



# ENVIRONMENTAL PROTECTION AGENCY

## REGION 1 – NEW ENGLAND

5 POST OFFICE SQUARE, SUITE 100  
BOSTON, MASSACHUSETTS 02109-3912

September 29, 2023

Frank Timmeny, Director of MFG  
Bridgeport Fittings, LLC  
705 Lordship Blvd  
Stratford, CT 06615

Re: U.S. EPA-Region 1 Inspection Report of Bridgeport Fittings, LLC, August 1, 2023

Dear Mr Timmeny:

In accordance with current policy, I am providing you with a copy of the final inspection report summarizing observations made during the July 31-August 1, 2023, inspection of your facility.

This inspection was conducted under the authority of RCRA.

Please contact me at 617-918-1760 or [wilkinson.cheryl@epa.gov](mailto:wilkinson.cheryl@epa.gov) if you have any questions.

Sincerely,

Cheryl Wilkinson, Life Scientist  
Waste and Chemical Compliance Section

cc: George Dews, CT DEEP

***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.***

**ENVIRONMENTAL PROTECTION AGENCY**

**REGION 1 – NEW ENGLAND**

5 POST OFFICE SQUARE, SUITE 100  
BOSTON, MASSACHUSETTS 02109-3912

**RCRA Compliance Inspection of:**

**Bridgeport Fittings, LLC  
705 Lordship Blvd  
Stratford, CT 06615**

July 31-August 1, 2023

Date of Inspection

Cheryl Wilkinson

Cheryl Wilkinson, Life Scientist  
Waste and Chemical Compliance Section

Sept 29, 2023

Date Inspection Report Approved

\_\_\_\_\_  
Mary Jane O'Donnell, Manager

Waste and Chemical Compliance Section

Sept. 29, 2023

Date Inspection Report Finalized

Sept. 29, 2023

Date Inspection Report Transmitted to Facility

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## RCRA HAZARDOUS WASTE INSPECTION REPORT

### I. GENERAL INFORMATION

- a. **Facility Name:** Bridgeport Fittings, LLC
- b. **Inspection Date:** July 31-August 1, 2023
- c. **Inspection Type:** RCRA Compliance Evaluation Inspection (CEI)
- d. **EPA Inspectors:** Cheryl Wilkinson, Life Scientist  
Linda Brolin, Environmental Engineer  
Ryan Maisano, Physical Scientist
- e. **EPA ID Number:** CTD001180728
- f. **NAICS:** 335932-Noncurrent-Carrying Wiring Device Manufacturing
- g. **Street Address:** 705 Lordship Blvd Stratford, CT 06615
- h. **Mailing Address:** 705 Lordship Blvd Stratford, CT 06615
- i. **Facility Contacts:**
  - Frank Timmeny  
VP of Manufacturing  
Phone: 203-381-3461  
Email: [frank@bptfittings.com](mailto:frank@bptfittings.com)
  - James Wiedow  
Corporate EHS Manager  
Phone: 704-793-7448  
Email: [jim.wiedow@nsiindustries.com](mailto:jim.wiedow@nsiindustries.com)
  - Kris DeBisschop  
Plating & Maintenance Manager  
Phone:203-381-3476  
Email: [krisd@bptfittings.com](mailto:krisd@bptfittings.com)
  - Brian Quinn  
Manufacturing Manager  
Phone:203-381-3430  
Email:[brianq@bpfittings.com](mailto:brianq@bpfittings.com)
  - Timothy Miller  
Site Leader  
Phone:203-381-3412  
Email:[tim.miller@bptfittings.com](mailto:tim.miller@bptfittings.com)

- j. **Generator Status (per RCRAInfo):** Large Quantity Generator (LQG)
- k. **Date first notified as a generator (per RCRAInfo):** 08/18/1980
- l. **Date of most recent notification in RCRAInfo:** 02/24/2022
- m. **Current Property Owner:** NSI Industries, Inc
- n. **Current Operator:** Bridgeport Fittings, Inc
- a. **Wastes generated (per most recent RCRAInfo notification):** F006

Report Attachments:

