

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
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RCRA Enforcement Section
61 Forsyth Street, SW
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2) Facility Information

Kason Industries Inc
57 Amlajack Blvd
Newnan, Georgia 30265

EPA ID#: GAD097395693
NAICS #: 332510 – Hardware Manufacturing

3) Responsible Officials

Sean Leroux
Director of Manufacturing
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4) Inspection Participants

Sean Leroux, Kason Industries
Kevin Rowland, Kason Industries

Summer Smith, GAEPD
George McBroom, USEPA, Region 4
Kayla Acosta, USEPA, Region 4

5) Date of Inspection

December 17, 2024

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).

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.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.02(1) [40 C.F.R. § 260.10], a large quantity generator of hazardous waste (LQG) is a generator who generates greater than or equal to 1,000 kilograms (2,200 pounds) of non-acute hazardous waste in a calendar month.

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 any point of generation where wastes initially accumulate, which is under the control of the operator of the process generating the waste, without a permit or without having interim status, as required by Section 12-8-66 of the GHWMA, Ga. Code Ann. § 12-8-66 [Section 3005 of RCRA, 42 U.S.C. § 6925], and without complying with Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.16(b) or § 262.17(a)], except as required in Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.15(a)(7) and (8)], provided that the generator complies with the satellite accumulation area conditions listed in Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.15] (hereinafter referred to as the “SAA Permit Exemption”).

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.17], an LQG may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status, as required by Section 12-8-66 of the GHWMA, Ga. Code Ann. § 12-8-66 [Section 3005 of RCRA, 42 U.S.C. § 6925], provided that the generator complies with the conditions listed in Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.17] (hereinafter referred to as the “LQG Permit Exemption”).

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.18 [40 C.F.R. § 273.9], a small quantity handler of universal waste (SQHUW) is a universal waste handler who does not accumulate 5,000 kilograms or more of universal waste (batteries, pesticides, mercury-containing equipment, lamps, or aerosol cans, calculated collectively) at any time.

7) Purpose of Inspection

The purpose of this inspection was for the U.S. Environmental Protection Agency, Region 4, and the Georgia Department of Natural Resources, Environmental Protection Division, to conduct an unannounced compliance evaluation inspection (CEI) to determine Kason Industries Inc. (hereinafter, “KII” or “the facility”) compliance with the applicable requirements of RCRA and the corresponding Georgia Department of Natural Resources, Environmental Protection Division (GAEPD), regulations. This was an EPA lead inspection.

8) Facility Description

Kason Industries Inc. is a wholly owned and independent corporation which manufactures commercial hardware (e.g. hinges, handles, outlets, latches, etc.) for industrial refrigeration, truck body, and commercial kitchen uses in Coweta County, Newnan, Georgia. KII has been in business for over 100 years, starting as a five and dime store in New York, and eventually moving to their current status as a hardware manufacturer. They have been at their current location since 1979. KII is a vertically integrated company and is in control of each step, from engineering, casting, polishing, plating, and distribution of their products worldwide and are the

largest commercial hardware supplier in the U.S. and one of the leading manufacturers of commercial service hardware in the world.

KII is located on approximately 30 acres in an approximately 340,000 sq ft facility. The facility has an open lot, but access is controlled by carded access throughout the facility. Approximately 220,000 sq ft is relegated to the manufacturing process, and 120,000 sq ft relegated to the warehousing space for both raw materials and finished product. KII maintains roughly 300 employees. A small portion is dedicated to front office and Research and Development (R&D). The facility operates Monday – Friday, the employees with waste generation responsibilities only work between 5:00 am and 3:00 pm. The rest of the facility operates on a 4-day/10-hours shift with Friday overtime. The facility receives water and sewer service from Coweta County Water and Sewer.

KII last notified and submitted its Biennial Report on June 25, 2024. Where it notified as a Large Quantity Generator (LQG) generating waste codes D002 (Corrosive), D007 (Chromium), F006 (Electroplating Sludges), and F008 (Electroplate bath residues containing cyanide). They did not identify as a large quantity handler of universal waste. Their current designated facility for disposal is Chemical Waste Management, but they have also used U.S. Ecology Sulligent Inc. As stated previously, KII has a Coweta County Water and Sewer Wastewater treatment permit, number CCW&SA-IP-04, which expires December 31, 2024. KII is currently in the process of completing the application for renewal.

