



RCRA Compliance Inspection Report

Honeywell Intl Inc 36th St

Redmond, WA

WAD009249392

July 23, 2024

JONATHAN MASTERS

Digitally signed by
JONATHAN MASTERS
Date: 2025.01.03
15:03:48 -08'00'

Kyle Masters
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Report Date

MATTHEW QUARTERMAN

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MATTHEW QUARTERMAN
Date: 2025.01.06 15:17:16
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Supervisor Signature

Date

MELANIE GARVEY (Affiliate)

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GARVEY (Affiliate)
Date: 2025.01.03 18:45:39
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Peer Review Signature

Date

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Disclaimer

This report is a summary of observations and information gathered from the facility at both the time of the inspection and the following off-site records review. The information provided does not constitute a final decision on compliance with RCRA regulations, nor is it meant to be a comprehensive summary of all activities and processes conducted at the facility.

Section A: Basic Facility and Inspection Information

Facility Information

Handler Name: Honeywell Intl Inc 36th St^a

Handler ID Number: WAD009249392

Facility Contact/Title: Joe Quercia; Senior Manager, Health, Safety, and Environmental (HSE)

Facility Location Address: 15001 NE 36th Street
Redmond, WA 98052

Facility Mailing Address: 15001 NE 36th Street
Redmond, WA 98052

Contact Phone Number: (206) 473-0111 (mobile)

Contact Email Address: Joe.Quercia@honeywell.com

Inspection Information

Inspection Type: RCRA Compliance Evaluation Inspection (CEI)

Inspection Date: July 23, 2024

Arrival Time: 09:10 AM

Departure Time: 02:15 PM

Inspection Team: Kyle Masters, RCRA Inspector
Jon Jones, RCRA Inspector
Katelynn Piazza, Inspector, Washington Department of Ecology
Fiona Brasfield, Inspector, Washington Department of Ecology

Section B: General Facility Information

Owner/Operator Information

According to the 2023 Dangerous Waste Annual Report (DWAR) received by the Washington Department of Ecology (Ecology) on 3/1/2024, the landowner is listed as the Microsoft Corporation, and the legal owner is listed as "Honeywell INTL INC" (Honeywell). The DWAR also lists Honeywell as the site operator, and Kyle Peterson as the site contact person, with the title of Senior HSE Manager. Ecology allows a second operator to manage their dangerous waste under the same EPA ID Number. A former site owner and operator, United Technologies Corporation (UTC) began shipping solvent contaminated groundwater off-site when they operated at the site full-time. On the 2014 DWAR, the Site ID Form lists UTC as the legal owner. Starting in 2020, Raytheon began reporting this waste. Currently, as of their 2023 DWAR, RTX Corporation ships this waste off-site with the F001, F002, and F005 waste codes. Raytheon changed their name to RTX in 2023. The Site ID Form filed by RTX lists Honeywell as the site operator. The notification of large quantity generator status by Honeywell dates to the 1995 DWAR, according to Ecology's online reporting database, Turbowaste.^b

^a The generator-supplied site name as used on the Site ID form, a component of the Dangerous Waste Annual Report

^b [Search for Hazardous Waste Facilities in Washington State - Report History View](#)

Background and Activities

I obtained background information on the site from the company's website prior to the inspection, and from these site representatives who participated during the opening and closing conferences, and during the inspection:

- Joanna Larson, Senior HSE Engineer (Environmental)
- James Flies, Senior HSE Engineer (Safety)
- David Taylor, Site Facility Manager
- Doug Brown, Senior Operations Manager

Honeywell is an industrial conglomerate specializing in manufacturing and providing services in several areas, such as building automation, energy and sustainability solutions, industrial automation, and aerospace technologies.^c The Redmond site predominantly specializes in manufacturing thermal switches, part of the navigation and sensors unit of the aerospace division.^d

The Washington State Department of Ecology (Ecology) last conducted an on-site inspection on February 21, 2019, and cited these violations in the accompanying inspection report:

- Failure to characterize a solid waste (designation)
- Failure to label containers of used oil
- Failure to accumulate universal waste lamps in structurally sound and closed containers

Ms. Larson told the inspection team she has worked for at the Honeywell Redmond site for almost 2 years; Mr. Flies stated he began working at the site five months ago. The site currently employs approximately 260-270 employees during the main shift, with an additional 50 employees working a swing shift.

Section C: Regulatory Information

Regulatory Status

Honeywell discharges treated wastewaters to the King County sewer in accordance with their discharge permit, Number 7206-08, reissued to Honeywell by King County in May of 2023. The site also operates in accordance with Ecology's general industrial stormwater permit, number WAR001530. The site carries the North American Industrial Classification System (NAICS) code of 334511, "Search, Detection, Navigation, Guidance, Aeronautical, and Nautical System and Instrument Manufacturing."

Site Hazardous Waste Information

According to the 2023 Dangerous Waste Annual Report filed with Ecology on 03/01/2024, Honeywell reported generating 33,726 pounds of dangerous waste coming from 15 separate waste streams. The largest waste streams reported included:

1. Mixed flammable solvent (hazardous waste codes D001, F003, D035, F005). According to the Generation and Management (GM) Form Honeywell submitted, the waste is managed off-site through incineration-thermal destruction other than use as a fuel (H040). This waste was shipped off-site twelve times. The total amount shipped off-site that year was 21,970.59 pounds.
2. Solvent contaminated debris (F003, F002, F005). This waste was reported with the same method management code as the above waste stream (mixed flammable solvent) and included

^c [About Us | Honeywell](#)

^d [Thermal Switches](#)

11 off-site shipments. The waste was reported also shipped off-site once and managed for energy recovery at the receiving facility (H050). The twelve shipments totaled 5,903 pounds of hazardous waste shipped off-site. The site further characterized the waste stream with the following statement found on the 2023 DWAR Generation and Management Form, "Waste contains Kimwipes, Q-Tip's, contaminated nitrile gloves – all used to clean manufactured parts."

3. Rags with acid contamination (state-only codes WSC2 and WT02). This waste was reported as landfilled (H132). It was also shipped off-site eleven times totalling 3,124 pounds.

Section D: Description of Inspection

Purpose of Inspection

This was a Resource Conservation and Recovery Act (RCRA) inspection conducted pursuant to the state of Washington's federally authorized RCRA regulations found at WAC 173-303. The inspection was conducted as part of a Core Program requirement for FY 2024. The facility was inspected to ensure compliance with large quantity generator, universal waste and used oil standards.

Inspection Entry and Opening Conference

The inspection was unannounced. On July 23, 2024, I, EPA Inspector Masters, along with Inspector Jones (EPA) arrived at the site at approximately 9:00 a.m. and met Inspectors Piazza (Ecology) and Brasfield (Ecology). We entered the site at approximately 9:10 a.m. In the main lobby we spoke with Chris Nelson, Security Manager at the front desk. Mr. Nelson asked us to sign in on a tablet as visitors. I asked if the sign-in included any non-disclosure agreements, and he replied it did not. We signed in and Mr. Nelson called Ms. Larson to meet us at the front desk. Ms. Larson escorted us to a nearby conference room and the three other on-site Honeywell employees noted in the Background and Activities section joined us. Ms. Larson and Mr. Brown called Mr. John Parise and Ms. Carolyn Able, off-site Honeywell representatives, who joined both the opening and closing conferences. Ms. Larson also explained Kyle Peterson (the site contact on the 2023 DWAR) no longer worked at the site as of approximately four months ago. She and Mr. Brown explained that Mr. Joe Quercia served as the EHS Manager, and though currently off-site, he would join the inspection when he arrived.

