
US EPA
WIKA Instruments
WIKA Instruments

5) **Date of Inspection**

February 15, 2023

6) **Applicable Regulations¹**

Resource Conservation and Recovery Act (RCRA) Sections 3002 (42 U.S. Code – Annotated U.S.C.A. 6925 and 6927), and 40 Code of Federal Regulation (C.F.R.) Parts 260 - 270, 273, 278, & 279; Georgia Hazardous Waste Management Act, Ga. Code Ann. § 12-8-60 *et seq.*, and Georgia Hazardous Waste Management Rules, Ga. Comp. R. and Regs. 391-3-11.01 to 391-3-11.18 (2016 and 2018).

The Georgia Hazardous Waste Management Act, as amended, O.C.G.A. 12-8-60, *et seq.* (Act); the Georgia Rules for Hazardous Waste Management, as amended, Chapter 391-3-11 (Rules); and those portions of 40 CFR Parts 260-270, 273, and 279 that are adopted into the Rules by reference.

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

7) **Purpose of Inspection**

The purpose of this inspection was to conduct an unannounced compliance evaluation inspection to determine WIKA Instrument's compliance with the applicable requirements of RCRA and the corresponding Georgia regulations. This was an EPA lead inspection.

8) **Facility Description**

WIK A Instrument, LP (WIK A) is a manufacturer of gauges used for a wide variety of commercial and industrial purposes. These include the petrochemical industry, the medical industry, and fire extinguisher manufacturers among others. WIK A opened the 240-thousand square foot facility in 1990, which consists of one large manufacturing plant divided into sections for different processes. The facility operates Monday through Friday across three rotating shifts. The site employs 670 workers between administrative and manufacturing staff. Access to the building is controlled through a lobby. Visitors are required to sign in and out.

Facility Process and Hazardous Waste Generation

WIK A generates hazardous waste from many parts of their manufacturing process. Some of the hazardous waste generated includes:

1. Waste isopropyl alcohol with water from the calibration process;
2. Waste acetone (F003) from the cleaning of fixtures and dials in the Printing Area;
3. Waste paint and thinner (D001, F003, F005) from the cleaning of paint guns used to paint cases;
4. Waste gun drill filters which are characteristically hazardous for lead (D008);
5. Waste chromium (D007) from the electro chemical machining (ECM) process;
6. Waste moth balls from a cooling process;
7. Waste silver nitrate is generated in the site lab; and
8. Waste tetrachloroethylene (PERC) from the FTIR machine.

The hazardous waste generated by WIK A is transported by Ecoflo (EPA ID NCD980842132) and is disposed of by Ecoflo, Inc. (EPA ID NCD980842132) and Ecoflo Southeast, Inc. (EPA ID GAR000052241).

WIK A most recently notified of hazardous waste activity on February 23, 2022 by submitting its 2021 Biennial Report. WIK A notified of large quantity generator activity. Generating hazardous waste bearing waste codes: D001, D002, D007, D008, D027, D035, D039, F002, F003 and F005.

WIK A holds a pretreatment permit. The rinse waters generated from the electropolishing (EP) and citric acid parts washers are treated prior to discharge to the POTW using the pretreatment process which includes metals precipitation and pH adjustment. WIK A also holds a synthetic minor Air Permit.

9) **Previous Inspection History**

On July 19, 2018, GA EPD conducted the most recent RCRA CEI at the subject facility and found six (6) apparent violations of RCRA's requirements for failure to properly mark and label containers and hazardous secondary material management. As a result, GA EPD issued a written informal notice to WIK A on September 20, 2018 and verified that the facility had returned to compliance on July 23, 2018.

10) **Opening Conference**

On February 15, 2023, EPA inspector Brooke York, accompanied by GA EPD inspector Christian Touchet, arrived at WIKA Instrument, LP at approximately 9:45 am. Catherine Bochenek, EHS Director, immediately received the inspectors. Catherine Bochenek and the inspectors were joined by Rhonda Williams, for the opening conference. The inspectors introduced themselves, showed their credentials to Catherine Bochenek, 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 EPA inspector explained that the Small Business Regulatory Enforcement Fairness Act's classification of a "small business" is generally set by the Small Business Administration using the business' SIC/NAICS code and annual receipts or number of employees. A copy of the EPA's information sheet for small businesses can be found at <https://www.epa.gov/sites/production/files/2017-06/documents/smallbusinessinfo.pdf>. The EPA inspector also discussed the company's ability, pursuant to 40 C.F.R. §2.203, to assert a business confidentiality claim for information submitted to EPA. The company did not assert a business confidentiality claim.