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

## II. FACILITY DESCRIPTION

Bridgeport Fittings, LLC (“Bridgeport Fittings” or “Facility”) is a large quantity generator that engages in manufacturing noncurrent carrying electrical devices, such as bushings, fittings, and clamps. They notified as a generator initially on 8/18/1980. The waste code generated, per the most recent biennial report, is F006. Bridgeport Fittings, LLC was purchased by NSi Industries on August 9, 2019, NSi owns the Bridgeport Fittings company and the property at 705 Lordship Blvd. Stratford, CT. The business has been in operation at its current location since 1969. The site is approximately 140,000 square feet in total, which includes a shipping building across the street. The shipping building is approximately 40,000 square feet and office area is approximately 20,000 square feet. Bridgeport Fittings employs 190 people which includes temporary workers. Manufacturing has split shifts which include the hours 7:00 AM to 3:30 PM and 3:30 PM to 12:00 AM. Office and administrative staff's normal hours are 7:00 AM to 3:30 PM.

## III. INSPECTION IN-BRIEF

EPA inspectors arrived at the Facility at 705 Lordship Blvd Stratford, CT 06615 at 12:45 pm on July 31, 2023. The EPA inspection team (“inspection team”) consisted of Cheryl Wilkinson, Linda Brolin, and Ryan Maisano. The inspection team arrived at the rear of the building and was met by security personnel. The inspection team presented their EPA credentials to security personnel, Frank Timmeny, Kris DeBisschop, Brian Quinn, and Timothy Miller. Business cards were given out at this time. The following personnel were present at the in-brief:

EPA:	Cheryl Wilkinson, Life Scientist
	Linda Brolin, Environmental Engineer
	Ryan Maisano, Physical Scientist

Facility: Frank Timmeny, VP of Manufacturing  
Kris DeBisschop, Plating & Maintenance Manager  
Brian Quinn, Manufacturing Manager  
Timothy Miller, Site Leader

EPA inspectors started the briefing by providing an overview of the inspection. The inspection team listed records that would be requested, areas of interest, photos, and explained CBI. The inspection team provided the forms to request CBI, the frequently asked questions for CBI, and the Small Business form. The inspection team learned from facility personnel that NSi, Incorporated owns the land and the company, but operates under the name Bridgeport Fittings, LLC. The facility manufactures electrical fittings, mainly using zinc and aluminum metals, as well as steel stamping. They service all electrical industries, commercial and residential. The site consists of the Main Plant, which is separated into five buildings, A, B, C, D and E, and one shipping and receiving building.

The following is the process that occurs for manufacturing of parts, explained by the Bridgeport Fittings team.

#### Die Cast

Die Cast consists of melting blocks of zinc in furnace and pouring the molten zinc into molds to cast into parts. The parts are then removed from the runners they were affixed to, and the runners go back to the furnace to reuse the zinc for more parts. The parts are then tumbled to remove flash, which is excess zinc on the parts. The flash is sent for recycle, back to the smelter (Eastern Alloys) instead of being sent back to the furnace. Each run of the Die Cast process, a water-based lubricant (#3363) is sprayed onto the die cast, which the facility explained is non-hazardous.

After Die Cast, the parts go through an ultrasonic cleaning process which uses a tank of approximately 150-gallons of caustic solution with a pH of 13.5. Facility personnel explained that every 90 days the ultrasonic cleaning tank gets neutralized, pumped into 55-gallon drums and managed as non-hazardous by the contract company, Republic Services. Next, the parts next go through either Threading or Reaming, depending on what the finished product requires.

#### Threading

This process includes tapping the part to put threads on to it. It consists of using machines with the water-based coolant, Super Edge Coolant 6754, which the facility stated is non-hazardous. The excess metal from the process goes back to the furnace for reuse.

#### Reaming

This is a mechanical process to remove excess material out of the threads that were created in the parts. The metal chips generated from this process go back to the furnace for reuse.

#### Burnishing

Once threading or Reaming is complete, the parts are run through steel media and soap inside a long tube to brighten up the parts, which help avoid corrosion. The soap the facility uses is MA-

818, which is made by US Chemical, and the facility stated is non-hazardous. The sap has a pH around neutral. The waste liquid from this process is sent to the WWT system.

The parts are then sent to either assembly or packaging.