Inspector Jones and I presented our credentials to the Honeywell representatives and explained our intent to conduct an unannounced inspection of this Honeywell facility. I explained the inspection would be EPA-led and I would serve as the lead inspector, with Inspectors Piazza and Brasfield serving as observers. I also explained the inspection would consist of an opening conference, a site tour, records check and a closing conference. I told them I would email a formal records request after the on-site portion of the inspection for a more involved records review. I explained the records I requested would consist of records the regulations require generators to keep and maintain, and possibly additional records based on our observations. During this time, Ms. Larson and Mr. Brown called additional Honeywell managers from off-site to participate. This also occurred during the closing conference.

We began the opening conference by discussing Honeywell operations. Ms. Larson confirmed the site operates as a large quantity generator of dangerous waste. Mr. Brown provided us with an expansive overview of the site's manufacturing processes. Mr. Brown told us the site engaged in the same processes as it had five years ago with not much changing in their production. He verbally took us through each process step-by-step going from initial metal working like stamping and shaping, through wet etching, to testing and assembly. Mr. Brown also told us Honeywell moved out of Building 2 approximately two years ago and consolidated operations in Building 1 and Building 3, with most dangerous waste generated in Building 3. I asked the local staff to walk the inspection team through the processes Mr. Brown outlined, they agreed, and we began the site tour.

Inspection Summary

The staff named above accompanied the inspection team throughout the inspection. During the inspection we looked at the facility's processes, in addition to its dangerous waste management practices, generation points, and accumulation areas. We also looked for wastes that facility representatives had not yet identified or designated as dangerous. We inspected throughout Honeywell's buildings and the surrounding areas during our site tour. During the inspection we observed Honeywell operations in these areas:

- Building 1 – Engineering Laboratory, The Tunnel
- Building 3 – Thermal Switch Production, Punch Press Station, Metal Parts, Reeds Fabrication, Gold Deposition, and other Production Floor areas
- Wastewater Treatment Unit and Area
- Chemical Storage Lockers / Central Accumulation Area (CAA)
- Engineering Shed

In the following parts of this Inspection Report I only discuss those areas in which we observed potential compliance concerns or noted other pertinent issues.

Inside Building 1 we inspected the Engineering Laboratory. We saw a satellite accumulation area (SAA) with one closed 5-gallon bucket labeled toxic hazardous waste, "Solder Dross Debris" (**Photo 1**). Next to it we saw another closed 5-gallon bucket labeled as "Solder Dross for Recycle." Ms. Larson told us the waste streams are substantively different as the dross itself can be recycled whereas the hazardous waste stream, the debris, could not be easily reclaimed. I noted additional guidance for staff next to the containers aiding in proper container selection. I saw the dross for recycling waste stream container was also labeled as waste code 19, while the hazardous waste stream was labeled waste code 19D. The waste codes, Ms. Larson explained, served as an internal control. Nearby we also saw an open 5-gallon pail labeled, "Electronic Waste for Recycling."

We moved into Building 3, entering by the flex test area. At this point Mr. Joe Quercia joined the inspection group and remained throughout the rest of the site tour. Ms. Brenna Perri, Program Manager for ChemicoMays, a Honeywell contractor, also joined the inspection in this area, after Mr. Quercia. We went to the thermal switch manufacturing area. We observed an SAA with acetone/isopropyl alcohol waste. We also saw an approximately pint-sized open tray containing a red liquid sitting next to a closed 5-gallon bucket of PMX-200 fluid (**Photo 2**). Both containers sat in a tray serving as secondary containment. Close by, at the punch press station, we saw a tube leading out of the back of the hydraulic punch press and into an open, approximately pint-sized bottle labeled as "Dangerous Waste Container" (**Photo 3**). At the time the bottle lacked a major risk or hazard indicator. At the time of the inspection, it appeared the liquid was an expelled, spent, cutting fluid from the punch press.

We continued to the metal parts area and the LOSMA machine and met area operator Tim. In this area I saw a spent cotton swab on the floor (**Photo 4**) and I noted the paper collecting off the machine (**Photo 5**). Farther down the process area we saw an SAA collecting spent flammable solvent (**Photo 6**). The approximately 3-gallon sized container of dangerous waste sat open with the required dangerous waste and major risk labels adhered to the side of the secondary containment vessel rather than the container itself (**Photo 7**).

In the reeds fabrication area, we saw an approximately 5-gallon step-can serving as an SAA for flammable hazardous waste solvent contaminated debris. The step-can sat open as a contaminated wipe lay over the lid and partly outside the container preventing a sealed closure (**Photo 8**). We then entered the gold deposition area and saw an SAA labeled as containing flammable hazardous waste debris (**Photo 9**). I asked if toxic would be a more appropriate hazard indicator and Mr. Brown explained the contamination came from applied solvent rather than accumulated metals.

We made our way outside to the chemical storage sheds which serve the site as both central accumulation area of dangerous waste and chemical product storage. In Chemical Shed 2 we saw two approximately 5-gallon containers: the rightmost container labeled clearly as toxic hazardous waste handy flux, the leftmost container apparently bore a similar label, though curled up and not legible without manipulating (**Photo 10**). Both containers lacked accumulation start dates. We saw two additional approximately 5-gallons jugs, both labeled as corrosive hazardous waste; both also labeled as “satellite” which lacked accumulation start dates (**Photo 11**).

Also in Chemical Shed 2, we saw an approximately 5-gallon jug labeled as “Waste Pending Analysis” and “45% KOH (Potassium Hydroxide) with Etching FOD” and a corrosive pictogram, but no start date or sampling date (despite area on label for date) (**Photo 12**). I asked the site representatives if they doubted if the waste stream would be characteristic corrosive dangerous waste. Mr. Quercia told me they awaited analytics for metals to complete a profile for the waste. I said the profiling process did not supersede the obligation to characterize, or designate, the waste at the point of generation and label a container of waste appropriately, including the accumulation start date.

Nearby I saw a 500mL bottle of Spectrum™ Collodion sitting aside on a shelf (**Photo 13**). I saw a site-applied label with additional tracking information on it. The label stated the product expired on “07/31/23,” with a manufacturing date a year prior to that. Next to the Collodion sat a container of AccuBRADE™ – 27. Above these I saw a shelf labeled “Expired Material Pending Production Use, with four containers of expired material (**Photo 14**). Two smaller bottles, approximately 50mL in size, held expired Enthone Catalyst (**Photo 15**). Later, I learned the catalyst expired February 11, 2024. Two other, approximately liter-sized bottles, held expired Isopropanol/Ethyl Acetate, with an expiration date of “01/10/24” (**Photos 16-17**). While viewing these labels I spoke with Mr. Quercia about Honeywell’s practice of using materials that may no longer be used for high specification work in other applications. I told Mr. Quercia clear labeling and storage practices would clarify these continued use practices. I also told him storing useable products with wastes confused the matter, and storage in lieu of disposal that delayed characterization of waste may not align with the regulations.