Catherine Bochenek provided an overview of the facility's history and current operations during the opening conference. The inspection participants also discussed health and safety protocols and required personal protective equipment before Facility representative led the inspectors on a tour of the Facility operations.

11) **Inspection Observations**

Sockets Area

At the time of inspection, the Sockets Area SAA contained one (1) 55-gallon container of used oil, which was not properly sealed. The container was, however, sealed immediately upon finding it to be open. The container was properly labelled with the words "used oil".

The inspectors observed, twelve (12) totes of hazardous waste (Figure 1) by the Sockets Area. The totes were all dated and sealed, no hazardous waste labels or hazard indications were noted on any of them. These totes were storing hazardous waste, rinse waters generated primarily from the parts washing operation in the Sockets Area, prior to the pretreatment process. The area where the totes were stored did not meet any of the CAA requirements, including but not limited to proper signage, a spill kit, weekly inspections, or a fire extinguisher. Because the facility did not identify the waste as a hazardous waste they did not follow through with the appropriate management of the waste, which would include appropriate signage, labeling, inspections, etc. The facility representatives were informed that the hazardous waste in the totes near the Sockets Area did not appear to be properly managed according to applicable RCRA regulations.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.11], a person who generates a solid waste, as defined in Ga. Comp. R. and Regs. 391-3-11-.07(1) [40 C.F.R. § 261.2], must make an accurate determination as to whether that waste is a hazardous waste in order to ensure wastes are properly managed according to applicable RCRA regulations. A hazardous waste determination is made using the methods articulated in Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.11].

Satellite Accumulation Areas (SAAs)

Other SAAs observed during the CEI include those listed below. Unless otherwise noted all containers observed were properly sealed, labeled, and marked.

- The FTIR Room SAA contained one (1) 1-gallon container of PERC.
- The Washing Machine SAA contained one (1) 55-gallon container of non-hazardous wastewater.
- The Direct Drive SAA contained one (1) 55-gallon container of silver nitrate solution and one (1) 55-gallon container of contaminated mothballs (toxic). (Figures 4 and 5)
- The Dark Room SAA contained one (1) 55-gallon container of waste methanol.
- The Cell 1712 SAA contained one (1) 55-gallon container of non-regulated used filters and one (1) 55-gallon container of waste paint thinner.
- The ECM SAA contained one (1) 55-gallon container of chromium contaminated ECM waste. This container was sealed, but not properly labeled (Figure 8). A hazardous waste label and a hazard indicator were placed on the container at the time of the inspection.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.15(a)(4)], which is a condition of the SAA Permit Exemption, a generator is required to keep containers of hazardous waste closed at all times during accumulation, except when adding, removing, or consolidating waste; or when temporary venting of a container is necessary for the proper operation of equipment, or to prevent dangerous situations, such as build-up of extreme pressure.

- The Gun Drill Machine SAA contained one (1) 55-gallon container of gun drill filters and chips.
- The CNC Department SAA contained two (2) 55-gallon containers of used oil.
- The Electropolishing SAA contained one (1) 55-gallon container of nitric acid, one (1) 55-gallon container of deox C, and one (1) 55-gallon container of non-regulated waste. (Figures 12 and 13)
- The SAA in the interior of the Printing Room contained one (1) 3-gallon bucket of waste acetone, which was dated despite not having to be, the container did not provide a seal that would prevent release of its contents. (Figure 18)

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.15(a)(4)], which is a condition of the SAA Permit Exemption, a generator is required to keep containers of hazardous waste closed at all times during accumulation, except when adding, removing, or consolidating waste; or when temporary venting of a container is necessary for the proper operation of equipment, or to prevent dangerous situations, such as build-up of extreme pressure.

- The SAA at the operators' work stations in the Printing Room contained 3-gallon buckets of solvent waste rags, which were not labeled (Figures 20 and 21).

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 261.4(a)(26)(i)], Solvent-contaminated wipes that are sent for cleaning and reuse are not solid wastes from the point of generation, provided that (i) The solvent-contaminated wipes, when accumulated, stored, and transported, are contained in non-leaking, closed containers that are labeled "Excluded Solvent-Contaminated Wipes." The containers must be able to contain free liquids, should free liquids occur. During accumulation, a container is

considered closed when there is complete contact between the fitted lid and the rim, except when it is necessary to add or remove solvent-contaminated wipes. When the container is full, or when the solvent-contaminated wipes are no longer being accumulated, or when the container is being transported, the container must be sealed with all lids properly and securely affixed to the container and all openings tightly bound or closed sufficiently to prevent leaks and emissions.

