

RCRA Compliance Evaluation Inspection Report

1) **Inspector and Author of Report**

Parvez Mallick
Environmental Engineer
Enforcement and Compliance Assurance Division
Chemical Safety and Land Enforcement Branch
RCRA Enforcement Section
U.S. Environmental Protection Agency, Region 4
Sam Nunn Atlanta Federal Center
61 Forsyth Street, S.W.
Atlanta, Georgia 30303

Phone: (404) 562-8594
Fax: (404) 562-8566
E-mail: mallick.parvez@epa.gov

2) **Facility Information**

Pall Aeropower Corporation
10540 Ridge Rd
New Port Richey, Florida 34654-5129
EPA ID: FLD046855086

County: Lee
Latitude: 28° 16' 31.4418''
Longitude: 82° 38' 26.3818''
Primary NAICS: 336413 - Other Aircraft Parts and Auxiliary Equipment Manufacturing
SIC Code: 3728 - Aircraft Parts and Auxiliary Equipment

3) **Responsible Official**

Mollie Maruca
Vice President EHS & Facilities
Pall Aeropower Corporation
mollie_maruca@pall.com

4) **Inspection Participants**

Parvez Mallick, U.S. EPA, Region 4
Sarah Green, Florida Department of Environmental Protection (FDEP)
Leslie Pedigo, FDEP
Jeff Gregg, FDEP
Shannon Lenhart, FDEP
David Petti, FDEP
Mollie Maruca, Pall Aeropower Corporation
Jeff Gunn, Pall Aeropower Corporation

5) **Dates of Inspection**

March 31, 2022, 9:30 a.m.

6) **Applicable Regulations**

Resource Conservation and Recovery Act (RCRA) Sections 3002, 3005 and 3007 (42 U.S.C. §§ 6922, 6925 and 6927), and the regulations promulgated pursuant thereto at 40 Code of Federal Regulations (C.F.R.) Parts 260-270, 273 and 279.

Florida Statutes (F.S.) Chapter 403.702 et seq., and the regulations promulgated pursuant thereto and set forth at the Florida Administrative Code (Fla. Admin. Code Ann. r.), Chapters 62-710, 62-730 and 62-750.

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(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 403.722 of the Florida Statutes, Fla. Stat. § 403.722 [Section 3005 of RCRA, 42 U.S.C. § 6925], provided that the generator complies with the conditions listed in Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.17] (hereinafter referred to as the “LQG Permit Exemption”).

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.15(a)], a generator may accumulate as much as 55 gallons of non-acute hazardous waste in containers at or near the point of generation where wastes initially accumulate, which is under the control of the operator of the process generating the waste, without a permit or without having interim status, as required by Section 403.722 of the Florida Statutes, Fla. Stat. § 403.722 [Section 3005 of RCRA, 42 U.S.C. § 6925], and without complying with Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.16(b) or §262.17(a)], except as required in Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.15(a)(7) and (8)], provided that the generator complies with the satellite accumulation area conditions listed in Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.15(a)] (hereinafter referred to as the “SAA Permit Exemption”).

Pursuant to Fla. Admin. Code Ann. r. 62-730.185(1) [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, or lamps, calculated collectively) at any time.

As the State’s authorized hazardous waste program operates in lieu of the federal RCRA program, the citations of those authorized provisions alleged herein will be to the authorized State program; however, for ease of reference, the federal citations will follow in brackets.

7) **Purpose of Compliance Evaluation Inspection**

On March 31, 2022, Sarah M. Green, Leslie Pedigo, David Petti, Shannon Lenhart, and Jeff Gregg of Florida Department of Environmental Protection (FDEP) and Parvez Mallick of the EPA conducted a routine compliance evaluation inspection (CEI) of the Pall Aeropower

Corporation (Pall or the facility) to determine the facility's compliance with state and federal hazardous waste regulations. This was an EPA lead inspection. Pall was represented by Mollie Maruca, Vice President EHS & Facilities; Jeff Gunn, Plant Manager; Reed Gibson, Facilities Manager; and David McFarland, Regional Occupational Health Nurse during the inspection. Upon entering the facility, the inspectors introduced themselves, showed their credentials and explained the purpose of the visit and a description of the facility's process was discussed. The inspectors described the anticipated use of digital camera during the inspection. The inspectors briefly discussed the company's ability, pursuant to 40 C.F.R. § 2.203, to assert a business confidentiality claim for information submitted to the EPA. The company did not assert a business confidentiality claim. The inspection participants also discussed health and safety protocols and required personal protective equipment before Pall representatives led the inspectors on a tour of the facility operations.

