



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

August 19, 2022

Marc Farrin, CEO

M.S. Ambrogio North America, LLC.

135 Rodman Road

Auburn, ME 04210

Re: U.S. EPA-Region 1 Inspection Report of M.S. Ambrogio North America, LLC May 24, 2022

Dear Mr. Farrin:

In accordance with current policy, I am providing you with a copy of the final inspection report summarizing observations made during the 5/24/2022 inspection of your facility.

This inspection was conducted under the authority of RCRA.

Please contact me at 617-918-1371 or odonnell.maryjane@epa.gov if you have any questions.

Sincerely,

Mary Jane O'Donnell,
Waste and Chemical Compliance Section

cc: Cherrie Plummer, ME DEP

Disclaimer: Unless otherwise noted, this report describes conditions at the facility/property as observed by EPA inspector(s), and/or through records provided to and/or information reported to EPA inspector(s) by facility representatives and as understood by the inspector(s). This report may not capture all operations or activities ongoing at the time of the inspection. This report does not make final determinations on potential areas of concern. Nothing in this report affects EPA's authorities under federal statutes and regulations to pursue further investigation or action.

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RCRA Compliance Inspection of:

M.S. Ambrogio North America, LLC.

135 Rodman Road

Auburn, ME 04210

5/24/2022

Date of Inspection

Linda Brolin, Environmental Engineer
Waste and Chemical Compliance Section

8/19/2022

Date Inspection Report Approved

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

8/19/2022

Date Inspection Report Finalized

8/19/2022

Date Inspection Report Transmitted to Facility

Disclaimer: Unless otherwise noted, this report describes conditions at the facility/property as observed by EPA inspector(s), and/or through records provided to and/or information reported to EPA inspector(s) by facility representatives and as understood by the inspector(s). This report may not capture all operations or activities ongoing at the time of the inspection. This report does not make final determinations on potential areas of concern. Nothing in this report affects EPA's authorities under federal statutes and regulations to pursue further investigation or action.

RCRA HAZARDOUS WASTE INSPECTION REPORT

I. GENERAL INFORMATION

- a. **Facility Name:** M.S. Ambrogio North America, LLC (“M.S. Ambrogio” or the “Facility”)
- b. **Inspection Date:** Tuesday, May 24, 2022
- c. **Inspection Type:** RCRA Compliance Evaluation Inspection (CEI)
- d. **EPA Inspectors:** Linda Brolin, Environmental Engineer, Conor O’Brien, Life Scientist

- e. **EPA ID Number:** MER00512095
- f. **NAICS:** 334419- Other electronic component manufacturer
332813- Electroplating, plating, polishing, anodizing and coloring.
- g. **Street Address:** 135 Rodman Road Auburn, ME 04210
- h. **Mailing Address:** 135 Rodman Road Auburn, ME 04210
- i.
- j. **Facility Contacts:** Matthew Sherbinski, HSE Specialist
Quality/Environmental Engineer
Phone: 207-786-5158
Email: matthew.sherbinski@ambrogio.com

- k. **Generator Status (per RCRAInfo):** Large Quantity Generator (LQG)
- l. **Date first notified as a generator (per RCRAInfo):** 10/12/2021
- m. **Date of most recent notification in RCRAInfo:** 10/22/2021
- n. **Current Property Owner:** M.S. Ambrogio North America, LLC.
- o. **Current Operator:** M.S. Ambrogio North America, LLC.
- p. **Wastes generated (per most recent RCRAInfo notification):** D001, D002, D003, D005, D006, D007, D011, D035, F006, F007, F008, F019

Report Attachments:

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

II. FACILITY DESCRIPTION

M.S. Ambrogio North America LLC owns and operates a metal finishing and electroplating facility for the manufacture of circuit protective devices in Auburn Maine. The parent company of the Owner/Operator is ABB Inc.

Industrial Connections and Solutions was sold to M.S. Ambrogio North America, LLC on October 12, 2021. M.S. Ambrogio North America, LLC is notified as a Large Quantity Generator of hazardous waste.

