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

September 7, 2023

Kim Proto, Facilities Manager
Aluminum Finishing Co. Inc.
1575 Railroad Ave.
Bridgeport, CT 06605

Re: U.S. EPA-Region 1 Inspection Report of Aluminum Finishing Co., Inc., July 12-13, 2023

Dear Ms., Proto:

In accordance with current policy, I am providing you with a copy of the final inspection report summarizing observations made during the July 12-13, 2023, inspection of your facility.

This inspection was conducted under the authority of RCRA.

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

Sincerely,

Linda Brolin, Environmental Engineer
Waste and Chemical Compliance Section

cc: Joseph Schiavone, 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.

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RCRA Compliance Inspection of:

Aluminum Finishing Co., Inc.
1575 Railroad Avenue
Bridgeport, CT 06605

July 12-13, 2023
Date of Inspection

September 7, 2023
Date Inspection Report Approved

September 7, 2023
Date Inspection Report Finalized

September 8, 2023
Date Inspection Report Transmitted to Facility

Linda Brolin, Environmental Engineer
Waste and Chemical Compliance Section

MARY ODONNELL Digitally signed by MARY ODONNELL Date: 2023.09.07 16:27:59 -04'00'

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

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RCRA HAZARDOUS WASTE INSPECTION REPORT

I. GENERAL INFORMATION

a. **Facility Name:** Aluminum Finishing Co. Inc. ("Aluminum Finishing" or the "Facility")

b. **Inspection Date:** July 12-13, 2023

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

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

e. **EPA ID Number:** CTD001161322

f. **NAICS:** 332813 Electroplating, Plating, Polishing, Anodizing and Coloring

g. **Street Address:** 1575 Railroad Ave Bridgeport, CT 06605

h. **Mailing Address:** PO Box 3379 Bridgeport, CT 06605

i. **Facility Contacts:** Kim Proto, General Manager
Aluminum Finishing Co. Inc.
Email: KIMP@ALUMINUM-FINISHING.COM
Phone: 203-366-5871

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

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

l. **Date of most recent notification in RCRAInfo:** 7/20/2022

m. **Current Property Owner:** Sivri Realty LLC

n. **Current Operator:** Sivri Realty LLC

o. **Wastes generated (per most recent RCRAInfo notification)**: D002, D005, D007, F019

Report Attachments:

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

II. FACILITY DESCRIPTION

Aluminum Finishing Company (the "Facility") is a large quantity generator which is a job shop metal finisher (NAICS 332813). Metal finishing services include the following: anodizing, conversion/phosphate coatings, surface treatment/passivation. Base metals are aluminum and stainless steel. Aluminum Finishing specializes in corrosion resistance. Their customers include the following industries: aerospace, medical and defense, and commercial work.

The facility is located at 1575 Railroad Avenue Bridgeport, CT. There is one 25,000 square foot building that includes the following areas: Office Space, Anodizing Line, Chemical Conversion Coating, Dye Lines, Wastewater Treatment Area, Boiler Room, Packing and Racking Areas, Chemical Storage, Shipping and Receiving; Packing and Racking Areas, and a Hazardous Waste Storage Area. The facility is in the process of adding a Paint Mixing Area and a Paint Spray Area.

The Facility's Contingency Plan was last updated on April 1, 2023. The facility notified initially on August 18, 1980. According to the most recent biennial report, the waste codes generated are the following: D002, D005, D007 and F019.

III. INSPECTION IN-BRIEF

EPA inspectors arrived at the Facility at 1575 Railroad Avenue Bridgeport, CT at 9:00 am on July 12, 2023. The EPA inspection team ("inspection team") consisted of Linda Brolin and Cheryl Wilkinson. The inspection team signed into the Visitor Log and were led to the Conference Room by Kim Proto, General Manager. Jay Grayjalez, the Facilities Manager joined the in-brief. The inspection team presented their EPA credentials to facility contacts and gave out business cards at this time. The following personnel were present at the in-brief:

EPA:	Linda Brolin, Environmental Engineer Cheryl Wilkinson, Life Scientist
Facility:	Kim Proto, General Manager Jay Grayjalez, Facility Manager

Linda Brolin explained the inspection process to the facility representatives. Ms. Proto provided copies of the facility layout. Ms. Proto explained the facility has one 90-day area.