In addition to the manufacturing of fittings, the facility also conducts steel stamping, which consists of stamping cold roll steel and galvanized steel. The stamping process is a mechanical process which removes specific shaped metal pieces from the steel. The metal waste generated from the stamping process is managed as scrap metal and sent to PC Metals for recycling. The stamping process uses the water-based coolant, MB10, which the facility stated is non-hazardous.

Once the stamping process is complete, the parts go through a zinc plating line, with the following steps:

- Step 1. Soak, two stage caustic soak, each tank is 300-gallons.
- Step 2. Two stage water rinse.
- Step 3. Acid activation, using hydrochloric acid, HCl.
- Step 4. Two stage water rinse.
- Step 5. Zinc chloride plating bath.
- Step 6. Three stage water rinse.
- Step 7. Trivalent chrome bath.
- Step 8. Two stage water rinse.
- Step 9. Dry

The facility operates a plating office, where the plating baths get analyzed using wet methods, such as metals analysis, and titration.

Facility personnel explained that the wash tanks on the zinc plating line go through the WWT system. The rinse tanks are exchanged at a rate of one to two gallons per minute. Facility personnel explained that the caustic tanks, when cleaned out are placed into the oily waste collection tank. The caustic cleaner is Ardand, which has a pH of 13. Facility personnel explained, when the caustic tank is spent, they neutralize the waste using HCl, to a pH of 8 by making live additions, in combination with a pH meter in a 500-gallon tank and manage it as non-hazardous at disposal. The 500-gallon tank is referred to as the oily waste collection tank and is located in the oily waste collection area. The facility uses a pump and hose to transfer the caustic waste from the caustic tanks on the zinc plating line into the oily waste tank.

Facility personnel explained that the acid from the plating line is sent to the WWT system, where there are two acid holding tanks with a combined volume of 1000-gallons. Facility personnel explained that when the trivalent chrome tank is spent, it is sent through the WWT system. The trivalent chrome tank is spent at a rate of half of the tank, once per month. The HCl acid tanks on the plating line can go years before being spent and needing to be wasted. Facility personnel explained there is a 2500-gallon pit under the plating line that when material enters the pit, it gets sent to the WWT system. Facility personnel explained that no sludge accumulated in the plating line tanks.

The facility uses a cleaning line for specific parts that are too thin to go through the burnishing process, such as locknuts. The facility has hired the contractor, Republic Services to do cleanouts of the cleaning line tanks. The following are the steps on the cleaning line:

Step 1. Cleaner tank, US Chemical cleaner with a pH near neutral, managed as non-hazardous. There are two cleaner tanks, 400 to 500 gallons each. The parts will go through one or both of these tanks.

Step 2. Three rinse water tanks.

Step 3. Drying Station

In addition, the facility uses a parts washer, which uses solvent supplied and managed by Safety-Kleen, as non-hazardous. They also operate a sand blaster with glass beads, and they explained that they do not paint any parts.

The facility operates the WWT system to comply with the pretreatment requirements in their NPDES permit. Facility personnel explained that they manage one 90-day hazardous accumulation area (HWAA), and the main hazardous waste generated on-site is F006 sludge from the wastewater treatment system, which is managed in cubic yard sacs. They explained that weekly HWAA inspections are conducted by Bridgeport Fittings wastewater treatment operators. The WWT system is located in the steel shed area which is a part of Building A. The facility also manages one satellite accumulation area (SAA) located at the end of the wastewater treatment process to collect dried sludge from the wastewater treatment process. The sludge falls into cubic yard bags that are transported to the HWAA when full. The F006 waste is picked up by ACV/Republic. Additionally, the facility manages an aerosol can puncturing station for aerosol cans such as, WD-40, solvents, and spray paint. The facility manages the punctured cans as metal scrap. The facility also manages universal waste, bulbs, ballasts, batteries and electronic waste.

