Inspection Date(s):	07/23/2019		
Media:	RCRA		
Regulatory Program(s)	Subtitle C – Hazardous Waste		
Company Name:	**M&K Plating, Inc.**		
Facility Name:	**M&K Plating, Inc.**		
Facility Physical Location:	2621 Finley		
(city, state, zip code)	Ft. Worth, TX 76111		
Mailing address:	P.O. Box 7302		
(city, state, zip code)	Ft. Worth, TX 76111		
County/Parish:			
Facility Contact:	James Curry	President	
	jcurry@mandkplating.com		
FRS Number:	NA		
Identification/Permit Number:	TXD020342044		
Media Number:	TCEQ Solid Waste ID #35063		
NAICS:	332813		
SIC:	3471		

Personnel participating in inspection:			
Adolphus Talton	R6 EPA/6ECDSR	EPA Enforcement Officer	214-665-6651
Debra Pandak	R6 EPA/6ECDSR	EPA Enforcement Officer	214-665-7565
William Mansfield	R6 EPA/6ECDSR	EPA Enforcement Officer	214-665-8321
Sailee Gawande	TCEQ	State Inspector	817-588-5800
James Curry	M&K Plating, Inc.	President	817-332-6021
Jim Conner	TCS Texas	Consultant	817-449-3162

EPA Lead Inspector Signature/Date	ADOLPHUS TALTON Digitally signed by ADOLPHUS TALTON DN: c=US, o=U.S. Government, ou=Environmental Protection Agency, cn=ADOLPHUS TALTON, 0.9.2342.19200300.100.1.1=68001003655566 Date: 2019.11.06 10:25:11 -06'00'	
	Adolphus Talton	Date
Supervisor Signature/Date	JEFFREY YURK Digitally signed by JEFFREY YURK DN: c=US, o=U.S. Government, ou=Environmental Protection Agency, cn=JEFFREY YURK, 0.9.2342.19200300.100.1.1=68001003652717 Date: 2019.11.06 11:33:00 -06'00'	
	Jeffery Yurk	Date

Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

On 07/23/2019, the Environmental Protection Agency, Region 6 Enforcement, Compliance and Assurance Division (EPA) inspectors, Debra Pandak, William Mansfield and I, conducted a Resource Conservation and Recovery Act (RCRA) compliance evaluation inspection (CEI) of M&K Plating, Inc. (MKPI) in Ft. Worth, Texas (Appendix C, photographs 1 and 29). Consistent with the RCRA Program Authorization Memorandum of Agreement, the Texas Commission on Environmental Quality (TCEQ) was notified in advance and invited to accompany. TCEQ inspector Sailee Gawande participated in the inspection.

This inspection was conducted under the authority of section 3007 of RCRA. The CEI was conducted based on data from the Texas STEERS database and biennial report, showing the MKPI generating waste similar in volume to a Large Quantity Generator (LQG) for the period of 2015 to 2017. However, its current registered status is a Small Quantity Generator (SQG). The CEI assessed the facility's compliance with the RCRA, including: waste generation, hazardous waste determinations, and waste storage and management practices.

This report documents the onsite observations made during the inspection conducted at MKPI. Photographs taken during the inspection are presented in Appendix C.

FACILITY DESCRIPTION

MKPI is a zinc electroplater in operation for 44 years. MKPI plates charge cases for the oil field industry and fasteners of all types for the fastener industry in the area. MKPI operates 5 plating lines: 3-barrel plating lines, 1 rack plating line and 1 phosphorate plating Line (Appendix C, photographs 26). MKPI also operates a wastewater treatment system on-site to manage plating rinse water. A process overview provided by MKPI is contained in Appendix A and B. MKPI registered as a small quantity generator (SQG) on February 8, 2011. The biennial report dated March 1, 2018 reports MKPI as a large quantity generator (LQG). MKPI has a stormwater permit issued by TCEQ to discharge wastewater under permit No. TXR05CZ91.

Section II - OBSERVATION

This section documents EPA observations made during the inspection and includes reference to photographs taken during the inspection (Appendix C). This section is sub-divided by the areas of the facility observed: black zinc area, chemical product storage area, wastewater treatment system, storage yard, and plating lines.

We arrived at MKPI at 9:00 am on 07/23/2019 for an unannounced inspection. We met with James Curry, President of MKPI. I presented my credentials to Mr. Curry and informed him that this was an EPA inspection to determine compliance with the facility's RCRA generator requirements. An opening meeting was held with Mr. Curry. I discussed the purpose and tentative schedule of the inspection and informed Mr. Curry of the company's right to request confidentiality for sensitive business information.