The building is 25,000 square feet under roof. There are 24 employees, some are temporary employees. The facility operates 8-hours per day five days a week. The hours of operation are 7:00 am-3:30 pm. During the summer months the hours are 5:00 am-1:30 pm Mr. Grayjalez's work hours are 8:00 am-4:00 pm.

They are a Chemical Processing company that specializes in corrosion resistance. Sikorsky is one of their main customers. Their customers include the Aerospace industry, Commercial work, Medical, and the Defense Industry (including guns). Aluminum and stainless steel are the only metals used in their processes.

The facility ships hazardous waste every 90 days.

Mr. Grayjalez, Facilities Manager explained the following processes performed at the facility:

- Chem Film Anodize is for aluminum only. First, clean with alkaline soap to remove any grease on the surface of the metal, then the material is etched and then deoxidized. The process includes the use of tanks of chemicals, and rinse tanks. This process creates a corrosion layer.

- Passivation is performed on stainless steel and aluminum. This process removes the free iron and other impurities on the top layer of the piece by placing into tanks of chemicals.

- Anodize process includes the use of three sulfuric acid tanks. The anodize tanks are a bigger line, sixty feet in size, and use 12-foot tanks. The First step is a Pre-cleaning with an Alkaline soap; Second step: Caustic etch; Third step: Deoxidizer; Fourth step Sulfuric acid anodize tanks; Then the material is ready for sealing or another final process, using chemicals such as nickel.

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

The process tanks of chemicals are tested weekly to determine chemical concentration and pH. The facility rarely has to take out the contents of the tanks, typically they only make additions to the tanks, which occurs approximately weekly. The nickel acetate seal tank is changed out every 6-8 weeks.

The rinse tanks are used to rinse off the chemicals through the process. The rinse tanks are connected to the wastewater treatment system, which are filtrated at a rate of five gallons per minute.

The Chemical tanks, when spent are sent out by tanker truck. If the facility can not get a tanker truck, they will put this material into 250-350-gallon totes and then the material is picked up by their waste hauler. The three sulfuric acid anodize tanks get changed out every 12-18 months.

The facility is currently installing a Painting area, which includes a spray booth. The facility is starting with paint guns. They have not generated any paint waste yet. They will use chrome and non-chrome solvent-based paint. The solvent they will use is acetone.

The in-house lab tests the pH of the chemical process tanks. Hubbard Hall is their supplier of chemicals for the chemical process tanks. They use a system called, Chem Track for documenting the specifications of their process tanks. The samples being pulled from the tanks for analysis go back into the tank when the analysis is completed.

They have an Industrial User Discharge Permit for their Wastewater discharge that was issued in 2020.

The facility has sixteen 3-ft tanks on the Anodize Line for dying the parts specific colors. These tanks are not used often.

The Black Dye tank is on the main line. The facility uses nickel acetate to seal the black dye onto the part. According to Mr. Grayjalez, there has only been one time since he has been working at the facility that they had to switch out the black dye tank and sent it out as hazardous waste. He said a waste determination was made at the time.

The anodize line includes different processes for the final finish on the parts, also known as chemical finishing, which finish used depends on the needs of the customer. One chemical finish uses Iridite which contains hexavalent chrome. Another chemical finish, called clear chem uses trivalent chrome.

Mr. Grayjalez explained that sludge does not typically accumulate in the process tanks, so they never have to scrape out the bottom of the process tanks.

The facility does not currently manage any SAAs. The new Paint Area will have a SAA, which there is a container and a SAA sign currently at the area. At the time of the inspection, they were not currently not generating any waste in this new Paint Area.

Masking Department

The facility uses a specific type of tape to affix onto areas of the metal parts to create conductive areas on the parts and have the remaining area of the parts be anodized.