As stated, the company is vertically integrated and produces their products from start to finish. The only portion KII does not produce is the raw materials for the manufacturing process. The product development process starts with either raw zinc alloy bars or rolls of sheet metal. If the parts are cast, which is the case for many of their parts (e.g. hinges, latches, handles), they begin with the melting of zinc alloy bars and casting in the casting room, from molds created in house. A small amount of zinc alloy slag is created during the process which is placed into a hopper to be recycled into new bars for production. The cast items are then moved to either the milling room and then the polishing room or directly to the polishing room. Here the parts are placed inside robotic polishing units where robotic arms manipulate the parts against polishing wheels to remove surface imperfections and provide an initial polished surface. The dust from the polishing process is withdrawn through a sealed ventilation system to a filtration unit outside which removes the zinc dust from the air and drops it into a hopper. This non-hazardous material is then placed in with the zinc slag in the casting room to be recycled.

For parts not being cast, such as light boxes and switch boxes, the facility runs a stamping area which uses various stamping machines and dies to stamp parts out of rolled sheet metal. The facility has a tool and die room for the creation and refurbishing of their own dies. The stamping process produces non-hazardous waste metal scrap. The dies are coated with a non-hazardous lubricant/oil to keep the parts from sticking to the die. After the stamping process, the parts are run through a rinsing unit which uses a non-hazardous wash bath to remove the lubricant/oil from the parts. Some parts are left coated as a protectant layer after their stamping process.

For parts being plated, the process starts by being placed onto part holders within the plating room. The plating system is a single conveyor line which uses a series of tanks and baths to wash the parts and plate them. The first ten baths are acid and rinse baths to remove various residues and dirt from the previous manufacturing steps. After this step, the parts are dipped and carried through a single bath which is the “copper strike” bath. This process applies a thin binding coat of copper to the parts. After this step the parts are dipped into a “copper plate” bath which uses copper cyanide to apply a plate of copper to the parts. The parts are then moved through a series of acid and rinse baths to remove copper cyanide material. The parts are then dipped into the nickel bath to apply a coat of nickel. After the nickel plating, they are placed into a “nickel drag out” bath, the bath material of which is recirculated back into the nickel bath periodically. The part then continues through another series of acid and water rinse baths to remove the residual copper plating material. The parts are then passed into the chrome plating bath which uses a hexavalent chromium material to plate the parts. To control the off gassing of hexavalent chromium into the atmosphere, a PFAS material was used to apply a thin mist layer over the surface of the chrome plating bath to prevent the chrome from off gassing. The company has since moved to a non-PFAS wet mist blanket material. Lastly, the parts go through a series of acid and water baths to remove the residual chrome material. All rinse baths are pumped out to the Wastewater Treatment Unit (WWTU) on a weekly basis for treatment and discharge of water to the publicly owned treatment works (POTW). The facility has a current Coweta County Industrial Use Wastewater Permit.

The WWTU is managed by a single member of the staff, Amanda Avery. She is also one of the primary staff members for the documentation of hazardous waste activities throughout the facility. It is composed of three (3) 1,500-gallon cyanide destruction tanks and one (1) 1,500-gallon chromium conversion tank, one (1) 3,500-gallon clarifier tank, a 2,500-gallon filter settling tank, and the wastewater holding / filtration tank. The wastewater process involves a series of steps prior to the passing of wastewater to the POTW. The initial step involves, what the facility calls, cyanide destruction and chromium reduction (reducing hexavalent to trivalent). After this step, wastewater enters the equalization tank and clarifier to allow metals to settle out. The wastewater is then pumped over to the filter settling tank where the sludges are piped to the filter press to dewater and be discarded as a filter cake, F006, and is placed in super sacks. The wastewater is pH adjusted and then passed to the disposal tank outside, which is tested prior to passing water to the POTW. If the water does not meet parameters, then it is recirculated back through the filter tank.

9) Previous Inspection History

On March 10, 2015, GAEPD conducted the most recent RCRA CEI at the subject facility and found no apparent violations of RCRA’s requirements. As a result, no further actions were required by GAEPD.

10) Opening Conference

On December 17, 2024, EPA inspectors George McBroom and Kayla Acosta, accompanied by GAEPD inspector Summer Smith, arrived at KII at approximately 8:35 AM. Sean Leroux, Director of Manufacturing, immediately received the inspectors. The inspectors introduced themselves and showed their credentials to Sean Leroux. Sean Leroux and the inspectors were joined by Kevin Rowland, VP of Operations, for the opening conference. The purpose of the visit was explained to Sean Leroux and Kevin Rowland.

The inspectors described the anticipated use of equipment digital camera and iPad 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. The company did not identify as a small business. 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.

Sean Leroux 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 Sean Leroux and Kevin Rowland led the inspectors on a tour of the Facility operations.