The facility manages used oil from cleaning machines, and from their processes, which they have a designated area for oily waste storage. Some oily waste streams are placed in the oily waste collection tank, and when removed from the tank, the waste is pumped into 55-gallon drums and managed as non-hazardous. This oily waste collection tank also receives waste from manufacturing processes, including the zinc plating line. Facility personnel explained that they neutralize the oily waste in the tank, approximately every two to three weeks, prior to pumping it into 55-gallon drums and managing it as non-hazardous waste, picked up by Republic Services. Facility personnel explained that they used to send the oily waste as non-hazardous, but they kept having problems with the pH being too high, so they decided to neutralize the waste prior to shipping it out. They began neutralizing the waste approximately 5-6 years ago. The facility manages an oily solids waste stream also, managed as non-hazardous which includes oily rags. The oily rags are mainly generated in the Tool Room and the Maintenance department.

The following is a breakdown of what operations and offices are located in each of the five buildings that make up the Main Plant:

- Building A
  - Die-Cast
  - Threading
  - Burnishing

- Assembly
- Zinc plating Line and Office
- Tumbling
- Reaming
- Wash Line
- Ultra Sonic Cleaning
- Oily Waste Tank
- WWT System
- Universal Waste Storage
- Steel Shed
  - Hazardous Waste Accumulation Area
  - Oily Waste Container Storage
- Building B
  - Automatic Assembly
  - Tool Room
  - Tool Crib
  - Oil Storage, virgin
  - Separator for steel/zinc separation
  - QC Office
- Building C
  - Maintenance
  - Stamping
  - Automatic Assembly
  - Battery Charging Area
  - Aerosol can puncture station.
- Building D
  - Receiving
  - Storage of raw materials
- Building E
  - Assembly and Packing

Facility personnel explained that they were using the contractor, Facilities Support Services FSS for hazardous training and they prepared the contingency plan. They have recently hired a new contractor to conduct the hazardous waste training, GZA GeoEnvironmental. The facility has a general permit for their compressor condensate, a WWT permit, and a stormwater permit.

PPE for the facility tour was discussed and it was determined to include safety glasses, hearing protection, and long sleeves.

The in-brief discussion ended around 2:30 pm, following which the inspection team conducted the walk-through portion of the inspection.

#### **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 from July 31 to August 1, 2023. The following personnel were present for all or part of the tour:

EPA: Cheryl Wilkinson, Life Scientist  
Linda Brolin, Environmental Engineer  
Ryan Maisano, Physical Scientist

Facility: Frank Timmeny, VP of Manufacturing  
Kris DeBisschop, Plating & Maintenance Manager  
Brian Quinn, Manufacturing Manager  
Timothy Miller, Site Leader

#### Building A, Steel Shed: Main Hazardous Waste Accumulation Area

The Steel Shed is located adjacent to Building A. The inspection team observed a no smoking sign, and a hazardous waste storage sign in the area along with a spill kit, phone, contact list, and fire extinguisher. Facility personnel explained that cell phones would be used instead of the landline phone.

There were ten hazardous waste cubic yard sacs stored in the HWAA. The ten sacs were staged on a three-tiered shelving system, with four on the bottom tier, four on the middle tier, and two on the top tier. Each sac was placed on a wooden pallet. The inspection team was unable to read all of the information on the hazardous waste labels, or observe whether the sacs were open or closed, for the sacs on the middle and top tier. The inspection team observed some of the dried sludge on the floor below the shelving system (*See Attachment 1 photos 1-10*).

The following is a description of the information the inspection team observed on the hazardous waste labels on the sacs staged on the shelving system:

##### Bottom Tier

- RQ, NA 3077, hazardous waste, solid, NOS Metal Hydroxide sludge (F006), dated 6/12/2023. The sac was closed.
- RQ, NA 3077, hazardous waste, solid, NOS Metal Hydroxide sludge (F006), dated 6/3/2023. The sac was closed.
- RQ, NA 3077, hazardous waste, solid, NOS Metal Hydroxide sludge (F006), dated 6/20/2023. The sac was open.
- RQ, NA 3077, hazardous waste, solid, NOS Metal Hydroxide sludge (F006), dated 5/27/2023. The sac was closed.

##### Middle Tier

- RQ, NA 3077, hazardous waste, solid, NOS Metal Hydroxide sludge (F006), dated 7/5/2023. Couldn't observed if the sac was closed.
- RQ, NA 3077, hazardous waste, solid, NOS Metal Hydroxide sludge (F006), dated 3/15/2023. The sac was closed.
- Couldn't see the information on the hazardous waste label or if the sac was closed.