The facility does not recycle waste and does not export waste.

U.S. Ecology is their transporter. Complete Environmental Technologies (CET) does the analytical analysis of their waste streams. Waste profiles are created by US Ecology using the analytical data from CET.

Photographs as part of the inspection were discussed. Ms. Proto requested that no photos be taken of parts.

The in-brief discussion ended at about 11:00 am, 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 on July 12-13, 2023. The following personnel were present for all or part of the tour:

EPA:	Linda Brolin Cheryl Wilkinson
Facility:	Kim Proto, General Manager Jay Grayjalez, Facility Manager

Day 1 – July 12, 2023 11:05 a.m.

Walk thru with Kim Proto and Jay Grayjalez.

Shipping and Receiving
Observed different grades of stainless steel and aluminum. There was no hazardous waste generated or stored in this area.

Staging
Staging is for the incoming work. There was no hazardous waste generated or stored in this area.

Prepping and Staging
Prepping and Staging is for the racking, masking, packing and inspecting of the final parts. There was no hazardous waste generated or stored in this area.

Paint
The Paint Area is new to the facility and was not operating at the time of the inspection. There is a mixing room and spray booth being constructed. There was one SAA with one 55-gallon closed drum, labeled Hazardous waste, waste paint, solvent. This SAA container was empty at the time of the inspection.

Chemical Storage Area
The Chemical Storage Area is located near the loading dock and is where the hazardous waste accumulation area HWAA is located. The floor is concrete. According to Ms. Proto, the floor in this area was sealed in 1998. At the time of the inspection there was no "Hazardous Waste Storage Area" sign posted. About fifty feet from the HWAA, in the new Paint Booth SAA, there was a "No Smoking" sign, the Emergency Contact List was posted (Fire Department and Police Department numbers, Mr. Grayjalez, Emergency Coordinator and Ms. Proto, Alternate Emergency Coordinator). The building has a sprinkler system. The area has a fire extinguisher and spill control material. There is a phone in the lab that is about 20 ft away. All employees have cell phones. The area has a fire extinguisher and spill control material.

The following is a list of hazardous waste containers in the Less-than 90-day HWAA:

One closed cubic-yard bag container on a wood pallet, labeled, "Hazardous waste, solid, 11176 (Metal hydroxide sludge), nos. (F019), 9, PGIII, ERG #171. There was no date on this container.

According to Mr. Grayjalez, it takes three cycles of the sludge press to fill the one cubic-yard container. There is another one cubic-yard bag container that is located under the belt filter press and when it is full it is moved to the HWAA.

Chemical Processing Room

According to Mr. Grayjalez, the facility runs the filter press about 2-3 times per week. At the time of the inspection, under the belt filter press was one, open cubic-yard container with sludge in it, with a HW label, RQ NA 3077 Hazardous waste solid, (Metal hydroxide sludge) nos, (F019), 9, PG III, ERG #171.

The area has a spill kit, fire extinguisher, the evacuation plan was posted, and the floor has a containment berm. According to Ms.Proto, the floor was sealed and designated secondary containment in 1998.

According to Mr. Grayjalez, the facility uses mean green and water to clean the floor. The wash water is put in the drain which goes to the sump to the wastewater treatment (WWT) system. There are 11 sumps that go to directly to the wastewater treatment system. The sumps have liners to prevent a release from the sump system.

Lunch Break

After the Break, the walk through continued with Ms. Proto and Mr. Grayjalez. Facility representatives explained that they use a local company to exchange forklift batteries and changing of spent light bulbs, therefore they don't manage any universal waste on-site.

Loading Dock/Shipping and Receiving
There was no hazardous waste generated or stored in this area.

Staging
There was no hazardous waste generated or stored in the Staging Area.

Racking and Packing Area
There was no hazardous waste generated or stored in the Racking and Packing Area.

Chemical Processing Area
This area is where all of the chemical process tanks are located for all processes at the facility.

