

INSPECTION REPORT

Inspection Entry Date/Time	08/29/2024 08:43 AM (PT)	Announced: No	
Inspection Exit Date/Time	08/29/2024 12:11 PM (PT)	Access: Granted	
Regulatory Program	RCRA		
Type of Inspection	Compliance Evaluation Inspection (CEI)		
Company Name	Portland Bolt & Manufacturing Company, Inc.		
Facility or Site Name	Portland Bolt & Manufacturing Company, Inc.		
Facility/Site Identifier	OR0000545798		
Facility/Site Physical Address	3441 NW Guam St		
City, State, Zip Code	Portland, OR 97210-1613		
County/Borough	Multnomah		
Generator Status	Large Quantity Generator (LQG)		
NAICS	332722 - BOLT, NUT, SCREW, RIVET, AND WASHER MANUFACTURING		
Type of Operation	Manufacturer of large, nonstandard anchor bolts and construction fasteners		
Geographic Coordinates	45.545, -122.717		
Mailing Address/Secondary Address	Zach Standish, Operations Manager zstandish@portlandbolt.com Portland Bolt & Manufacturing Company, Inc. 3441 NW Guam St. Portland, OR 97210-1613		
City, State, Zip Code	Portland, OR 97210-1613		
Permit Number (If Applicable)	Not Applicable		
Lead Inspector:			
Jon Jones	Jones, Jon	Digitally signed by Jones, Jon Date: 2024.10.25 08:26:48 -08'00'	
	EPA Region 10	Jones.Jon@epa.gov	(907) 271-6329
Supervisor Review:			
Matthew Quarterman	MATTHEW QUARTERMAN	Digitally signed by MATTHEW QUARTERMAN Date: 2024.10.29 15:02:38 -07'00'	
	EPA Region 10	Quarterman.Matthew@epa.gov	(206) 553-2146

SECTION I – INTRODUCTION

Site Entry and Purpose of the Inspection

Type of inspection: Compliance Evaluation Inspection (CEI)

EPA Region 10 Lead Inspector, Jon Jones, arrived at the Portland Bolt & Manufacturing Company, Inc. Facility (the “Site” or “Facility”), located at 3441 NW Guam St., Portland, OR 97210-1613, at 08:43 AM (PT) on 08/29/2024 for an unannounced inspection. EPA Region 10 Lead Inspector presented credentials to and informed Trevor Tucker, Production Supervisor, that this was an EPA Region 10 inspection to determine compliance with Resource Conservation and Recovery Act (RCRA).

This was a Resource Conservation and Recovery Act (RCRA) inspection conducted pursuant to Oregon's federally authorized RCRA program which is found at OAR chapter 340. The facility was inspected in accordance with OAR chapter 340, divisions 100 to 106, 109, 111, 113, 120, 124 and 142 which incorporates by reference, hazardous waste management regulations of the federal program, included in 40 C. F. R. Parts 260 to 268, 270, 273 and Subpart A and Subpart B of Part 124 into the Oregon Administrative Rules. The inspection was conducted as a core program requirement for fiscal year 2024.

This report is based on information supplied by Portland Bolt & Manufacturing Company, Inc. Facility representatives, observations made by the EPA REGION 10 inspector, and records and reports maintained by the facility including, but not limited to: direct observations made by the EPA Region 10 Inspector(s), photographs taken by EPA Region 10 inspector(s), physical evidence collected by the EPA Region 10 inspector(s), measurements or samples taken by EPA Region 10 inspector(s), verbal or written statements made by information supplied by the facility representatives during or subsequent to the on-site Inspection, and materials, processes, data, photographs, or documents shown, demonstrated, or submitted to the EPA Region 10 inspector(s) by the facility representatives during or subsequent to the on-site Inspection. In addition, information gathered prior to or subsequent to the Inspection from a review of USEPA, State, and public records may be included in this report.

Attendees

Title/Organization	Name	Phone	Email	Opening Conf.	Closing Conf.
Lead Inspector/EPA REGION 10	Jon Jones	(907) 271-6329	Jones.Jon@epa.gov	Yes	Yes
Operations Manager /Portland Bolt & Manufacturing Company, Inc.	Zach Standish	(503) 595-5789	zstandish@portlandbolt.com	Yes	Yes
Production Supervisor /Portland Bolt & Manufacturing Company, Inc.	Trever Tucker	(503) 323-0432	trever@portlandbolt.com	Yes	Yes
RCRA inspector/Oregon department of environmental quality	Eric Kelly	(971) 563-6863	eric.kelley@deq.oregon.gov	Yes	Yes
RCRA Inspector /Washington Department of Ecology	Garret Peck	(564) 669-0836	gpec461@ECY.WA.GOV	Yes	Yes

Opening Conference

Shortly after arriving on-site, we met Mr. Trevor Tucker, Production Supervisor. Mr. Tucker invited us to a facility conference room. Just after entering the conference room, we met with Mr. Zach Standish, Operations Manager.

During the opening conference, I asked about any changes since the last RCRA compliance inspection, by ODEQ, of the facility which took place on 2/24/2017. Mr. Tucker told us about the following changes:

- The facility switched from caustic soda to phosphoric acid in 2020 due to ease of use. Portland Bolt staff discovered the phosphoric remained workable longer than the caustic, and they have yet to generate any hazardous waste from this process.
- Waste sulfuric acid is no longer accumulated on-site. An acid tank is pumped out into a tote, where it is then designated as a hazardous waste and shipped out the same day. About 5, ~300 to 350-gallon totes are filled from one of two tanks, staggered quarterly, generating roughly 15K to 16K pounds a quarter.

We were not denied access to any portion of the facility and were not denied permission to take photographs. We were accompanied during the entirety of the inspection by Mr. Tucker.

During the inspection of the facility, I looked at the facility's processes, hazardous waste management practices, generation points, and accumulation areas. I looked for wastes that facility representatives had not yet identified or designated as hazardous. I also observed the facility's used oil management. At the time of the inspection, the facility was not generating any wastes being managed as universal waste.

Only those areas in which I observed potential compliance concerns or noted other pertinent issues are discussed in Section III of this inspection report.

Facility/Site Information

Safety Training Provided to Inspector(s)?	No
Operating Hours	6:30 a.m. to 11:00 p.m. Monday through Friday
Length of Facility at Location	Since 1991
Number of employees	70
Size of Facility	Approximately 137,000 square feet
What type of generator facility notified?	Large Quantity Generator (LQG)
What type of generator facility verified as?	LQG

Portland Bolt is a manufacturer of large, nonstandard anchor bolts and construction fasteners. The facility includes a hot dip galvanizing line, welding and plate fabrication equipment, and a warehouse. Its galvanizing line produces hazardous waste. The facility periodically cleans out a sulfuric acid process that has heavy metal contaminants.