- Couldn't see the information on the hazardous waste label or if the sac was closed.

#### Top Tier

- Couldn't see the information on the hazardous waste label or if the sac was closed.
- Couldn't see the information on the hazardous waste label or if the sac was closed.

The inspection team observed containers of used oil in the Steel Shed. The facility stored wood pallets of four 55-gallon drums of used oil per pallet. One pallet was staged near the sacs of hazardous waste. One of the four containers on that pallet was open, and none of them were dated (*See Attachment 1 photos 11-12*). Staged near the rear of the shed, the inspection team observed an additional eleven pallets, each with four 55-gallon drums of used oil. All containers of used oil were labeled, but not dated, (*See Attachment 1 photos 13-14*). Empty drums were also stored in the shed. Additionally, the inspection team observed three hoppers, one was empty, the other two had zinc floor sweepings and sludge located in the shed near the drums of used oil, (*See Attachment 1 photos 15-16*). Facility personnel explained that the zinc floor sweepings were mainly from the die cast area but could be from anywhere in the facility. The inspection team also observed one cardboard tote labeled as oily solids, non-hazardous.

The inspection team then left the area and followed the facility personnel back to the conference room in Building A. The inspection team then left for the day. The inspection team left the facility at approximately 3:45 pm.

### **Start of Day 2, August 1, 2023**

The inspection team arrived at the Facility at approximately 8:30 AM on August 1, 2023. The inspection team was led back to the same conference room as the previous day. The inspection team was joined by Frank Timmeny, Kris DeBisschop, Brian Quinn, and Timothy Miller from the facility. The inspection team began the walk-through in Building A. The following is what the inspectors observed during the walk-through.

#### Building A: Die Cast

The inspection team observed the raw zinc bars/sows. Facility personnel explained they melt about 30,000 pounds of zinc bars a day in die casting. There is one furnace for melting the zinc that can handle around 40,000 pounds. The zinc is gravity-fed on an automatic line into the furnace. The facility recycles 90-99% of the zinc that is not used in the products. The facility operates 26 die cast machines. The inspection team observed two red cans for dirty rags, which are generated when wiping parts. These rags can be contaminated with WD-40, hydraulic oil, spray lubricant, or machine oil and are managed as non-hazardous.

The inspection team continued the inspection in the Tapping/Reaming area. The facility operates fifteen tapping stations, which use the water-soluble lubricant, Hysol in the process. The facility operates six reaming stations.

#### Building A: Burnishing

The inspection continued in the burnishing area. The inspection team observed containers of virgin Radiant MA-818L, which is the soap used in this process, (*See Attachment 1 photos 17-*

18). At the end of the burnishing process, the inspection team observed two 10-gallon buckets collecting waste soap/water, which is sent to the WWT system.

The inspection team observed a vacuum in the burnishing area, which facility personnel explained is used to clean the floors, (*See Attachment 1 photo 26*). Facility personnel explained that there are approximately five to six vacuums throughout the facility, which all get emptied into the oily waste tank.

#### Building A: Cleaning/Wash line

The inspection team then observed the wash line (*See Attachment 1 photos 19-25*). The wash line is done in three steps. Step 1 uses two 500-gallon tanks with a solution of 10% Alclene RA85N-L, a US Chemical degreaser. Step 2 is a three-tank water rinse, which includes the use of Radiant MA 818-L. Step 3 is a drying station. Republic Services does cleanouts of the Alclene tanks every six months. The tanks and the sludge are managed as non-hazardous.

#### Building A: Ultra Sonic Cleaning

The inspection team observed the ultra-sonic cleaning tank, which uses a caustic solution with water and the water-based rust inhibitor DURL-HIB III. The ultrasonic tank is approximately 150-gallons and is pumped to the oily water tank where it is neutralized.

#### Building A: Automatic Plating Line

The inspection team observed the plating line, which is automatic and consists of a series of tanks. The caustic soak tanks use sodium hydroxide and potassium hydroxide. The acid activation tank uses hydrochloric acid. The zinc plating tank uses zinc chloride, and Zetaplus Merit Maintenance ammonium bisulfite 2-chlorobenzaldehyde. The plating line also uses Luster-On-Tri Blue 800 Plus in the trivalent chrome tank. Mr. Timmeny explained that he was unsure why the trivalent chrome tank, when spent is sent to the WWT system, but it was permitted per their pretreatment permit and has been happening for a long time. The rinse water tanks, when spent go to the WWT system. The caustic tanks, when spent go to the oily waste tank, where it is neutralized and eventually sent out as non-hazardous.