At the small anodize line, the inspection team observed a spin dryer that facility personnel explained is used to spin liquid off of small parts after the anodize process. They explained that it is used infrequently and generates minimal residual liquid waste, which drains to an open 5-gallon bucket. There was some liquid in this bucket at the time of the inspection. This 5-gallon bucket had a SAA label "Used batteries". Mr. Grayjalez and Ms. Proto explained that this spin dryer is used for small parts only and is used infrequently. Mr. Grayjalez stated that this container has been here for a year and a half and has not been emptied because it has not gotten full. Mr. Grayjalez explained that if the container had to be emptied, the waste would be placed into the wastewater treatment system. Ms. Proto explained that there has been no waste determination done on this liquid. This container is open and not labeled with the correct contents.

In this same area, there was one open 5-gallon unlabeled bucket of solid material that had a filter from the Tank 1 soap in it. The solid material is scraped off the floor in the area according to Mr. Grayjalez and placed in this container. Ms. Proto and Mr. Grayjalez explained that they have done analysis a couple of times on the solid material and at times it has been hazardous. The container is open and unlabeled.

The mop water goes to the WWT system. US Ecology does chemical analysis on the miscellaneous debris.

Anodize Line/ Dye Tank Area
The Anodize line has three anodize tanks. The floor drains go to the WWT system.

Chemical Storage Area
This area is located behind the new paint area. There is a flammable waste cabinet in this area. Behind the flammable waste cabinet, the inspection team observed three containers that were dusty with worn labels. The following is a description of those containers:

- One approximatley-20-gallon container of sodium hypochlorite product label which states to use by10/22/2019.
- One approximately-20-gallon container of acetic acid solution product label which is visibly old and worn out. The inspection team could not see a date on the label unless the container was moved, and the inspection team did not want to move the container due to safety concerns.
- One approximately -20-gallon container of muriatic acid product label which states to use by 03/22/2020.
- One-cubic yard container that was labeled, Paint related waste, was open and had paint contaminated tape, rags and empty paint cans. Ms. Proto explained that a sample of the waste has been sent for analysis to determine if it is hazardous or not.

The inspection team asked the facility representatives about the three containers sitting behind the flammable storage cabinet, sodium hypochlorite, acetic acid and muriatic acid. Mr. Grayjalez and Ms. Proto explained they haven't used these chemicals or needed to use them since they both began at the facility. Mr. Grayjalez has been at the facility for six years and Ms. Proto has been there for four years.

The inspection team observed one pallet at the HWAA near the loading dock. The pallet had five carboard containers on it. Facility personnel explained they are in the process of making a waste determination on the material as it is material they no longer use. They are having a waste analysis done by US Ecology to determine if the material is hazardous. There was one box labeled as Nickel Acetate Tetrahydrate and one container labeled as Clariant Anodal. The other containers were not labeled. They are doing waste analysis on the containers to determine how to ship them out.

Chemical Storage
Chemical storage is for product storage. The area has a spill kit.

Laboratory
The Lab is located in a trailer in this area. The lab tests the pH concentrations of all the process tanks once per week. All of the samples go back into the tanks. There is no waste in the Lab. The facility uses a Chemical Tracking system for the tanks.

The inspection team went back to the conference room. This concluded the walk-through portion of the inspection.

V. RECORDS REVIEW

The inspection team reviewed all documents on-site on July 13, 2023, following the walk-through portion of the inspection. During the record review, Ms. Proto explained that US Ecology sent a waste analysis on the boxes on the pallet at the HWAA, and all five boxes were non-hazardous.

Manifests/LDRs
The inspection team reviewed hazardous waste manifests and land disposal restriction notifications (LDRs) from shipments made by Aluminum Finishing during 2022-2023. For year 2023, the facility only had two manifests in their records on-site.

The following manifests did not have LDRs:

015678638FLE dated 06/16/2023
016384171FLE dated 03/21/2023
016372112FLE dated 04/13/2022
023013279FLE

Manifest 0163661160FLE dated 01/19/2022 did not have the Final Destination facility copy of the manifest and the LDR notification did not include the manifest number.