In the same shed we saw two blue poly 55-gallon drums labeled as waste pending analysis and tritium exit signs (**Photos 18-19**). Next to the exit signs I saw an approximately 5-gallon bucket of toxic hazardous waste solder dross debris lacking an accumulation start date (**Photo 20**). Next to the solder dross debris we saw an open 5-gallon bucket with sampling materials, an absorbent pad, and a dark liquid accumulating in the bottom (**Photo 21**). I asked site representatives about this liquid and Ms. Perri told me she thought it was Axarel, a material the site uses and stores as product in the same shed (**Photo 22**).

We next went to Chemical Storage Shed 3 and saw a container labeled as flammable hazardous waste solvent contaminated debris (**Photo 23**). I looked inside the container and saw approximately a dozen cotton swabs and other debris (**Photo 24**). The container did not have a start date, and it was not apparent the container served as a satellite accumulation area within the storage shed. Nearby we saw a 55-gallon drum labeled as flammable hazardous waste solvent contaminated debris with an accumulation start date of “7/22/24” (**Photo 25**). The latch on the drum was open and the lid did not sit flush with the top of the drum.

We then went to Chemical Storage Shed 1. We saw 33 boxes of Nano-Strip® 2x labeled as corrosive and oxidizer, each box weighing about 60 pounds (**Photo 26**). I looked at the fronts of approximately 10 boxes and they all read expired as of May 2024 (**Photo 27**). In the same shed we saw four boxes of chromium etchant with a shipping name reading “UN3264” and “Corrosive liquid.” These boxes contained approximately 4 gallons of material and read as expiring “14 May 2024” (**Photo 28**). I asked the site representatives about these expired materials. I said I did not understand using these materials outside of customer specification processes. Ms. Perri said she understood the intent was to ship at least the chromium etchant off-site as waste.

In the same shed we saw three additional containers, two 5-gallon and one 1-gallon, labeled as 45% KOH and waste pending analysis sitting in a secondary containment tray (**Photo 29**). By the tray holding the Mr. we saw a 55-gallon white poly drum labeled corrosive hazardous waste, satellite accumulation, “temp hold” and “sodium hyd.” The drum lacked an accumulation start date and did not appear close to a point of generation of sodium hydroxide (**Photo 30**). We left the storage shed and went into the triple rinse shed. Inside an open fume hood, we saw an approximately 1-liter sized jug holding a brownish liquid (**Photo 31**). The jug lacked any labels, and our site representatives told us they did not know what the liquid was.

We left the chemical shed storage area and walked back to Building 1. On the way we stopped by the engineering shed and I asked to enter the shed. Mr. Brown called a colleague holding access credentials to join us. In the shed we saw an unlabeled, open, solid waste bin containing used “Kimtech” wipes. Mr. Brown took the bin and told me staff would transfer the used wipes to another container and appropriately manage the used wipes. I asked Mr. Brown how area staff use the wipes and he said he was not sure.

We returned to Building 1 and entered the Tunnel underneath. Inside an office in the tunnel, the HSE storage area, I saw a box holding multiple smaller containers of hand sanitizer (**Photo 32**). I asked Mr. Flies if he thought the sanitizer had expired. He replied he was not sure but that was a possibility. In the same office, on a different desk, I saw two light fixture housings (**Photo 33**). I asked Mr. Flies if the housings contained spent light bulbs, and he again said he was not sure. Later in the tunnel we saw two boxes each a cubic yard in size. One of the boxes was labeled “used cathode ray tube(s)” (**Photo 34**). I looked in the box and saw approximately three monitors (**Photo 35**).

We returned to the conference room used during the opening conference and began to review selected records. We looked at recent central accumulation area inspection logs. In reviewing weekly inspection logs from 2022, we saw an inspection logged on August 24, with the next inspection logged on September 6. The inspection logs indicate no CAA inspection occurred the week of August 28 – September 3. We also saw a record for a weekly inspection conducted on April 22, 2024, with the subsequent inspection logged on May 6, 2024, fourteen days later (**Photos 60-61**). I asked Mr. Correa, who joined us at this time and is listed as conducting weekly inspection during this time interval, if he had been on vacation the last week of April and he said he was. I also reviewed the site’s contingency plan and noted the plan still listed Mr. Kyle Peterson as the Primary Incident Manager in the Emergency Response Team section. The contingency plan also included an old, non-working phone number for the regional Department of Ecology office.

Closing Conference

At approximately 2:00 p.m., the inspection team initiated the closing conference. Ms. Able and Mr. Parise again joined via telephone. I thanked Mr. Quercia, and the other site representatives for their time showing us around the manufacturing floor, and in answering our questions. I recapitulated our site tour and observations from the walkthrough. I stated again that I would email a request for records within a few working days and that I would refrain from addressing all potential areas of concern until I reviewed those records and could document my observations in an inspection report. I did address these areas of concern during the closing conference:

- Expired hazardous materials stored in the CAA without a waste determination.
- Improper satellite accumulation area container labels and missing accumulation start dates
- Missing dangerous waste labels
- Two missing CAA inspections.
- Inadequate contingency plan.

We again thanked all the Honeywell representatives for their cooperation and departed at approximately 2:15 PM.

Records Review

On July 24, 2024, I emailed my records request to Ms. Larson and asked for a complete submission by close of business on August 7, 2024. Mr. Quercia requested a file transfer protocol (FTP) link that same day and completed the document submission on August 8, 2024. The Document Log, Attachment B, lists the records I requested and Honeywell's submission.

The following list includes my observations of the records and focuses on compliance concerns and other pertinent issues:

- In their explanatory cover letter, Honeywell stated, "A review of site records did not provide information on any manifest exception reports submitted by the facility."
- Weekly CAA inspection logs indicate no inspections between these dates:
 - 1-23-2020 – 2-6-2020
 - 5-20-2022 – 5-31-2022
 - July 2022
 - 12-19-2022 – 1-2-2023
 - 4/21/2023 – 5/1/2023
 - 9/22/2023 – 10/2/2023
 - 11/20/2023 – 12/4/2023
- The submitted Contingency Plan, Honeywell's Emergency Management Plan includes a revision date of "07/26/2024," indicating the site revised the plan between the inspection and submitting the plan. Section 10 of the plan, "Revision History," states the July revision includes, "Further updates to HSE contacts, Site IMT contacts, and Site ERT contacts."

The submitted plan directs the reader to Appendix A for a list of emergency contacts, the "Site Incident Management Team (IMT)." This list no longer includes Kyle Peterson. It also states that Ed Lowney is the primary incident manager. However, the "Emergency Response Team" table on page 6 of 51 says Mr. Peterson serves as the primary incident manager. The plan, on page 6, also says, "Security will call the scheduled On-Call person who is responsible for determining if the activation of the ERT is required."

While phone numbers are given for the above persons, no distinction is made between office or home phone numbers. Further, the plan fails to list addresses for these persons, and all other listed members of the IMT.

On pages 33 and 34, the plan lists the phone number for the local Ecology office as 425-649-7000. This is incorrect and is no longer a working phone line. The plan lists an accurate phone number on page 21.

- The submitted training plan indicates Ms. Larson, as the environmental programs HSE manager should take annual dangerous waste management training (8-hour training). The training records indicate Ms. Larson took one annual refresher on "7-Aug-2024." During the inspection, Ms. Larson told us she worked at the Redmond site for about two years, the oldest training record dated to May 2022. The training record does not specify other RCRA or dangerous waste training. The record does not show Ms. Larson took HAZWOPER training, also a plan requirement.
- While reviewing general facility inspection logs, I noted the logs lacked the printed names of the

inspectors prior to March 2022. After September 2022, the logs variously had the printed name of the inspector. Various remedial actions taken, such as the request for calcium gluconate to stock the spill response inventory in the Reed Laboratory, inspection dated “3-23-22,” lacked a correction date.