11) Inspection Observations

Section 5 – Warehouse – Primary Central Accumulation Area

Section 5 – Warehouse is used as the primary location for storage of manufacturing materials and finished products. Housed at the back of this warehouse is the primary central accumulation area (CAA). Inspectors observed that the area is fenced off along its open sides by a chain link fence standing approximately 6 feet in height with a rolling access gate. The area was posted with warning signs saying "Danger – Hazardous Storage Area" as well as "No Smoking" (Photograph - 1).

Inside the storage area inspectors observed a total of seven (7) "super sacks" labeled as "Hazardous Waste", Hazardous Waste Solid, with waste codes F006 (electroplate filter cake waste) and D007 (Chromium) with an accumulation date of less than 90-days. All sacks were stored on pallets and appeared in good condition with no observable leaks of material. Sacks were stored in a manner that allowed for access to all sides. The facility had placed DOT Class 9 labels on the sacks. There were no other words or indicators of the hazard associated with the hazardous waste. Sean Leroux and Kevin Rowland were notified of the fact that the Class 9 DOT label does not effectively describe the characteristic hazard associated with the hazardous waste and were informed that the super sacks needed to have the word or labeling indicating "TOXIC". This was completed prior to inspector departure from the facility (Photographs 2, 3, 4, 6 – 9, and 26 – 28).

Inspectors also observed two (2) 55-gallon steel drums located on a pallet and shrink wrapped. The containers were labeled “Hazardous Waste” and had the waste code F008 (electroplate residues containing cyanide) These containers had an accumulation date of less than 90-days. The containers were also marked with a “TOXIC” DOT placard, indicating a hazard for F008 waste. The containers were not marked with an indication of “Reactive” hazard, which is a hazard associated with F008 per regulations.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.17(a)(5)(i)(B)], which is a condition of the LQG Permit Exemption, a generator is required to mark or label all containers of hazardous waste with an indication of the hazards associated with the contents.

Inspectors also observed a 55-gallon steel drum satellite accumulation area (SAA) with an aerosol can puncturing device on top. The device and drum were closed and in good condition. The drum was labeled “Hazardous Waste”, D001, and had an indication of the hazard “Flammable” placard. There was no observed empty can collection container or area.

Also observed in this area was a single box of waste batteries labeled as “Universal Waste Batteries” with an accumulation date of March 8, 2024. The box was in good condition and was closed and taped shut (Photograph 11).

Inspectors observed that there was adequate fire protection for the area provided by appropriate portable fire extinguishers and sprinklers, a “No Smoking” sign, an eye wash station, and a large, closed utility box which contained spill response equipment. Inspectors asked how notification or communication was made in the event of emergency, and Sean Leroux told inspectors there was a Public Address / Intercom system just across the room that could address the entire facility to notify of an emergency. Inspectors were also told personnel would use personal cell phones for emergency communications.

Just outside the fenced CAA, inspectors observed an area for holding non-hazardous waste. In this area were a large cardboard box on a pallet labeled “Universal Waste E-Waste” and contained old computers, the box was in good condition and closed, with an accumulation date of July 7, 2024. This waste is not regulated as a universal waste. Also observed was a 4-foot box labeled “Universal Waste Bulbs” and not “Universal Waste – Lamps”, which was in good condition and sealed with an accumulation date of November 1, 2024 (Photographs 15 – 17).

Section 4 – Stamping/Pressing and Tool/Die Rooms

Facility personnel led inspectors to the stamping/pressing room in Section 4 which is for the creation of parts from sheet metal material. The area contains a mixture of automated and human operated stamping and pressing equipment. Inspectors observe two (2) automated part stamping lines designated M-1 and M-2. Each of these lines stamped parts, then fed them to a conveyor which carried the parts to a parts washer bath. The parts then exited the bath and were deposited into a box by an outgoing conveyor. Inspectors asked about the parts washing baths and they were informed that the parts washer material is a non-hazardous soap material

which is used to rinse of the lubricant oil residue from each part. The facility had made a waste determination and profile of the bath solution.

Sean Leroux and Kevin Rowland then lead the inspectors to the Tool and Die room. This area contained several work benches and work areas for the creation and maintenance of various tooling and dies associated for use with the stamping and pressing machines. Inspectors observed an open 5-gallon plastic bucket of aerosol cans sitting against a wall. When asked if the cans were waste, facility personnel confirmed that they were in fact universal waste aerosols from the tool and die shop. Inspectors were told that the shop accumulated the cans in the bucket until there were enough to take over and puncture in the CAA. Sean Leroux was informed that the container needed to be labeled as “Universal Waste Aerosols” and they must track accumulation time accordingly. This issue was corrected prior to departure from the facility.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.18 [40 C.F.R. § 273.14(f)], a SQHUW is required to mark or label each aerosol can or a container holding the cans with the words “Universal Waste – Aerosol Can(s)”, “Waste Aerosol Can(s)”, or “Used Aerosol Can(s)”.

