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

June 7, 2023

Jeffrey Langlois, Facilities Manager

Northeast Coatings Technologies

105 York Street

Kennebunk, ME 04043

Re: U.S. EPA-Region 1 Inspection Report of Northeast Coating Technologies, March 30-31, 2023

Dear Mr. Langlois:

In accordance with current policy, I am providing you with a copy of the final inspection report summarizing observations made during the March 30-31, 2023 inspection of your facility.

This inspection was conducted under the authority of RCRA.

Please contact me at 617-918-1876 or brolin.linda@epa.gov if you have any questions.

Sincerely,

Linda Brolin, Environmental Engineer
Waste and Chemical Compliance Section

cc: Cherrie Plummer, MEDEP

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.

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

RCRA Compliance Inspection of:

Northeast Coating Technologies

105 York Street

Kennebunk, ME 04043

March 30-31, 2023
Date of Inspection

June 7, 2023
Date Inspection Report Approved

June 7, 2023
Date Inspection Report Finalized

June 8, 2023
Date Inspection Report Transmitted to Facility

Linda Brolin, Environmental Engineer
Waste and Chemical Compliance Section

MARY ODONNELL Digitally signed by MARY ODONNELL Date: 2023.06.07 14:12:08 -04'00'

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

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:** Northeast Coating Technologies ("Northeast Coating" or the "Facility")

b. **Inspection Date:** March 30-31, 2023

c. **Inspection Type:** RCRA Compliance Evaluation Inspection (CEI)

d. **Inspectors:** Linda Brolin, Environmental Engineer, EPA
Cheryl Wilkinson, Life Scientist. EPA
Autumn Smith, OHMS II, ME DEP

e. **EPA ID Number:** MED083188854

f. **NAICS:** 332812 Metal Coating, Engraving and allied services to Manufacturers

g. **Street Address:** 105 York Street Kennebunk, ME 04043

h. **Mailing Address:** 105 York Street Kennebunk, ME 04043

i. **Facility Contacts:** Jeffrey Langlois
Facilities Manager
Email: JLANGLOIS@NORTHEASTCOATING.COM
Phone: (207)985-3232x422

j. **Generator Status (per RCRAInfo):** LQG

k. **Date first notified as a generator (per RCRAInfo):** 10/18/1983

l. **Date of most recent notification in RCRAInfo:** 9/12/2022

m. **Current Property Owner:** SC Enterprises

n. **Current Operator:** Northeast Coating Technologies

o. **Wastes generated (per most recent RCRAInfo notification)**: D001, D002, D005, D007

Report Attachments:

ATTACHMENT 1 – List of documents requested by EPA

ATTACHMENT 2 – Digital photo log of photos taken by EPA inspectors throughout the inspection.

II. FACILITY DESCRIPTION

Northeast Coatings Technology (the "Facility") is a manufacturer of the following advanced coatings: Physical Vapor Deposition (PVD) coating, Diamond-Like Carbon (DLC) coating, and Salt Bath Nitriding. Their customers include the following industries: automotive, medical, and dental, military and firearms.

III. INSPECTION IN-BRIEF

EPA inspectors arrived at the Facility at 105 York Street Kennebunk, ME at 9:00 am on March 30, 2023. The inspection team ("inspection team") consisted of Linda Brolin, Cheryl Wilkinson, EPA, and Autumn Smith, ME DEP. The inspection team signed into the visitor log at the Security Desk and were led to the conference room. The inspection team presented their credentials to facility contact(s) and gave out business cards at this time. The following personnel were present at the in-brief:

EPA:	Linda Brolin, Environmental Engineer Cheryl Wilkinson, Life Scientist
MEDEP:	Autumn Smith, Inspector
Facility:	Steve Lamontagne, Maintenance Manager Jeffrey Langlois, Facility Manager

The inspection team met Steve Lamontagne, Maintenance Manager who signs manifests and calls for waste pick-ups. Steve Lamontagne stated that Jeffrey Langlois was on his way from their Sanford, Maine Facility. Jeffrey Langlois is the Regional Facilities and Manufacturing Manager in North America, who manages 20 facilities. Jeffrey Langlois arrived at about 9:30 am. Linda Brolin explained the inspection process to the facility representatives.