EPA and TCEQ personnel performed the following activities:

- Interviewed Mr. Curry about process operations and points of hazardous waste generation.
- Conducted a walk-through tour to observe process operations and waste generation and storage areas.
- Requested and gathered facility documents, including process flow diagrams, training records, wastewater treatment permit issued by the City of Fort Worth, Texas, and several other documents (see documents with an asterisk in Section IV below).

Mr. Curry started the tour at the receiving and shipping area where customers and products are received and shipped (Appendix C, photographs 3). The wastewater treatment area is directly across from the receiving area (Appendix C, photographs 2).

Black Zinc Area

MKPI once operated a plating process that used black zinc and green dye. Mr. Curry said this operation is no longer in use. In the secondary containment area, we observed liquid residue of the operation (Appendix C, photograph 7). We also observed a super sack of wastewater sludge stored next to the black zinc secondary containment structure (Appendix C, photograph 6).

Chemical Product Storage Area

EPA observed sacks of zinc contaminated soil from prior spills and spilled material on the concrete near the black 55-gal drum. EPA asked Mr. Curry to identify the spilled material which he mentioned the possibility of being a zinc material. EPA observed three super sacks of sludge from wastewater treatment system. The sack in foreground was open (Appendix C, photographs 5, 8-10).

Waste Water Treatment System (WWTS)

EPA observed two half-filled 5-gallon open buckets of sludge (Appendix C, photograph 12). We also observed spilled material on the floor of the secondary containment area (Appendix C, photograph 12). The material was not identified by MPKI. We observed filter cake from the filter press on the floor under the press bench (Appendix C, photograph 16). Behind the bench press was the press operation exposing the piping and mechanics of the press. This is the collection area of the filter pressed sludge material. It was noticed that sludge material was on the floor (Appendix C, photograph 18). The sludge carries a hazardous waste code of F006. We also observed a leak at the connection port of a tank next to the filter press in the WWTS (Appendix C, photograph 19). Mr. Curry informed us that the tank was full of untreated wastewater. An EPA representative also observed an opened sludge tank near the sludge holding tank #5 full of sludge material being stored for processing through the filter press (Appendix C, photographs 20). A City POTW discharge point near the sludge holding tank #5 was

noticed by EPA representatives (Appendix C, photograph 21). The discharged point was locked by owner to prevent discharges.

EPA observed, and Mr. Curry explained, that all the units in the WWTS (listed below) are used to store treated/untreated wastewater and sludge in the wastewater treatment area:

WWTS Units observed during inspection:

- Tanks TX1 and TX2 (Appendix C, photograph 2)
- Tanks 2 (Appendix C, photograph 13)
- Tanks 3 (Appendix C, photograph 17)
- Tanks 4 (Appendix C, photograph 14)
- Tanks 5 (Appendix C, photograph 15, 16, and 19)
- Black/grey sludge tank (Appendix C, photograph 2)
- Blue sludge tank (Appendix C, photograph 2)
- Two 5-gal buckets of wastewater sludge (Appendix C, photograph 12)
- Waste tank cut down containing wastewater sludge (Appendix C, photograph 11)
- Three super sacks of wastewater sludge (Appendix C, photograph 9)
- Tank #5 holding filter press (Appendix C, photograph 15)
- Sludge tank (Appendix C, photograph 20)

Storage Yard

The storage yard is located outside on the north side of the MKPI property. Mr. Curry said MKPI is storing treated and untreated wastewater and wastewater sludge in totes and drums. Mr. Curry counted the number of containers during the inspection and there were 42 totes and 20 drums storing potentially hazardous waste (Appendix C, photograph 22-24). There was also observed the storage in process tanks in the area (Appendix C, photographs 23). The containers, totes, and tanks were missing hazardous waste labels and dates of accumulation/generation (Appendix C, photograph 22-24). Mr. Curry could not determine the length of time stored, but he gave an estimation of one year and 6 months.

Plating Lines

Plating lines are located adjacent to the office space of MKPI and consist of 5 lines (Appendix C, photographs 25 and 26):

- 3-barrel plating lines,
- 1 rack plating line, and
- 1 phosphorate plating line.

