



RCRA Compliance Inspection Report

Pacific Propeller Intl LLC

Kent, WA

WAD002788412

June 27, 2024

JONATHAN MASTERS

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Report 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: Pacific Propeller Intl LLC

Handler ID Number: WAD002788412

Facility Contact/Title: Taylor Spisak; Equipment Engineer and Facilities Manager

Facility Location Address: 5802 South 228th Street
Kent, WA 98032

Facility Mailing Address: PO Box 1187
Keyport, WA 98032

Contact Phone Number: (253) 872-7767, Extension 215

Contact Email Address: Tspisak@pacprop.com

Inspection Information

Inspection Type: RCRA Compliance Evaluation Inspection (CEI)

Inspection Date: June 27, 2024

Arrival Time: 09:50 AM

Departure Time: 02:45 PM

Inspection Team: Kyle Masters, RCRA Inspector-in-Training
Xiangyu Chu, RCRA Inspector
Amy Simmons, Inspector, Washington Department of Ecology

Section B: General Facility Information

Owner/Operator Information

According to the 2023 Dangerous Waste Annual Report received by the Department of Ecology (Ecology) on 8/1/2024, the landowner is listed as Leavitt Capital Companies, and the legal owner is listed as Precision Aerospace. The site operator is listed as Pacific Propeller Intl LLC, and the site contact is listed as Taylor Spisak, with the title of Facility Manager.

Background and Activities

The following information was obtained from the company's website prior to the inspection, and from Taylor Spisak, Equipment Engineer, and Facilities Manager during the opening conference of the inspection unless noted otherwise:

Originally founded in 1946, by 1953 Pacific Propeller Intl (PPI) focused business operations on aircraft propeller maintenance repair and overhaul.^a Precision Aerospace Corporation purchased PPI in 1994. Mr. Spisak told us Precision also owns a facility in Texas. Mr. Spisak said the company originally owned the land its manufacturing facility sits on but sold the property at some point to raise revenue for

^a [ABOUT PPI – Pacific Propeller International LLC \(pacprop.com\)](https://www.pacprop.com)

business operations.

According to King County's Parcel Viewer, Leavitt-Wolff Northwest Prop LLC acquired Parcel 1422049031 from Leavitt Investment Company Et Al, through PB Investments LP from Abraham Kosokoff Et Al in 2005. The parcel is approximately 5.67 acres in size. The original building was constructed in 1967, with a second, attached, building added in 1982 bringing the total square footage of the manufacturing facility up to just under 62,000 square feet.

The Washington State Department of Ecology (Ecology) last conducted an off-site virtual inspection and non-financial records review on April 21, 2021, and cited these violations in the accompanying inspection report:

- Failure to characterize hazardous waste (designation)
- Failure to accurately report dangerous waste activities on the Site ID Form (on-site treatment)
- Failure to accurately report waste stream management on Generation and Management Form
- Failure to submit general facility inspection logs.
- Failure to label containers of dangerous waste so they are visible from 25 feet.
- Failure to complete weekly inspection logs.
- Failure to maintain an adequate training plan.
- Failure to label containers of used oil

Ecology last completed an on-site inspection of the facility on June 8, 2017. The inspection report cited these violations:

- Failure to characterize hazardous waste (designation)
- Storing waste on-site over 90 days
- Failure to label containers of dangerous waste as dangerous waste and apply appropriate risk labels.
- Failure to close containers of dangerous waste
- Failure to mark containers of dangerous waste with the accumulation start date.
- Failure to complete general facility inspection logs.
- Failure to maintain decontamination equipment.
- Failure to maintain an adequate contingency plan.
- Failure to institute a training program and ensure staff training.

Mr. Spisak told the inspection team he has worked for PPI for almost 2 years. The site currently employed approximately 85-90 employees. Records indicate Mr. Spisak did not work for PPI during the previous Ecology dangerous waste compliance monitoring activities.

Section C: Regulatory Information

Regulatory Status

According to Ecology's online dangerous waste annual reporting database, PPI has reported as a large quantity generator since 1993.^b EPA's Enforcement and Compliance History Online (ECHO) website also lists a Clean Air Act area source permit from the Puget Sound Clean Air Agency.^c ECHO also reports PPI paid a penalty of \$66,300 for failure to report under EPCRA Section 312 regulations.

PPI discharges treated wastewaters to the King County sewer in accordance with their discharge permit, Number 7235-06, reissued to PPI effective November 1, 2019. King County issued a 14-day report for a discharge violation to PPI on May 7, 2021. PPI discharged effluent with a cadmium value of 0.8 ppm; the permit's instantaneous cadmium limit is 0.6 ppm. As a result, King County required

^b [Search for Hazardous Waste Facilities in Washington State](#)

^c [Detailed Facility Report | ECHO | US EPA](#)

reformatting of analytical results for easier understanding, increased operator training, independent review of analytical test results prior to discharge, and submittal of pre-discharge analytical test results to the county for review.