Mr. Langlois stated there are three original buildings and they have added two more buildings. There is 75,000 square feet under roof. There are 140 employees, some are temporary employees. The facility operates 24-hours/seven days a week. There following four employees handle hazardous waste: Jeff Langlois, Steve Lamontagne, Paul Nadeau, and Steve Newman.

Mr. Langlois stated there is one hazardous waste storage area (HWSA) and two-three satellite accumulation areas (SAAs.) The facility ships hazardous waste every 90 days. The facility generates waste from the following processes:

Parts are cleaned in aqueous solution, blown dry and then dipped in isopropyl alcohol (IPA) to disperse water from the parts in the manual cleaning lines. Typically, no solvents are used. Acetone had been used previously. Currently isopropyl alcohol is used.

The strip process is for nonconforming parts which are stripped with a potassium hydroxide and sodium nitrate mixture, then re-fixtured and then recoated. There is one SAA for isopropyl alcohol.

Bakutrit is a hydrogen peroxide water mixture to strip a coating off a part (used infrequently).

Salt bath nitriding is for case hardening material that takes mild steel and applies a case hardening material and a black oxide coating to the part. This process generates barium waste (D005). There are two SAAs in the salt bath nitriding area: one corrosive liquid and one corrosive solid.

Waste is managed in 55-gallon drums and 275-gallon totes. There are no tanks. Used oil is generated. Mr. Langlois stated that do not treat hazardous waste. The facility generates universal waste bulbs. The facility has changed over to LED lighting.

In the Tribology Lab, there is a SEM machine, which measures thickness of the coatings using light. The lab also tests the chemistry for the salt bath line. The Tribology Lab has one SAA.

Sand blasting is done on all new stainless steel and mild steel to add a surface finish, mostly for gun manufacturing. The blast media (nonhazardous waste aluminum oxide) is exported to Canada. If the blast media contains aluminum oxide and glass, then it goes out on a hazardous waste manifest.

The facility has a central dust collection system.

PVD coating is a physical vapor deposition coating done in a vacuum chamber. Once parts are fixtured (placed in the machine) they rotate inside the chamber. Parts have a positive charge. The target gets vaporized to coat the parts which erodes the target. Argon, nitrogen, and acetylene gases are used inside the chamber. No waste is generated. The targets used in the PVD coating lines are boron, titanium, chrome, or WCC (tungsten carbide). The facility recycles the targets and sends them out to scrap metal companies once per year. The facility generates about 1,000 pounds of titanium targets and approximately 30 pounds of other metal targets per year.

Processes include the following:
Manual cleaning lines
Sand blast
Vapor degreasing- The facility uses 3M Novec product which 3M takes back and recycles.
PVD coating
Salt bath nitriding
Strip

The waste is being picked up every 90 days.

The in-brief discussion ended at 2:15 pm, following which the inspection team conducted the walk-through portion of the inspection.

IV. FACILITY TOUR

This section consists of observations by inspectors during the physical tour of the Facility. Please see Attachment 2 for a digital photo log of photos taken throughout the inspection.

The tour of the Facility took place on March 30-31, 2023. The following personnel were present for all or part of the tour:

EPA:	Linda Brolin Cheryl Wilkinson
ME DEP:	Autumn Smith
Facility:	Jeffrey Langlois, Facility Manager

Tribology Lab

In the Tribology Lab, the Facility tests coatings for thickness/hardness, type, and chemical composition.
The following SAA was in this area:

There was one 2-1/2-gallon closed container labeled, hazardous waste, deionized water with some hydrochloric acid and silver nitrate.

This waste stream is being sent to the evaporator in the Salt Bath Nitriding Area. The facility takes corrosive liquid waste streams that are generated around the facility and adds them together and evaporates the water off in an evaporator. After evaporating the water off, the result is a concentrated corrosive waste stream that is shipped out as hazardous waste. Jeff Langlois stated that Andy Slusarski, ME DEP had explained that it isn't considered treatment of hazardous waste.

Autumn Smith pointed out there was a crack in the cement floor near this SAA.

Shipping and Receiving Department

There is no hazardous waste generated in the Shipping and Receiving Department.

Sand Blast Room

The Sand Blast Room is equipped with a filtration system that goes to a TORIT system. The filters on the TORIT system are changed out every week. Gun parts get sand blasted. Medical parts are not sand blasted.