III. INSPECTION IN-BRIEF

EPA inspectors arrived at the facility at 135 Rodman Road, Auburn, ME at about 8:40 AM on the 24th of May 2022. The EPA Region 1 inspection team (“inspection team”) consisted of Linda Brolin and Conor O’Brien. The inspection team entered the Main Entrance, went to the Security Booth and the inspection team signed the Visitor Log. The inspection team was greeted by Matthew Sherbinski, HSE. The inspection team presented their EPA credentials, signed into the facility, and obtained temporary nametags/passes to the facility. The inspection team followed Mr. Sherbinski to a conference room, where the opening conference was conducted. Also present during the opening conference were: Marc Farrin, CEO; Alex Rose, HSE Manager; and Matthew Sherbinski, HSE Specialist. EPA Inspectors exchanged business cards with the Facility representatives at this time. The following personnel were present at the in-brief:

EPA:	Linda Brolin, Environmental Engineer Conor O’Brien, Life Scientist
M.S. Ambrogio North America, LLC	Marc Farrin, CEO Alex Rose, HSE Manager Matthew Sherbinski, Health and Safety Specialist

On 5/24/2022, EPA emailed Mr. Farrin with a list of the requested documents after the inspection, which were uploaded to a shared electronic folder by the Facility and were reviewed by EPA after the inspection.

M.S. Ambrogio employees and EPA inspectors discussed the following information about the Facility during the in-brief:

The inspection team first asked the facility representatives for an overview of the Facility’s operations. M.S. Ambrogio North America, LLC currently has 215 employees and operates three shifts Monday thru Friday (6:30 am-2:30pm, 2:30pm-10:30pm and 10:30pm-6:30am).

M.S. Ambrogio makes electrical components such as screws and lugs for electrical connections. They also produce Neutral bars for the GE Brand. They also make residential electrical panels, switch gears and electrical components.

GE purchased the plant in 1967 and sold to ABB in 2018.

Alex Rose is the Primary Emergency Coordinator and Marc Farrin is the Alternate Emergency Coordinator.

Mr. Farrin gave an overview of M.S. Ambrogio's processes:

Stamping Department There are 15-20 Presses that range in size from 30-225 Tons. Scrap metal is generated and sold for reclaim. There is no hazardous waste generated.

Tool Room maintains and makes repairs for the dies in the Press area and makes tooling. Coolant is used in the machines in this area.

Screw Machine Department uses Mechanical screw machines that make the screws and lugs. The wastes generated in this department are waste oil and coolant.

Neutral & Vertical Machining: Milling, Tapping and Drilling are done in this Department. Waste streams include oil and coolant. Ometa Novamet is a water-based coolant which is able to be recycled. The facility checks the concentration of the coolant to determine if they need to add water. The metal chips are spun out and the facility sends out the metal chips as scrap metal. The facility recycles oil.

The inspection team requested copies of the oil and coolant waste profile from Clean Harbors, which go out to energy reclamation.

The Robo Drills used at the facility are the same as are used in vertical machining.

Welding & Brazing Department: The facility brazes pieces of copper together using silver contacts on the copper parts. The waste generated in this area sometimes includes accumulated flux from the solder. The Solder flux helps the joints to set and adhere. Some machining is done in this area, so coolant is also generated.

Plating Department: There are eight different plating lines. The facility operates rack lines whereby parts are hung on racks or placed in barrels to go through the process. The facility has Zinc Plating, Tin Plating, Silver Plating, Phosphate Plating, and Copper Plating. The base metals for this plating are aluminum, copper, steel and brass.

The area under the plating lines is double walled. The drains in the Plating Department go to the Wastewater treatment under an Industrial user permit with the Lewiston-Auburn WWTP. The metal hydroxide sludge (F006) is picked up by World Resources.

When the Plating Baths are spent, the Tech notifies Matt, and the baths are pumped to drums and picked up by Triumvirate.

The Acid Dip Area on the facility map is referred to as a manual “Un-plating”. Alex explained if there is a bad finish on a part it is put in the Acid dip to clean the part (which is run the same way as plating) and then the part goes back to the plating line. This process is not used much. When the acid dip is no longer effective it is pumped out and put in drums.

The facility operates two nitric strip racks which strip off the silver which then goes for precious metal reclamation.

The compressor room on the map is for compressed air in the building.

The heat treat furnace is for any parts that require it, for example steel. For tempering metal in a heat treat furnace, that tempering process would occur prior to any plating process.

There is a furnace for the welding brazing process.

The facility has an Air Emission License (A-152-71-K-R/A) for the natural gas boilers, the plating lines, and the scrubbers.