- The supplied designation records for the solder dross and solder dross debris indicate both waste streams have been designated as dangerous waste and are neither exempted nor recycled. The solder dross container in the Engineering Laboratory lacked dangerous waste and risk labels. The supplied PMX-200 designation records state Honeywell manages the spent fluid as used oil.
- The supplied waste determination dates statement gives either July 31, 2024, or August 2, 2024, as the date of waste generation for the various materials observed during the inspection. It also states the carboys of potassium hydroxide were moved into the CAA on May 5, 2024. The submission provided neither characterization information, nor an accurate date of generation for the brown liquid found in the triple rinse shed.

Regarding the Nano Strip, Spectrum Collodion, Isopropanol/Ethyl Acetate, and Enthone Catalyst, Honeywell stated their vendor sought alternative uses before deciding to dispose of it as wastes. They also stated the Accubrade and exit signs either would not designate as dangerous wastes, or come under alternative regulations (exit signs), and that the chromium etchant received an extended expiration date from the manufacturer, though Honeywell decided to dispose of it also. Honeywell stated they had no information on the storage of the brown liquid, and that the potassium hydroxide waste began to be stored in the CAA on May 5, 2024.

Areas of Concern

The following areas of concern are based on my observations made during the inspection, our conversations with facility representatives and my review of facility records. These areas of concern are not compliance determinations of violations of the pertinent regulations. I identify the following concerns based on my review to date:

1. Honeywell failed to appropriately label containers of dangerous waste with accumulation start dates, dangerous waste labels, and/or major hazard/risk indicators throughout the facility:
 - Solder dross bucket missing all labels (Photo 1, Engineering Laboratory)
 - Flammable solvent secondary containment structure labeled in lieu of the container (Photo 5, Metal Parts)
 - Carboys labeled as handy flux in the CAA missing accumulation start dates (Photo 10, Shed 2)
 - The surface strip and chrome etch carboys in the CAA missing accumulation start dates (Photo 11, Shed 2)
 - Containers of potassium hydroxide not labeled as dangerous waste and missing accumulation start dates (Photos 13, 29, Shed 2 and 1)
 - Solder dross debris missing accumulation start date (Photo 20, Shed 2)
 - “Sodium Hyd” 55-gallon drum missing an accumulation start date (Photo 30, Shed 1)
2. Honeywell failed to keep containers of dangerous waste closed except when adding or removing waste:
 - Flammable solvent (Photo 5, Metal Parts)
 - Solvent contaminated debris (Photo 6, Metal Parts)
 - Solvent contaminated debris (Photo 25, Shed 3)
3. Honeywell failed to label and keep closed containers of used oil:

- Open tray of PMX-200 fluid lacked a used oil label and sat open (Photo 2, Flex Test)
 - Open bucket holding discarded Axarel lacked a used oil label (Photo 21, Shed 2)
4. During the inspection, Honeywell lacked waste characterization information for these expired and, potentially, stored-in-lieu-of disposed materials:
- Nano strip 2x (Photos 26-27, Shed 1)
 - Chromium etchant 1020 (Photo 28, Shed 1)
 - Spectrum Collodion (Photo 13, Shed 2)
 - Two bottles labeled "Isopropanol/Ethyl Acetate" (Photos 16-17, Shed 2)
 - One bottle of Enthone Catalyst (Photo 15, Shed 2)
 - The one-gallon container of the brown liquid (Photo 31, Triple Rinse Shed)

Despite claiming alternative uses for these materials during the inspection, Honeywell determined these materials are in fact wastes within 10 days of the inspection.

5. Honeywell lacks weekly inspection logs for 12 weeks during the period of review, indicating a failure to conduct all the required weekly inspections of the CAA.
6. Honeywell operates with an inadequate contingency plan. The plan submitted after the inspection contained some updates, but still lacks required information.
7. The submitted training records indicate missed required training for Ms. Larson according to the training plan.
8. The submitted training plan fails to clearly state the slate of trainings required for the first tier, "Hazardous Waste Program HSE Staff" must be completed within six months of employment.
9. General facility inspection logs do not incorporate all the required data elements: many inspection logs either fail to include the full printed name or signature of the inspector; remedial actions and repairs are not dated.
10. Honeywell failed to submit manifest exception reports for these manifested shipments of dangerous waste in transit over 45 days:

Manifest Tracking Number	Shipped Date	Received Date
018795032FLE	11/21/2023	1/18/2024
018789967FLE	10/24/2023	1/1/2024
018620013FLE	8/22/2023	10/14/2023
018754191FLE	5/24/2023	7/19/2023
018281524FLE	5/23/2023	7/10/2023
018281330FLE	4/28/2023	6/21/2023
018280767FLE	3/23/2023	5/9/2023
017264749FLE	9/27/2022	11/17/2022
017254995FLE	8/9/2022	10/3/2022
016909694FLE	4/26/2022	6/17/2022
015814162FLE	4/12/2022	6/1/2022
015814018FLE	3/1/2022	4/20/2022

015813923FLE	2/1/2022	3/19/2022
015813880FLE	1/18/2022	3/17/2022
016319257FLE	11/30/2021	2/16/2022
016448920FLE	9/21/2021	11/20/2021
016318872FLE	8/31/2021	10/20/2021
015901844FLE	7/6/2021	8/21/2021
015812623FLE	6/1/2021	7/17/2021
014819058FLE	12/15/2020	1/21/2021