8) Facility Description

Pall Aeropower Corporation manufactures filters and apparatus for filtration, separation and purification in the aerospace, defense and marine markets for commercial aircraft, helicopters, military aircraft, military vehicles, ships, space vehicles, and water purification treatment. Primary manufacturing operations consist of machining, anodizing, and finishing of mostly aluminum filter bodies and housings, assembly, and quality control testing of the finished units. Pall also manufactures components for aircraft hydraulic systems and has laboratories on site for quality testing.

Pall occupies three buildings located on approximately sixty acres and employs approximately five hundred employees working in two shifts from 6:30 AM-12:30 AM., Monday through Friday. Water and sewer services are provided by the City of New Port Richey. Pall's most recent Hazardous Waste Generator Notification (EPA Form 8700-12) dated March 31, 2020, characterized the facility as a large quantity generator (LQG) of hazardous waste. Currently Pall may generate hazardous waste streams, used oil and universal wastes (such as spent batteries and spent fluorescent lamps), spent solvents, paint waste, and other wastes which include EPA Waste Codes D001, D002, D003, D007, D018, D035, F003, F005, F006, and F019.

9) Previous Inspection History

Pall has been inspected by the FDEP several times before, most recently on February 28, 2018. No violations were observed during the February 28, 2018, inspection.

10) Inspection Findings

Following the opening conference, the inspection team proceeded with the inspection. The inspectors inspected the following areas during the onsite inspection: Hydraulics Lab, Delta Dyne, Paint Shop, Plating Room, Fabrication Shop, Scientific Lab Services, Product Qualification Lab, Machine Shop, New Plating Building, Wastewater Pretreatment System, Chemical Building, and Compressor Room. Below is a description of the observations made during the inspection.

Hydraulics Lab

The Hydraulics Lab is divided into two areas: the hydraulics test/assembly area and the pump room. Various types of filters are manufactured and tested in the Hydraulics Lab. In one part of the lab, hydraulic filters are corrugated and are placed into filter housings; in the Cabin Air Filter area, cabin filters are assembled; and in Air Valve Stream area water purification filters are assembled. Various hydraulic or heptane test fluids are used in the lab's twenty-seven test stands. Test stands are cleaned weekly and hydraulic oil is recycled. The test stand filters are replaced once the viscosity test of the oil is performed and oil is deemed unusable.

The lab area has four 35-gallon heptane parts washers (rinse tanks) to clean tools. Heptane is replaced daily, while the filters are replaced as needed. Spent heptane from the parts washers are recycled and filters are managed as hazardous waste throughout the facility. The following waste containers were observed in lab area:

- One closed 35-gallon container of spent wipes marked "Hazardous Waste" and an indication of hazards of the contents;
- One closed 55-gallon container marked "Used Oil; and
- One closed 55-gallon container of corrosive hazardous waste solvent wipes/epoxy resin marked "Hazardous Waste" and an indication of hazards of the contents.

The pump room is located off the north end of the Hydraulics Lab. Spent solvents and oil collected from the hydraulics area are collected in 55-gallon satellite accumulation containers in the pump room. The spent solvents containers are taken to the Chemical Building for storage and recycling once full. The following hazardous waste containers were stored in the pump room:

- One closed 55-gallon container of spent isopropyl alcohol for recycling (while a "flammable" label was present, the container was not marked "Hazardous Waste" nor contained a "Toxic" hazard of the content label);
- One closed 55-gallon container of "Used Heptane" for recycling (while a "flammable" label was present, the container was not marked "Hazardous Waste" nor contained a "Toxic" hazard of the content label) (Photograph #1);
- Three closed 55-gallon containers marked "Used Oil" (Photograph #1); and
- One closed 55-gallon container of non-hazardous oily debris/absorbents.

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.15(a)(5)(ii)], which is a condition of the SAA Permit Exemption, a generator must mark or label its containers with the following: (ii) an indication of the hazards of the contents (examples include, but are not limited to, the applicable hazardous waste characteristic(s) (i.e., ignitable, corrosive, reactive, toxic); hazard communication consistent with the Department of Transportation requirements at 49 C.F.R. part 172 subpart E (labeling) or subpart F (placarding); a hazard statement or pictogram consistent with the Occupational Safety and Health Administration Hazard Communication Standard at 29 C.F.R. 1910.1200; or a chemical hazard label consistent with the National Fire Protection Association code 704).