The in brief conference ended at 9:10 AM, after which the inspection team followed the facility representatives on the facility walkthrough.

IV. FACILITY TOUR

This section consists of observations by EPA Inspectors during the physical tour of the Facility. Please see Attachment 1 for a digital photo log of photos taken throughout the inspection.

The tour of the Facility took place on Tuesday, May 24, 2022. The following personnel were present for all or part of the tour:

EPA: Linda Brolin
Conor O’Brien

MS Ambrogio: Marc Farrin, CEO
Alex Rose, HSE Manager
Matthew Sherbinski, HSE Specialist

Areas inspected (description and location):

- 1. HWSA Storage** is located behind Door #4. The following signs were posted: “No Smoking”, “Danger Hazardous Waste Storage Area”, “Danger Keep Out Authorized Personnel Only”. There was a fire extinguisher. This area is inspected daily and weekly.

The following containers were stored in the HWSA:

2-55- gallon container with a HW label, oil sludge with speedi-dry

1-55-gallon container with a Non HW label contaminated oil with debris

1-55-gallon container with a HW label oil sludge (oil, oil sludge and metal fines)

1 55-gallon container with a non HW label, wash sludge with the cover on but not closed.
There were also nine 5-gallon paint cans that were going to be lab packed.

The Universal waste storage area is also in this location with the following sign posted “Universal Waste Storage Only”. The Universal Waste containers were dated less than one year. The following containers were stored in the UWSA:

- 1 4 ft. box labeled Universal waste fluorescent lamps for recycle, dated 3/15/2022
- 1 4 ft box labeled Universal waste fluorescent lamps for recycle with 2 lamps
- 1 2ft box labeled Universal waste electronic waste dated 4/26/22
- 1 box labeled Universal waste electronic waste with a LED monitor date
- 1 2 ft box labeled Universal waste Lamps with 4 metal halide lamps and 3 u-shaped fluorescent lamps, dated 5/4/22
- 1 5-gallon container labeled Universal waste Batteries, lithium-ion batteries, dated 4/26/22
- 1 5-gallon container labeled Universal waste batteries, lead acid battery, dated 4/26/22

Universal waste is picked up once or twice per year.

2. **Saw Building-** The Saw Room is where the facility cuts metal down to the correct size. No hazardous waste was observed.
3. **Receiving Department-** No hazardous waste was observed. There was aerosol product stored in the Flammable Cabinet.
4. **Stamping Department-** The Auto Press can make 450 finished parts per minute. The building has a sprinkler system, which is tested quarterly by a third party. There is a spill kit near the Material Metal Storage.
5. **Tool Room** is where they design and make tools in house and conduct maintenance on the dies. Scrap metal is collected and placed in separate containers for copper, steel, aluminum and brass. There is a parts washer that is managed by Safety Kleen. There is a furnace that heat treats the parts. There is a spectrometer in this area.
6. **Screw Machines** make the screws and the lugs. Rags are serviced under contract with Unifirst. There was one 5-gallon red step can oily waste.
7. **Secondary Press** is done by hand. The “sucker” vacuum ups the oil/coolant/cutting oil and the metal chips are filtered out. The waste coolant is put in a tote and shipped out for energy recovery by Clean Harbors.
8. **Laser Cutter** is similar to a plasma cutter. The facility spins out the oil/coolant from the metal chips. The facility reuses the oil and coolant in the machines. The metal chips go out as scrap metal. There were two 55-gallon containers with a Non-hazardous waste label, oil/coolant absorbents.
9. **Deburr Area** Vibration removes the burs on the metal parts. There was one 55-gallon black steel drum, closed, with lid lock, labeled, Hazardous waste. The label did not have the contents on the label. At the time of the inspection, Alex added “aerosol cans” to the label. The following signs were posted at this SAA: “Recycle Aerosol cans here”,

“Caution Hazardous Waste Satellite Accumulation Area Unauthorized Employees Keep Out”. There was a 5-gallon closed step can labeled, oil rags, “oily waste can”.

10. Vertical Machining (VMC)

No hazardous waste observed.