Additional information about the facility can be found on their website at portlandbolt.com.

Process Description

Facility processes include the following:

- Hot dip galvanizing

- Heading
- Threading
- Cutting
- Plate fabrication
- Bending

The bulk of the facility's waste generation is their waste sulfuric acid, followed by waste aerosol cans, and waste aerosol can residue from a can popping process. The facility contracts out the removal and replacement of all their lighting as well as the removal and replacement of oil in all of their equipment. The facility does not generate any waste batteries or waste antifreeze. Metal chips and shavings are recycled as scrap metal.

All the locations inspected are listed in the building(s) table below.

Building(s)

Building/Area/Sub-area	Process Description	Area of Concern
Portland Bolt & Manufacturing Company, Inc.		Yes
Cutting Department	Waste aerosol SAA	Yes
Expansion Area		Yes
Galvanizing Department	Waste aerosol residue SAA	Yes
Lower Mezzanine Storage	New leather glove storage	Yes
Maintenance Department	Waste aerosol can SAA	Yes
Packaging Department	Waste aerosol can SAA	Yes
West Bay Round Bar Storage		Yes

SECTION II – OBSERVATIONS

Building: Portland Bolt & Manufacturing Company, Inc./Galvanizing Department			
Observation #: JJ1-OB-001	Date: 08/29/2024	Contains AOC: No	Contains CBI: No
Person Interviewed: Trever Tucker		Title: Production Supervisor	
We started the inspection in the facility’s Galvanizing Department. While there, I inspected the old caustic tank. At the time of the inspection, the caustic tank was no longer in-use. According to Mr. Tucker that tank had been removed from service. During the inspection, I did not observe any areas of concern related to the caustic tank.			
Photo(s) 1. IMG-20240829092107217110798.jpg 2. IMG-20240829092124212485967.jpg			

Building: Portland Bolt & Manufacturing Company, Inc./Galvanizing Department			
Observation #: JJ1-OB-002	Date: 08/29/2024	Contains AOC: No	Contains CBI: No
Person Interviewed: Trever Tucker		Title: Production Supervisor	
While still in the Galvanizing Department, I inspected the sulfuric acid tanks and rinse tanks. According to Mr. Tucker, every three to four months the contents of one of the two sulfuric acid tanks are pumped out into large ~300 to 350-gallon totes. There are two sulfuric acid tanks and each time the tanks are pumped out they generate about five totes of sulfuric acid waste per tank. The generation of the waste acid is staggered. Waste			

is generated after pumping each tank every other quarter (~three months). According to Mr. Tucker, the hazardous waste company (Clean Earth Specialty Waste Solutions) comes and pumps out sulfuric waste into totes. When the acid is pumped into the tote, the facility makes a waste determination and ships the acid offsite as a hazardous waste.

The sulfuric acid waste designates for corrosivity (D002), chromium (D007), and lead (D008). A copy of the disposal paperwork for the last shipment was provided by the facility and included in the Document Log of this report. A map of the area and description of the tanks is included as an attachment to the facility's Contingency/Response Plan that was provided following the inspection and is also included in the Document Log of this report. No areas of concern were identified in the area of the sulfuric acid tanks.

Photo(s)

1. [IMG-2024082909310931991842.jpg](#)
2. [IMG-20240829093150315079251.jpg](#)
3. [IMG-202408290932203220111271.jpg](#)

Building: Portland Bolt & Manufacturing Company, Inc./Galvanizing Department

Observation #: JJ1-OB-003

Date: 08/29/2024

Contains AOC: Yes

Contains CBI: No

Person Interviewed: Trever Tucker

Title: Production Supervisor

While still in the Galvanizing Department, I saw a closed-top, 55-gallon SAA container, with an attached filter and aerosol can popping device. The facility was using the container to accumulate waste aerosol can residue generated during the Aerosol can popping process. I pushed on and tapped the container in an effort to determine how much waste the container held. The container was closed and was approximately 1/3 full of waste aerosol can residue. Mr. Tucker concurred that the container seemed to be approximately 1/3 full.

At the time of the inspection, I saw the following areas of concern related to the container:

- There were nine waste aerosol cans on top of the 55-gallon SAA container which had not yet been processed through the waste aerosol can popper. These waste aerosol cans were not labeled with the words "Hazardous Waste" or marked with hazard indicators.
- The 55-gallon SAA drum of waste aerosol can residue was not visibly labeled with the words "Hazardous Waste." There was a hazardous waste label on the container; however, it was very faded and covered with paint overspray to make it unreadable.
- The 55-gallon SAA container was not marked with a hazard indicator.

Photo(s)

1. [IMG-202408290943534353107511.jpg](#)
2. [IMG-20240829094401441112444.jpg](#)
3. [IMG-202408290944134413124554.jpg](#)
4. [IMG-202408290944174417113457.jpg](#)
5. [IMG-202408290944464446101015.jpg](#)
6. [IMG-202408290944514451110687.jpg](#)
7. [IMG-202408290945124512143324.jpg](#)
8. [IMG-202408290945174517110695.jpg](#)
9. [IMG-2024082909470747780983.jpg](#)

Building: Portland Bolt & Manufacturing Company, Inc./Packaging Department

Observation #: JJ1-OB-004	Date: 08/29/2024	Contains AOC: Yes	Contains CBI: No
Person Interviewed: Trever Tucker		Title: Production Supervisor	
While in the Packaging Department, I saw a 20- gallon step-can that held waste aerosol cans. The step-can lid was labeled "AEROSOL CANS DESTINED FOR THE ASPIRATOR." At the time of the inspection, the waste aerosol SAA container was not closed, due to having too many waste aerosol cans inside the container. The SAA container was also not labeled with the words "Hazardous Waste" or marked with a hazard indicator.			
Photo(s) 1. IMG-20240829095750575091802.jpg 2. IMG-20240829095759575981418.jpg 3. IMG-2024082909580758791085.jpg 4. IMG-20240829095815581591289.jpg 5. IMG-202408290958275827102119.jpg			