Delta Dyne

This area manufactures Delta Dyne differential pressure switches used to indicate when the aircraft filter element is becoming blocked and needs to be changed. The Pall representative indicated that Delta Dyne area will be moving to a different section of the building in the coming

months. The following waste containers were stored in the Delta Dyne satellite accumulation area (SSA):

- One heptane parts washer;
- Three closed half-gallon containers of used heptane; and
- One closed half-gallon container of spent isopropyl alcohol (Photograph #2). All four half-gallon containers were not marked with the words “Hazardous Waste” and had no indication of the hazards of the contents. Both “Flammable” and “Toxic” labels should be affixed to the containers.

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.15(a)(5)(i-ii)], which is a condition of the SAA Permit Exemption, a generator must mark or label its containers with the following: (i) the words “Hazardous Waste,” (ii) an indication of the hazards of the contents (examples include, but are not limited to, the applicable hazardous waste characteristic(s) (i.e., ignitable, corrosive, reactive, toxic); hazard communication consistent with the Department of Transportation requirements at 49 C.F.R. part 172 subpart E (labeling) or subpart F (placarding); a hazard statement or pictogram consistent with the Occupational Safety and Health Administration Hazard Communication Standard at 29 C.F.R. 1910.1200; or a chemical hazard label consistent with the National Fire Protection Association code 704).

Paint Shop

Pall operates one large paint booth for the painting of parts which are allowed to air dry. The facility representatives stated that used paint booth filters are changed weekly. The following waste containers were stored in the Paint Shop areas:

- One closed 55-gallon container of paint booth filters marked with the words “Hazardous Waste” and a “Flammable” label (a “Toxic” hazard of the content label was not present). The container is equipped with a hydraulic press to flatten filters to accommodate additional filters in the container (Photograph #3). The inspectors indicated the 55-gallon container should be managed as a less than 90-day storage container. An indication of the hazards of the contents and an accumulation start date must be affixed on the container. In addition, weekly inspection must be completed and documented of the container. The facility’s contingency plan (CP) also be updated to reflect the less than 90-day storage container;
- One closed 55-gallon container of spent paint thinner waste marked “Hazardous Waste” and “Flammable.” The container was not marked with a “Toxic” hazard of the content label (Photograph #4);
- One closed container 55-gallon container of paint gun cleaning waste (Photograph #5). The container was not marked “Hazardous Waste” and had no indication of the hazards of the contents (“Flammable” and “Toxic”).

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.17(a)(5)(i)(B-C)], which is a condition of the LQG Permit Exemption, Pall must mark or label container of paint booth filters with the following: (B) an indication of the hazards of the contents (examples include, but are not limited to, the applicable hazardous waste characteristic(s) (i.e. toxic); hazard communication consistent with the Department of Transportation requirements at 49 C.F.R. part 172 subpart E (labeling) or subpart F (placarding); a hazard statement or pictogram consistent with the Occupational Safety and Health

Administration Hazard Communication Standard at 29 C.F.R. 1910.1200; or a chemical hazard label consistent with the National Fire Protection Association code 704); and (C) the date upon which each period of accumulation begins clearly visible for inspection on each container.

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.15(a)(5)(i-ii)], which is a condition of the SAA Permit Exemption, Pall must mark or label the 55-gallon container of paint gun cleaning waste with the following: (i) the words “Hazardous Waste,” (ii) an indication of the hazards of the contents (examples include, but are not limited to, the applicable hazardous waste characteristic(s) (i.e., ignitable, corrosive, reactive, toxic); hazard communication consistent with the Department of Transportation requirements at 49 C.F.R. part 172 subpart E (labeling) or subpart F (placarding); a hazard statement or pictogram consistent with the Occupational Safety and Health Administration Hazard Communication Standard at 29 C.F.R. 1910.1200; or a chemical hazard label consistent with the National Fire Protection Association code 704).