#### Building A: Wastewater Treatment System

The inspection team continued the inspection at the WWT system. Wastewater gets pumped from a collection pit located behind the plating line in Building A. The pit is approximately 2,500 gallons. The pit adjusts the pH from 4.5-5 to 8-10 using sodium hydroxide. A cationic polymer is also added to start the sedimentation process. This separates the sludge from the liquid in the 1,000-gallon clarifier tank (*See Attachment 1 photos 29-30*). Once the sludge separates from the liquid waste, it is pumped from the tank to the filter press (*See Attachment 1 photo 31*). Liquid that is removed from the filter press goes back to the pit and the sludge from the press goes to a sludge dryer for further liquid removal. At the end of the process, there is a tote collecting the F006 sludge, the inspection team observed that the tote was open as the system was actively adding waste at the time. The tote was labeled with a hazardous waste label, which was dated 07-29-23, (*See Attachment 1 photo 32-33*). The inspection team observed a spill kit, a fire extinguisher, and a water hose nearby. The inspection team observed that the floor was concrete and was not sealed at the edge of the wall, but that the tote had secondary containment, (*See Attachment 1 photo 34*). A water hose is near the treatment area along with a fire

extinguisher. During the in-brief, facility personnel explained they manage this area as an SAA, inspector Wilkinson explained the tote is greater than 55-gallons and explained that with the tote being dated and observing the area, it is consistent with the requirements for a HWAA. The inspection team did not observe a HWAA sign at the area.

#### Building A: Oily Waste Tank

The inspection team observed the oily waste tank, which had the words, “EVAPORATOR HOLDING TANK TANK 2” posted on the tank, (*See Attachment 1 photos 35*). The inspection team questioned the signage on the tank, and facility personnel explained they no longer do evaporation in this tank, and this is the oily waste tank. Facility personnel explained that the waste streams that enter this tank are the caustic soak tanks from the zinc plating line, vacuum waste, and the ultrasonic cleaner waste. The facility explained they neutralize the waste in this tank using HCl and a pH meter manually, and once neutralized the waste is pumped from the tank into 55-gallon containers and managed as non-hazardous. Facility personnel explained that any sludge that accumulates in the tank is removed by Republic services and managed as non-hazardous. The inspection team requested the waste profile for the sludge waste.

The inspection team observed a 5-gallon bucket, labeled with a used oil label, the bucket was open and approximately ¼ full of liquid collected from the drainage of the pump lines that feed waste to/from the oily waste tank (*See Attachment 1 photos 36-37*).

#### Building A: Universal Waste, B Dock

Universal waste was located in Building A. The inspection team observed a universal waste sign and a fire extinguisher in the area. The following is a description of the universal waste inspectors observed in the area, (*See Attachment 1 photo 38*):

- One 55-gallon container, used batteries, dated 2/1/2023. The container was closed.
- One 55-gallon container, used ballasts, dated 2/1/2023. The container was closed.
- One 55-gallon cardboard container, used lamps, dated 2/1/2023. The container was closed.
- One cubic yard box, labeled used electronics, 7/31/2023, the container was empty.

#### Building B: Automatic Assembly

The inspection team continued the inspection in Building B and observed the oil cage, which is where virgin oil is stored. The inspection continued at the Automatic Assembly area where facility personnel explained the only waste generated in this area are zinc chips.

#### Building B: Tool Crib

The inspection continued in the tool crib where parts, tools, and pumps are stored. The inspection team observed a flammable cabinet with aerosol products. Facility personnel explained the waste stream in this area is rags contaminated with denatured alcohol generated from wiping the molds, which are collected in red containers. A storage area is located in a mezzanine level in the Tool Crib, which is used for storage of paper goods.