Building: Portland Bolt & Manufacturing Company, Inc./Cutting Department			
Observation #: JJ1-OB-005	Date: 08/29/2024	Contains AOC: Yes	Contains CBI: No
Person Interviewed: Trever Tucker		Title: Production Supervisor	
While in the Cutting Department, I saw an aerosol can on top of a yellow flammable storage cabinet. I picked up the aerosol can, shook it, and identified it as a waste aerosol can. Mr. Tucker verified that it was a waste aerosol can. I opened the flammable storage cabinet and found another waste aerosol can inside which was verified by Mr. Tucker as being a waste aerosol can. At the time of the inspection, the two waste aerosol cans were not labeled with the words "Hazardous Waste" or marked with a hazard indicator. Mr. Tucker placed the waste aerosol cans into the SAA during the inspection. Adjacent to the flammable storage cabinet, I saw another 20-gallon waste aerosol SAA step-can that held waste aerosol cans. At the time of the inspection, the SAA step-can was not closed (step-can lid was not making a complete seal with the container) and not marked with a hazard indicator.			
Photo(s) 1. IMG-2024082910075675673869.jpg 2. IMG-202408291008028292014.jpg 3. IMG-2024082910081281297979.jpg 4. IMG-2024082910094894886807.jpg 5. IMG-2024082910095695666293.jpg 6. IMG-2024082910100210263627.jpg 7. IMG-2024082910100810886054.jpg 8. IMG-20240829101018101870225.jpg 9. IMG-20240829101028102858336.jpg 10. IMG-20240829101221122189385.jpg 11. IMG-202408291012281228101185.jpg			

Building: Portland Bolt & Manufacturing Company, Inc./West Bay Round Bar Storage			
Observation #: JJ1-OB-006	Date: 08/29/2024	Contains AOC: Yes	Contains CBI: No
Person Interviewed: Trever Tucker		Title: Production Supervisor	
While inspecting the area, I saw a yellow flammable storage cabinet that had some aerosol cans up on top of the cabinet. Upon further inspection, I saw that there were four waste aerosol cans on top of the cabinet and one waste aerosol can inside of the cabinet. Mr. Tucker verified that all five aerosol cans were waste aerosol cans. At the time of the inspection, all five waste aerosol cans were not labeled with the words "Hazardous Waste" and not marked with hazard indicators. During the inspection, Mr. Tucker removed the waste aerosol cans from the area and placed them into a waste aerosol SAA container.			
Photo(s) 1. IMG-20240829101934193471845.jpg 2. IMG-20240829101949194997409.jpg 3. IMG-20240829101953195399032.jpg 4. IMG-202408291019591959104002.jpg 5. IMG-20240829102011201185244.jpg			

Building: Portland Bolt & Manufacturing Company, Inc./Maintenance Department			
Observation #: JJ1-OB-007	Date: 08/29/2024	Contains AOC: Yes	Contains CBI: No
Person Interviewed: Trever Tucker		Title: Production Supervisor	
While passing through the Maintenance Department, I saw oil on the floor next to a container with parts. According to Mr. Tucker, the oil was a 40-wt oil for diesel engines and the oil in the container will be recycled and put back into machinery that uses a gear oil. According to Mr. Tucker, he had pulled the parts the evening prior and hadn't cleaned up before leaving for the day. At the time of the inspection, there was a release of used oil that had not been managed properly.			
Photo(s) 1. IMG-20240829103203323103365.jpg 2. IMG-20240829103210321062832.jpg			

Building: Portland Bolt & Manufacturing Company, Inc./Maintenance Department			
Observation #: JJ1-OB-008	Date: 08/29/2024	Contains AOC: Yes	Contains CBI: No
Person Interviewed: Trever Tucker		Title: Production Supervisor	
While still in the Maintenance Department, I saw a ten-gallon SAA step-can that held waste aerosol cans. At the time of the inspection, the step-can lid did not make a complete seal with the step-can and was not closed. The SAA step-can was also not labeled with the words "Hazardous Waste" and was not marked with a hazard indicator.			

Photo(s)

1. [IMG-20240829103620362072630.jpg](#)
2. [IMG-20240829103626362662161.jpg](#)
3. [IMG-20240829103630363066489.jpg](#)
4. [IMG-20240829103643364371802.jpg](#)

Building: Portland Bolt & Manufacturing Company, Inc./Expansion Area**Observation #:** JJ1-OB-009**Date:** 08/29/2024**Contains AOC:** Yes**Contains CBI:** No**Person Interviewed:** Trever Tucker**Title:** Production Supervisor

We entered an area of the facility that Mr. Tucker told us was the expansion area. He told us that the facility was expanding operations and while there, contractors were working on-site. While I was inspecting the expansion area, I saw a pan containing a dark liquid next to a compressor. At the time of the inspection, Mr. Tucker didn't know what the pan held. The pan was approximately one and a half feet in diameter and five inches tall. The unknown liquid in the pan was approximately three inches deep in the pan. I told Mr. Tucker that he would need to make a waste determination.

Photo(s)

1. [IMG-20240829104619461971266.jpg](#)
2. [IMG-20240829104625462588934.jpg](#)
3. [IMG-20240829104630463072337.jpg](#)

Building: Portland Bolt & Manufacturing Company, Inc./Expansion Area**Observation #:** JJ1-OB-010**Date:** 08/29/2024**Contains AOC:** Yes**Contains CBI:** No**Person Interviewed:** Trever Tucker**Title:** Production Supervisor

While still in the expansion area, I saw what appeared to be a waste aerosol can that was inside of a trash can. I pulled the aerosol can from the trash and shook it and it felt empty and waste-like. Mr. Tucker verified that the aerosol can was a waste aerosol.

During the inspection, I spoke with Mr. Tucker about contractors performing work at facilities which led to a discussion about co-generators of hazardous waste. I explained that Portland Bolt could be a co-generator of the waste aerosol in trash. I suggested that he might want to set up another waste aerosol can SAA container in the expansion area for the contractors to use.

At the time of the inspection, the waste aerosol can in the trash was not labeled with the words "Hazardous Waste" and was not marked with a hazard indicator.

Photo(s)

1. [IMG-20240829105044504460094.jpg](#)
2. [IMG-20240829105049504977181.jpg](#)
3. [IMG-2024082910510351387511.jpg](#)

Building: Portland Bolt & Manufacturing Company, Inc./Lower Mezzanine Storage**Observation #:** JJ1-OB-011**Date:** 08/29/2024**Contains AOC:** Yes**Contains CBI:** No**Person Interviewed:** Trever Tucker**Title:** Production Supervisor

During the inspection, I asked Mr. Tucker if the facility provided any PPE to employees that were made of leather (i.e., leather gloves, welding chaps, or work boots). Mr. Tucker did tell me that they supply leather gloves to their employees. I asked to see the area where the gloves were kept prior to being issued or provided to the employees. Upon arriving at the Lower Mezzanine Storage area, I saw some shelves where the gloves were being stored prior to use. I explained to Mr. Tucker that the gloves typically fail TCLP for chrome and that his facility would need to make a waste determination for waste leather gloves.