Mr. Curry identified two tanks being used to store electroplating wastewater and sludge: Tank 4 in barrel plating line #3 (Appendix C, photograph 25) and Tank 5 in the barrel plating line #1 (Appendix C**,** photograph 26). Mr. Curry said waste is held in the tanks until there is room in the WWTS. Normally the rinse water from the plating lines is piped directly to tanks in the WWTS for treatment, storage and disposal. Mr. Curry identified the hazardous characteristic of the untreated wastewater and sludge as D006 (cadmium), D007 (chromium), and F006. He said analytical testing for profiling the waste is conducted prior to disposal by the disposal firm hired by MKPI.

Public Owned Treatment Works (POTW)

In front of MKPI are outfalls A & B in which the City of Fort Worth required MKPI to cease from discharge because of prior violation of their water permit. MKPI placed a locked steel container over each outfall. This was done to comply with city requirements (Appendix C, photographs 27 and 28).

Section III – AREAS OF CONCERN

Areas of concern discussed during the inspection.

- Storage of hazardous waste in excess of 90 days on-site in the storage yard, and inside the facility.
- Lack of waste determinations for treated and untreated rinse waters and sludges in containers, tanks and totes stored throughout the facility.
- No labeling of tanks, totes, drums and super sacks containing hazardous waste.
- Observed leaks and spills in the WWTS and black zinc plating areas.
- Open containers, and tanks in WWTS area and storage yard.

Section IV – FOLLOW UP

The following documents were received by EPA on August 9, 2019, via U.S. Mail from MKPI. The documents were provided in electronic format on a flash drive.

- *Process flow diagram
- *Proposed treatment system diagram
- M&K Plating business background information
- 2018 Sludge Discharge Approval Documentation
- 2018 Toxic Organic Management Plan (TOMP)
- City of Ft Worth Compliance/Non-Compliance Documents
- City of Ft Worth Permit
- City of Ft Worth Show Cause Hearing Documentation
- Facility Layouts and Survey
- Notice of Registration (NOR)
- Plating Chemistry Documentation
- Plating Procedures
- Safety Data Sheet (SDS)
- Personal Identifiable information (excluded from report)
- Training Documents
- Treatment Systems Drawings
- Waste Manifests
- Wastewater Treatment Chemistry Documentation
- Wastewater Treatment Procedures