- The SAA on the exterior of the Printing Room contained one (1) 55-gallon container of waste acetone and three (3) 30-gallon containers of solvent contaminated rags. The container of acetone was capped with a funnel that was very dirty (Figures 23 and 24). It was advised that the facility clean this funnel, as the substances on it were most likely residues of the hazardous waste kept in the container. Additionally, this container is not at or near the point of generation of the waste.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.15(a)], a generator may accumulate as much as 55 gallons of non-acute hazardous waste in containers at or near the point of generation where wastes initially accumulate, which is under the control of the operator of the process generating the waste.

- The chemical storage SAA contained one (1) 55-gallon container of waste paint fitted with a puncturing mechanism for aerosol paint cans. The container was properly labeled but was stuck open (Figure 25) due to what looked like excess paint buildup. The opening in the puncture system could not be closed at the time of inspection.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.15(a)(4)], which is a condition of the SAA Permit Exemption, a generator is required to keep containers of hazardous waste closed at all times during accumulation, except when adding, removing, or consolidating waste; or when temporary venting of a container is necessary for the proper operation of equipment, or to prevent dangerous situations, such as build-up of extreme pressure.

Electro Chemical Machining (ECM)

Additionally, the area contained two (2) large container-like hoppers that were positioned to collect waste from the filter press machines. Although this waste is considered hazardous, the containers are left open. Waste is only added to the tanks once per week when the machine is drained, which fills them completely. The hazardous waste is promptly removed from the hopper like containers, then they are promptly cleaned and the waste containerized into approximately one and a half 55-gallon containers. At the time of the inspection the hoppers appeared RCRA empty (Figure 9).

Electropolishing

The Electropolishing Area had two (2) separate lines that could be used for electropolishing. The old electropolishing apparatus, involving many tanks used for procedural chemical baths of gauge parts, had been recently replaced with a new set-up on the opposite side of the room (Figure 11). This new set-up had gone out of order a weeks before the inspection, forcing the facility to refill some of the previously empty, old tanks with chemicals (Figure 10). Upon the restart of the new system, the chemicals were left in these open tanks in the old system to sit in case a similar situation were to arise again. The chemicals in these open containers are

hazardous, but the facility made it clear that these chemicals remained usable in their electropolishing process. Inspectors observed a tote at the end of the old line. This tote did not appear to contain 55 gallons of waste. However, the facility representatives were reminded of the SAA requirements. Additionally, the area behind this old system appeared to be covered with a white substance from the machine (Figures 10 and 14).

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.17(a)(6)], which incorporates Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.251], and is a condition of the LQG Permit Exemption, a generator is required to 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.

Printing Room (Interior)

At the time of inspection, the inspectors observed the hood in the interior of the Printing Room. The hood did not appear to be in proper operation and there appeared to be build up in the ventilation beneath the workstation, as seen in Figure 19.

Chemical Storage

It was noted that the SAA also contained a pile of waste aerosol cans, which were being staged for puncturing once enough cans were piled up. Once punctured and fully drained, the empty cans would be recycled. These aerosol cans were kept in an unlabeled, open bin (Figure 26), which would easily allow for the cans to tip over and spill on the floor. It was advised that the facility begin puncturing cans as soon as they are moved into this room, so as to avoid any future build-ups of unlabeled hazardous/universal waste.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.15(a)(5)], which is a condition of the SAA Permit Exemption, a generator is required to mark or label its containers (i) with the words “Hazardous Waste” and (ii) with an indication of the hazards of the contents.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.15(a)(4)], which is a condition of the SAA Permit Exemption, a generator is required to keep containers of hazardous waste closed at all times during accumulation, except when adding, removing, or consolidating waste; or when temporary venting of a container is necessary for the proper operation of equipment, or to prevent dangerous situations, such as build-up of extreme pressure.

Central Accumulation Area (CAA)

The facility operates a CAA, which is located behind a movable divider next to the Sockets Area.

At the time of the inspection, the CAA contained the following:

- Eight (8) 55-gallon containers of ECM solid waste
- One (1) 55-gallon container of waste isopropyl alcohol
- One (1) 55-gallon container of CNC filter press sludge
- Four (4) 55-gallon containers of EPS 4000 corrosive waste
- One (1) 55-gallon container of Deox C corrosive waste
- One (1) 55-gallon container of wastewater with chromium

Seven (7) 55-gallon containers of non-regulated waste
Six (6) 55-gallon containers of used oil

All containers were properly sealed and labeled, including being marked with an accumulation start date. The oldest date found was November 21, 2022. At the time of the inspection, the CAA lacked aisle space, making inspecting the area very difficult. Proper space should be allotted to the CAA so that sufficient aisle space can be maintained.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.17(a)(6)], which incorporates Ga. Comp. R. and Regs. 391-3-11-.08(1) [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.