I then asked Mr. Tucker if he could provide me with an inventory of the leather gloves the facility purchased over the last three years. I explained that the information would provide an approximate number of the amount of waste leather gloves that the facility generated each year. Mr. Tucker provided this data following the inspection and indicated in an email that the facility had purchased approximately 1470 pairs of gloves from Airgas of varying sizes and styles since 2021.

At the time of the inspection, no discarded leather gloves were observed in any trash can at the facility.

Photo(s)

1. [IMG-20240829105712571265514.jpg](#)
2. [IMG-20240829105716571661045.jpg](#)
3. [IMG-20240829105720572054628.jpg](#)
4. [IMG-20240829105750575062079.jpg](#)
5. [IMG-2024082910580358354320.jpg](#)

SECTION III – RECORDS REVIEW

Record: Personnel Training		AOC: Yes
Ref #: JJ1-RR-001	Reviewed By: Jon Jones	Reviewed Date: 08/29/2024
At the time of the inspection, the facility did not have a training plan and employees managing hazardous waste had not had any training for several years.		
Record: Contingency Plan's Quick Reference Guide		AOC: No
Ref #: JJ1-RR-002	Reviewed By: Jon Jones	Reviewed Date: 08/29/2024
I inspected the facility's Contingency/Response Plan during the inspection and saw that there was a change in facility personnel that had not yet been updated in their current plan. According to facility personnel, there was a change in one of the emergency coordinators within approximately the last month. I asked Mr. Tucker and Mr. Standish if they could make the changes right away and provide me with a copy.		
Immediately following the inspection, Mr. Standish emailed a copy of the updated Contingency/Response Plan on 8/29/2024. The facility also followed up with emails, that included attached copies of the plan, to the local Police, Fire, and medical facilities.		
Both a copy of the Contingency/Response Plan as well as copies of emails demonstrating distribution of the plan are included in the Document Log of this report.		
Record: Inspections		AOC: Yes
Ref #: JJ1-RR-003	Reviewed By: Jon Jones	Reviewed Date: 08/29/2024

I inspected weekly hazardous waste inspections for the period from August 29, 2021, through December 31, 2021. During this period, I saw that there were no inspections that were conducted from August 29, 2021, through October 9, 2021, for a total of six weeks.

Photo(s)

1. [IMG-20240829114427442768543.jpg](#)
2. [IMG-20240829114435443572564.jpg](#)

SECTION IV – AREA OF CONCERN

The presentation of Area(s) of Concern does not constitute a formal compliance determination or violation.

Building: Portland Bolt & Manufacturing Company, Inc.	Area: Galvanizing Department	Sub-area:
JJ1-OB-003		
Nine waste aerosol cans on top of waste aerosol residue SAA container not labeled with the words “Hazardous Waste” or marked with hazard indicators.	Regulations:	Sections:
Building: Portland Bolt & Manufacturing Company, Inc.	Area: Galvanizing Department	Sub-area:
JJ1-OB-003		
55-gallon waste aerosol can residue SAA container was not labeled with the words “Hazardous Waste.”	Regulations:	Sections:
Building: Portland Bolt & Manufacturing Company, Inc.	Area: Galvanizing Department	Sub-area:
JJ1-OB-003		
55-gallon waste aerosol can residue SAA container was not marked with a hazard indicator.	Regulations:	Sections:
Building: Portland Bolt & Manufacturing Company, Inc.	Area: Packaging Department	Sub-area:
JJ1-OB-004		
A waste aerosol SAA Step-can was not closed, not labeled with the words “Hazardous Waste,” and not marked with a hazard indicator.	Regulations:	Sections:
Building: Portland Bolt & Manufacturing Company, Inc.	Area: Cutting Department	Sub-area:

JJ1-OB-005		
A waste aerosol can on top of a yellow flammable storage cabinet was not labeled with the words "Hazardous Waste," and not marked with a hazard indicator.	Regulations:	Sections:
Building: Portland Bolt & Manufacturing Company, Inc.	Area: Cutting Department	Sub-area:
JJ1-OB-005		
A waste aerosol can SAA Step-can was not closed, and not marked with a hazard indicator.	Regulations:	Sections:
Building: Portland Bolt & Manufacturing Company, Inc.	Area: Cutting Department	Sub-area:
JJ1-OB-005		
A waste aerosol can in a storage cabinet was not labeled with the words "Hazardous Waste," and not marked with a hazard indicator.	Regulations:	Sections:
Building: Portland Bolt & Manufacturing Company, Inc.	Area: West Bay Round Bar Storage	Sub-area:
JJ1-OB-006		
Four waste aerosol cans on top of cabinet, and one waste aerosol inside a cabinet were not labeled with the words "Hazardous Waste," and not marked with a hazard indicator.	Regulations:	Sections:
Building: Portland Bolt & Manufacturing Company, Inc.	Area: Maintenance Department	Sub-area:
JJ1-OB-007		
A release of used oil had not been managed properly.	Regulations:	Sections:
Building: Portland Bolt & Manufacturing Company, Inc.	Area: Maintenance Department	Sub-area:
JJ1-OB-008		
A waste aerosol can SAA Step-can was not closed, not labeled with the	Regulations:	Sections:

words "Hazardous Waste," and not marked with a hazard indicator.		
Building: Portland Bolt & Manufacturing Company, Inc.	Area: Expansion Area	Sub-area:
JJ1-OB-009		
Failure to make a hazardous waste determination at the point of generation for the contents of a pan that held a thick, dark colored unknown liquid.	Regulations:	Sections:
Building: Portland Bolt & Manufacturing Company, Inc.	Area: Expansion Area	Sub-area:
JJ1-OB-010		
Waste aerosol was found in a trash can and was not labeled with the words "Hazardous Waste," and not marked with a hazard indicator.	Regulations:	Sections:
Building: Portland Bolt & Manufacturing Company, Inc.	Area: Lower Mezzanine Storage	Sub-area:
JJ1-OB-011		
Failure to make a hazardous waste determination at the point of generation for leather gloves.	Regulations:	Sections:

Record: Personnel Training		
JJ1-RR-001		
No training plan and no training for several years for personnel that manage hazardous waste.	Regulations:	Sections:
Record: Inspections		
JJ1-RR-003		
No weekly hazardous waste inspections were conducted from 8/29/21 through 10/09/21 for a total of six weeks.	Regulations:	Sections:

SECTION V – CLOSING CONFERENCE AND FOLLOW UP

Closing Conference

At the end of the inspection, I held a closing conference to discuss the findings of my inspection with Portland Bolt personnel. I explained that I had inspected the facility looking at areas where solid, and hazardous wastes were managed. I discussed all the areas of concern that are identified in Section III of the report, and I also explained the report writing process and follow-up process once the report was completed.