Section 3 – Warehouse and CNC/Machining Rooms

Facility personnel led inspectors through the warehouse in Section 3, which is more warehouse space for additional raw material and finished products. There are no waste generation activities within this space.

Inspectors were led from the warehouse into the CNC/Machining shop where there were several automated CNC machines and several pieces of manually operated machining equipment. Facility personnel were asked about the CNC machines and any waste output due to cutting fluids. Sean Leroux indicated that the fluid coming from the machines is mostly water containing a small amount of non-hazardous cutting oil.

Section 2 – Diecasting and Polishing Rooms

Facility personnel led inspectors through the diecasting room in Section 2. The diecasting room contains the furnace and crucible equipment for the melting of the zinc alloy, as well as the means to pour the melted material into the dies for casting parts. The process uses a cooling water system which does not come in contact with any hazardous waste. In this area, inspectors noted a large wire reinforced bin which was used to place the slag from the zinc melting process. Facility personnel informed inspectors that this material is recycled back into the melting and casting process. There were no observed hazardous waste generation activities in this area.

Inspectors were then led into the polishing room which is where the cast parts are taken to be polished prior to plating, to remove surface imperfections. There were several automated, contained polishing booths which utilized robotic arms to manipulate the pieces to polish all surfaces. These booths create a polishing dust of the polishing compound and zinc which are

fed through a ventilation duct from each machine to a central duct. This duct feeds into a wet filtration machine which removes the zinc dust prior to the air being sent back out to the environment. The filtrate is then moved by conveyor to hopper bin outside. The material from this process is allowed to dry and is then placed with the slag back into the casting process. There were no observed hazardous waste generation activities in this area.

Section 1 – Plating, Boiler Room, Lab, and Wastewater Treatment Unit

Sean Leroux and Kevin Rowland led inspectors into the plating line area in Section 1. Here parts are placed onto hanging racks which are mounted onto an overhead conveyor system. The plating line consists of a series of tanks for various washes and plating solutions, copper, nickel, and chrome. The rinse / acid baths are emptied to the WWTU on a weekly basis and result in the F006 filter cakes. Inspectors were walked around the process from start to finish.

Inspectors were taken to the boiler room which maintains the hot water for process baths and facility process use. In this area, inspectors observed a 55-gallon steel drum labeled as “Used Oil”. The container was closed and in good condition, with no observable signs of leakage (Photograph 18).

Inspectors were taken to the lab where the group met up with Amanda Avery, Waste Stream Operations and Shondrika Dixon, Plating Coordinator. Amanda and Shondrika explained that the lab was split into two (2) sections. One side was reserved for the testing of WWTU effluent to determine if the wastewater met the required wastewater permit standards for discharge to the POTW. The other side was reserved for the testing of plating bath solutions to ensure that their chemistry was appropriate for the process. The only analyzing equipment was an Inductively Coupled Plasma (ICP) Spectroscopy machine which is used to analyze the WWTU effluent. The sampling discharge was a small 5-gallon plastic jug which was not labeled or closed. Amanda Avery explained that the process reagent in the jug is determined as non-hazardous waste. It is periodically emptied into the sink within the lab. The lab sink drains to the WWTU system, not directly to the outside POTW. Inspectors asked about the process for wastewater treatment. Amanda Avery explained that the bath water is first piped to separate tanks based on their contamination (Cyanide or Hexavalent Chromium). The cyanide goes through a cyanide destruction process, while the Chromium goes through a reduction process to reduce from Hexavalent to Trivalent Chromium. The fluids are then passed together into an equalization tank. The waste stream is then passed into a clarifier tank where the pH is adjusted and the metals/solids are allowed to drop out. Then this sludge is piped to a filter bag system where the liquid is permitted to drain out. The pH adjusted water is piped into the discharge tank outside. This is where the wastewater is tested, if it passes, then it is released to the POTW. If it does not pass, it is passed back through the clarifier and filter. The filters from this process are added to the F006 waste.