11. Plating Department

The following SAAs were in the Plating Department:

- a. SAA – There was one 55-gallon blue poly drum, closed, labeled “Corrosive solid” on Lid and “Debris contaminated with alkali”. The words “Hazardous waste” was not on the label. At the time of the inspection, the facility put the following Hazardous waste label on this container: “Hazardous Waste corrosive solid, basic, Potassium hydroxide, UN 3262”.
- b. SAA – There was one 55-gallon blue poly drum with a Hazardous waste label, potassium copper cyanide 80%, sodium hydroxide 20%, Corrosive, Reactive Toxic, Poison.
- c. SAA- There was one 55-gallon blue poly drum, closed, labeled “Hazardous waste, Cyanide Filters, Reactive, Toxic, Poison, Corrosive”.
- d. SAA- Alkaline Satellite Station There was one 55-gallon blue poly container with a locking lid, with a Hazardous waste label, Caustic, alkali, aluminum hydroxide, 1-1% copper hydroxide, 1-1% Sodium hydroxide sludge 25-100%, surfactants 25-50%, Corrosive, UN1824”
- e. SAA – Copper Sulfate Satellite Station There was one 55-gallon blue poly container on a secondary containment pallet, with a Hazardous waste label, Copper sulfate crystals, and dip tank residue, ignitable, corrosive, oxidizing, D001, D002.
- f. SAA- Acid Satellite Station. There was one 55-gallon blue poly container with a hazardous waste label, Sulfuric acid contaminated filters, UN 3260
- g. SAA There was one 55-gallon blue poly container with a non-hazardous waste label, waste oil.

12. Sludge Room HWSA- The Sludge Filter press generates wastewater treatment sludge, F006 that is put in a twenty-yard roll-off, that is covered with a tarp when not in use and labeled, Hazardous waste, F006. The facility sends out the sludge about every 2 weeks and this waste is transported for recycling at World Resources.

13. Chemical Storage Room stores product such as Copper cyanide and silver brite.

- a. There was one 55-gallon container with a Hazardous waste label, JS600 Barium, Copper, Nickel, waste environmentally hazardous substances, liquid, chromium, nickel, D007, UN3082 on a cart. This container was from Line 1 which is about 200 feet away according to Marc Farrin. This container was not at or near the SAA.
- b. Cyanide SAA with the following three Satellite Containers:
 - i. one 55-gallon clear poly drum, empty, with no hazardous waste label;
 - ii. one 55-gallon container with hazardous waste label, Cyanide sludge, potassium copper cyanide, poison, corrosive, UN3289 contents about 3/4th full and

- iii. one 55-gallon clear poly container with no Hazardous waste label, marked “Corrosive”, “Poison” with the level of the contents about 1 inch high.

- 14. Acid Dip Line is for cleaning parts and then part brought back to the plating line.
- 15. Shipping Area- No Hazardous waste observed.
- 16. Assembly – No hazardous waste observed.
- 17. Shipping – No hazardous waste observed.
- 18. Heat Treat – No Hazardous waste observed.

V. RECORDS REVIEW

The inspection team reviewed all documents remotely following the electronic submission made by M.S. Ambrogio.

Manifests/LDRs

The inspection team reviewed hazardous waste manifests and land disposal restriction notifications from shipments made by M.S. Ambrogio from April 2021 through to April 2022. Manifests were signed by Luke Pinard, Matt Sherbinski, Josh Basso, Tim McDonald, Brandy Sanders, Adam Grant, Brandon Griffin, and Alexander Rose. No deviations from the regulatory requirements were noted based on a review of the documents provided.

Inspection Logs

Representative inspection logs for the years April 2021 - April 2022 were reviewed by the inspection team.

The 90-Day HWAA inspection logs include: inspector’s name, date and time of the inspection, leaks, deterioration, containers properly closed, correct labeling, dated <90 days, sufficient aisle space, fire extinguishers, spill control equipment, containers covered, phone works and list posted, and a space for general observations/actions taken. No missing inspections were found by the inspection team in reviewing these documents.

M.S. Ambrogio conducts daily inspections of its SAAs with the same inspection parameters as for the 90-day HWAA.

Training/Job Descriptions

Training attendance logs and job descriptions were reviewed by the inspection team and no deviations from the regulatory requirements were noted.

Contingency Plan

M.S. Ambrogio’s Integrated contingency plan was reviewed by the inspection team and no deviations were noted.

Permits

M.S. Ambrogio has a CAA minor source permit (A-152-71-K-R/A) and CWA pretreatment sewer discharge permit with Lewiston Auburn WPCA.