Universal Waste

The facility has been undergoing a process of switching out their fluorescent lighting. Universal Waste bulbs recovered from this are accumulated in the building's facilities and maintenance area. At the time of inspection, the Universal Waste storage area contained two (2) boxes of Universal Waste fluorescent lamps (Figures 16 and 17). Although properly closed and labeled with the words "Universal Waste", the containers featured no labeling specifying that they contained lamps or bulbs and did not feature any accumulation start dates. This labeling issue was corrected immediately upon identifying it.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.18 [40 C.F.R. § 273.34(d)], a LQHUW 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 Ga. Comp. R. and Regs. 391-3-11-.18 [40 C.F.R. § 273.35(a) and (c)], a LQHUW may accumulate universal waste no longer than one year and must to 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.

Universal waste is transported by Ecoflo (EPA ID NCD980842132) and is disposed of by Ecoflo, Inc. (EPA ID NCD980842132) and Ecoflo Southeast, Inc. (EPA ID GAR000052241).

Records Reviewed

The following records were requested for review: 2021 Biennial Report and 2022 Waste Reduction Plan, uniform hazardous waste manifests from the last three years, bills of lading, waste profiles, most recent contingency plan, personnel training records, documentation of weekly inspections, and copies of all applicable permits. All records requested were available and no apparent deficiencies were noted.

12) Closing Conference

The inspectors conducted the exit meeting with Catherine Bochenek and Rhonda Williams. During this meeting, the inspectors stated their preliminary observations of the inspection.

13) List of Appendices

Appendix 1 – Photo Log:
26 Photos taken on: February 15, 2023
Photos taken by: Brooke York
Photos taken with: Olympus Tough
EPA Property Tag: S75550

14) **Signed**

BROOKE YORK Digitally signed by BROOKE YORK
Date: 2023.03.23 14:27:18 -04'00'

Brooke York
Environmental Engineer

15) **Concurrence**

ARACELI CHAVEZ Digitally signed by ARACELI
CHAVEZ
Date: 2023.04.11 08:17:16 -04'00'

Araceli B. Chavez
Chief, RCRA Enforcement Section

Appendix 1 – Photo Log:
26 Photos taken on: February 15, 2023
Photos taken by: Brooke York
Photos taken with: Olympus Tough
EPA Property Tag: S75550



Figure 1: P2150008.JPG – Totes of Rinse Water stored prior to Pretreatment



Figure 2: P2150009.JPG – CAA



Figure 3: P2150010.JPG - CAA



Figure 4: P2150014.JPG – Direct Drive Waste Container



Figure 5: P2150015.JPG– Direct Drive Waste Container



Figure 6: P2150016.JPG – Paint Booth



Figure 7: P2150017.JPG- ECM Filter Presses and hoppers



Figure 8: P2150018.JPG – Container in ECM Area



Figure 9: P2150019.JPG – Hopper in the ECM Area



Figure 10: P2150022.JPG – Old Electropolishing Line



Figure 11: P2150023.JPG – New Electropolishing Line



Figure 12: P2150024.JPG – Container in the SAA in the Electropolishing Area



Figure 13: P2150026.JPG – Container in the SAA in the Electropolishing Area



Figure 14: P2150027.JPG – Floor in the rear of the Old Electropolishing Line and Tote



Figure 15: P2150028.JPG – Old Electropolishing Line Tote



Figure 16: P2150030.JPG – Universal Waste



Figure 17: P2150031.JPG – Universal Waste



Figure 18: P2150032.JPG – Printing Room container to collect Acetone



Figure 19: P2150033.JPG – Hood in the Printing Room



Figure 20: P2150034.JPG – Solvent wipe container at workstation in Printing Room



Figure 21: P2150035.JPG – Solvent wipe container at workstation in Printing Room



Figure 22: P2150036.JPG – Solvent contaminated wipes



Figure 23: P2150037.JPG – Container of Acetone outside the Printing Room



Figure 24: P2150038.JPG – Container of Acetone outside the Printing Room



Figure 25: P2150039.JPG – Aerosol Can Puncturing Station



Figure 26: P2150040.JPG – Pile of aerosol cans awaiting puncturing.