

RCRA Inspection Report

1) Inspector and Author of Report

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2) Facility Information

United Plating Beechmont
5015 Beechmont Dr
Huntsville, Alabama 35811

EPA ID # ALD983166042
NAICS # 332812 – Metal coating, engraving,
and allied services to manufacturers
NAICS # 332813 – Electroplating, plating,
polishing, anodizing, and coloring

3) Responsible Officials

Jim Butler
Controller/Environmental Manager

jbutler@unitedplating.com

4) Inspection Participants

Jim Butler, United Plating
Sarah Yeldell, S&ME, Inc.
Deborah Jones, S&ME, Inc.

Corey Holmes, Alabama Department of
Environmental Management (ADEM)
Raj Aiyar, USEPA
Nereida Hernandez, USEPA

5) Date of Inspection

May 2, 2023

6) Applicable Regulations¹

Alabama Hazardous Waste Management and Minimization Act of 1978 (AHWMMA), Ala. Code § 22-30-1 *et seq.*, [Resource Conservation and Recovery Act (RCRA) Sections 3002 - 3005, (42 U.S. Code - Annotated U.S.C.A. 6925 and 6927)] and rules 335-14-1 to 335-14-17 (2016 and 2018) of the Alabama Department of Environmental Management (ADEM) Administrative Code (ADEM Admin. Code) [40 Code of Federal Regulation (C.F.R.) Parts 260-270, 273 and 279].

¹ As the State's authorized hazardous waste program operates in lieu of the federal RCRA program, the citations of those authorized provisions will be to the authorized State program. However, for ease of reference, the federal citations will follow in brackets.

Pursuant to ADEM Admin. Code r. 335 14-1-.02-(1)(a)111. [40 C.F.R. § 260.10], a large quantity generator (LQG) of hazardous waste is a generator who generates greater than or equal to 1,000 kilograms (2,200 pounds) of non-acute hazardous waste in a calendar month.

Pursuant to ADEM Admin. Code r. 335-14-11-.02(a)(a)244. [40 C.F.R. § 273.9], a small quantity handler of universal waste (SQHUW) is a universal waste handler who does not accumulate 5,000 kilograms or more of universal waste (batteries, pesticides, mercury-containing equipment, lamps, or aerosol cans, calculated collectively) at any time.

Pursuant to ADEM Admin. Code r. 335-14-3-.01(5)(a) [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 22-30-12(b) of the Alabama Hazardous Wastes Management and Minimization Act (AHWMMA), Ala. Code § 22-30-12(b) [Section 3005 of RCRA, 42 U.S.C. § 6925], and without complying with ADEM Admin. Code r. 335-14-3-.01(6)(b) or 335-14-3-.01(7)(a) [40 C.F.R. § 262.16(b) or § 262.17(a)], except as required in ADEM Admin. Code r. 335-14-3-.01(5)(a)7. and 8. [40 C.F.R. § 262.15(a)(7) and (8)], provided that the generator complies with the satellite accumulation area conditions listed in ADEM Admin. Code r. 335-14-3-.01(5)(a) [40 C.F.R. § 262.15(a)] (hereinafter referred to as the “SAA Permit Exemption”).

Pursuant to ADEM Admin. Code r. 335-14-3-.01(7) [40 C.F.R. § 262.17], a LQG may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status, as required by Section 22-30-12(b) of the AHWMMA, Ala. Code § 22-30-12(b) [Section 3005 of RCRA, 42 U.S.C. § 6925], provided that the generator complies with the conditions listed in ADEM Admin. Code r. 335-14-3-.01(7) [40 C.F.R. § 262.17] (hereinafter referred to as the “LQG Permit Exemption”).

7) Purpose of Inspection

The purpose of this inspection was to conduct an unannounced compliance evaluation inspection to determine United Plating’s compliance with the applicable requirements of RCRA and the corresponding Alabama regulations. This was an EPA lead inspection.

