



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Region 1
5 Post Office Square, Suite 100
Boston, MA 02109-3912

URGENT MATTER - EARLY WARNING NOTICE

January 17, 2024

Dennis Reidy, Quality Coordinator
C.I.L. Electroplating, Incorporated
125 Glenn St.
Lawrence, MA 01840

RE: NOTICE OF POTENTIAL VIOLATION of the Resource Conservation and Recovery Act (RCRA), the Hazardous and Solid Waste Amendments of 1984 (HSWA) and Massachusetts General Law, Chapter 21C, Sections 4 and 6. The State of Massachusetts has been granted final authorization by EPA to administer certain portions of RCRA.

Dear Mr. Reidy:

On October 18 and 19 of 2023, representatives of the United States Environmental Protection Agency ("EPA") conducted a RCRA Compliance Evaluation Inspection. The purpose of this inspection was, in part, to determine the compliance of C.I.L. Electroplating, Inc., EPA ID # MAR000014183, with the relevant hazardous waste management regulations for the State of Massachusetts and the corresponding federal Hazardous Waste Management Regulations found at 40 C.F.R. Parts 260-273.

As a follow up to the out-brief meeting provided by EPA at the conclusion of the inspection of your facility, a partial written list of deficiencies is provided below to summarize the potential violations/areas of concern identified. Additional potential violations or areas of concern determined after EPA's inspection may also be included in the list below. You are requested to take immediate action on your part to evaluate this listing below and take corrective measures where necessary.

Potential Violations/Areas of Concern:

1. Failure to obtain a permit to store hazardous waste for longer than 90 days

2. Failure to inspect hazardous waste containers on a weekly basis
3. Failure to document weekly container inspections
4. Failure to make adequate waste determinations
5. Failure to maintain closed containers while waste was not being added or removed
6. Failure to appropriately date containers of hazardous waste
7. Failure to appropriately label containers of hazardous waste
8. Failure to maintain adequate aisle space between hazardous waste containers
9. Failure to conduct hazardous waste training
10. Failure to include all required information in a Contingency Plan
11. Failure to submit an updated copy of the Contingency Plan to local authorities
12. Failure to retain appropriate copies of the Uniform Hazardous Waste Manifest
13. Failure to comply with universal waste requirements.

This letter is EPA's initial response to potential hazardous waste violations and areas of concern that were observed during our October 18 and 19, 2023 inspection of your facility. The primary purpose of this letter is to identify potential problem areas and seek compliance. This Notice does not limit or otherwise preclude EPA from taking civil or criminal enforcement action pursuant to Section 3008 of RCRA, 42 U.S.C. § 6928 with regard to these or other violations that may be determined. EPA is continuing to investigate and evaluate C.I.L. Electroplating, Inc.'s compliance under RCRA and may take an enforcement action as appropriate.

I urge you to take immediate positive steps to remedy the above-cited potential violations/areas of concern. If you have any questions regarding this letter or how to comply with RCRA requirements, please contact Cheryl Wilkinson of my staff at (617) 918-1760.

Sincerely,

MARY O'DONNELL Digitally signed by MARY O'DONNELL
Date: 2024.01.17 15:39:56 -05'00'

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

cc: Scott Fasulo, MassDEP