#### Building B: Tool Room

The inspection continued in the Tool Room, which is where steel cutting machines are located. These cutting machines use a brass wire and water to cut parts out of the metal. The brass shavings get collected in a bin and are sent for recycling. Additionally, a sinker Mitsubishi EA12E machine is located in this area. This machine burns shapes into the metal. The sinker machine uses EDM, dielectric fluid as a coolant and copper for burning. This machine uses filters to recycle the fluid, spent filters are managed in the oily solids waste stream (*See Attachment 1 photo 39*). The inspection team also observed computerized numerical control, CNC lines which cut metal and use Hysol oil. Additionally, this area houses three milling machines. Facility personnel explained that they make their own tools and parts to use. The area had red waste cans for dirty rags, which are managed as non-hazardous waste.

#### Building B: Grinding Room

The inspection continued in the Grinding Room with grinders that use Hysol oil, and generate a sludge, which is collected in a bin near the machines and managed as non-hazardous (*See Attachment 1 photo 40*). This is the sludge that the inspection team observed in the hoppers in the Steel Shed, near the HWAA. The grinding room is equipped with a MicroAir Twister filtration system for the grinders and is managed and cleaned out once a year by Aquest Corp. The inspection team observed another Safety Kleen parts washer located in the Grinding Room.

#### Building C: Maintenance

The inspection continued in the Maintenance area, where there was a Safety Kleen Parts washer. The inspection team also observed the aerosol can puncture station, which was equipped with a carbon filter canister (*See Attachment 1 photo 41-42*). The inspection team observed a 55-gallon container labeled with a hazardous waste label with the words, aerosol can waste, RCRA D001 WD 40, LPS contact cleaner, LPS grease, spray paint. Facility personnel explained the punctured cans are sent out as scrap metal. The manufacturer's label on the carbon filter attached to the puncturing station stated to replace the filter every three months. The inspection team asked when the filter was last replaced. Mr. DeBisschop explained he was unsure when the carbon filter canister was last replaced, but it had been longer than three months. Mr. DeBisschop stated he will put in an order to have regular maintenance done on the equipment and they will replace the filter.

#### Building C: Stamping Area

The inspection continued in the Stamping area, where the facility uses machines to stamp parts out of steel. The stamping process uses the water-soluble coolant, Hysol and the excess metal is sent for scrap metal recycling to PC Metals.

#### Building D: Material Storage

The inspection continued in the Material Storage area, where scrap cardboard, and wood pallets are stored. Additionally, receiving of material occurs here. Facility personnel explained that no hazardous waste is generated in this area.

#### Building E: Hand Assembly, Finished Work, and Packing

The inspection continued in Building E, which is where hand assembly occurs and finished products are packed and shipped. The facility operates an automated machine for the taping and labeling of the finished product. Finished products are transferred across the street to the

warehouse building. Facility personnel explained that there is no hazardous waste is generated in this area.

#### Building A: Plating Office

The Plating office is used as a QC lab. There are five titrators in the QC lab with room for a sixth. Facility personnel explained that the sink is plumbed to the WWT system via a sump. The chemicals used in the QC lab are sodium hydroxide and sodium thiosulfate. The inspection team completed the walk-through part of the inspection at the Plating office.

### **V. RECORDS REVIEW**

The inspection team conducted a records review on-site following the walk-through portion of the inspection.

#### Manifests/LDRs/BOL

The inspection team reviewed hazardous waste manifests and land disposal restriction notices from shipments made by Bridgeport Fittings during years 2022 and 2023. Bills of lading were reviewed for the same time period for universal waste and used oil.

#### Observations:

- Manifest 024086169 Metal Hydroxide Sludge, F006, 11/2/2022, Copy not signed and dated by generator.
- Manifest 024086097 Metal Hydroxide Sludge, F006, 4/11/2022, Copy not signed and dated by generator.
- BOL reviewed for Oily Waste in Oily Waste Tank, which is sent out as state regulated waste under the code CR02.

#### Inspection Logs

The inspection team reviewed inspection logs for years 2022-2023. The HWAA and SAA are both done weekly with no weeks missed during the period reviewed. There were no corrective actions noted. The two operators who performed the inspections were Luis Cruz and Kris DeBisschop.