Mr. Langlois explained that small amounts of IPA on cotton rags are used in this area to unstick parts from the fixture, and to clean the parts. This process generates used cotton rags. There is no liquid waste generated from this process.

Cleaning Room
There are automated cleaning lines where the parts are cleaned, dried, and fixtured.

There is also a manual cleaning line. The facility checks the conductivity of the water. IPA is used in the rinsing system. There is a water bath rinse and then an IPA rinse. When the IPA is spent, it is placed into a 55-gallon drum and the drum is brought to the 90-day area.

Citric acid cleaner is also used in this area and when spent, it is either placed into a 55-gallon drum that is brought to the tank or the tank is wheeled to the 55-gallon drum at a hallway SAA outside of this room.

There is also a cleaning tank that uses Simple Green as the cleaning agent.

The facility also uses Rust Stripper (sodium hydroxide) in the cleaning room. When the tank of rust stripper is spent, it is also placed into a 55-gallon drum and is brought to the Hallway SAA that is nearby.

Medical Fixturing
The Medical parts are fixtured here. There was no waste in this area.

Fixturing
Bottles with IPA are used around the facility. The IPA is used with cotton swabs to wipe parts. The cotton swabs with IPA are placed in the trash.

Coating Room PVD
This is where the Sputtering cathodic arc process takes place. There was no waste generated in this room.

Hallway SAA
There was one 55-gallon empty and closed container, grounded with label that read waste and another label isopropyl alcohol. This container is for waste IPA. The words "Hazardous Waste" were not on the label.

There was also one 55-gallon container labeled "waste oil".

There was also four 55-gallon drums of IPA product and two 55-gallon drums of oil product.

All of the containers in the hallway SAA were on secondary containment.

Little Sand Blast Room
There was no waste observed in this room.

Surface Finish Area
The surface finish area is for gun cleaning. There is a degreaser located in this area. The system prevents vapors from leaving system. 3M Novec Engineered fluid 73DE is used in the degreaser. 3M picks up this material when spent for recycling.

There are two IPA cleaning tanks for parts dipping. When the IPA is spent, it is also brought to the hallway SAA. The inspection team discussed the need for the satellite container to be at or near the point of generation requirement.

Fixturing Room for Sig Sauer

There was an open box of "Used Cottons". Cotton gloves are used to wipe parts using IPA. Mr. Langlois was unsure if the cotton gloves were being laundered.

The process of stripping of the Diamond Like Coating occurs in this room.

Salt Bath Area

Strip Room

In the Strip Room, the inspection team observed one 30-gallon blue SAA container that was labeled "Hazardous Waste, Sodium Hydroxide, Ethylene Glycol" with a cover and gloves on the top (*See Attachment 1, Photo #7 and #8*.).

There was also one 5-gallon container with PPE and gloves (*See Attachment 1, Photo #9*).

This room had white powder coating the floor, shelves, counters, and containers (*See Attachment 1, Photo #10- #13*). The materials used in this room was hydrogen peroxide, water, and tetrasodium pyrophosphate (TSPP).

There was one closed blue container with no label. It was unknown if this container holds waste or product. The inspection team asked to speak with Chris the operator in this area to find out. Mr. Langlois explained that Chris was in the hospital, and unavailable. Mr. Langlois explained he was the only worker in that area.

There was one 5-gallon tote with some pink liquid. Mr. Langlois stated that he did not know if the pink liquid was waste or not. Mr. Langlois did not know what the pink liquid was.

Inspector Wilkinson used a pH strip on the liquid under the sink inside this room, and the results were consistent with a neutral pH.

Strip Area (located outside the Strip Room)

In the Strip Area, the inspection team observed one 275-gallon tote labeled non-hazardous waste, with an open funnel in the top. (*See Attachment 1, photos # 14 and #16*)

In front of this tote, there was a bag of tetrasodium pyrophosphate. (*See Attachment 1, photo #15*)

To the left of the 275-gallon tote, on a wheeled cart, there was a bag of soda ash and a box of sodium hydroxide. Crystals were all around the top of the cart. Sodium hydroxide and sodium peroxide were also stored in this area. (*See Attachment 1, photos #17-19*)

In the next room is the Salt Bath Defixturing and Packing Area

There were drums of corrosive /oxidizing salt product stored in this area.