Follow Up

Following the inspection, I received photos from the facility that were provided to show that the facility had taken corrective action for some of the areas of concern that were identified on the day of the inspection.

A few of the photos, showing the waste aerosol can SAA step-cans seemed to indicate that the waste aerosol cans were going to be managed as universal waste prior to the can popping process. These photos showed that they were marked with the words "Universal Waste;" however, the labels were not specific to the universal waste being managed and should have either been labeled with either of the following phrases, "Universal Waste – Aerosol Can(s)," "Waste Aerosol Can(s)," or "Used Aerosol Can(s)."

Photos of the 55-gallon waste aerosol residue SAA container showed that it had been relabeled with a legible hazardous waste label but had not been marked with a hazard indicator. In the photo provided, the container was also not closed.

SECTION VI – SAMPLING ACTIVITIES AND ANALYTICAL RESULTS - No sampling was conducted.

SECTION VII – LIST OF APPENDICES

1. Photo Log
2. Document Log

APPENDIX 1: PHOTO LOG



[Title]			IMG-20240829092107217110798.jpg
08/29/2024 09:21 AM (PT)	No CBI	No PII	Photographer: Jon Jones
Portland Bolt & Manufacturing Company, Inc./Galvanizing Department			45.5446819, -122.71805716
View of the old caustic tank.			



[Title]			IMG-20240829092124212485967.jpg
08/29/2024 09:21 AM (PT)	No CBI	No PII	Photographer: Jon Jones
Portland Bolt & Manufacturing Company, Inc./Galvanizing Department			45.54471237, -122.71817534
Another view of the old caustic tank.			



[Title]			IMG-2024082909310931991842.jpg
08/29/2024 09:31 AM (PT)	No CBI	No PII	Photographer: Jon Jones
Portland Bolt & Manufacturing Company, Inc./Galvanizing Department			45.5446501, -122.7180767
View of the sulfuric acid tanks, seen here in tandem.			



[Title]			IMG-20240829093150315079251.jpg
08/29/2024 09:31 AM (PT)	No CBI	No PII	Photographer: Jon Jones
Portland Bolt & Manufacturing Company, Inc./Galvanizing Department			45.54460554, -122.71808201
View of the rinse tank.			



[Title]			IMG-202408290932203220111271.jpg
08/29/2024 09:32 AM (PT)	No CBI	No PII	Photographer: Jon Jones
Portland Bolt & Manufacturing Company, Inc./Galvanizing Department			45.54463115, -122.71810212
Another view of the sulfuric acid tanks.			



[Title]			IMG-202408290943534353107511.jpg
08/29/2024 09:43 AM (PT)	No CBI	No PII	Photographer: Jon Jones
Portland Bolt & Manufacturing Company, Inc./Galvanizing Department			45.54453724, -122.71795508
View of nine, unpunctured and unlabeled, waste aerosol cans seen here on top of the 55-gallon SAA waste aerosol residue container.			



[Title]			IMG-2024082909440144112444.jpg
08/29/2024 09:44 AM (PT)	No CBI	No PII	Photographer: Jon Jones
Portland Bolt & Manufacturing Company, Inc./Galvanizing Department			45.54451584, -122.71805023
A close-up view of the labeling on some of the nine waste aerosol cans seen in the previous photo.			



[Title]			IMG-202408290944134413124554.jpg
08/29/2024 09:44 AM (PT)	No CBI	No PII	Photographer: Jon Jones
Portland Bolt & Manufacturing Company, Inc./Galvanizing Department			45.54455234, -122.71814763
Another close-up view of the labeling on some of the nine waste aerosol cans seen in the previous photo.			



[Title]			IMG-202408290944174417113457.jpg
08/29/2024 09:44 AM (PT)	No CBI	No PII	Photographer: Jon Jones
Portland Bolt & Manufacturing Company, Inc./Galvanizing Department			45.5446119, -122.71810631
Another close-up view of the labeling on some of the nine waste aerosol cans seen in the previous photo.			



[Title]			IMG-202408290944464446101015.jpg
08/29/2024 09:44 AM (PT)	No CBI	No PII	Photographer: Jon Jones
Portland Bolt & Manufacturing Company, Inc./Galvanizing Department			45.54454998, -122.71807403
Another view of the nine, unpunctured, waste aerosol cans on top of the 55-gallon SAA waste aerosol residue container, seen here without a hazard indicator and not labeled with the words "Hazardous Waste."			



[Title]			IMG-202408290944514451110687.jpg
08/29/2024 09:44 AM (PT)	No CBI	No PII	Photographer: Jon Jones
Portland Bolt & Manufacturing Company, Inc./Galvanizing Department			45.5445926, -122.71801174
Close-up view of the labeling on the 55-gallon SAA container, showing that paint overspray and fading rendered the label illegible.			



[Title]			IMG-202408290945124512143324.jpg
08/29/2024 09:45 AM (PT)	No CBI	No PII	Photographer: Jon Jones
Portland Bolt & Manufacturing Company, Inc./Galvanizing Department			45.54459275, -122.71801132
View of a facility notice, that is seen here affixed to the container, instructing facility personnel not to place waste aerosols in the area without puncturing them.			



[Title]			IMG-202408290945174517110695.jpg
08/29/2024 09:45 AM (PT)	No CBI	No PII	Photographer: Jon Jones
Portland Bolt & Manufacturing Company, Inc./Galvanizing Department			45.54454321, -122.71796331
View of the empty aerosol cans that have been punctured.			



[Title]			IMG-2024082909470747780983.jpg
08/29/2024 09:47 AM (PT)	No CBI	No PII	Photographer: Jon Jones
Portland Bolt & Manufacturing Company, Inc./Galvanizing Department			45.54451057, -122.71808193
Overall view of the area where the facility processes waste aerosol cans.			



[Title]			IMG-20240829095750575091802.jpg
08/29/2024 09:57 AM (PT)	No CBI	No PII	Photographer: Jon Jones
Portland Bolt & Manufacturing Company, Inc./Packaging Department			45.54463609, -122.71807907
View of a waste aerosol can SAA step-can that is not closed, not labeled with the words "Hazardous Waste," and not marked with a hazard indicator.			