Amanda Avery showed the inspectors to the three (3) SAAs for different waste streams from the plating baths. The plating baths are never emptied, but the sludge is removed and placed in the SAAs until they are full, then are removed to the CAA in Section 5 of the facility. Inspectors

observed three separate SAAs in this area two of the SAAs were marked with the following signs “CN Sludge” and “CN Filter Bags”. The third was placed next to a portion of the plating line. All SAAs contained 55-gallon metal drums which were closed and in good condition. All were labeled with the words “Hazardous Waste”. The “CN Sludge” SAA container had waste codes F008 (Copper Plating bath sludge containing cyanide) and D003 (Reactive Waste), and the DOT designation Waste Cyanide Solution UN1935. The drum was placarded with a hazard indicator for “Toxic”, there was no indicator for “Reactive” (Photographs 19 – 21). The “CN Filter Bags” SAA container had waste code F008 (Copper Plating bath sludge containing cyanide), and the DOT designation Waste Toxic Solids UN2811. The container had a hazard indication of “Toxic”. There was no indication of “Reactive” hazard (Photographs 22 – 24). The third SAA was labeled “Hazardous Waste”, with the waste code F008 (Copper Plating bath sludge containing cyanide), Carbonate Sludge, and the DOT designation Waste Toxic Liquids UN3287. The container had a placarded hazard indication of “Toxic”. There was no indication of “Reactive” hazard (Photograph 25).

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

Facility personnel, including Amanda Avery then escorted the inspectors the WWTU room. Here she showed the various tanks outlined in the wastewater treatment process described above. The filter unit consists of a pipeline at the bottom of a conical clarifier tank which feeds the sludge to a hopper to which is attached a filter bag. Below the filter bag is positioned an open 55-gallon poly drum for collecting the water which is draining from the sludge. A hose and sump pump are used to pump this water back to the tank. This is considered part of the wastewater treatment process. Once drained, the filter bag and solids are placed into a poly super sack. There was a super sack placed in an additional CAA in this room. The super sack was labeled “Hazardous Waste”, had waste code F006, the DOT designation Hazardous Waste Solid NA3077, and an accumulation date of December 16, 2024. There were placards indicating both DOT Class 9 and a “Toxic” hazard. The super sack was closed and in good condition, placed on a pallet, and had no observable signs of leakage.

12) Records Review

The records review began at 12:41 pm and included both Sean Leroux and Kevin Rowland.

Biennial Reporting

Facility personnel were able to provide a copy of their Biennial Report. The report was last submitted on June 25, 2024. The Biennial Report does not include the waste code D001 for the puncturing of the aerosol cans at the facility. The facility was told that they should provide an updated Biennial Report to GAEPD to update this information.

During a review of the manifests after the completion of the in-person inspection, inspectors noted that between the previous Biennial Report on May 9, 2022, and the current report,

several manifests were found with non-reported waste codes. Waste code D006 (Cadmium) was found on manifest # 007382209GBF from March 8, 2024. Waste code D039 (Tetrachloroethylene) was found on manifest #s 008534176SKS and 008534480SKS from November 1, 2022, and January 27, 2023, respectively. The current Biennial Report did not contain these waste codes.

In an email from January 9, 2025, Sean Leroux explained that the D006 waste code is believed to be erroneous as the paper manifest does not contain the D006 code, but instead has an F006 code. He believes this may be due to a mistype on the TSDF side of eManifest and will address it with the TSDF. The D039 waste was for, the typically, non-hazardous tool cleaning solution. However, on the occasions noted, the tools had first been cleaned with an aerosol cleaner that caused the non-hazardous tool cleaner waste to become a hazardous waste. Sean Leroux informed the EPA that he was able to provide an updated notification with the missing waste codes. EPA inspector George McBroom was able to access the notification in RCRAInfo and noted that all necessary missing waste codes were provided.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.41(a)] a generator who is a large quantity generator for at least one month of an odd-numbered year (reporting year) who ships any hazardous waste off-site to a treatment, storage or disposal facility within the United States must complete and submit EPA Form 8700-13 A/B to the Regional Administrator by March 1 of the following even-numbered year and must cover generator activities during the previous year.

Contingency Plan and Quick Reference Guide (QRG):

The actions that facility personnel should take in response to an emergency are described in the facility's Contingency Plan, which reviewed on January 10, 2024. The plan included all sections and information required by 40 C.F.R. § 262.261. The contingency plan and the quick reference guide were last filed with the Coweta County Emergency Management Agency on January 4, 2023.

The Quick Reference guide included all sections required by the 40 C.F.R. § 262.262(b). Inspectors observed that on the included map of the facility, that while the locations of stored hazardous waste were identified, the routes necessary to reach those locations were not identified. The facility corrected the facility map, with clearly indicated routes, prior to the departure of the inspectors. On December 30, 2024, the facility provided a letter from Coweta County Emergency Management dated December 30, 2024, acknowledging the receipt of the updated quick reference guide on December 18, 2024.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.17(a)(6)], which incorporates [40 C.F.R. § 262.262(b)(4)], and is a condition of the LQG permit exemption, an LQG is required to include in its Quick Reference Guide, a map of the facility identifying the locations where hazardous waste are generated, accumulated, and treated and the routes for accessing those wastes.