Salt Bath Nitriding Room

This area is for case hardening of metal. The following are the steps for Salt Bath Nitriding Line:
1. Ferrous soak.
2. Drip dry
3. 750 degrees pre-heated oven.
4. One of four salt baths of 900°-1075° F molten salt, with 3% cyanide salt which does the case hardening.
5. Oxidizer (AB1 corrosive salt) kills the free cyanide and creates black oxide into metal at 800° F.
6. Quench in room temperature water.
7. Cascade rinse water from this process goes into a sump and is pumped to a holding tank and then is fed to the evaporator. This is caustic water.

The salt bath nitriding process is equipped with a wet scrubber, which Mr. Langlois explained was to remove the ammonia. Mr. Langlois explained that the wet scrubber turns the vapor stream back into a liquid stream which gets collected in a sump and is then pumped to a holding tank. The material in the holding tank gets sent to an evaporator. The evaporator is evaporating the water from the liquid, which results in a concentrated caustic waste, which the facility sends out as hazardous waste. The Salt Bath Nitriding Line has the following SAA, one 55-gallon clear poly drum, labeled, waste rust stripper, corrosive, alkaline. The SAA container was not labeled with the words "Hazardous Waste". (*See Attachment#1, Photos#38-39*)

Scrubber waste liquid drains directly into the sump and based on a floating level the liquid is pumped to the holding tank. The sump that is located at the base of the wet scrubber is an open plastic 55-gallon drum under the piping feeding to the scrubber. (*See Attachment #1, Photos #20-23*). Next to the piping and sump area is the 220-gallon holding tank. (*See Attachment #1, Photos # 24-25*) The sump is equipped with a float that is a sensor. When the container is about half full a pump is supposed to turn on and pump the contents to the holding tank. At the time of the inspection, the drum was more than half full and it was not being pumped to the holding tank.

Staged next to the holding tank were five blue 55-gallon drums. Two drums are full of unknown liquid, three had some liquid in them. All five containers were open and unlabeled. (*See Attachment #1, Photos #27-31*). One of the blue 55-gallon drums had a hose running from the top open hole of an empty drum into the sump (*See Attachment #1, Photo #26*) and two of blue 55-gallon drums are empty.

The evaporator is labelled with a hazardous waste label that read, "Potassium hydroxide, Sodium Nitrate Oxidizer", the tanks was also labeled as "Corrosive". (*See Attachment #1, Photo #32-33)* The label on the evaporator is incorrect according to Mr. Langlois, who stated that AB1 liquid is in the evaporator.

On top of the evaporator is a door to add the other corrosive water to the evaporator. AB1 liquid is one of the corrosive liquids that are placed into the evaporator.

Located in this area, there is a trench that is grated. AT the time of the inspection, there was some liquid in the trench. (*See Attachment 1, Photos # 40-42*) Mr. Langlois stated that the trench is blocked and doesn't lead anywhere. Inspector Wilkinson tested this liquid using a pH dipstick and the result was consistent with a neutral pH. Mr. Langlois explained this water is from cleaning the floors in the area and that they pump the water from the trench into the evaporator. The liquid from the SAA also gets added to the evaporator.

There is equipment that is coated with oil and corolac. Corolac is a corrosion inhibitor. According to Mr. Langlois, corolac is non-hazardous. The corolac drips on the floor. This drippage is the liquid that gets washed into the trench. The SDS for corolac shows that it includes petroleum distillates, and barium salts. The manifest waste line lists barium and cadmium. The SDS does not include cadmium.

Day 2 - March 31, 2023

The inspection team discussed the following information in the conference room, prior to going back out in the facility. Mr. Langlois explained again, that ammonia gas is generated from the salt bath nitriding area and the ammonia vapor stream leads to the wet scrubber, which turns vapor into a liquid, which is collected in the sump beneath the scrubber. The liquid is then pumped to the caustic holding tank.

Mr. Langlois explained that the quench waters from the salt bath nitriding line (AB1) also go into the evaporator. Both the evaporator and the salt bath nitride line are feeding into the wet scrubber.

Mr. Langlois explained that when the evaporator is cleaned out, the facility draws out the AB1 concentrated liquid and sends it out as caustic hazardous (concentrated liquid). The sludge generated is scraped out and sent out as corrosive solid.