Attachment A: Photo Log

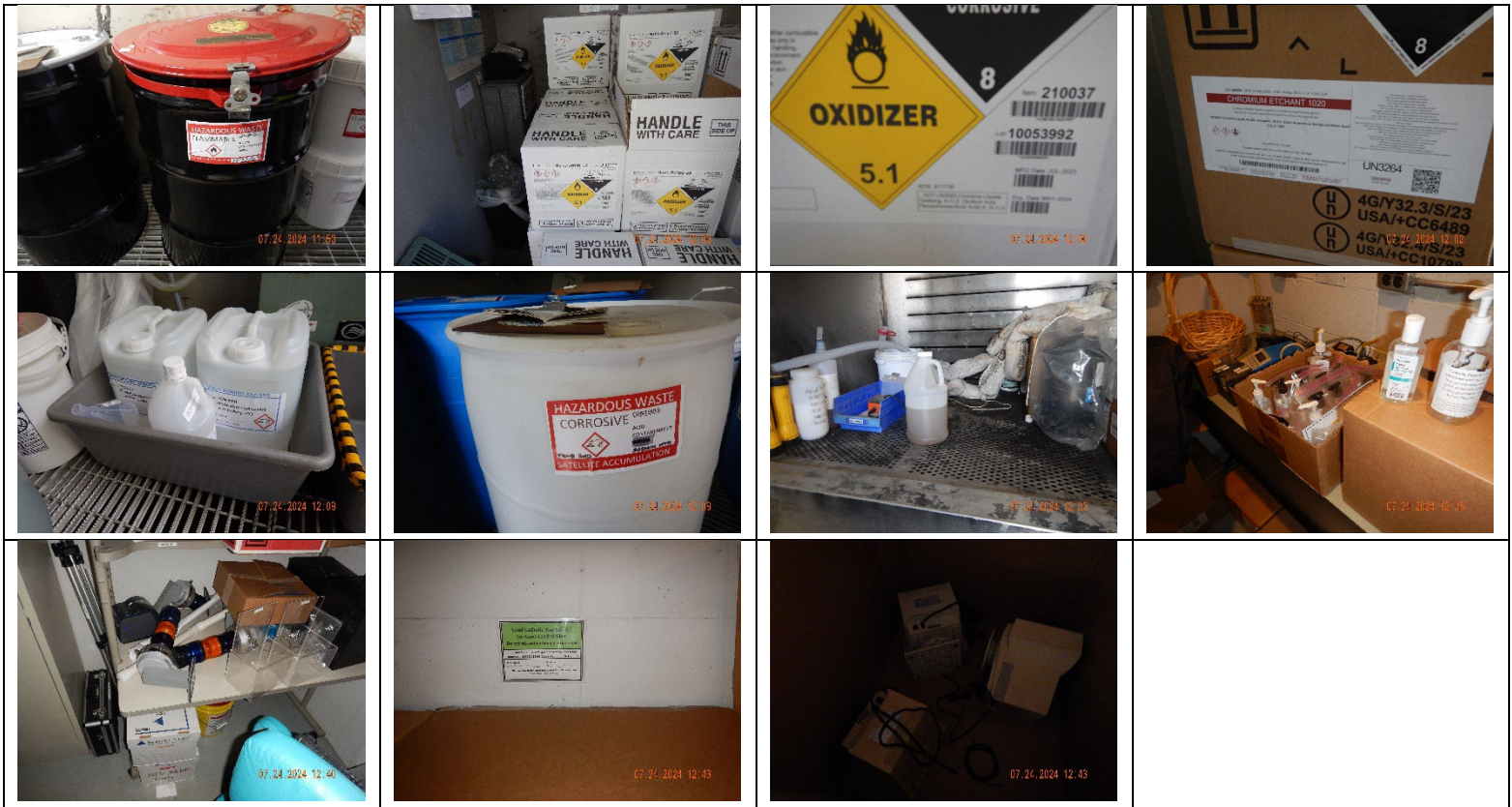
I took photographs 1-35 during the inspection with my EPA issued camera, a Nikon Coolpix AW120.^e Inspector Jones took photographs 36-73 using his EPA issued SmartTools tablet.

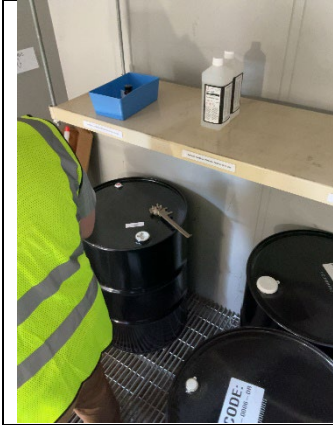
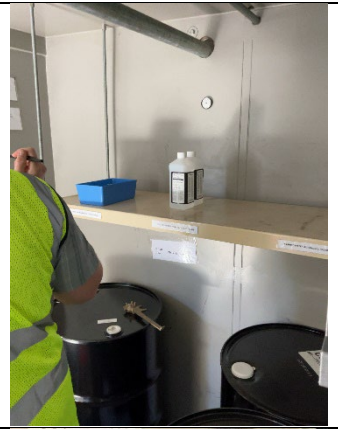
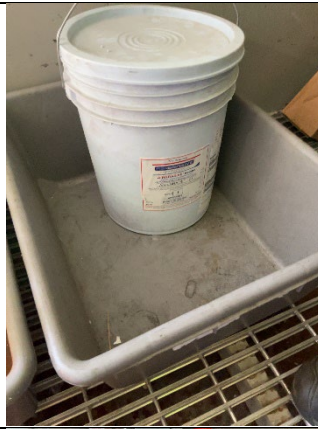
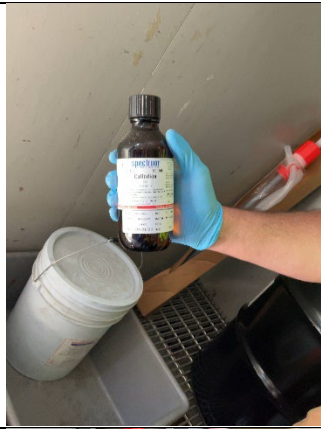
1. DSCN0697.JPG – Two 5-gallon pails holding solder dross and solder dross debris	36. IMG-2024072310105410542294763.jpg – Similar to Photo 1
2. DSCN0698.JPG – Open, approx. 1-pint container of PMX-200 fluid	37. IMG-2024072310322532251874866.jpg – Similar to Photo 2
3. DSCN0699.JPG – Open, approx. 1-pint container of spent cutting fluid	38. IMG-2024072310452645261994172.jpg – View of LOSMA machine
4. DSCN0700.JPG – Used cotton swabs on floor	39. IMG-2024072310453745371954692.jpg – Alternative view of LOSMA machine
5. DSCN0701.JPG – LOSMA machine with paper	40. IMG-202407231053005301601439.jpg – Similar to Photo 6, open SAA container
6. DSCN0702.JPG – Approx 3-gallon SAA bucket with opening	41. IMG-2024072310574157412442602.jpg – Similar to Photo 8, lid not flush
7. DSCN0703.JPG – Side of 3-gallon SAA, labels on secondary containment	42. IMG-2024072311202420242145724.jpg – Overview of containers in Photos 10-12
8. DSCN0704.JPG – Approx. 5-gallon SAA with wipe hanging over bucket-top	43. IMG-2024072311222422243464417.jpg – Similar to Photos 42 and 10
9. DSCN0705.JPG – Approx 5-gallon SAA, showing spent wipes contained inside	44. IMG-2024072311244324432376453.jpg – Similar to Photo 11
10. DSCN0706.JPG – Two 5-gallon jugs of handy flux, one with illegible label	45. IMG-202407231127052751581001.jpg – Similar to Photo 13
11. DSCN0707.JPG – Two 5-gallon jugs of hazardous waste with no start dates	46. IMG-2024072311272027202015619.jpg – Similar to Photo 13
12. DSCN0708.JPG – One 5-gallon jug labeled waste pending analysis, “45% KOH”	47. IMG-2024072311321232121676285.jpg – Similar to Photo 14
13. DSCN0709.JPG – One 500mL bottle labeled “Collodion” and expired “07/31/23” and 5-gallon bucket of “Accu-BRADE™-27”	48. IMG-2024072311324232421895469.jpg – Similar to Photo 47
14. DSCN0710.JPG – Two expired pint-sized containers of Isopropanol/Ethyl Acetate	49. IMG-2024072311354735471915312.jpg – Similar to Photo 18
15. DSCN0711.JPG – One small jar of expired Enthone Catalyst	50. IMG-2024072311365436542197645.jpg – Similar to Photo 20
16. DSCN0712.JPG – Close-up of containers in Photo 14	51. IMG-2024072311384738471936176.jpg – Similar to Photo 22
17. DSCN0713.JPG – Back of containers in Photos 14 and 16 with expired label “01/10/24”	52. IMG-2024072311453245322350375.jpg – Similar to Photo 25
18. DSCN0714.JPG – Two 55-gallon drums labeled waste pending analysis and “Trillium (sic) exit signs”	53. IMG-2024072311454045402163426.jpg – Close-up view of Photo 52
19. DSCN0715.JPG – Close-up of label in Photo 18	54. IMG-2024072311471547151905148.jpg – Sideview of container in Photos 53 & 54
20. DSCN0716.JPG – One 5-gallon bucket of hazardous waste solder dross debris without ASD	55. IMG-202407231154095493394152.jpg – Similar to Photo 26
	56. IMG-2024072311541854183111438.jpg – Similar to Photo 27
	57. IMG-2024072311543154312823865.jpg – Similar to Photos 55 and 26
	58. IMG-202407231202452453285357.jpg – Similar to Photo 29

^e The time and date stamp on the photographs taken with this camera are off by one day.