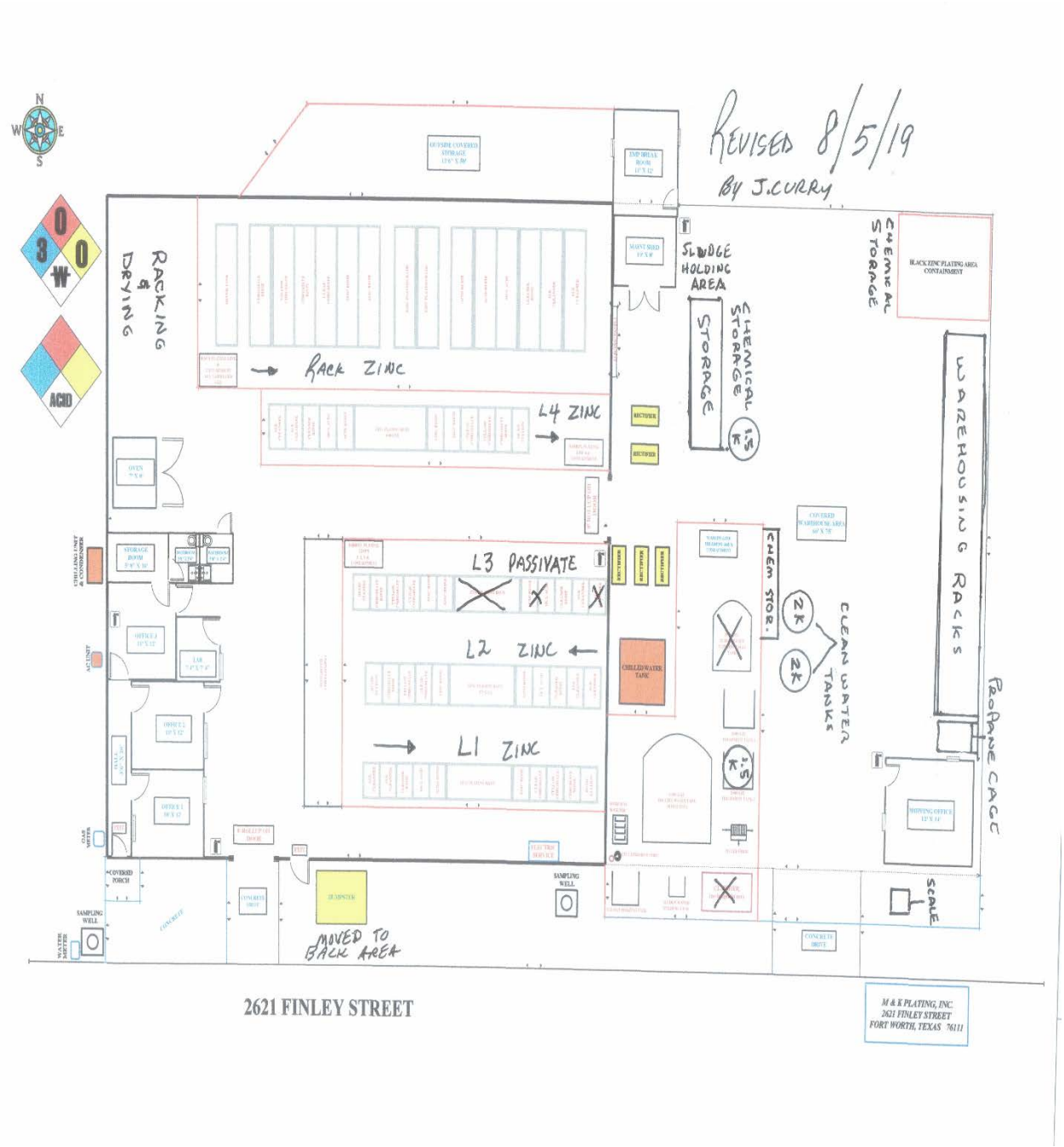
Section V – LIST OF APPENDICES

Appendix A –Process Overview (2 pages)

Appendix B – Proposed Treatment System Diagrams (3 pages)
Appendix C – EPA Photographs (30 pages)

Appendix A

Process Overview


REVISED 8/5/19
BY J.CURRY
RACKING & DRYING
RACK ZINC
L4 ZINC
L3 PASSIVATE
L2 ZINC
L1 ZINC
SLUDGE HOLDING AREA
CHEMICAL STORAGE
CHEMICAL STORAGE
BLACK ZINC PLATING AREA CONTAINMENT
WAREHOUSING RACKS
PROPANE CAGE
CHEM STOR.
CLEAN WATER TANKS
CHILLED WATER TANK
SCALE
DUMPSTER
MOVED TO BACK AREA
2621 FINLEY STREET
M & K PLATING, INC.
2621 FINLEY STREET
FORT WORTH, TEXAS 76111

Appendix B

Proposed Treatment System Diagrams

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 11

Location: M&K Plating 2621 Finley St.		
City: Fort Worth	County/Parish: Tarrant	State: Texas

Appendix C

Photograph Log

Photo File Name: P7230001
Date of Photo: July 23, 2019 Time: 9:27 a.m.
Photographer: Debra Pandak, EPA Inspector
Description: Outside of facility.

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Photo File Name: P7230002
Date of Photo: July 23, 2019 Time: 10:46 a.m.
Photographer: Debra Pandak, EPA Inspector
Description: View of wastewater treatment area (left). Receiving area is located off photo to the right.

Photo File Name: P7230003
Date of Photo: July 23, 2019 Time: 10:48 a.m.
Photographer: Debra Pandak, EPA Inspector
Description: Receiving office.

Photo File Name: P7230004
Date of Photo: July 23, 2019 Time: 10:48 a.m.
Photographer: Debra Pandak, EPA Inspector
Description: Chemical and product storage area adjacent to receiving area.

Photo File Name: P7230005
Date of Photo: July 23, 2019 Time: 10:50 a.m.
Photographer: Debra Pandak, EPA Inspector
Description: Chemical storage area. Products used in processes on site.

Photo File Name: P7230006
Date of Photo: July 23, 2019 Time: 10:51 a.m.
Photographer: Debra Pandak, EPA Inspector
Description: Sack with waste sludge located next to black zinc area.

Photo File Name: P7230007
Date of Photo: July 23, 2019 Time: 10:52 a.m.
Photographer: Debra Pandak, EPA Inspector
Description: Area previously used for black zinc. Owner said water contains green dye from black zinc process. Area last used 3 years ago per owner.

Photo File Name: P7230008
Date of Photo: July 23, 2019 Time: 10:53 a.m.
Photographer: Debra Pandak, EPA Inspector
Description: Chemical product storage area. Includes sacks of zinc contaminated soil from prior spill.

Photo File Name: P7230009
Date of Photo: July 23, 2019 Time: 10:54 a.m.
Photographer: Debra Pandak, EPA Inspector
Description: Three sacks of sludge from wastewater treatment system. Sack in foreground is open.