PPI carries the North American Industrial Classification System (NAICS) code of 336413, "Other Aircraft Parts and Auxiliary Equipment Manufacturing."

Site Hazardous Waste Information

According to the 2023 Dangerous Waste Annual Report filed with Ecology on 08/01/2024, PPI reported generating 63,425 pounds of dangerous waste coming from 18 separate waste streams. The largest waste streams reported included:

1. Sodium hydroxide (hazardous waste codes D002, D007). According to the reported GM Form the waste is managed off-site as undergoing treatment only prior to disposal at a landfill or surface impoundment that will be closed as a landfill (H132). This waste was shipped off-site once at 13,500 pounds.
2. Plastic Media with Paint Chips (D006, D005, D008, D007). This waste was reported with the same method management code as the above waste stream. The waste was reported as shipped off-site nine times at 11,280 pounds.
3. Isoprep 35 (D002). This waste was reported as other recovery or reclamation for reuse including acid regeneration, organics recovery, etc (to specify in comments – H039). PPI did not specify in the comments of the form. This waste was also shipped off-site once, at 11,000 pounds.
4. Waste paints, solvents, and oils (D001, D006, D007, D008, F005, F003). This waste was reported as undergoing fuel blending prior to energy recovery at another site. This waste was shipped off-site nine times at 7,550 pounds.
5. Cadmium Cyanide Electroplating Waste (D002, D006, F008, F007, F009). The GM Form for this waste indicates it was received, stored and or bulked, and transferred off-site with no treatment or recovery (H141). The waste was shipped off-site eight times at 4,450 pounds.
6. Chromic Acid Plating Bath/Rinse Water (D008, D007, D002). The GM Form for this waste indicates it is managed off-site as undergoing treatment only prior to disposal at a landfill or surface impoundment that will be closed as a landfill (H132). This waste was shipped off-site once at 4,000 pounds.
7. Waste Filter Press Sludge (F006). The GM Form for this waste also indicates it is managed off-site as undergoing treatment only prior to disposal at a landfill or surface impoundment that will be closed as a landfill. This waste was shipped off-site three times at 3,700 pounds. The comments form on the form adds PPI discharges the associated industrial wastewater to sewer in accordance with permit-by rule (WAC 173-303-802(5)).

The Facility's 2023 Site ID Form indicates the facility does not conduct treatment by generator, i.e. none of the reported waste streams were described as treated on-site. Further, the Site ID form does not indicate PPI conducts on-site treatment of hazardous waste, or operates under permit-by-rule.

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 June 28, 2024, I, EPA Inspector Masters, along with Inspector

Chu (EPA) arrived at the site at approximately 9:45 a.m. and met Inspector Simmons (Ecology). We entered the site at approximately 9:50. In the main lobby we spoke with the administrative staffer present^d. She asked us to sign in to PPI using an electronic tablet. I asked her to call Mr. Taylor Spisak to the front office, which she agreed to do. Based on a quick review of the language presented, it appeared the tablet asked for the signee's agreement with a non-disclosure agreement. I asked the PPI staff person we spoke with, and she agreed the tablet's language included such an agreement. I told her we could not sign in using the tablet's language, but we could sign a simple visitor's log. Mr. Spisak arrived at this time and escorted to us to a conference room. We did not sign either the electronic or hardcopy version of a visitor's log

Inspector Chu and I presented our credentials to Mr. Spisak and explained our intent to conduct an unannounced inspection of PPI. I explained the inspection would be EPA-led and I would serve as the lead inspector. Inspector Simmons served as an observer. I also explained the inspection would consist of a, opening conference, records check, a site tour, a closing conference, and a more involved off-site records review. I explained I would initiate the records review via email and the records I requested would consist of records generators are required to maintain and additional records based on our observations.

We began the opening conference by discussing PPI operations. Mr. Spisak confirmed the site operates as a large quantity generator of dangerous waste. He also told us PPI specializes in refurbishing propellers for C-130 aircraft, and both manufacturers and refurbishes propellers for P-3 aircraft. He explained most dangerous wastes are generated in the plating, machining, assembly, and painting operations conducted at PPI. I asked if PPI recently recorded any spills in the operating record. Mr. Spisak said a vendor spilled approximately 2-3 gallons of chromic acid in the parking lot during a plating tank cleanout. I asked if PPI initiated their contingency plan in response and Mr. Spisak said he did not believe so. He said he called Ecology and reported it on the day of the spill.^e

We moved into spot checking records, and I asked to review the two most recent dangerous waste annual reports (DWARs) and contingency plan. Mr. Spisak showed us a copy of the contingency plan and brought up the online portal Ecology uses for dangerous waste handlers to submit and amend their DWARs. We saw no 2022 or 2023 DWARs submitted for PPI. Mr. Spisak then showed us a saved version of the 2023 DWAR, though it appeared missing certification and final submittal to Ecology.