[Title]			IMG-20240829095759575981418.jpg
08/29/2024 09:57 AM (PT)	No CBI	No PII	Photographer: Jon Jones
Portland Bolt & Manufacturing Company, Inc./Packaging Department			45.54461145, -122.71805251
Top view of a waste aerosol can SAA step-can that is not closed, not labeled with the words "Hazardous Waste," and not marked with a hazard indicator.			



[Title]			IMG-2024082909580758791085.jpg
08/29/2024 09:58 AM (PT)	No CBI	No PII	Photographer: Jon Jones
Portland Bolt & Manufacturing Company, Inc./Packaging Department			45.54452346, -122.71800119
Another view of a waste aerosol can SAA step-can that is not closed, not labeled with the words "Hazardous Waste," and not marked with a hazard indicator.			



[Title]			IMG-20240829095815581591289.jpg
08/29/2024 09:58 AM (PT)	No CBI	No PII	Photographer: Jon Jones
Portland Bolt & Manufacturing Company, Inc./Packaging Department			45.54450966, -122.71808726
Close-up view showing that the container is not closed.			



[Title]			IMG-202408290958275827102119.jpg
08/29/2024 09:58 AM (PT)	No CBI	No PII	Photographer: Jon Jones
Portland Bolt & Manufacturing Company, Inc./Packaging Department			45.54452271, -122.71801649
View of the waste aerosol cans inside the SAA step-can.			



[Title]			IMG-2024082910075675673869.jpg
08/29/2024 10:07 AM (PT)	No CBI	No PII	Photographer: Jon Jones
Portland Bolt & Manufacturing Company, Inc./Cutting Department			45.5445818, -122.71826532
View of a waste aerosol can, seen here on top of the yellow flammable storage cabinet.			



[Title]			IMG-202408291008028292014.jpg
08/29/2024 10:08 AM (PT)	No CBI	No PII	Photographer: Jon Jones
Portland Bolt & Manufacturing Company, Inc./Cutting Department			45.54463353, -122.71853404
Close-up view of the waste aerosol can on top of the storage cabinet.			



[Title]			IMG-2024082910081281297979.jpg
08/29/2024 10:08 AM (PT)	No CBI	No PII	Photographer: Jon Jones
Portland Bolt & Manufacturing Company, Inc./Cutting Department			45.54463357, -122.7185558
A close-up view of the hazard labeling on the back of the waste aerosol, seen in the previous photo.			



[Title]			IMG-2024082910094894886807.jpg
08/29/2024 10:09 AM (PT)	No CBI	No PII	Photographer: Jon Jones
Portland Bolt & Manufacturing Company, Inc./Cutting Department			45.54456747, -122.71839516
View of waste aerosol SAA step-can adjacent to the yellow flammable storage cabinet, seen here without a hazard indicator.			



[Title]			IMG-2024082910095695666293.jpg
08/29/2024 10:09 AM (PT)	No CBI	No PII	Photographer: Jon Jones
Portland Bolt & Manufacturing Company, Inc./Cutting Department			45.5445676, -122.71840439
Another view of waste aerosol SAA step-can, seen here without a hazard indicator and showing that the lid is not making contact with the container.			



[Title]			IMG-2024082910100210263627.jpg
08/29/2024 10:10 AM (PT)	No CBI	No PII	Photographer: Jon Jones
Portland Bolt & Manufacturing Company, Inc./Cutting Department			45.54457351, -122.71820576
Another view of waste aerosol SAA step-can, seen here without a hazard indicator and showing that the lid is not making contact with the container.			



[Title]			IMG-2024082910100810886054.jpg
08/29/2024 10:10 AM (PT)	No CBI	No PII	Photographer: Jon Jones
Portland Bolt & Manufacturing Company, Inc./Cutting Department			45.54464257, -122.71829527
Top view of the same SAA step-can, seen in the previous photos.			



[Title]			IMG-20240829101018101870225.jpg
08/29/2024 10:10 AM (PT)	No CBI	No PII	Photographer: Jon Jones
Portland Bolt & Manufacturing Company, Inc./Cutting Department			45.5446456, -122.718221
Close-up view of the same SAA step-can, showing that the container is not closed.			



[Title]			IMG-20240829101028102858336.jpg
08/29/2024 10:10 AM (PT)	No CBI	No PII	Photographer: Jon Jones
Portland Bolt & Manufacturing Company, Inc./Cutting Department			45.54464329, -122.71822166
Another view of the same SAA step-can, showing there is no hazard indicator.			



[Title]			IMG-20240829101221122189385.jpg
08/29/2024 10:12 AM (PT)	No CBI	No PII	Photographer: Jon Jones
Portland Bolt & Manufacturing Company, Inc./Cutting Department			45.54457827, -122.71819539
View of waste aerosol can in yellow flammable storage cabinet.			



[Title]			IMG-202408291012281228101185.jpg
08/29/2024 10:12 AM (PT)	No CBI	No PII	Photographer: Jon Jones
Portland Bolt & Manufacturing Company, Inc./Cutting Department			45.54457844, -122.71819652
Close-up view of the labeling on the back of the waste aerosol can, seen in the previous photo.			



[Title]			IMG-20240829101934193471845.jpg
08/29/2024 10:19 AM (PT)	No CBI	No PII	Photographer: Jon Jones
Portland Bolt & Manufacturing Company, Inc./West Bay Round Bar Storage			45.54464861, -122.71851109
View of four waste aerosol cans on top of another yellow flammable storage cabinet.			



[Title]			IMG-20240829101949194997409.jpg
08/29/2024 10:19 AM (PT)	No CBI	No PII	Photographer: Jon Jones
Portland Bolt & Manufacturing Company, Inc./West Bay Round Bar Storage			45.54464858, -122.71851152
Close-up view of the labeling on two of the four waste aerosol cans on top of cabinet.			



[Title]			IMG-20240829101953195399032.jpg
08/29/2024 10:19 AM (PT)	No CBI	No PII	Photographer: Jon Jones
Portland Bolt & Manufacturing Company, Inc./West Bay Round Bar Storage			45.54468787, -122.71833588
Another close-up view of the labeling on the waste aerosol cans.			



[Title]			IMG-202408291019591959104002.jpg
08/29/2024 10:19 AM (PT)	No CBI	No PII	Photographer: Jon Jones
Portland Bolt & Manufacturing Company, Inc./West Bay Round Bar Storage			45.54468656, -122.71833986
View of a waste aerosol can inside the flammable storage cabinet.			