21. DSCN0717.JPG – One open 5-gallon bucket with COLIWASA, spill pad and black, oily liquid named as Axarel	59. IMG-202407231202552552355569.jpg – Close-up view of Photo 58
22. DSCN0718.JPG – One 55-gallon drum “Axarel™ 9100”	60. IMG-20240723130039039118372.jpg – Weekly CAA inspection log April 2024
23. DSCN0719.JPG – One approx. 25-gallon bin labeled hazardous waste, no ASD	61. IMG-2024072313010414118465.jpg - Weekly CAA inspection log May 2024
24. DSCN0720.JPG – Contents of bin, with debris inside	62. IMG-20240723130253253133788.jpg - Weekly CAA inspection log July 2024
25. DSCN0721.JPG – One 55-gallon drum labeled hazardous waste debris, unlatched	63. IMG-2024072313030434117546.jpg – Page 2 of July 2024 weekly inspection log
26. DSCN0722.JPG – Approximately 33 60-pound boxes of nano-strip labeled corrosive and oxidizer	64. IMG-202407231310501050113603.jpg – Weekly inspection log April 2022
27. DSCN0723.JPG – Close-up of one box in Photo 26 showing expiration date “May-2024”	65. IMG-202407231315421542117445.jpg – Weekly inspection log August 2022
28. DSCN0724.JPG – One of four boxes of chromium etchant with expiration date “14 May 2024”	66. IMG-202407231315551555102646.jpg – Page 2 inspection log August 2022
29. DSCN0725.JPG – Two 5-gallon jugs, one 1-quart sized jug, labeled waste pending analysis and “45% KOH”	67. IMG-20240723131608168101137.jpg – Weekly inspection log Sept. 2022
30. DSCN0726.JPG – One 55-gallon drum labeled hazardous waste, “Sodium Hyd” and “Satellite...” with no ASD	68. IMG-202407231316201620103215.jpg - Page 2 inspection log Sept. 2022
31. DSCN0727.JPG – One approximately pint-sized jug with no labels	69. IMG-202407231323352335129239.jpg – Clearer copy of Photo 65
32. DSCN0728.JPG – One box holding assortment of hand sanitizer	70. IMG-20240723132344234485889.jpg – Copy of Photo 66
33. DSCN0729.JPG – Two multicolored lamp housing units	71. IMG-202407231323552355116947.jpg – Copy of Photo 67
34. DSCN0730.JPG – One cubic yard box labeled “Used Cathode Ray Tube(s)”	72. IMG-2024072313240224290429.jpg – Copy of Photo 68
35. DSCN0731.JPG – Inside of box shown in Photo 34	







[illegible][illegible]



EcoLogic
Environmental Consulting & Logistics

Central Accumulation Areas

This form is to be completed for all Central Accumulation Areas (CAAs) identified in the following locations: *see map*

* Remove "yes" or "no" for each question, every week.
 If you need to, simply mark "not sure" or "not applicable".

5/1/2014

Date	Time	Inspector's printed name	Signature
Week 1 <i>2/27/14</i>	<i>06:50</i>	<i>John J. ...</i>	<i>[Signature]</i>
Week 2 <i>3/6/14</i>	<i>06:50</i>	<i>John J. ...</i>	<i>[Signature]</i>
Week 3 <i>3/13/14</i>	<i>06:50</i>	<i>John J. ...</i>	<i>[Signature]</i>
Week 4 <i>3/20/14</i>	<i>06:50</i>	<i>John J. ...</i>	<i>[Signature]</i>
Week 5 <i>3/27/14</i>	<i>06:50</i>	<i>John J. ...</i>	<i>[Signature]</i>

Regulatory Weekly

Questions	Week 1	Week 2	Week 3	Week 4	Week 5
1. Is the accumulation area free of leaks?	<i>Yes</i>	<i>No</i>	<i>Yes</i>	<i>No</i>	<i>Yes</i>
2. Are all containers properly sealed and labeled?	<i>Yes</i>	<i>No</i>	<i>Yes</i>	<i>No</i>	<i>Yes</i>
3. Are all containers properly sealed and labeled?	<i>Yes</i>	<i>No</i>	<i>Yes</i>	<i>No</i>	<i>Yes</i>
4. Is the secondary containment correct?	<i>Yes</i>	<i>No</i>	<i>Yes</i>	<i>No</i>	<i>Yes</i>
5. Is the secondary containment correct?	<i>Yes</i>	<i>No</i>	<i>Yes</i>	<i>No</i>	<i>Yes</i>

Questions Manager and Operation

We recommend you print these questions to remain in compliance.

Questions	Week 1	Week 2	Week 3	Week 4	Week 5
1. Are all containers properly sealed and labeled?	<i>Yes</i>	<i>No</i>	<i>Yes</i>	<i>No</i>	<i>Yes</i>
2. Are all containers properly sealed and labeled?	<i>Yes</i>	<i>No</i>	<i>Yes</i>	<i>No</i>	<i>Yes</i>
3. Are all containers properly sealed and labeled?	<i>Yes</i>	<i>No</i>	<i>Yes</i>	<i>No</i>	<i>Yes</i>
4. Is the secondary containment correct?	<i>Yes</i>	<i>No</i>	<i>Yes</i>	<i>No</i>	<i>Yes</i>
5. Is the secondary containment correct?	<i>Yes</i>	<i>No</i>	<i>Yes</i>	<i>No</i>	<i>Yes</i>
6. Are all containers within the large secondary containment area?	<i>Yes</i>	<i>No</i>	<i>Yes</i>	<i>No</i>	<i>Yes</i>
7. Are all containers within the large secondary containment area?	<i>Yes</i>	<i>No</i>	<i>Yes</i>	<i>No</i>	<i>Yes</i>

* *Notes: Inspected on 5/1/2014*

Remediation *to request materials is a formal for the weekly required, required for compliance*

Request *Call EcolLogic at 304-405-4700, Refuse Service 301 977 8733 8341.*

Publication 12-04-019
Revised February 2013

Weekly Inspection Checklist for Central Administration Areas

Plant and Waste and Issues Reduction Program



U.S. DEPARTMENT OF
ENVIRONMENTAL PROTECTION

Questions	Week 1	Week 2	Week 3	Week 4	Week 5
1. Are all hazardous liquids sealed and labeled?	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No
2. Are all containers closed?	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No
3. Are there any leaks of solid or liquid waste?	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No
4. Are the containers at least one container length away from the edge of the container?	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No
5. Are the containers inspected at each work shift?	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No

Secondary Containment

Questions	Week 1	Week 2	Week 3	Week 4	Week 5
1. Is secondary containment clean and free of debris, leaks, cracks, and standing water?	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No

Preparations and Prevention

You must have additional equipment to detect and prevent hazards and perform general inspections of that equipment. See [General Facility Inspection](#) for more information on general facility preparation requirements.