The solid material on the floor is also collected using either a shovel or a vacuum and the facility sends it out as solid caustic waste. The vacuum does not have filters.

Mr. Langlois explained that the two drums at this area that didn't have bungs on them and were open because the material needs to cool down. Mr. Langlois explained that they placed the material into the containers from the evaporator when the material was hot, and it needs to cooldown. (*See Attachment 1, Photos #27-31*.)

Mr. Langlois explained the following waste streams are going into the evaporator (*see Attachment #1, Photos #32-33*):

- Wet scrubber liquid in the sump from salt bath nitriding process (ammonia), and in the holding tank
- Quench waters from the salt bath nitriding line
- Caustic waters from the tribology lab (silver nitrate)
- Wash water from washing the floor around the salt bath nitriding line,
- An Rust stripper waste

The inspection team began the second day walk through of the facility at the HWSA. The HWSA is in a separate building. The door has a lock on it. The floor is concrete. The following

signs were present: “Hazardous Waste Storage Area” and “No Smoking”. (*See Attachment 1, Photo #43*.) There was no fire extinguisher, and the building has no sprinklers. There was a water source nearby. All employees have cell phones. There was no spill control equipment in this building. Jeff Langlois stated that there is spill control equipment in the building next door.

The inspection team observed a crack in the cement floor of the HWSA, (*See Attachment 1, Photo # 44).* The inspection team observed the HWSA building was metal, and the cement floor went directly against the metal walls of the building. The inspection team did not observe a wall or berm, nor secondary containment pallets, which would contain a spill in the event one occurred. The inspection team asked Mr. Langlois about secondary containment in the area, and he explained that the facility has plans to move all of the containers to a different area of the HWSA building, which has secondary containment. At the time of the inspection, this area was being used as empty container storage, it was constructed of concrete and was about four feet lower than the floor level of the HWSA.

The inspection team observed containers in the HWSA with less than 36 inches of aisle space between rows of containers. The inspection team observed containers staged against the walls of the HWSA. Mr. Langlois moved containers around for the inspection team to observe them (*See Attachment 1, Photos #46, #47, #50 and #53).*

Images of the configuration of the left and right side of the HWSA can be seen in Attachment 1, photos #44 through #51, and photos #57 through #60, respectively.

The inspection team observed the following containers in the 90-day hazardous waste accumulation area (HWSA):

Container Type/Contents: • One 55-gallon clear poly container, non-hazardous waste label, Bakutrit, 3/3/2023
Container Type/Contents: • Three 55-gallon drum, hazardous waste label, potassium hydroxide, sodium nitrate solids, 3/22/23
Container Type/Contents: • The inspectors could not read the label of this container
Container Type/Contents: • One 275-gallon container, hazardous waste label, potassium hydroxide, sodium nitrate, oxidizer, corrosive, 3/17/2023
Container Type/Contents: • One 275-gallon container, hazardous waste label, potassium hydroxide, sodium nitrate, oxidizer, corrosive, 3/1/2023
Container Type/Contents: • One 275-gallon container, hazardous waste label, potassium hydroxide, sodium nitrate, Oxidizer, Corrosive The inspector could not see the date on the label.
Container Type/Contents: 1 55-gallon clear poly container, non-hazardous waste, Bakutrit 3/3/2023

Container Type/Contents: One 55-gallon clear poly container, non-hazardous waste, Bakutrit 3/3/2023
Container Type/Contents: Two 55-gallon clear poly container, non-hazardous waste, Bakutrit. There was no date on these two labels.
Two 55-gallon containers, hazardous waste label potassium hydroxide, solids, sodium nitrate, Corrosive oxidizer, 3/26/23
Two 55-gallon containers, hazardous waste label potassium hydroxide, solids, sodium nitrate, corrosive oxidizer, 3/20/23
One 250-gallon tote, hazardous waste label potassium hydroxide sodium nitrate, corrosive, oxidizer, 3/24/23
One 250-gallon tote, hazardous waste label potassium hydroxide sodium nitrate, corrosive, oxidizer 3/27/23
Two 55-gallon steel drums, hazardous waste label isopropyl alcohol flammable liquid 3/15/23, 3/29/23
Three 55-gallon steel drums, with 3M Novec product labels. The containers were not dated. These containers are waiting to be picked up by 3M to be recycled.
One 55-gallon steel drum hazardous waste label waste oil, 3/9/23
One 55-gallon black steel drum hazardous waste label, potassium hydroxide, sodium nitrate solids. The date was not included in the inspection notes.
One 55-gallon blue poly drum ethylene glycol sodium hydroxide. The was date was not included in the inspection notes.
Three 55-gallon blue poly drum, non-hazardous waste, Bakutrit, 3/6/23
One 20-gallon blue container, hazardous waste label, sulfuric acid, 3/20/23
One 20-gallon clear poly container, hazardous waste label, sulfuric acid, 3/20/23
One 55-gallon blue poly drum, hazardous waste Corolac waste, 3/3/23
Three 55-gallon 3M Novac drums
One 250-gallon tote, hazardous waste potassium hydroxide, oxidizer, corrosive, 3/27/23
Two 55-gallon drums hazardous waste isopropyl alcohol, flammable liquid, 3/15/23, 3/29/23
One 30-gallon drum hazardous waste ethylene glycol, sodium hydroxide, 3/10/23