Training Records:

The inspectors reviewed facility job descriptions and training records for Amanda Avery, Wastewater Operator, Shondrika Dixon, Plating Coordinator, and Juan F. Rodriguez, Plating Operator, these are the only individuals that physically handle hazardous waste within the facility or perform hazardous waste duties, other than record keeping. Each description included the requisite skill, education, or other qualifications, and duties of facility personnel assigned to that position.

KII provided a written description of the type and amount of both introductory and continuing training to be given to each person filling the positions listed above. The inspectors reviewed records of employee hazardous waste training completed in 2022, 2023, and 2024. All records appeared to be adequate.

Waste Manifest and Land Disposal Restriction (LDR) Records:

The inspectors reviewed available hazardous waste manifest records and land disposal restriction forms for shipments of hazardous waste for 2022 – the date of inspection in 2024. Hazardous waste manifest records show that D002, D007, F006, and F008 waste codes, are routinely shipped to TM Deer Park Services (TXD000719518), US Ecology Sulligent, Inc. (ALD983177015), and Chemical Waste Management, Inc. (ALD000622464), and the most recent shipment was made on October 30, 2024.

LDRs for all observed waste codes were available for review and no concerns were observed.

Weekly Inspection Records:

The inspectors reviewed KII's available records of inspections of the hazardous waste central accumulation areas (CAAs) from December 14, 2021 – December 12, 2024. The inspection sheets included name, date, condition of containers, if containers are closed, if there are signs of corrosion, if they are labeled, if they are dated and marked with indications of the hazards, and comment section. Employees do routinely record inspection observations on the inspection log. No inspection records were provided for the week(s) of December 18, 2023 – January 5, 2024. The facility closes down operations for the two weeks of Christmas and New Years. The facility ships the waste off-site prior to the holiday break in operations.

Waste Profiles

Waste Profiles for the F008 waste streams were examined and concerns were observed at the time of inspection, particularly the labeling of some waste as F008 only and others as F008 and D003. A waste profile for the non-hazardous waste drums located in the Section 5 CAA examined and no concerns were observed.

Waste profiles for all F008 waste streams were requested in an email to Sean Leroux on December 31, 2024. Sean Leroux provided the waste profiles for all F008 waste to the EPA on

January 9, 2025. All waste streams were examined and concerns about labeling of the waste streams were clarified. The facility is following their waste profiles in labeling and some of the F008 waste does not contain the reportable level of Cyanides, thus not having the D003 waste code. Due to its origin from the cyanide involved plating process, it requires the F008 waste code only.

Universal Waste Records

The shipping documents for the shipment of universal hazardous waste were examined and no concerns were observed. After the inspection, further questions arose regarding the disposition of the aerosol cans, no records were observed at the time of in-person inspection regarding shipments of aerosol cans for recycling. In records received on January 9, 2025, the facility provided records of Bill of Lading (BOL) for scrap recycling.

Wastewater Permit

Inspectors reviewed permit CCW&SA-IP-04 from Coweta County Water and Sewer with an expiration date of December 31, 2024. The facility stated that this was in the process of renewal. Inspectors also reviewed the most recent monthly report of analysis for wastewater from the WWTU and observed that levels fell below allowable limits stated in the permit.

Post Inspection Records Request

On December 31, 2024, inspector George McBroom sent an email request for information to Sean Leroux regarding some additional observations and concerns made during the report writing process. The items requested included information about the disposition of punctured aerosol cans, the waste profiles for all F008 waste streams, and information and waste profiles for the manifested materials on Manifest #s 007382209GBF, 008534176SKS, and 008534480SKS.

On December 30, 2024 and January 9, 2025, Sean Leroux provided all requested documents and information.

13) Closing Conference

The inspectors conducted the exit meeting at 2:56 pm with Sean Leroux and Kevin Rowland. During this meeting, the inspectors stated their preliminary observations of the inspection. KII agreed to provide verification of update to the Biennial Report to add the D001 waste code and verification of submission of updated QRG to Coweta County Emergency Management. No due date was required as it relied upon outside agencies and systems for submission. On December 17, 2024, Sean Leroux emailed George McBroom and provided an email string regarding the update of the Biennial Report. The Biennial Report system in RCRAInfo was currently locked from new entries or updates and GAEPD personnel would notify Sean when it was unlocked for entry. On December 30, 2024, Sean Leroux provided a verification letter from Coweta County emergency Management in an email to George McBroom.