Plating Room

Three metal finishing lines are operated at the facility: aluminum anodizing, chrome conversion, and passivation of stainless steel. The plating room is capable of anodizing Type I, Type II, and Type III. There are three contained areas, one against each wall and a third one in between. When customer specification requires that the filter components be chrome coated or anodized prior to assembly, the components are processed in the chrome conversion and anodizing lines. The chrome conversion is a series of dip tanks containing various chemicals. The anodizing line is a similar dipping process line.

At the time of the inspection, liquids and solids were observed in the containment structures under the plating tanks/area. The inspectors inform the facility to keep the containment area clean, free of liquids, and remove solids as needed.

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.17(a)(6)], which incorporates Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.255], and is a condition of the LQG Permit Exemption, a LQG generator must maintain and operate its facility to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment.

Fabrication Shop

The Fabrication Shop had several step cans for paint cups and solvent wipes in several areas. The containers were marked “Hazardous Waste” and had indications of hazards of the contents. The inspectors observed that step cans labels were fading and should be replaced with new labels. There was also one closed 5-gallon container marked “Universal Waste Batteries” at the battery recycling station. The accumulation date of the 5-gallon container was less than a year.

Scientific Lab Services (SLS)

The SLS lab is a series of smaller labs used to test breakability in products and systems. The SLS Lab and the JP-4 Productivity Test Room each had one heptane parts washer. The following waste containers were observed in the SLS area:

- One closed 55-gallon container of used heptane marked “Hazardous Waste” and “Flammable.” The container was not marked with an indication of the hazards of the contents “Toxic” (Photograph #6);
- One closed 55-gallon container of used aviation fuel marked “Hazardous Waste” and “Flammable.” The container was not marked with an indication of the hazards of the contents “Toxic” (Photograph #7); and
- One 55-gallon container of non-hazardous spent absorbent pig mats.

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.15(a)(5)(i-ii)], which is a condition of the SAA Permit Exemption, Pall must mark or label the 55-gallon container of paint gun cleaning waste with the following: (i) the words “Hazardous Waste,” (ii) an indication of the hazards of the contents (examples include, but are not limited to, the applicable hazardous waste characteristic(s) (i.e., ignitable, corrosive, reactive, toxic); hazard communication consistent with the Department of Transportation requirements at 49 C.F.R. part 172 subpart E (labeling) or subpart F (placarding); a hazard statement or pictogram consistent with the Occupational Safety and Health Administration Hazard Communication Standard at 29 C.F.R. 1910.1200; or a chemical hazard label consistent with the National Fire Protection Association code 704).

Product Qualification Lab

The lab contained one heptane parts washer and one closed 55-gallon container of “Used Oil.”

Machine Shop

The Machine Shop contained eight 5-axis milling machines. The shop fabricates the metal filters and mounting plates for the filter component. Metal used are stainless steel and aluminum alloys. Scrap metal and alloys are collected and sold to a metal recycler. Deburring, the process of removing small imperfections known as burrs from machined metal products is done by hand using files. This shop contained two heptane parts washers and one 55-gallon container of waste metal burrs for recycling.

New Plating Building

The new plating building has been constructed and will replace the current plating room in near future. The new room comes equipped with three plating lines (Photograph #8). No wastes were observed in the new plating building during the inspection.

Wastewater Pretreatment System

The facility’s waste solutions are treated on-site in a pretreatment system permitted under the Pasco County (Permit #1999-001). The Industrial User permit was issued on June 15, 2020 and will expire on August 31, 2023. The facility has a discharge outfall 001 with effluent limitation for cyanide, cadmium, chromium, copper, lead, nickel, silver, zinc, and total toxic organics.

Chromate wastewater from the plating room is sent to a dedicated treatment tank where it is batch treated. The wastewater is pH adjusted and treated with sodium metabisulfite to reduce the chromate from hexavalent to trivalent chromium and dechlorination. Magnesium hydroxide and other chemicals are used to adjust the pH and then the wastewater is tested to ensure complete treatment. Once the treatment is deemed to be complete, a flocculant is added to aid in the precipitation of the solids. The sludge is then sent to the filter press and the solids are collected in a 55-gallon container while the wastewater is sent to an effluent rinse tank. Non-chromate wastewater is sent to a dedicated treatment tank where it is batch treated with flocculant to aid in the precipitation of the solids. The sludge is then sent to the filter press and the solids are collected in a 55-gallon container while the wastewater is sent to the effluent rinse tank. Spent final rinse tanks wastewater from the plating room is conveyed directly to the effluent rinse tank. The pH is adjusted as needed prior to the wastewater is discharged into facility's outfall 001, which is connected to the City of New Port Richey publicly owned treatment works (POTW).