#### Training/Job Descriptions

The inspection team reviewed Bridgeport Fittings' training certificates and training logs. The last RCRA trainings were conducted on 8/30/2021, and 09/02/2021. Mr. DeBisschop explained that the previous contractor was hired to conduct the training and hasn't provided it since 2021. They explained that the new contractor they hired is scheduled to provide RCRA training in the upcoming two to three weeks. Facility personnel explained that five employees at the facility require hazardous waste training.

Some employees received DOT training in 2023.

HAZCOM training was conducted during fire drills. The last fire drill/HAZCOM training was done on June 30, 2023.

The training plan was reviewed by the inspection team.

### Contingency Plan

The inspection team reviewed Bridgeport Fittings' contingency plan. The contingency plan was updated by the facility in 2022, at that time, the contact information was updated. Proof that the updated plan was distributed to local emergency response officials was not provided by the facility. The facility explained that their previous consultant was responsible for sending it out, and that the facility doesn't have any proof at the time of the inspection but were requesting it from their previous consultant.

### Permits

The inspection team reviewed Bridgeport Fittings' operation and maintenance manual for the WWT system that was provided to CT DEEP in the last pretreatment permit application. The operation and maintenance manual was last updated in 2017 when the facility applied for the permit renewal. Bridgeport Fittings has not received a response from CT DEEP about the permit application. The operation and maintenance manual mentioned that there was a presence of hexavalent chrome. The inspection team questioned where hexavalent chrome is used at the facility and the facility personnel explained they don't use it, but it has somehow showed up in their WWT system, and that the facility was required to add a zinc filter to the backwash system to remove any hexavalent chromium.

### SDS/Hazardous Waste Determinations/Waste Profiles

The inspection team reviewed the following SDS's, hazardous waste determinations and waste profiles for the following items:

#### SDS

- Rustlick EDM-250, used in the Tool Room, flash point >199.4°F.
- PRELIQ, used as plating line soak cleaner, pH 12-14, goes to oily waste tank.
- Alclene RA95N-L, managed by Republic as non-hazardous.
- DURL-Strip 606, ultrasonic cleaner solution, pH 12.5, goes to oily waste tank.

#### Waste Profiles

- Oily water tank, completed by Tradebe, based on analysis.
- Zinc Chips with Cutting Oils, completed by generator knowledge, non-hazardous.

#### HW Determinations

- Metal hydroxide sludge, determination of hazardous F006.
- Aerosol Can Waste, determination of hazardous D001.
- Tool Room Blast Media, determination of non-hazardous.
- Tool Room Grinding Dust, determination of non-hazardous.

- Safety Kleen Premium Solvent, determination of non-hazardous.
- Universal Waste Bulbs and Ballasts.
- Used Oil-Total Halogens tested.
- Used Oil Solids.

## VI. INSPECTION OUTBRIEF

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

EPA:	Cheryl Wilkinson, Life Scientist Linda Brolin, Environmental Engineer Ryan Maisano, Physical Scientist
Facility:	Frank Timmeny, VP of Manufacturing Kris DeBisschop, Plating & Maintenance Manager Timothy Miller, Site Leader James Wiedow, EH&S Manager for NSI Corporate

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

1. Cubic yard tote of hazardous waste F006 sludge in the HWAA, dated 6/20/2023 and was open at the time of the inspection.
2. Cubic yard tote of hazardous waste F006 was dated 3/15/2023, which was greater than 90-day for storage.
3. The inspection team could not inspect the cubic yard totes on the upper shelves in the HWAA. It is unknown if they were labeled properly or closed at the time of the inspection.
4. The secondary containment area under the HWAA had some material in it.
5. The filter press at the WWT system did not have a hazardous waste storage area sign.
6. No proof that the contingency plan was distributed to local emergency response officials was provided.
7. The carbon air filter on the aerosol can puncturing station has not been changed in the required timeframe stated on the manufactures label side of the filter which states to change it every 3 months.
8. No RCRA training was completed since 2021.

After discussing the above areas of concern, the inspection team explained the next steps in the inspection process, including that the facility should receive an inspection report within 60 days of the inspection and after that, the inspection team will discuss with management if any violations were found. The inspection team explained the broad spectrum of all possible post-inspection follow-ups, based on if any and what violations are found, including both informal and formal notices.

Following this discussion, the inspection team left the premises, concluding the inspection.