8) Facility Description

United Plating Beechmont (hereinafter referred as United Plating or the facility) is in Huntsville, Alabama. The facility comprises five buildings (Building #5 to Building #9) that are enclosed by a fence. United Plating has been operating at this location for more than 40 years and employs approximately 75 employees. Access to the facility is restricted. Visitors must register at the main office and must be escorted by facility personnel. United Plating is involved in the plating, polishing, anodizing, and painting of metal components used by the military and the aerospace industry. United Plating operates from 6:00 am to 11:00 pm, five days a week (Monday to Friday). The NAICS codes for the facility are 332812 and 332813.

The most recent Hazardous Waste Generator Notification (EPA Form 8700-12) dated March 14, 2023, characterized the facility as a large quantity generator (LQG) of hazardous waste and a

management of hazardous secondary material. Waste codes from the EPA Form 8700-12 include D001 (ignitable waste), F003 (non-halogenated solvents), F006 (wastewater treatment sludges from electroplating operations), and F019 (wastewater treatment sludges from the chemical conversion coating of aluminum). Besides hazardous waste, the facility also generates used oil and universal waste.

9) Previous Inspection History

ADEM has conducted nine RCRA CEIs at United Plating since 1991. The most recent inspection was conducted on June 1, 2020. The inspector found ten apparent violations that were corrected in March 2021.

10) Opening Conference

On May 2, 2023, EPA inspectors Nereida Hernandez Morales and Raj Aiyar, accompanied by ADEM inspector Corey Holmes, arrived at United Plating at approximately 9:05 a.m. After checking-in in the main office, Jim Butler, Controller for United Plating, received the inspectors. Jim Butler and the inspectors were joined by Sarah Yeldell and Deborah Jones (Environmental Consultants) from S&ME, Inc. for the opening conference. The inspectors introduced themselves, showed their credentials and explained the purpose of the visit.

The inspectors described the anticipated use of equipment (digital camera) during the inspection and provided a list of records to be reviewed as part of the recordkeeping. The EPA inspector explained that the Small Business Regulatory Enforcement Fairness Act's classification of a "small business" is generally set by the Small Business Administration using the business' SIC/NAICS code and annual receipts or number of employees. A copy of the EPA's information sheet for small businesses can be found at <https://www.epa.gov/sites/production/files/2017-06/documents/smallbusinessinfo.pdf>.

The EPA inspector also discussed the company's ability, pursuant to 40 C.F.R. §2.203, to assert a business confidentiality claim for information submitted to EPA. The facility did not assert business confidentiality claim.

Jim Butler provided an overview of the facility's history and current operations during the opening conference. The inspectors also discussed health and safety protocols and the required personal protective equipment required for the inspection.

11) Inspection Observations

United Plating manages several central accumulation areas (CAAs) and several satellite accumulation areas (SAAs) across the facility. All the waste in the SAAs are moved to a CAAs prior to shipment.

Emergency showers, eye wash stations, and spill kits were observed around the SAAs and CAAs at time of the inspection.

Building #5

Building #5 is divided in Section 1 and Section 2. Section 1 consists of three plating lines (anodizing, chem-film, and passivate), a wastewater treatment system, and universal waste storage area. Section 2 consists of a sandblasting area.

In Building #5, Section 1, the inspectors observed that the plating lines are enclosed by concrete secondary containment. The secondary containment systems were clean. No cracks in secondary containment were observed at time of the inspection. Per Jim Butler, the secondary containment is cleaned out on a regular basis. A work sheet is maintained to record every time the secondary containment is cleaned out.

Three different locations were observed to be used as SAAs in Building #5. One 55-gallon container with rags (D001, F03, and F005), one 5-gallon bucket with rags, and one 5-gallon shop vacuum container (D002, D006 and D007). Each container was observed to be closed and labeled with the words “Hazardous Waste” and with an indication of the hazards of the contents.