The inspectors observed a closed 55-gallon of filter press solids marked "Hazardous Waste" (Photograph #9). The container had no indication of the hazards of the contents.

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.15(a)(5)(ii)], which is a condition of the SAA Permit Exemption, Pall must mark or label the 55-gallon container of paint gun cleaning waste with the following: (ii) an indication of the hazards of the contents (examples include, but are not limited to, the applicable hazardous waste characteristic(s) (i.e., ignitable, corrosive, reactive, toxic); hazard communication consistent with the Department of Transportation requirements at 49 C.F.R. part 172 subpart E (labeling) or subpart F (placarding); a hazard statement or pictogram consistent with the Occupational Safety and Health Administration Hazard Communication Standard at 29 C.F.R. 1910.1200; or a chemical hazard label consistent with the National Fire Protection Association code 704).

Chemical Building (Central Accumulation Area)

A less than 90-day hazardous waste storage area and two solvent recyclers (Resolv-r 2 and Siva S-10 solvent recovery system) to distill spent alcohol and heptane are located in the Chemical Building (Photographs #10-11). The following waste containers were observed in the Chemical Building:

- One closed 500-gallon poly "Used Oil" tank;
- Two closed 55-gallon containers of waste paint filter marked "Hazardous Waste," with an indication of the hazards of the contents, and dated March 28, 2022 (Photograph #12) and March 11, 2022;
- One closed 55-gallon container of paint thinner waste marked "Hazardous Waste," with an indication of the hazards of the contents, and dated March 18, 2022;
- One closed 55-gallon container of solvent waste marked "Hazardous Waste," with an indication of the hazards of the contents, and dated March 30, 2022;
- One closed 30-gallon container of dioctyl phthalate-soaked rags waste marked "Hazardous Waste," with an indication of the hazards of the contents, and dated March 17, 2022;
- One closed 10-gallon container of dioctyl phthalate-soaked rags waste marked "Hazardous Waste," and dated March 17, 2022, but with no indication of the hazards of the contents; and

- There were fourteen 55-gallon spent ethanol containers and two 55-gallon spent isopropyl alcohol (IPA) stored near the two stills for distillation (Photograph #13). At the time of the inspection, one 55-gallon container was in process connected to the ethanol still and another 55-gallon container was connected to the IPA still. According to the facility representative, on average, two 55-gallon containers are processed/distilled each day. The containers are handled using *First in First Out* based off facility's 90-day storage limit. The containers were marked "Flammable" but not marked "Hazardous Waste", no accumulation start date and, no "Toxic" hazard of the content label. The facility representative indicated that the fourteen containers have been stored in the CAA no longer than 60 days.

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.17(a)(5)(i)(A-C)], which is a condition of the LQG Permit Exemption, Pall must mark or label container of paint booth filters with the following: (A) the words "Hazardous Waste," (B) an indication of the hazards of the contents (examples include, but are not limited to, the applicable hazardous waste characteristic(s) (i.e. toxic); hazard communication consistent with the Department of Transportation requirements at 49 C.F.R. part 172 subpart E (labeling) or subpart F (placarding); a hazard statement or pictogram consistent with the Occupational Safety and Health Administration Hazard Communication Standard at 29 C.F.R. 1910.1200; or a chemical hazard label consistent with the National Fire Protection Association code 704); and (C) the date upon which each period of accumulation begins clearly visible for inspection on each container. The inspectors indicated that all spent ethanol and IPA containers for distillation must be managed as hazardous waste prior to recycling and must be marked with the words "Hazardous Waste," an indication of the hazards of the contents, and start accumulation date.

Compressor Room

The Compressor Room stores Pall's universal wastes (Photograph #14). The facility is currently in the process of switching to LED lighting. The containers in this area included:

- One 8-foot long tube spent lamps box and one 4-foot long tube spent lamps box;
- Two square boxes for compact spent lamps; and
- Two 30-gallon containers marked "Universal Waste Batteries".

All universal wastes containers were closed and had accumulation start dates of December 6, 2021. The four lamp boxes were marked "Universal Waste Lamps."