[Title]			IMG-20240829102011201185244.jpg
08/29/2024 10:20 AM (PT)	No CBI	No PII	Photographer: Jon Jones
Portland Bolt & Manufacturing Company, Inc./West Bay Round Bar Storage			45.54468539, -122.71836671
Close-up view of the labeling on the waste aerosol can, seen in the previous photo.			



[Title]			IMG-20240829103203323103365.jpg
08/29/2024 10:32 AM (PT)	No CBI	No PII	Photographer: Jon Jones
Portland Bolt & Manufacturing Company, Inc./Maintenance Department			45.54455982, -122.71829282
View of a used oil spill that occurred the previous day and was not manage properly.			



[Title]			IMG-20240829103210321062832.jpg
08/29/2024 10:32 AM (PT)	No CBI	No PII	Photographer: Jon Jones
Portland Bolt & Manufacturing Company, Inc./Maintenance Department			45.54455975, -122.71829285
Close-up view of the oily contents inside the container seen in the previous photo.			



[Title]			IMG-20240829103620362072630.jpg
08/29/2024 10:36 AM (PT)	No CBI	No PII	Photographer: Jon Jones
Portland Bolt & Manufacturing Company, Inc./Maintenance Department			45.54462602, -122.71829713
View of a waste aerosol SAA step-can that is not closed, not labeled with the words "Hazardous Waste," and not marked with a hazard indicator.			



[Title]			IMG-20240829103626362662161.jpg
08/29/2024 10:36 AM (PT)	No CBI	No PII	Photographer: Jon Jones
Portland Bolt & Manufacturing Company, Inc./Maintenance Department			45.54462586, -122.71829738
Top view of the waste aerosol SAA step-can, seen in the previous photo.			



[Title]			IMG-20240829103630363066489.jpg
08/29/2024 10:36 AM (PT)	No CBI	No PII	Photographer: Jon Jones
Portland Bolt & Manufacturing Company, Inc./Maintenance Department			45.54462902, -122.71814846
Close-up view of the same waste aerosol SAA step-can that is not closed, not labeled with the words "Hazardous Waste," and not marked with a hazard indicator.			



[Title]			IMG-20240829103643364371802.jpg
08/29/2024 10:36 AM (PT)	No CBI	No PII	Photographer: Jon Jones
Portland Bolt & Manufacturing Company, Inc./Maintenance Department			45.54462856, -122.718154
View of the waste aerosol cans inside of the SAA step-can.			



[Title]			IMG-20240829104619461971266.jpg
08/29/2024 10:46 AM (PT)	No CBI	No PII	Photographer: Jon Jones
Portland Bolt & Manufacturing Company, Inc./Expansion Area			45.54482813, -122.71822895
View of a pan that contains a thick, dark colored unknown liquid, seen here next to compressor.			



[Title]			IMG-20240829104625462588934.jpg
08/29/2024 10:46 AM (PT)	No CBI	No PII	Photographer: Jon Jones
Portland Bolt & Manufacturing Company, Inc./Expansion Area			45.54482759, -122.71822913
Close-up view of pan that contains a thick, dark colored unknown liquid.			



[Title]			IMG-20240829104630463072337.jpg
08/29/2024 10:46 AM (PT)	No CBI	No PII	Photographer: Jon Jones
Portland Bolt & Manufacturing Company, Inc./Expansion Area			45.54480907, -122.71832094
Another close-up view of pan that contains a thick, dark colored unknown liquid.			



[Title]			IMG-20240829105044504460094.jpg
08/29/2024 10:50 AM (PT)	No CBI	No PII	Photographer: Jon Jones
Portland Bolt & Manufacturing Company, Inc./Expansion Area			45.54495904, -122.71840027
View of a waste aerosol can, seen here inside of a trash can.			



[Title]			IMG-20240829105049504977181.jpg
08/29/2024 10:50 AM (PT)	No CBI	No PII	Photographer: Jon Jones
Portland Bolt & Manufacturing Company, Inc./Expansion Area			45.54495943, -122.71840109
Close-up view of the waste aerosol can.			



[Title]			IMG-2024082910510351387511.jpg
08/29/2024 10:51 AM (PT)	No CBI	No PII	Photographer: Jon Jones
Portland Bolt & Manufacturing Company, Inc./Expansion Area			45.54477215, -122.71826909
Close-up view of the labeling on the waste aerosol can.			



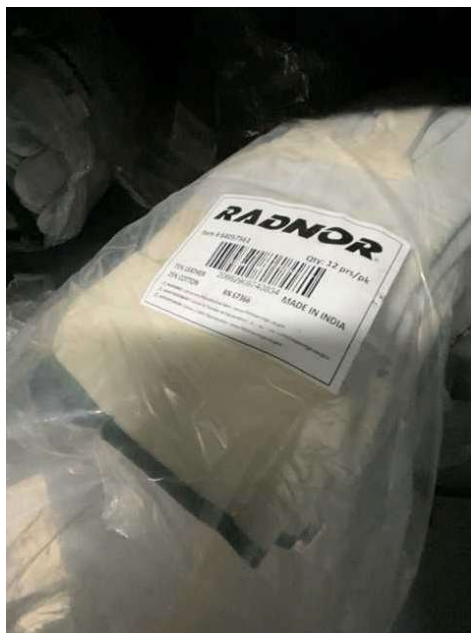
[Title]			IMG-20240829105712571265514.jpg
08/29/2024 10:57 AM (PT)	No CBI	No PII	Photographer: Jon Jones
Portland Bolt & Manufacturing Company, Inc./Lower Mezzanine Storage			45.54445462, -122.7185883
View of the leather gloves that are provided to facility personnel.			



[Title]			IMG-20240829105716571661045.jpg
08/29/2024 10:57 AM (PT)	No CBI	No PII	Photographer: Jon Jones
Portland Bolt & Manufacturing Company, Inc./Lower Mezzanine Storage			45.54459391, -122.71849266
Another view of the leather gloves that are provided to facility personnel.			



[Title]			IMG-20240829105720572054628.jpg
08/29/2024 10:57 AM (PT)	No CBI	No PII	Photographer: Jon Jones
Portland Bolt & Manufacturing Company, Inc./Lower Mezzanine Storage			45.54459388, -122.71849266
Close-up view of the leather gloves that are provided to facility personnel.			