Manifest 016390228FLE (UN3082 Environmentally hazardous liquid, nos (Nickel acetate) 9, PGIII, ERG#171, waste code 420, Non-hazardous. [RQ UN1832, waste sulfuric acid spent, 8, PG II, D002, D007) ERG #137. This manifest did not have a completed LDR. The LDR did not include the manifest number, date, signature, and title of the person signing the form.

Manifest 017203062FLE did have an LDR with the manifest number. The LDR did not include the date, the name and title of the person signing the form and was not signed.

The manifests were signed by Timothy Bucca, Jay Grayjalez, and Anthony Jones. The inspection team requested the DOT training documents for the personnel that sign the manifests.

Inspection Logs

The inspection team asked for the HWAA inspection logs for July 2021 - July 2023. At the time of the inspection, there were no weekly inspection logs of the HWAA.

The facility conducts a daily maintenance checklist that includes checking the water levels of all of the process tanks, and the operations in the facility.

Training/Job Descriptions

The inspection team asked for the Facility's RCRA training certificates and training logs for 2021-2023. The facility uses JJ Kellar and Pay Chex for a training plan, videos and training aides. The facility conducts Employee Communications, and General Safety Training yearly. They also conduct hazardous communication training, which is training on if an emergency happens on-site. At the time of the inspection, there were no RCRA training records. Ms. Proto explained some facility personnel have had HAZWOPER training, and they train on the contingency plan, but they have not conducted RCRA training. Ms. Proto explained she is currently looking for a contractor to conduct the training for the facility.

Contingency Plan

The inspection team reviewed Facility's contingency plan revised April 1, 2023. The Emergency Coordinator is. Kim Proto and the Alternate Emergency Coordinator is Jay Grayjalez. The plan includes Emergency Procedures, Emergency Equipment List, Evacuation plan. The plan was sent to the local authorities in 2011. Ms. Proto explained that all of the chemicals in the contingency plan are the same currently, as they were in 2011.

Additional documents reviewed Waste profiles

The inspection team reviewed waste determination documentation for some waste streams. The facility uses analytical analysis for most waste streams. The facility uses an outside lab to conduct analysis. The lab uses Method 200.4 to determine metals analysis on liquid waste streams.

The inspection team reviewed the U.S. Ecology waste determination document for Metal Hydroxide sludge (F019). The waste determination was made by process knowledge.

The inspection team reviewed the waste determination for the solid material in the 5-gallon container that is collected from the floor in the anodize area. The waste analysis showed it was hazardous for chromium.

The inspection team reviewed the waste determination for the nickel acetate which the analysis showed it was not hazardous.

VI. INSPECTION OUTBRIEF

An out-brief conference was conducted on July 13, 2023, prior to leaving the facility. The following personnel were present for the closing conference:

EPA:	Linda Brolin Cheryl Wilkinson
Facility:	Kim Proto Jay Grayjalez

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

Areas of Concern:

1. The inspection team observed there were no Hazardous Waste Storage Area Signs at the two HWSAs.
2. There was one open and undated cubic yard container located under the belt filter press (HWAA).
3. There was no date on one closed cubic yard container of sludge located in the second HWAA.
4. There were no waste determinations done on the following material: three approximately 20-gallon containers of expired material behind the flammable cabinet at the chemical storage area. There was one open and unlabeled 5-gallon SAA container located at the spin dryer, collecting the liquid waste from the spin dryer.
5. There was one open and unlabeled 5-gallon SAA container with hazardous floor scraping material (D007), located near the small anodize line.
6. There were no weekly inspection logs of the HWAAs.
7. There were no RCRA training certificates. The facility conducts other training, such as Employee Communications, contingency plan and General Safety Training. And some employees have HAZWOPER.
8. There was one January 2022 manifest with no final destination facility copy. There were two manifests with no LDRs. There was one manifest with one LDR not filled out and not signed.

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

Following this discussion, the inspection team left the premises at approximately 12:15 pm, concluding the inspection.