Questions	Week 1	Week 2	Week 3	Week 4	Week 5
1. Are fire extinguishers charged?	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No
2. Are spill kits used?	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No
3. Are spill kits placed in easy reach without changing properties?	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No
4. Are spill kits inspected and replaced as needed?	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No
5. Are spill kits inspected and replaced as needed?	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No
6. Are spill kits inspected and replaced as needed?	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No
7. Are spill kits inspected and replaced as needed?	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No
8. Are spill kits inspected and replaced as needed?	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No
9. Are spill kits inspected and replaced as needed?	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No
10. Are spill kits inspected and replaced as needed?	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No
11. Are spill kits inspected and replaced as needed?	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No
12. Are spill kits inspected and replaced as needed?	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No
13. Are spill kits inspected and replaced as needed?	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No
14. Are spill kits inspected and replaced as needed?	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No
15. Are spill kits inspected and replaced as needed?	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No
16. Are spill kits inspected and replaced as needed?	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No
17. Are spill kits inspected and replaced as needed?	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No
18. Are spill kits inspected and replaced as needed?	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No
19. Are spill kits inspected and replaced as needed?	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No
20. Are spill kits inspected and replaced as needed?	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No
21. Are spill kits inspected and replaced as needed?	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No
22. Are spill kits inspected and replaced as needed?	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No
23. Are spill kits inspected and replaced as needed?	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No	

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Weekly Inspection Checklist for Central Accumulation Areas

If you present grounds for requesting a general observation area (GEO), you must meet with the GELC staff and discuss your concerns. Once the GELC has been notified, the GELC will send you a copy of the inspection report. Please ensure that you are able to be addressed.

Answer "yes" or "no" for each question, every week.
 * If you select "no", you must attach a note.

Date	Inspector's printed name	Signature
Week 1: <u>2016/11/14</u> - <u>2016/11/19</u>	<u>James Spence</u>	<u>[Signature]</u>
Week 2: <u>2016/11/20</u> - <u>2016/11/25</u>	<u>James Spence</u>	<u>[Signature]</u>
Week 3: <u>2016/11/26</u> - <u>2016/12/1</u>	<u>James Spence</u>	<u>[Signature]</u>
Week 4: <u>2016/12/02</u> - <u>2016/12/07</u>	<u>James Spence</u>	<u>[Signature]</u>
Week 5: <u>2016/12/08</u> - <u>2016/12/13</u>	<u>James Spence</u>	<u>[Signature]</u>
Week 6: <u>2016/12/14</u> - <u>2016/12/19</u>	<u>James Spence</u>	<u>[Signature]</u>

Required Weekly

Questions	Week 1	Week 2	Week 3	Week 4	Week 5	Week 6
1. Is the observation area free of debris and clutter?	Yes	Yes	Yes	Yes	Yes	Yes
2. Is the observation area free of standing water?	Yes	Yes	Yes	Yes	Yes	Yes
3. Is the observation area good condition (no debris, clutter, standing water, etc.)	Yes	Yes	Yes	Yes	Yes	Yes
4. Is the observation area free of standing water?	Yes	Yes	Yes	Yes	Yes	Yes
5. Is the observation area free of standing water?	Yes	Yes	Yes	Yes	Yes	Yes
6. Is the observation area free of standing water?	Yes	Yes	Yes	Yes	Yes	Yes
7. Is the observation area free of standing water?	Yes	Yes	Yes	Yes	Yes	Yes
8. Is the observation area free of standing water?	Yes	Yes	Yes	Yes	Yes	Yes
9. Is the observation area free of standing water?	Yes	Yes	Yes	Yes	Yes	Yes
10. Is the observation area free of standing water?	Yes	Yes	Yes	Yes	Yes	Yes
11. Is the observation area free of standing water?	Yes	Yes	Yes	Yes	Yes	Yes
12. Is the observation area free of standing water?	Yes	Yes	Yes	Yes	Yes	Yes
13. Is the observation area free of standing water?	Yes	Yes	Yes	Yes	Yes	Yes
14. Is the observation area free of standing water?	Yes	Yes	Yes	Yes	Yes	Yes
15. Is the observation area free of standing water?	Yes	Yes	Yes	Yes	Yes	Yes
16. Is the observation area free of standing water?	Yes	Yes	Yes	Yes	Yes	Yes
17. Is the observation area free of standing water?	Yes	Yes	Yes	Yes	Yes	Yes
18. Is the observation area free of standing water?	Yes	Yes	Yes	Yes	Yes	Yes
19. Is the observation area free of standing water?	Yes	Yes	Yes	Yes	Yes	Yes
20. Is the observation area free of standing water?	Yes	Yes	Yes	Yes	Yes	Yes
21. Is the observation area free of standing water?	Yes	Yes	Yes	Yes	Yes	Yes
22. Is the observation area free of standing water?	Yes	Yes	Yes	Yes	Yes	Yes
23. Is the observation area free of standing water?	Yes	Yes	Yes	Yes	Yes	Yes
24. Is the observation area free of standing water?	Yes	Yes	Yes	Yes	Yes	Yes
25. Is the observation area free of standing water?	Yes	Yes	Yes	Yes	Yes	Yes
26. Is the observation area free of standing water?	Yes	Yes	Yes	Yes	Yes	Yes
27. Is the observation area free of standing water?	Yes	Yes	Yes	Yes	Yes	Yes
28. Is the observation area free of standing water?	Yes	Yes	Yes	Yes	Yes	Yes
29. Is the observation area free of standing water?	Yes	Yes	Yes	Yes	Yes	Yes
30. Is the observation area free of standing water?	Yes	Yes	Yes	Yes	Yes	Yes
31. Is the observation area free of standing water?	Yes	Yes	Yes	Yes	Yes	Yes
32. Is the observation area free of standing water?	Yes	Yes	Yes	Yes	Yes	Yes
33. Is the observation area free of standing water?	Yes	Yes	Yes	Yes	Yes	Yes
34. Is the observation area free of standing water?	Yes	Yes	Yes	Yes	Yes	Yes
35. Is the observation area free of standing water?	Yes	Yes	Yes	Yes	Yes	Yes
36. Is the observation area free of standing water?	Yes	Yes	Yes	Yes	Yes	Yes
37. Is the observation area free of standing water?	Yes	Yes	Yes	Yes	Yes	Yes
38. Is the observation area free of standing water?	Yes	Yes	Yes	Yes	Yes	Yes
39. Is the observation area free of standing water?	Yes	Yes	Yes	Yes	Yes	Yes
40. Is the observation area free of standing water?	Yes	Yes	Yes	Yes	Yes	Yes
41. Is the observation area free of standing water?	Yes	Yes	Yes	Yes	Yes	Yes
42. Is the observation area free of standing water?	Yes	Yes	Yes	Yes	Yes	Yes
43. Is the observation area free of standing water?	Yes	Yes	Yes	Yes	Yes	Yes
44. Is the observation area free of standing water?	Yes	Yes	Yes	Yes	Yes	Yes
45. Is the observation area free of standing water?	Yes	Yes	Yes	Yes	Yes	Yes
46. Is the observation area free of standing water?	Yes	Yes	Yes	Yes	Yes	Yes
47. Is the observation area free of standing water?	Yes	Yes	Yes	Yes	Yes	Yes
48. Is the observation area free of standing water?	Yes	Yes	Yes	Yes	Yes	Yes
49. Is the observation area free of standing water?						