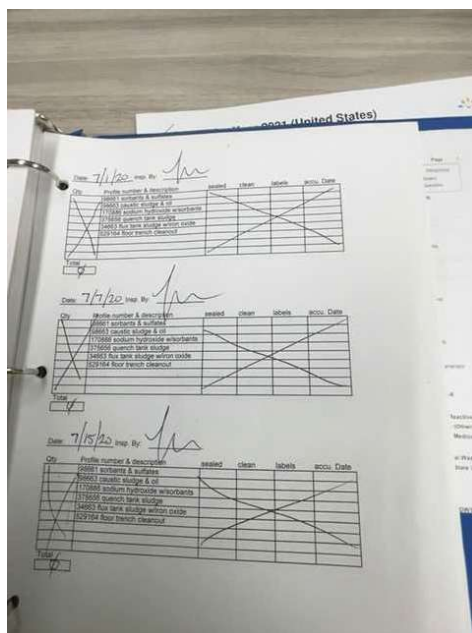
[Title]			IMG-20240829105750575062079.jpg
08/29/2024 10:57 AM (PT)	No CBI	No PII	Photographer: Jon Jones
Portland Bolt & Manufacturing Company, Inc./Lower Mezzanine Storage			45.54448656, -122.71859996
Close-up view of the labeling on the leather gloves.			



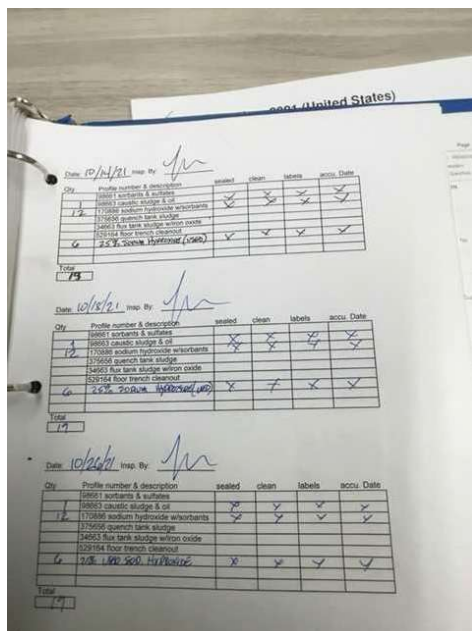
[Title]			IMG-2024082910580358354320.jpg
08/29/2024 10:58 AM (PT)	No CBI	No PII	Photographer: Jon Jones
Portland Bolt & Manufacturing Company, Inc./Lower Mezzanine Storage			45.54461047, -122.71860905
Another view of the leather gloves that are provided to facility personnel.			

Inspection Date(s):

08/29/2024 - 08/29/2024



[Title]			IMG-20240829114427442768543.jpg
08/29/2024 11:44 AM (PT)	No CBI	No PII	Photographer: Jon Jones
[Building/Area]			45.54441417, -122.71827436
A view of the inspection logs showing the inspections that were conducted prior to the period from 8/29/21 through 10/09/21 when no inspections were conducted.			



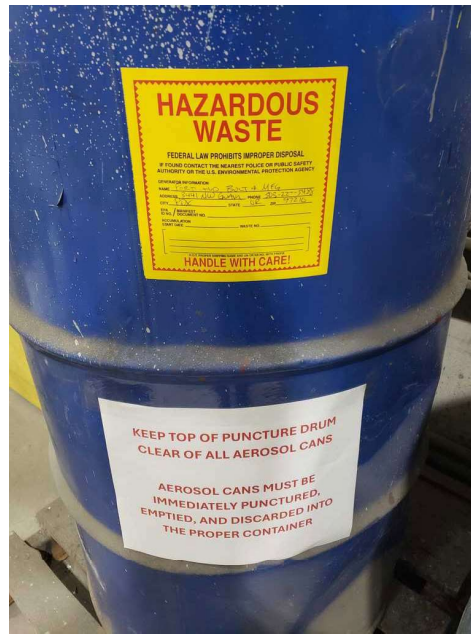
[Title]			IMG-20240829114435443572564.jpg
08/29/2024 11:44 AM (PT)	No CBI	No PII	Photographer: Jon Jones
[Building/Area]			45.54441417, -122.71827435
A view of the inspection logs showing the inspections that were conducted following the period from 8/29/21 through 10/09/21 when no inspections were conducted.			



[Title]			Satellite Container Label 2.jpg
09/11/2024 10:35 AM	No CBI	No PII	Photographer: Facility
[Building/Area]			[Geographic Coordinates]
Photo provided by the facility, following the inspection, which seems to indicate that they are now managing waste aerosol cans as universal waste. The container is also seen with a hazard indicator.			



[Title]			Satellite Container Label.jpg
09/11/2024 10:40 AM	No CBI	No PII	Photographer: Facility
[Building/Area]			[Geographic Coordinates]
Photo provided by the facility, following the inspection, which seems to indicate that they are now managing waste aerosol cans as universal waste. The container is also seen with a hazard indicator.			



[Title]			Puncture Drum label.jpg
09/11/2024 10:44 AM	No CBI	No PII	Photographer: Facility
[Building/Area]			[Geographic Coordinates]
Photo provided by the facility that shows they have re-labeled their 55-gallon SAA container of waste aerosol can residue with a new hazardous waste label and facility notice; however, there is no hazard indicator.			



[Title]			Puncture Drum Cleared.jpg
09/11/2024 10:44 AM	No CBI	No PII	Photographer: Facility
[Building/Area]			[Geographic Coordinates]
This wide-angle view of the container seen in the previous photo, provided by the facility following the inspection, not only shows no hazard indicator was affixed to the container, but also shows that the container is not closed.			

APPENDIX 2: DOCUMENT LOG

Document Type	Document Name	Contains CBI	Contains PII	Uploaded By	Date Received
Contingency Plan	Portland Bolt Response Plan 2024 Update.docx	No	No	Jon Jones	10/11/2024
Local Authority Notification	Certified letter to Hospital 2024.doc	No	No	Jon Jones	10/11/2024
Local Authority Notification	Certified letter to FD 2024.doc	No	No	Jon Jones	10/11/2024
Local Authority Notification	Portland Bolt Contingency Response Plan Email9.4.24.msg	No	No	Jon Jones	10/11/2024
Local Authority Notification	Re Portland Bolt Contingency Response Plan311 response9.4.24.msg	No	No	Jon Jones	10/11/2024
Manifests	05.16.24 Haz Waste Pickup.pdf	No	No	Jon Jones	10/11/2024
Communications	8.30.24.Email regarding only 2024 HW shipment.msg	No	No	Jon Jones	10/11/2024
Personnel Training	HAZARDOUS WASTE TRAINING PLAN.docx	No	No	Jon Jones	10/11/2024
Personnel Training	TT 2022 RCRA TRAINING.pdf	No	No	Jon Jones	10/11/2024
Personnel Training	TT 2022 TITLE 49 TRAINING.pdf	No	No	Jon Jones	10/11/2024