The wastewater treatment system consists of three 2,500-gallon tanks (two neutralization and one clarifier). The process consists of receiving the rinse waters from the plating lines, neutralizing the content (pH adjustment), clarifying to settle the sludge, and finally, the spent liquid is sent to the filter press to separate the liquid from the solids prior to discharging into the Public Owned Treatment Works (POTW). The sludge removed from the filter press, is accumulated in a “press sludge container” located underneath the filter press marked as CAA #1. The accumulated sludge is then transferred to a roll-off container located outside of Building #9 (use as CAA #2). At the time of the inspection, “press sludge container” was labeled with the words “Hazardous Waste”, and waste codes F006 and F019. The indication of hazard of its contents and the hazard accumulation start date were missing on the container (Photo 1). Signage reading “Unauthorized Personnel Keep Out” and “No smoking” were posted at the entrance of the building.

Pursuant to ADEM Admin. Code r. 335-14-3-.01(7)(a)5(i) [40 C.F.R. § 262.17(a)(5)(i)], which is a condition of the LQG Permit Exemption, a generator must mark or label its containers with the following: the words “Hazardous Waste”; an indication of the hazards of the contents; and the date upon which each period of accumulation begins clearly visible for inspection on each container.

Two 250-gallon totes with hazardous waste liquid (corrosive, D002 and D007) were observed in this area as well. The totes were observed to be closed, marked with an accumulation start date (May 2, 2023, less than 90-days), labeled with the words “Hazardous Waste”, and with an indication of the hazards of the contents.

The inspectors visited Section 2 – Sandblasting. The process consists of smoothing and cleaning the metal surface. No hazardous waste is generated in this area.

Universal Waste Storage Area:

There is a small room, in Building #5, designated as universal waste storage area. No universal waste was accumulated at time of the inspection.

Building #6 - Painting

Building #6 consists of two paint booths and one curing oven. An overhead conveyor is used to carry parts through the paint booths and the curing oven. An automatic paint gun cleaner is used to remove the paint residues with lacquer thinner. There is a solvent recovery unit used to regenerate spent lacquer thinner, so it can be reused onsite. The generated waste (spent solvent) is stored in a 55-gallon satellite container with secondary containment. The container was observed to be labeled with the words “Hazardous Waste”, that was stained with paint residues, and with an indication of the hazards of its content at time of the inspection. The container is also equipped with a funnel on top that was opened at time of the inspection (Photo 2).

Pursuant to ADEM Admin. Code r. 335-14-3-.01(5)(a)(4) [40 CFR 262.15(a)(4)], a SAA container holding hazardous waste must always be closed during accumulation, except when it is necessary to add or remove waste and must not be opened, handled, or stored in a manner that may rupture the container or cause it to leak.

One 15-gallon satellite container with rags (paint waste), was observed to be closed; however, the container was not labeled with the words “Hazardous Waste” and with an indication of the hazards of its content. (Photo 3).

Pursuant to ADEM Admin. Code r. 335-14-3-.01(5)(a)5.(ii) [40 C.F.R. § 262.15(a)(5) (ii)], which is a condition of the SAA Permit Exemption, a LQG is required to mark or label its SAA containers with an indication of the hazards of the contents.

Two additional 55-gallon satellite containers (one with rags and one with liquid-D001, F003, and F005) were observed in this area. The containers were observed to be closed and labeled with the words “Hazardous Waste” and with an indication of the hazards of the contents.

Building #7 – Masking Area

In this area, masking tapes are used to prevent certain areas of an item from been electroplated. One 55-gallon satellite container with solvent wipes was observed in this area. The container was observed to be closed and labeled with the words “Hazardous Waste” and with an indication of the hazards of the contents.

Building #8

Building #8 consists of four plating lines (three anodizing and one phosphate/zinc coating) and a wastewater treatment system. The plating lines are enclosed by concrete secondary containment. The secondary containment systems were clean. No cracks in secondary containment were

observed at time of the inspection.

The inspectors observed two separate SAAs in Building #8. One 5-gallon shop vacuum SAA container and one 20-gallon shop vacuum SAA container. Each container was observed to be closed and labeled with the words “Hazardous Waste” and with an indication of the hazards of the contents.