Weekly Inspection Checklist for central accumulation areas
 (before Work and Task Debriefing Program)



UNIVERSITY OF
COLORADO
 BOULDER

Questions	Week 1	Week 2	Week 3	Week 4	Week 5
1. Are there any obvious leaks and/or spills?	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No
2. Are there odors that are unusual?	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No
3. Are there indications of any gases or vapors that are unusual?	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No
4. Are there indications of any leaks or spills of liquids or solids?	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No
5. Are there indications of any leaks or spills of gases or vapors?	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No

Secondary Containment:

Questions	Week 1	Week 2	Week 3	Week 4	Week 5
1. Are secondary containment walls and/or dikes, impermeable walls, tanks, etc. present?	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No

Preparedness and Prevention

You must have additional equipment to detect and prevent hazards and perform a general inspection of these equipment. See General Health Inspection for comprehensive general facility inspection requirements.

Questions	Week 1	Week 2	Week 3	Week 4	Week 5
1. Are fire extinguishers present?	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No
2. Are fire exits marked?	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No
3. Is the emergency shower and eye wash available?	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No
4. Are the emergency eyewashes present?	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No
5. Are the emergency showers present?	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No
6. Are the emergency showers present and used after each construction area?	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No

Action Items

If you responded "no" to any of the questions, describe how you fixed the problem and include the date you took action to solve it.

Page 1 of 2

2019-2020

Revised January 2021

[illegible]



 FLORIDA DEPARTMENT OF
 ECOLOGY
 www.floridadepartmentofecology.com

Weekly Inspection Checklist for central accumulation areas
 Nonpoint Source and Backs Reduction Program

Questions	Week 1	Week 2	Week 3	Week 4	Week 5
1. Are all containers visible and labeled?	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No
2. Are all containers sealed?	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No
3. Are there leaks or drips going between the containers?	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No
4. Are there leaks or drips from a container and/or are there two containers used and allow for accumulation of hazardous waste?	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No

Secondary Containment

Questions	Week 1	Week 2	Week 3	Week 4	Week 5
1. Is there secondary containment and leak detection system in place for all drums, containers, tanks, totes, and storage tanks?	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No

Preparedness and Prevention

You must have additional equipment to detect and prevent hazards and perform general housekeeping of that must be kept in good working order for comprehensive general facility inspection requirements.

Questions	Week 1	Week 2	Week 3	Week 4	Week 5
1. Is there a spill kit?	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No
2. Are spill kits inspected?	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No
3. Is there emergency shower and eye wash facilities present?	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No
4. Are the emergency containment equipment inspected?	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No
5. Are there spill containment equipment inspected?	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No
6. Are there spill containment equipment inspected?	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No

Actions Taken

If you responded "No" to any of the questions, describe how you fixed the problem and include the date you took action to solve it.

Date: _____

(Printed Name) _____

[illegible]

Ministry of Education checks for content inaccuracies before printing and before releasing books

Ministry of Education

LEARNING

Preparations and Preventions

Questions

1. An ionic compound contains iron and iodine. Write the chemical formula of this compound.
2. Write the chemical formula of the compound that contains the same number of atoms of each element as the compound Fe_2I_6 .
3. An ionic compound contains iron and iodine. Write the chemical formula of this compound.
4. Write the chemical formula of the compound that contains the same number of atoms of each element as the compound Fe_2I_6 .
5. An ionic compound contains iron and iodine. Write the chemical formula of this compound.

Answers

	Question 1	Question 2	Question 3	Question 4	Question 5
Chemical formula	FeI_2	FeI_2	FeI_2	FeI_2	FeI_2
Chemical formula	FeI_2	FeI_2	FeI_2	FeI_2	FeI_2
Chemical formula	FeI_2	FeI_2	FeI_2	FeI_2	FeI_2
Chemical formula	FeI_2	FeI_2	FeI_2	FeI_2	FeI_2
Chemical formula	FeI_2	FeI_2	FeI_2	FeI_2	FeI_2

Preparations and Preventions

1. A compound contains iron and iodine. Write the chemical formula of this compound.

2. Write the chemical formula of the compound that contains the same number of atoms of each element as the compound Fe_2I_6 .

3. A compound contains iron and iodine. Write the chemical formula of this compound.

4. Write the chemical formula of the compound that contains the same number of atoms of each element as the compound Fe_2I_6 .

5. A compound contains iron and iodine. Write the chemical formula of this compound.

Answers

	Question 1	Question 2	Question 3	Question 4	Question 5
Chemical formula	FeI_2	FeI_2	FeI_2	FeI_2	FeI_2
Chemical formula	FeI_2	FeI_2	FeI_2	FeI_2	FeI_2
Chemical formula	FeI_2	FeI_2	FeI_2	FeI_2	FeI_2
Chemical formula	FeI_2	FeI_2	FeI_2	FeI_2	FeI_2
Chemical formula	FeI_2	FeI_2	FeI_2	FeI_2	FeI_2

Artem Task

If you are "not" sure of any of the questions, describe how you find the problem and include the data you look at first for value 8.

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[illegible][illegible]

Attachment B: Document Log

I submitted the following records request (numbered) the day after the inspection, July 24, 2024.

Honeywell submitted the requested records on August 8. I requested these records:

- Any manifest exception reports submitted by the facility in the previous 5 years
- Weekly inspection logs of the central accumulation area(s) from the previous 5 years
- Dangerous waste contingency plan
- Dangerous waste training plan
- Training records for these individuals –
 - Joanna Larson
 - Tim from Metal Parts (Kui Fat (Tim) Kan)
- General facility inspection logs, from the previous 5 years
- Waste analysis plan/documentation for the wastewater treated on-site. Please include influent analytical testing results, i.e. characteristic of the waste stream as it exits the facility and enters the holding tank prior to pH correction or other treatment.
- Designation/characterization records for the following waste streams -
 - Waste code 19 and 19D, dross for recycling and solder dross debris, respectively
 - PMX-200, include the safety data sheet
 - The cutting fluid used by the punch in thermal switches, include the safety data sheet
 - Spent blasting media we observed outside of Building 3 as we walked back to Building 1
 - Axarel 9100, include the safety data sheet
 - Nano strip 2x
 - LOSMA paper/debris, please include all analytical testing records for this waste stream
- Waste determination dates for these materials observed in the chemical storage sheds/central accumulation area, including the dates they were moved to this area of the facility –
 - Nano strip 2x (approximately 33 boxes of apparently expired material)
 - Chromium etchant 1020 (approximately 4 boxes)
 - Two drums labeled “waste pending analysis” and “trillium (sic) exit signs”
 - Approximately 5 containers labeled “waste pending analysis” and “potassium hydroxide 45%”
 - “Spectrum Collodion”
 - “AccuBRADE 27”
 - Two bottles labeled “Isopropanol/Ethyl Acetate” with an expiration date of January 10, 2024
 - One bottle of Enthone Catalyst
 - The one-gallon container of the brown mystery liquid we found in the fume hood inside the triple rinse shed

Honeywell’s response included an explanatory cover letter signed by the Plant Director, Mr. Ed Lowney as well as a series of attachments. The letter included explanations for the submittals:

- A statement explaining the site has no manifest exception reports on file
- Weekly inspection logs as Attachment A
- Contingency Plan as Attachment B
- Training Plan as Attachment C
- Training records as Attachment D
- General facility inspection logs as Attachment E
- Waste Analysis Plan as Attachment F
- Designation records for the requested waste streams as Attachment G
- Waste determination records for the requested waste streams in Attachment H