14) **List of Attachment**

Attachment 1 – Photo Log

15) **Signed**

GEORGE MCBROOM Digitally signed by GEORGE MCBROOM
Date: 2025.02.28 13:11:39 -05'00'

George McBroom
Life Scientist

KAYLA ACOSTA Digitally signed by KAYLA
ACOSTA
Date: 2025.03.03 08:50:59 -05'00'

Kayla Acosta
Physical Scientist

16) **Concurrence**

ARACELI CHAVEZ Digitally signed by ARACELI CHAVEZ
Date: 2025.03.03 12:31:01 -05'00'

Araceli B. Chavez
RCRA Enforcement Section

Attachment 1 – Photo Log

28 Photos taken on: December 17, 2024

Photos taken by: Kayla Acosta

Photos taken with: iPad



Photograph 1
CAA fencing in Section 5 – Warehouse



Photograph 2
Super sacks of F006 waste in CAA in Section 5-
Warehouse



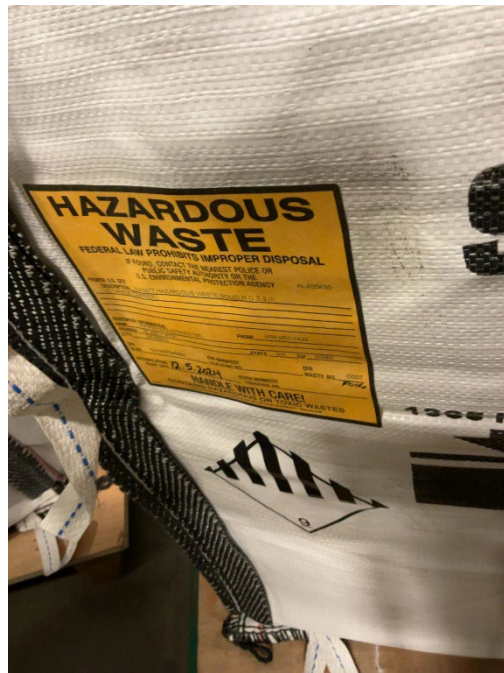
Photograph 3
Hazardous Waste labeling on super sack in
Section 5-Warehouse CAA.



Photograph 4
Hazardous Waste labeling on super sack in
Section 5-Warehouse CAA.



Photograph 5
Section 5 warehouse CAA Spill kit



Photograph 6
Hazardous Waste labeling on super sack in Section 5-Warehouse CAA.



Photograph 7
Hazardous Waste labeling on super sack in Section 5-Warehouse CAA.



Photograph 8
Hazardous Waste labeling on super sack in Section 5- Warehouse CAA.



Photograph 9

Hazardous Waste labeling on super sac in Section 5- Warehouse CAA.



Photograph 10

Hazardous Waste in drums in Section 5- Warehouse CAA.



Photograph 11

Universal Waste Batteries in Section 5- Warehouse CAA.



Photograph 12

Aerosol can puncturing container in Section 5- Warehouse CAA.



Photograph 13
Aerosol puncturing device in Section 5 Warehouse CAA.



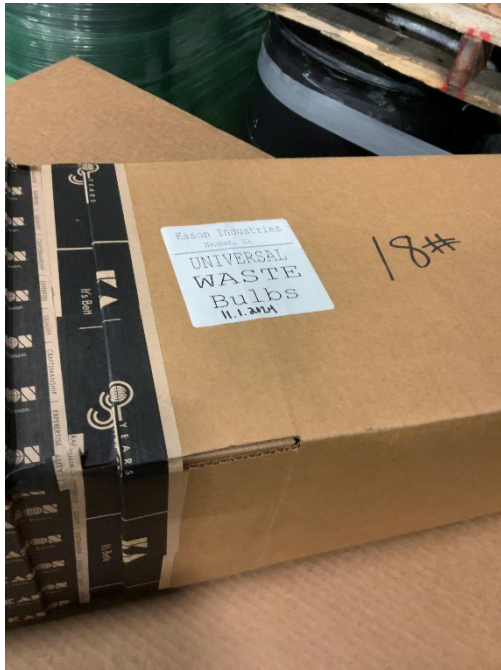
Photograph 14
Hazardous waste label on aerosol puncture device in Section 5 Warehouse CAA.



Photograph 15
Universal E-waste in Section 5 Warehouse outside CAA.