The wastewater treatment system in Building #8 operates similar to wastewater treatment system in Building #5. The process consists of receiving the rinse waters from the plating lines, neutralizing the content (pH adjustment), clarifying to settle the sludge, and finally, the spent liquid is sent to the filter press to separate the liquid from the solids prior to discharging into the POTW. The sludge removed from the filter press, is accumulated in the “press sludge container” located underneath the filter press. The accumulated sludge is transferred to a roll-off container located outside of Building #9 (CAA #2). The “press sludge container” was labeled as “Hazardous Waste”, and with the waste codes F006, F019. The accumulation start date was noted to be April 13, 2023. The “press sludge container” was not marked with an identification of hazards of the contents.

Pursuant to ADEM Admin. Code r. 335-14-3-.01(7)(a)5(i) [40 C.F.R. § 262.17(a)(5)(i)], which is a condition of the LQG Permit Exemption, a generator must mark or label its containers with the following: the words “Hazardous Waste”; an indication of the hazards of the contents; and the date upon which each period of accumulation begins clearly visible for inspection on each container.

Building #9

Building #9 consists of two plating (anodizing) lines that are enclosed by concrete secondary containment. Overflow from the plating lines is accumulated in the secondary containment. Once the liquid reaches certain level it flows into a 1,200-gallon tank located in Building #9 (receiving area). The liquid in the 1,200-gallon tank is then pumped out to a wastewater treatment system located in Building #5.

There is a plating bath tank in this area with a separate secondary containment system that captures the condensate liquid from the plating bath tank. Per Jim Butler, the condensate liquid is manually pumped, when needed, to the facility’s wastewater treatment system (Photo 4). A work sheet is used to record every time the liquid is pumped out. Per Jim Butler, United Plating will consider piping the condensate liquid to flow directly into the facility’s wastewater treatment system.

One 55-gallon SAA container with filter bags was observed in the SAA. The container was in secondary containment and was labeled as “hazardous waste”, with waste codes D007 and F006 and labeled with hazard indication as “toxic” (Photo 5).

Pre-Treatment System

The inspectors observed a 1,200-gallon tank in Building #9. The tank is located within a concrete secondary containment (Photo 6). This tank receives the wastewater from the electroplating process mentioned above. When the liquid reaches certain level, it is pumped out to the wastewater treatment system in Building #5. The pH reading was noted to be 8.7 and the tank was 75% full at time of the inspection.

Roll-Off Container – 25 cubic yards (CAA #2)

The sludge is transferred into a roll-off container (25 yards) located outside Building #9. The roll-off container is used to store the sludge from the facility's two wastewater treatment plants. The roll-off container was observed to be closed, labeled with the words "Hazardous Waste" and an accumulation start date of April 25, 2023. The indication of the hazards of the contents was missing on the container. (Photos 7 and 8). The area was also marked with signage reading "Unauthorized Personnel Keep Out" and "No Smoking". United Plating designated this area as CAA #2.

Pursuant to ADEM Admin. Code r. 335-14-3-.01(7)(a)5(i) [40 C.F.R. § 262.17(a)(5)(i)], which is a condition of the LQG Permit Exemption, a generator must mark or label its containers with the following: the words "Hazardous Waste"; an indication of the hazards of the contents; and the date upon which each period of accumulation begins clearly visible for inspection on each container.

Central Hazardous Waste Accumulation Area

The inspectors visited the CAA that is located next of Building #6. United Plating designated this area as CAA #3. This area consists of a small building divided in two rooms. One room is used to store the hazardous waste liquids and the other room is used to store the hazardous waste solids. No hazardous waste was stored in the CAA at time of the inspection. (Photos 9 and 10). According to shipping records, the waste was shipped on April 24, 2023, and April 27, 2023. Signage reading: "Danger", "Hazardous Waste Storage Area" "Unauthorized Persons Keep Out", "Flammable", and "No Smoking" were posted on one side of the building (hazardous waste solid) (Photo 11). However, the signs posted on the front of the building had faded and were not legible. (Photos 12 and 13).