Three 55-gallon drums, non HW, Bakutrit, 3/6/23

There were three closed and taped cardboard boxes with universal waste (UW) lamps. There were no UW waste lamp marking on these boxes. (*See Attachment #1, Photos # 7-58*)

According to Jeff Langlois, the UW lamps have been there since January 2023. There was also one 30-gallon container, labeled as universal waste broken lamps, with no date on the label.

Additionally, there were six universal waste lamps on a shelf, that were not in a container, not labelled and not dated. Mr. Langlois was unsure where they had come from and how long they had been there. (*See Attachment #1, Photo #59*)

At the time of the inspection, Jeff Langlois put a spill kit and a fire extinguisher in the HWSA. Jeff Langlois stated that he was having the workers come to the HWSA to move the containers so there will be 36 inches of aisle space.

There was one aerosol can "Krylon Metallics" that was in the general trash barrel in the HWSA. (*See Attachment #1, Photos # 62-63*).

At the time of the inspection, there was no sign posted for the "Universal Hazardous Waste Storage".

The inspection team went back to the conference room. This concluded the walk-through portion of the inspection.

V. RECORDS REVIEW

The inspection team reviewed all documents on-site on March 31, 2023 following the walk-through portion of the inspection.

Manifests/LDRs

The inspection team reviewed hazardous waste manifests and land disposal restriction notifications from shipments made by Northeast Coatings Technologies during 2021-2023.

Manifest 022873089JJK had four LDRs one for each line of the manifest. The manifest included D007, but this waste code was not listed on the LDR.

The LDR for manifest 021465609JJK was missing D001 waste code on line #3.

The LDR for manifest 022139815JJK was missing the D007 waste code. Prior to 6/18/21, the D007 waste code was not on any LDRs. The waste code first appeared on manifest 022139815JJK dated 6/18/21.

For manifests 023880556JJK and 021465752JJK, the LDRs were not signed.

Inspection Logs
The inspection team reviewed inspection logs for Jan 2020-March 2023. There was no inspection for 5/21/2020 in the inspection logs reviewed. The following personnel had done the inspections: Jeff Langlois, Steven Lamontagne, and Paul Nadeau.

Training/Job Descriptions
The inspection team reviewed the Facility's training certificates and training logs for personnel requiring RCRA hazardous waste training The inspection team had no comment.

Contingency Plan
The inspection team reviewed the Facility's contingency plan revised April 26, 2021. The emergency coordinator is Jeffery Langlois and the alternate emergency coordinators are Shawn Spencer and Steven Lamontagne. The plan includes emergency procedures, an emergency equipment list, and an evacuation plan. The plan has been sent to the local authorities.

Mutual Aid Agreements
The 2022 Mutual Aid Agreements with the following:
York County EMA, Mary Smith Director, Work Well Southern Maine Healthcare
York County EMA, Art Cleaves, EMA Director
Town of Kennebunk Fire Department, John Brady, EMS Division Chief
Town of Kennebunk Fire Department, Jeffrey Rowe, Fire Chief
Town of Kennebunk Police Department Robert MacKenzie, Police Chief

Waste Profiles
The inspection team reviewed the waste profile 663964 - hydrogen peroxide with waste code D001. The tote had a non-hazardous waste label on the tote.