Photo File Name: P7230010
Date of Photo: July 23, 2019 Time: 10:58 a.m.
Photographer: Debra Pandak, EPA Inspector
Description: Stacked sacks containing soil contaminated with zinc. Soils were contaminated from a spill on site. Stored in chemical product area.

Photo File Name: P7230011
Date of Photo: July 23, 2019 Time: 11:00 a.m.
Photographer: Debra Pandak, EPA Inspector
Description: Photo of wastewater treatment area. Shown: prior waste tank cut down but contains sludge.

Photo File Name: P7230012
Date of Photo: July 23, 2019 Time: 11:01 a.m.
Photographer: Debra Pandak, EPA Inspector
Description: Photo of wastewater treatment area. Shown: curbing, two buckets with sludge, floor of containment area, and cut tank in background.

Photo File Name: P7230013
Date of Photo: July 23, 2019 Time: 11:03 a.m.
Photographer: Debra Pandak, EPA Inspector
Description: Photo of wastewater treatment system. Shown: treatment tank for concentrates.

Photo File Name: P7230014
Date of Photo: July 23, 2019 Time: 11:03 a.m.
Photographer: Debra Pandak, EPA Inspector
Description: Photo of wastewater treatment system. Shown: treatment tank for rinse waters (center), and filter (grey cylinder left).