Records Review

Following the facility's tour, the EPA and FDEP proceeded with records review. The records review included hazardous waste manifests, land disposal restriction (LDR) records, universal waste manifests, weekly inspection logs, waste minimization plan, personnel training documents, contingency plan, waste determinations, and biennial report.

Hazardous waste is transported through Heritage-Crystal Clean (ILR000130062) with a destination facility of Allworth, LLC (ALD094476793) on a monthly to bi-monthly basis. All hazardous waste manifests were complete, signed receipts and land disposal restriction forms were present. Several manifests were noted with dates exceeding exception reporting requirements. The manifests were observed with the designated facility signature date beyond 45

days. Pall must follow-up with the owner or operator of the designated facility and submit an Exception Report to the EPA Regional Administrator if the facility has not received a copy of the manifest with the handwritten signature of the owner or operator of the designated facility within 45 days of the date the waste was accepted by the initial transporter.

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.42(a)], and is a condition of the LQG Permit Exemption, (1) a generator of 1,000 kilograms or greater of hazardous waste in a calendar month, or greater than 1 kg of acute hazardous waste listed in § 261.31 or §261.33(e) in a calendar month, who does not receive a copy of the manifest with the handwritten signature of the owner or operator of the designated facility within 35 days of the date the waste was accepted by the initial transporter must contact the transporter and/or the owner or operator of the designated facility to determine the status of the hazardous waste; (2) a generator of 1,000 kilograms or greater of hazardous waste in a calendar month, or greater than 1 kg of acute hazardous waste listed in § 261.31 or § 261.33(e) in a calendar month, must submit an Exception Report to the EPA Regional Administrator for the Region in which the generator is located if he has not received a copy of the manifest with the handwritten signature of the owner or operator of the designated facility within 45 days of the date the waste was accepted by the initial transporter. The Exception Report must include: (i) a legible copy of the manifest for which the generator does not have confirmation of delivery; (ii) a cover letter signed by the generator or his authorized representative explaining the efforts taken to locate the hazardous waste and the results of those efforts.

Universal waste spent lamps go to Envirolight and Disposal (FLR000252361) on a bi-annual cycle. Used oil is sent to Heritage-Crystal Clean (ILR000130062) on an as needed basis. Scrap metal recycling goes to Pasco Iron and Metal on monthly basis.

Hazardous waste training is done in house and is comprised of facility specific Environmental Health and Safety Training, RCRA Rules, and Waste Quick Guide Do's and Don'ts of RCRA. This training is conducted annually, most recent training was in March 2022. Job titles and position descriptions for trained personnel for training were available and reviewed.

Weekly inspection records were review and appeared timely and accurate, with all required information present. The inspector indicated that Pall's Paint Shop paint booth filter container must be added to the weekly inspection log.

The Contingency Plan (CP) dated November 1, 2019, was submitted to FDEP on March 31, 2022, for the EPA and FDEP review. Review of CP indicated that it lacked updated emergency coordinator contact information. The CP must be updated to reflect new emergency coordinator information and the new plating building of the facility. In addition, CP lacked emergency equipment location and a physical description of each item on the list, and a brief outline of its capabilities; an evacuation plan, evacuation routes, and alternate evacuation routes; and map of the facility showing SAAs and CAAs locations. The facility did not develop a quick reference guide (QRG). Copies of the CP and QRG must be distributed to the appropriate local authorities that have agreed to provide emergency services, including the police, fire department, emergency response team, hospital, and local emergency planning committee, as applicable. Proof of distribution must be retained onsite.

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.17(a)(6)], which incorporates Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.261(e) and (f)], and is a condition of the LQG Permit Exemption, (e) the plan must include a list of all emergency equipment at the facility (such as fire extinguishing systems, spill control equipment, communications, and alarm systems (internal and external), and decontamination equipment), where this equipment is required. This list must be kept up to date. In addition, the plan must include the location and a physical description of each item on the list, and a brief outline of its capabilities; (f) the plan must include an evacuation plan for generator personnel where there is a possibility that evacuation could be necessary. This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes (in cases where the primary routes could be blocked by releases of hazardous waste or fires).

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.17(a)(6)], which incorporates Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.263(d)], and is a condition of the LQG Permit Exemption, the contingency plan must be reviewed, and immediately amended, if necessary, whenever: (d) the list of emergency coordinators changes.