Pursuant to ADEM Admin. Code r. 335-14-3-.01(7)(a)4 [40 C.F.R. § 262.17(a)(4)], which is a condition of the LQG Permit Exemption, a generator must mark or label its containment building with the words "Hazardous Waste" in a conspicuous place easily visible to employees, visitors, emergency responders, waste handlers, or other persons on site, and also in a conspicuous place provide 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 CFR 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 CFR 1910.1200; or a chemical hazard label consistent with the National Fire Protection Association code 704).

12) Records Review:

After the walkthrough, the inspectors reviewed the following records:

Contingency Plan and Quick Reference Guide (QRG):

The facility maintains a contingency plan (CP) that describes the actions that facility personnel must take in response to fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste. The Contingency Plan was last revised on November 1, 2022.

The plan includes emergency contact information, quick reference, an evacuation map, emergency response and preparedness procedures, arrangements with local authorities, and emergency equipment descriptions and locations.

The plan lists the names and emergency telephone numbers for persons identified as primary and alternate emergency coordinators.

Waste Manifest Records:

The inspectors reviewed hazardous waste manifest records from January 2020 to March 2023. Hazardous waste manifest records show that an average of two shipments of hazardous waste are shipped every calendar month.

The facility uses Homeland Environmental Solutions, LLC (ALR000046870) and Robbie D. Wood, Inc (ALD067138891) as transporters and Clean Earth Alabama, Inc. (ALD981020894) and Chemical Waste Management of Alabama (ALD00622464) are used for the disposal of their hazardous waste.

Waste Profiles:

The inspectors reviewed the waste profiles records for “metal hydroxide sludge” for the purposes of hazardous waste determination. The last waste profile was conducted on June 24, 2022, and the next waste profile is due on June 22, 2024.

Training Records:

Training records were available for review at the time of the inspection. Job titles for each employee handling hazardous waste were not available for review. The last training was provided on August 23, 2022.

Pursuant to ADEM Admin. Code r. 335-14-3-.01(7)(a)7 [40 C.F.R. § 262.17(a)(7)], which is a condition of the LQG Permit Exemption, facility personnel must successfully complete a program of classroom instruction or on-the-job training that teaches them to perform their duties in a way that ensures the facility's compliance with the regulations; (ii) Facility personnel must complete personnel training within six months of being hired or of being assigned to a new position at the Facility; (iii) Facility personnel must take part in an annual review of the initial training required by this section; and/or (iv) the generator must maintain training records that include, among others: the job title for each position at the facility related to hazardous waste management, and the name of the employee filling each job; a written job description for each position; a written description of the type and amount of both introductory and continuing training that will be given to each person filling a position; and records documenting that the required training has been given to and completed by Facility personnel.

Weekly and Daily Inspection Records:

United Plating is conducting daily inspections to the CAAs. The inspectors reviewed the records of inspections of the CAAs since January 1, 2021. The container inspection log included the date and time of inspection, the name of the staff member conducting the inspection, any corrective actions taken, and the total number of containers.

Biennial Report Record:

The biennial report for the facility's hazardous waste activities in 2021 was available to review on-site. The biennial report was submitted to ADEM on March 14, 2023.

13) Closing Conference

After the inspection, the inspectors had their exit briefing with Jim Butler, Sarah Yeldell and Deborah Jones. During the meeting, the inspectors discussed the observations made during the inspection and the inspection was concluded.

14) List of Attachments

Attachment 1 – Photo Log:

Photos taken on: May 2, 2023

Photos taken by: Raj Aiyar

Photos taken with: Kodak Pix Pro Digital CameraFZ53

EPA Property Tag: SX9090

15) **Signed**

NEREIDA HERNANDEZ MORALES Digitally signed by NEREIDA
HERNANDEZ MORALES
Date: 2023.07.03 14:44:04 -04'00'

Nereida Hernandez Morales
Life Scientist

RAJAGOPAL AIYAR Digitally signed by RAJAGOPAL AIYAR
Date: 2023.07.06 09:01:32 -04'00'

Raj Aiyar
Environmental Engineer

16) **Concurrence**

ARACELI CHAVEZ Digitally signed by ARACELI
CHAVEZ
Date: 2023.07.06 15:56:31 -04'00'

Araceli B. Chavez
Chief
RCRA Enforcement Section