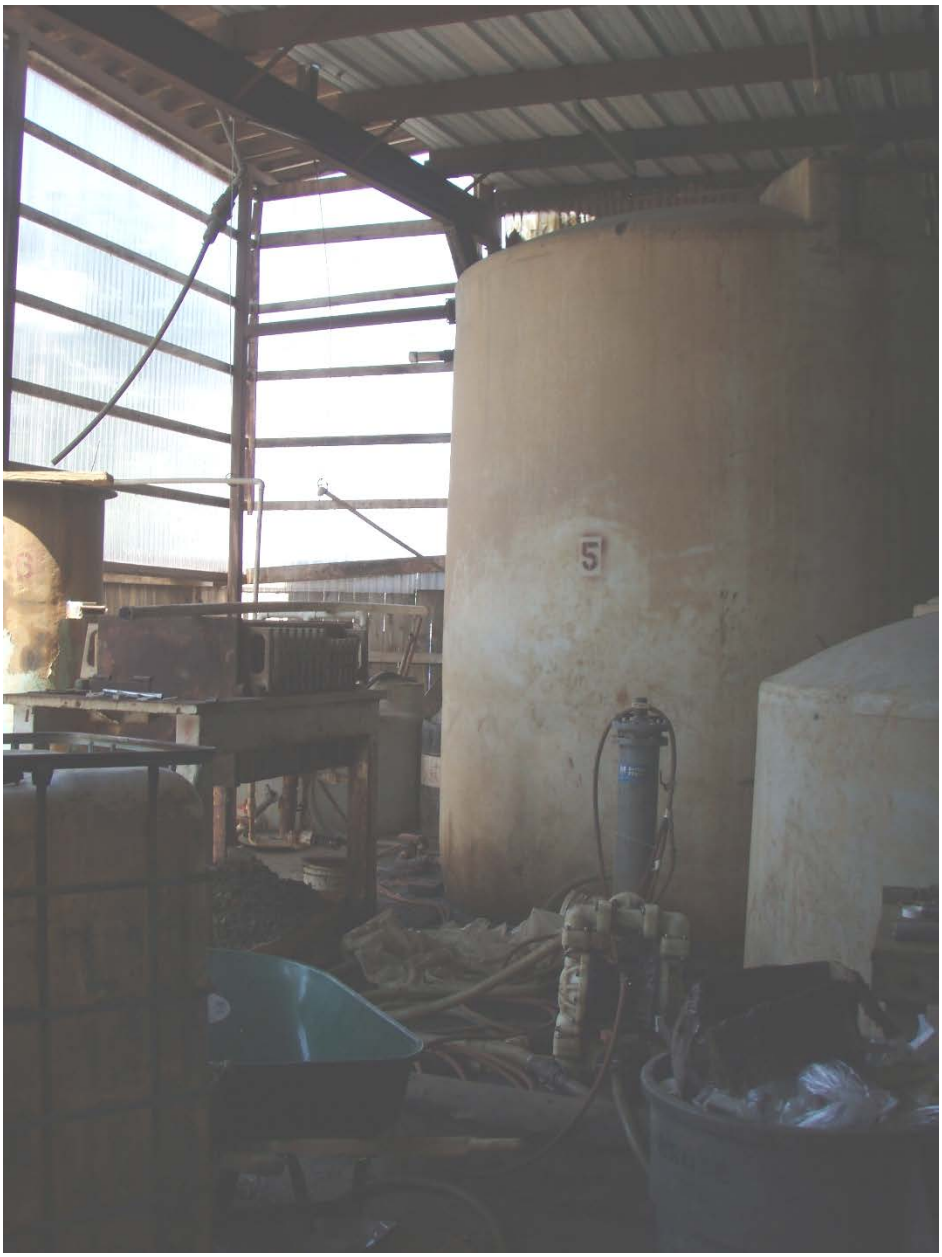

Photo File Name: P7230015
Date of Photo: July 23, 2019 Time: 11:03 a.m.
Photographer: Debra Pandak, EPA Inspector
Description: Photo of wastewater treatment system. Shown: tank typically used for treated water (tank 5), filter (grey cylinder; center) and filter press (left). Photo lightened, and contrast lightened to show detail.

Photo File Name: P7230016
Date of Photo: July 23, 2019 Time: 11:04 a.m.
Photographer: Debra Pandak, EPA Inspector
Description: Filter press for wastewater treatment system.

Photo File Name: P7230017
Date of Photo: July 23, 2019 Time: 11:05 a.m.
Photographer: Debra Pandak, EPA Inspector
Description: Extra tanks brought in to hold treated wastewater prior to shipping off-site. Tank on left is metal and on the right is plastic.

Photo File Name: P7230018
Date of Photo: July 23, 2019 Time: 11:13 a.m.
Photographer: Debra Pandak, EPA Inspector
Description: Filter press showing piping and mechanics. Sludge collection below.

Photo File Name: P7230019
Date of Photo: July 23, 2019 Time: 11:14 a.m.
Photographer: Debra Pandak, EPA Inspector
Description: Leak/spillage at connection to tank next to filter press. Tank is full of untreated wastewater per the owner.

Photo File Name: P7230020
Date of Photo: July 23, 2019 Time: 11:17 a.m.
Photographer: Debra Pandak, EPA Inspector
Description: Sludge tank within wastewater treatment containment area. During inspection full.

Photo File Name: P7230021
Date of Photo: July 23, 2019 Time: 11:19 a.m.
Photographer: Debra Pandak, EPA Inspector
Description: City POTW discharge point locked by owner to prevent discharges. Located in wastewater treatment containment area.

Photo File Name: P7230022
Date of Photo: July 23, 2019 Time: 11:25 a.m.
Photographer: Debra Pandak, EPA Inspector
Description: Back yard area used to store untreated wastewater/sludge in totes and drums. Owner counted 42 totes and 20 drums.

Photo File Name: P7230023
Date of Photo: July 23, 2019 Time: 11:29 a.m.
Photographer: Debra Pandak, EPA Inspector
Description: Back yard area used to store totes and drums of untreated wastewater/sludge. View of old process tanks no longer used by M&K.

Photo File Name: P7230024
Date of Photo: July 23, 2019 Time: 11:31 a.m.
Photographer: Debra Pandak, EPA Inspector
Description: Back yard area used to store totes and drums containing untreated wastewater/sludge.

Photo File Name: P7230025
Date of Photo: July 23, 2019 Time: 11:35 a.m.
Photographer: Debra Pandak, EPA Inspector
Description: Plating line 3 in foreground. Line one in background. Tank prominent in photo is being used to store untreated rinse/wastewater. Photo lightened to show detail.

Photo File Name: P7230026
Date of Photo: July 23, 2019 Time: 11:41 a.m.
Photographer: Debra Pandak, EPA Inspector
Description: View inside plating line area. Line 1 in foreground, line 5 in back (left in picture).

Photo File Name: P7230027
Date of Photo: July 23, 2019 Time: 11:43 a.m.
Photographer: Debra Pandak, EPA Inspector
Description: City POTW outfall monitoring well/sump A. Located in front of facility

Photo File Name: P7230028
Date of Photo: July 23, 2019 Time: 11:45 a.m.
Photographer: Debra Pandak, EPA Inspector
Description: City POTW outfall monitoring well/sump B. Located in front of facility

Photo File Name: P7230029
Date of Photo: July 23, 2019 Time: 11:46 a.m.
Photographer: Debra Pandak, EPA Inspector
Description: Front of M&K Plating facility.