VI. INSPECTION OUTBRIEF

An initial out-brief conference was conducted on Tuesday May 24, 2022, prior to leaving the facility. The following personnel were present for the closing conference:

EPA: Linda Brolin
Conor O'Brien

MS Ambrogio: Marc Farrin, CEO
Alex Rose, HSE Manager and Primary EC
Matthew Sherbinsky, HSE

EPA Inspectors noted that the inspection was still ongoing at this point as there were still outstanding records to be reviewed. EPA then relayed the following areas of concern that arose from observations throughout the inspection:

1. Near the Debur area, there was 1 55-gallon container with a hazardous waste label, but the label did not include the contents. At the time of the inspection, "aerosol cans" was added to the label.

In the Plating SAA, there was 1 55-gallon container with a closed lid, labeled, "Corrosive" on the lid, Corrosive solid, basic, potassium hydroxide, UN3262. There was no "hazardous waste" on the label. At the time of the inspection, a Hazardous waste label was put on the container.

In the Cyanide SAA, there was one 55-gallon container labeled "Corrosive", "Poison" with about 1 inch of waste in it. The label did not have the words "hazardous waste" on the label.

2. In the Chemical Storage Room, there was one 55-gallon container, with a hazardous waste label, Waste environmentally hazardous substances, liquid, chromium, nickel, JS 600 Barium, copper, nickel, UN 3082, D007 closed, on a cart. This satellite container is from Line 1 which is about 200 ft away according to Marc Farrin. This satellite container is not at or near the point of generation.
3. In the HWSA Behind Door #4, there was one 55-gallon container of Non-hazardous waste wash sludge, with a cover on but the lid was not closed.

After discussing the above areas of concern, the inspection team reviewed the broad spectrum of all possible post-inspection follow-up and asked the facility to provide the following documents which was sent by email dated 5/24/2022 to Marc Farrin:

- RCRA Inspection Schedule and Logs for April 2021 - April 2022
- Hazardous Waste Contingency Plan (if available) or else other applicable emergency response plan
- RCRA Personnel Training Records
 - RCRA Training Program Description or Plan
 - Job Titles and Job descriptions for all positions with hazardous waste responsibilities
 - Names and job titles of all staff with hazardous waste responsibilities
 - Documentation of any annual hazardous waste training for the last three years (2020-2022)
- Hazardous Waste Manifests and Land Disposal Restriction Notices for April 2021- April 2022
- Exception Reports for Hazardous Waste Shipments for 2021 (if applicable)
- Hazardous Waste Import/Export Records (if applicable)
- Any Clean Air Act (CAA) and Clean Water Act (CWA- pretreatment) permits maintained by the facility
- SDS and waste profile for the coolant/cutting oil shipped out for energy recovery by Clean Harbors
- SDS and waste profile for the non hazardous waste wash sludge located in 55-gallon drum with an open lid in the HWSA
- Mutual Aid Agreements

The inspection team discussed that after these documents were reviewed, we would schedule an out-brief call with the facility representatives to discuss the findings. The inspection team then signed out of the building, and left the premises, which concluded the on-site portion of the inspection.

The out-brief call, held on June 10, 2022, discussed the following area of concern from the Document Review:

1. M.S. Ambrogio did not attempt to annually make Mutual Aid Agreements, as required by 40 CFR 262.37 and 851(13)(C)(7)(c)(ii).

Mutual Aid Agreements letters reviewed were dated 10/1/2018 and two were dated in June 2022 and sent to the following:

Greg Klyachman, Triumvirate (confirmation signature 10/23/2018)
Mike Hatch, St Mary's Regional Medical Center (10/10/2018, 6/1/22)
Joanne Potrin, Androscoggin Unified Emergency Management Agency (10/9/2018)
John Dunlap, Maine DEP (10/10/2018)
Paul Gosselin, United Ambulance Service, Lewiston, ME (10/9/2018)

Clean Harbors, Norwell, MA (10/6/2018)
Chief Robert Chase, City of Auburn Fire Department (10/12/2018)
Jonathan Torres, WorkMed (11/6/2018, 6/3/2022)

There were no Mutual Aid Agreement letters for 2019, 2020, and 2021. There were only 2 Mutual Aid Agreement letters for 2022.