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.17(a)(6)(a)(1-5)], which incorporates Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.262(b)], and is a condition of the LQG Permit Exemption, a large quantity generator that first becomes subject to these provisions after May 30, 2017 or a large quantity generator that is otherwise amending its contingency plan must at that time submit a quick reference guide of the contingency plan to the local emergency responders identified at paragraph (a) of this section or, as appropriate, the Local Emergency Planning Committee. The quick reference guide must include the following elements: 1. The types/names of hazardous wastes in layman's terms and the associated hazard associated with each hazardous waste present at any one time (e.g., toxic paint wastes, spent ignitable solvent, corrosive acid); 2. The estimated maximum amount of each hazardous waste that may be present at any one time; 3. The identification of any hazardous wastes where exposure would require unique or special treatment by medical or hospital staff; 4. A map of the facility showing where hazardous wastes are generated and accumulated, and routes for accessing these wastes; 5. A street map of the facility in relation to surrounding businesses, schools and residential areas to understand how best to get to the facility and also evacuate citizens and workers.

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.17(a)(6)], which incorporates Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.256], and is a condition of the LQG Permit Exemption, (b) a LQG shall maintain records documenting the arrangements with the local fire department as well as any other organization necessary to respond to an emergency. This documentation must include documentation in the operating record that either confirms such arrangements actively exist or, in cases where no arrangements exist, confirms that attempts to make such arrangements were made.

11) Closing Conference

A closing conference was conducted at the conclusion of the inspection. The observations made during the inspection were discussed and the inspection was concluded. Pall was inspected as a large quantity generator of hazardous waste and a small quantity handler of universal waste. On

April 7, 2022, Pall submitted documents indicating corrective actions taken on container management deficiencies. On a May 9, 2022, FDEP requested Pall to submit an updated CP, QRG, and proof of distribution for CP and QRG by May 25, 2022.

12) **Signed**

PARVEZ
MALLICK

Digitally signed by
PARVEZ MALLICK
Date: 2022.05.16
08:41:50 -04'00'

Parvez Mallick
Inspector and Author of Report

Date

13) **Concurrence and Approval**

ARACELI
CHAVEZ

Digitally signed by
ARACELI CHAVEZ
Date: 2022.05.16
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Araceli B. Chavez
Chief
RCRA Enforcement Section

Date

Compliance Evaluation Inspection photographs were taken by Parvez Mallick of EPA

Canon PowerShot SD980 IS - EPA Property Number S75319



Photograph #1 – Used heptane container without “Hazardous Waste” and hazard indication label.



Photograph #2 – Half-gallon container of IPA without labels.



Photograph #3 – 55-gallon container of paint filter without an accumulation date.



Photograph #4 - 55-gallon container of paint thinner without indication of hazards.



Photograph #5: Paint gun cleaner container without “Hazardous Waste” and indication of hazards “Toxic” label.



Photograph #6: 55-gallon container of used heptane without an indication of hazards “Toxic” label.



Photograph #7 – 55-gallon container of aviation fuel without hazards contents label.



Photograph #8 – New Plating Building.



Photograph #9 – 55-gallon container of filter press sludge with no indication of hazards of the contents.



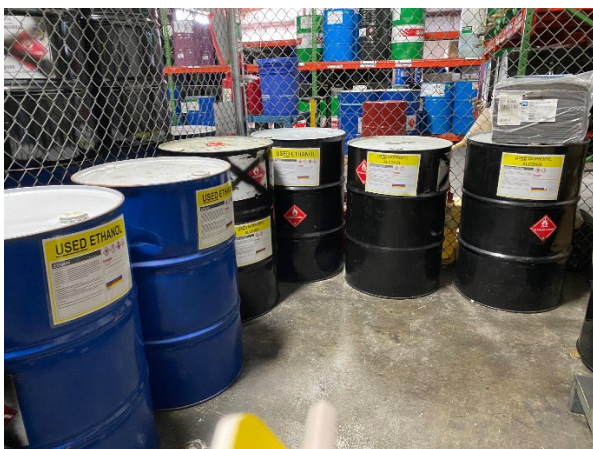
Photograph #10 – Resolv-r 2 solvent recovery system.



Photograph #11 – Siva S-10 solvent recovery system.



Photograph #12 – 55-gallon container of paint filter dated 3/28/22 in the Chemical Building.



Photograph #13 – 55-gallon containers of used ethanol and IPA stored in the Chemical Building.



Photograph #14 – Universal wastes containers in the Compressor Room.