While reviewing the contingency plan I asked Mr. Spisak if PPI had developed a quick reference guide, he replied they had not. I saw the plan appeared recently updated/revised with Jared Flynn listed as the General Manager, which Mr. Spisak confirmed. After reviewing the contingency plan, I noted it appeared to lack specifics on the capabilities of the mapped emergency response equipment, did not include the addresses of the listed emergency contacts, or descriptions of arrangements made with local authorities.

I next started reviewing select manifests. I asked to see manifests from the period of July – December 2022, and manifests created in 2024. I found these manifests with greater than 45 days between the shipped date and the received date:^f

- 000435439DAT
- 000434609DAT

I also noted manifest 000434932DAT recorded PPI shipped 2,500 pounds of "Waste Corrosive liquid" (not otherwise specified) off-site on September 8, 2022, with the waste codes D002, D006, D007, and WT02. Box 14 of the manifest, "Special Handling Instructions and Additional Information" describes the

^d PPI's contingency plan refers to this position as the receptionist.

^e After the inspection, I asked Inspector Simmons to check Ecology's records. She confirmed Ecology had no record of the call, nor had an ERTS report been filed.

^f Inspector Simmons sent me the most recent exception report on file from PPI, for manifest 000394132DAT.

waste as, “Evaporator Sludge Zyglo/Hydrosil.”

I further noted manifest 000499831DAT recorded PPI shipped 100 pounds of “Waste Toluene Diisocyanate” off-site on February 20, 2024, with waste codes U223 and WT02. Later, while reviewing manifests off-site after the inspection, I noted on the uploaded version of the manifest the U223 code lined through in black ink. PPI signed the manifest in blue ink.

Inspection Summary

Mr. Taylor Spisak accompanied the inspection team throughout the inspection. During the inspection we looked at the facility’s processes, in addition to hazardous waste management practices, generation points, and accumulation areas. We looked for wastes that facility representatives had not yet identified or designated as hazardous. We inspected throughout PPI’s building and the room map with titles in Attachment C appeared accurate during our site tour. During the inspection we observed PPI operations in these areas:

- Shipping/Receiving
- Rig Room
- IOC
- Machine Shop
- Incoming/Teardown
- Spinners
- Painting Area
- Blade Department
- Plating Area
- Blade Cuff/Large Propellers
- Small Parts
- Wastewater Treatment Area
- Non-Destructive Testing
- Evaporator
- Chemical Storage Lockers
- HW Storage/Central Accumulation Area (CAA)

Only those areas in which we observed potential compliance concerns or noted other pertinent issues are discussed in this inspection report.

As we walked down a hallway towards Shipping and Receiving, we saw a 55-gallon drum labeled as flammable hazardous waste (**Photo 1**). I observed the drum lacked an accumulation start date. Mr. Spisak said PPI staff had recently pulled the drum from a satellite accumulation area since it filled up and replaced it with a new container. He said PPI waste handlers would move it into the CAA.

In the IOC area we saw a 5-gallon bucket labeled as both flammable hazardous waste and used oil (**Photo 2**). The bucket sate closed. I asked Mr. Spisak what waste accumulated in the bucket, and he said he was not sure. I agreed the labeling seemed confusing.

In the Incoming area we saw an approximately 2-gallon pail with a modified lid that had a slit cut into the top, appearing open (**Photo 3**). The pail was labeled hazardous waste but lacked a major risk label.

We next moved into the Spinners area. In one satellite accumulation area we saw a 55-gallon drum labelled as flammable hazardous waste (paint rags and containers) with a flip top lid (**Photo 4**). Either

the drum's lid appeared bent or the hinge loose as the lid appeared to not make a complete seal and sit flush with the drum's lip.

In one satellite accumulation area in the Painting department saw an approximately 5-gallon red step can labeled as hazardous waste (solvent rags) (**Photo 5**). The step can lacked a major risk label. Next to the container, on the floor of the area, I saw two of the solvent contaminated rags on the floor, not in a container.

We saw a parts washer with an open 5-gallon pail sitting beneath its drain valve (**Photo 6**) in the Blades department. The pail sat unlabeled and held a small amount of a medium dark viscous liquid. The reservoir of the parts washer bore a DOT flammable liquid label. I told Mr. Spisak that it appeared to me the pail held spent parts washer solvent and the PPI would need to either formally characterize the waste as nonhazardous, or apply a hazardous waste and major risk indicator labels.