Waste profile 435251- Corolac S oil generated in the salt bath nitriding process and is manifested as barium(D005.) The SDS for Corolac lists only the barium (D005). The manifest waste line lists barium and cadmium.

Waste profile 435292- isopropyl alcohol with water from the cleaning baths in the DCL Area and is manifested as D001.

Waste profile 663964- hydrogen peroxide to strip tools of dirt and rust and is manifested as waste hydrogen peroxide aqueous solutions, D001. That manifest, number 021465002JJK had four drums of waste hydrogen peroxide, 8/31/20. This was the only instance where this waste steam was shipped from the manifests reviewed. The 275-gallon tote, located in the Salt Bath Area General Maintenance Area, had a non-hazardous waste label on it. (*See Attachment 1, Photo #14*)

Waste profile 435254 HEF-DUR Ferrit AB-1 liquid, byproduct processing with stainless steel and cast iron and is manifested as D001 and D002.

Waste Profile 435253 HEF-DUR Ferrit AB-1 solids, byproduct processing with stainless steel and cast iron and is manifested as D001, D002,waste corrosive solids oxidizing nos potassium hydroxide sodium nitrate.

Product name TF-1, SDS # HEF-007 which contains potassium cyanate and sodium carbonate and is used for the heat treatment of steel.

Product name 3M Novec 73DE engineered fluid, SDS which contains 1,2 trans dichloroethylene, pentane, 1,1,1,2,2,3,4,5,5,5, -decafluoro-3-methoxy-4-trifluoromethyl and is used to clean medical devices and as lubricant deposition solvents for medical devices.

VI. INSPECTION OUTBRIEF

An out-brief conference was conducted on March 31, 2023, prior to leaving the facility. The following personnel were present for the closing conference:

EPA:	Linda Brolin Cheryl Wilkinson
MEDEP:	Autumn Smith
Facility:	Jefferey Langlois

EPA Inspectors noted that no violations were determined at this time. EPA then relayed the following areas of concern that arose from observations throughout the inspection.

1. <u>Areas of Concern:</u>

    a. The inspection team observed a crack in the floor in the Tribology Lab SAA Area.
    b. The SAA was not at the point of generation for the cleaning baths in the Diamond Like Coating Area.
    c. There was one 30-gallon container located in the Salt Bath Nitriding Area with no label and the drum ring was not fastened.
    d. The used IPA contaminated cotton gloves.
    e. There was one 5-gallon tote of pink liquid in the Strip Area that was not labeled.
    f. Outside Salt Bath (Strip Room), there was one open 250-gallon tote with a non HW label. The waste profile says it is D001.
    g. Outside the Salt Bath (Strip Room) there was a cardboard box with sodium hydroxide in it, that had crystallization on the bottom of the box.
    h. In the Salt Bath Nitride Area, EPA is looking into regulatory status of the evaporator
    i. Also in the Salt Bath Nitride Area, there were five 55-gallon drums that were open and with no labels. Two were full, three had a small amount of liquid.
    j. Salt Bath Nitride Area, the SAA container of rust stripper, the label said waste. The label did not have the words hazardous waste.
    k. There was no “Danger Unauthorized Personnel Keep Out” sign posted at the HWSA.
    l. There was no fire extinguisher, no spill control equipment, inadequate aisle space and there was not adequate secondary containment at the HWSA.

m. There was no label on two boxes of UW lamps. There were UW lamps that were not in a closed box.
n. If part of the HWSA is considered a storage area for universal waste, there was no sign "Waste Lamp Storage" or "Universal Hazardous Waste Storage" sign posted in the area.
o. There was one aerosol can in the trash barrel.
p. The MSDS for 3M Novec "73DE" showed it contained 1,2 Trans-Dichloroethylene" and was being sent out on a few non-hazardous manifests.

2. Other areas of concern:

a. The management of the 3M Novec as recycle material. The inspection team requested and received the SDS for the 3M Novec. According to the SDS, 3M Novec contains 1,2-trans-dichloroethylene, pentane, and trifluoromethyl
b. The rust stripper waste also goes in the evaporator, which is a corrosive high pH cleaner.

After discussing the above areas of concerns, the inspection team reviewed the broad spectrum of all possible post-inspection follow-ups, including both informal and formal notices.

Following this discussion, the inspection team left the premises at 1:36pm, concluding the on-site portion of the inspection.