Photograph 16
Universal Waste Bulbs in Section 5 Warehouse outside CAA.



Photograph 17

Universal waste bulbs outside Section 5 Warehouse CAA.



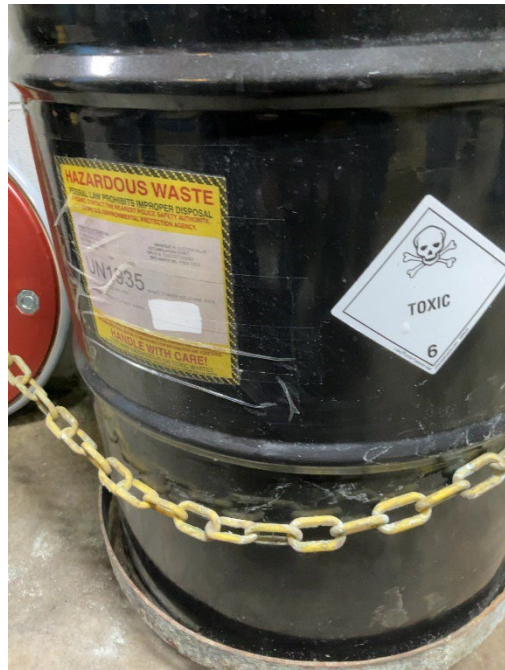
Photograph 18

Used Oil drum Section 1 Boiler Room



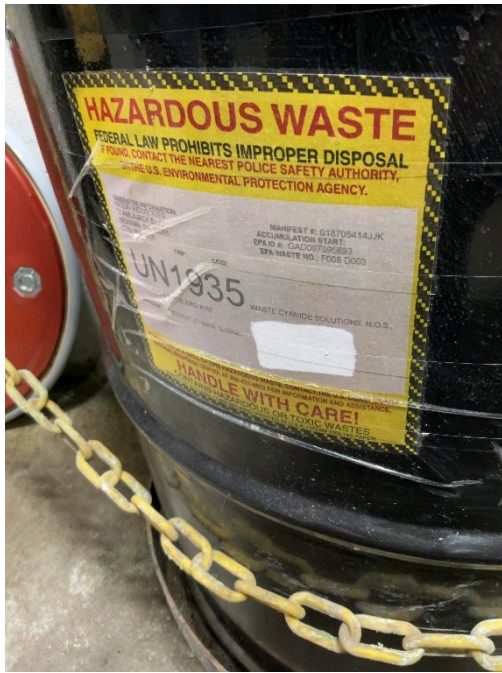
Photograph 19

CN Sludge sign for Cyanide Sludge SAA at Section 1 Plating Line.



Photograph 20

CN Sludge SAA labeling at Section 1 Plating Line.



Photograph 21

Hazardous Waste label Cyanide Sludge SAA at Section 1 Plating Line.



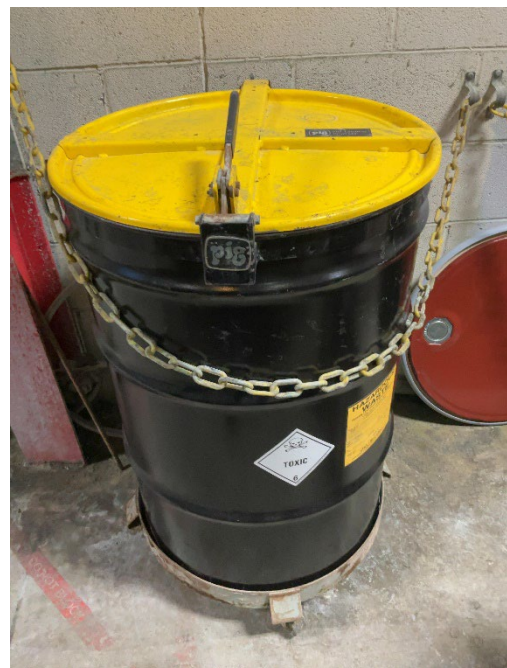
Photograph 22

CN Filter sign for Cyanide Filter SAA at Section 1 Plating Line.



Photograph 23

Labels on Cyanide Filter SAA at Section 1 Plating Line



Photograph 24

Cyanide Filter SAA at Section 1 Plating Line.



Photograph 25

Carbonate Sludge SAA at Section 1
Plating Line.



Photograph 26

Filter cake CAA located in Section 1
Wastewater Treatment Area.



Photograph 27

Hazardous Waste label on Filter Cake CAA
In Section 1 Wastewater Treatment Area.



Photograph 28

Labels on Filter Cake CAA in Section 1
Wastewater Treatment Area.