As we moved into the Plating area, we saw an open tank Mr. Spisak called the black oxide tank. Electric fans were blowing air in the area, and as we talked, we saw a sheet of PPI paperwork blow into the open tank (**Photo 7**). Nearby, on grating over the chrome plating line's secondary containment, we saw a shop vac sitting unused (**Photo 8**). I asked Mr. Spisak what area staff use the shop vac for and he told me they use it to vacuum plating tank solids out when the liquid has been drained for either treatment or disposal. I explained to Mr. Spisak that the shop vac should be labeled appropriately as a hazardous waste container and would likely have to be disposed of as hazardous waste when PPI decided to replace or discard it.

As Mr. Spisak showed us the plating area, he pointed out tanks formerly used in a hard chrome process that PPI no longer performed (**Photo 9**). I looked inside the plating tank and saw remnant dried-out plating solids (**Photo 10**). The tank was not labeled as hazardous waste. On the lid of a second hard chrome tank we saw an accumulation of spent cotton swabs (**Photo 11**). Area operators apparently used the swabs to clean what appeared to be plating line hangers. While standing on the grating over the chrome plating line I saw an extensive accumulation of drag out and rinsate stored in the line's secondary containment (**Photo 12**). I also saw liquids actively dripping into the containment, suggestive of either equipment deterioration and leaking, or an ongoing accumulation (**Photo 13**). As we moved to the side, and slight below the grating previously standing upon, we saw an apparent build-up of debris in the containment, including what appeared to be the spray nozzle of a pressurized line (**Photo 14**). I then climbed down on a raised concrete step like the one visible in Photo 11. Utilizing pH test strips, I dipped the strip and took a sample of the liquid in the plating line's secondary containment. The pH paper showed an unverified result of approximately 1.5 pH, apparently redder than the orange indicative of a pH of 2 (**Photo 15 and 16**). I did not collect a sample for laboratory analysis. A liquid solid waste with a pH below 2.0 meets the definition of a characteristically corrosive hazardous waste, with the waste code D002.

We moved from the chrome plating line to the cadmium cyanide line, the second of the two large plating lines at PPI. The backside of the cadmium line faces the chrome line, and as we looked at the back of the cadmium line we saw a white self-adhering granular material escaping from where a flexible line clamped into a hard line and filter housing (**Photo 17**). Below the line we saw an open, approximately 2-gallon pail accumulating the white material. We also saw the white material on the floor behind the cadmium line (**Photo 18**). From the frontside of the cadmium line we saw a water filter housing with the white material escaping the flanged lid (**Photo 19 and 20**). We also saw the material escaping from a valve and gauge seal (**Photo 21**). I looked closer at the source of the white material visible in Photo 16 and saw more of the material on the plating floor and built up around the base flange of the filter (**Photo 22**). I saw corrosion around the bolts of the flange. While I took a photo of the filter housing (**Photo 23**) I asked Mr. Spisak what he thought the white material was and he replied he thought it was cadmium. Discarded materials are solid wastes subject to characterization when not exempted, and solid waste cadmium designates as a characteristically toxic hazardous waste with the waste code D006.

We left the plating area and moved in the Blade Cuff and mixing areas of the building. In the foam mixing area we saw spent, hardened foam on fiber board on a bench next to a 55-gallon drum (**Photo 24**). Inside the drum, a satellite accumulation container for spent foam and debris, a dangerous waste, we saw hardened foam and debris (**Photo 25**). We also saw spent foam on the floor of the mixing area (**Photo 26 and 27**).

Back in the Large Propeller Assembly area we saw four small cylindrical parts sitting on a grate over an open tray (**Photos 28 and 29**). We asked Mr. Spisak about the reddish liquid we saw in the tray and he said it was a mixture of alcohol and hydraulic fluid from letting the parts drain after cleaning them. We also saw a second, similar tray in the same area (not pictured). I told Mr. Spisak the trays appeared to contain used oil and lacked the required labeling or marking.

In an area Mr. Spisak called the Small Parts area, we saw two blasting cabinets. The bottom of the cabinets connected to a closed bucket, used to receive the spent blasting material (**Photo 30**). Close to the blasting area we saw a closed 55-gallon drum labeled as hazardous waste (**Photo 31**). We did not see a risk label initially, however on the backside of the drum we saw a label with the word "Toxic" facing the wall.

Next, we inspected the wastewater treatment area. We saw five approximately 5,000-gallon tanks in the area. On one side we saw tank T-1, the alkaline and cyanide holding tank, tank T-2, the acid and chrome holding tank, and the clear water holding tank (**Photo 32**). On the other side of the area we saw tank T-A, the alkaline and cyanide treatment tank, and tank T-B, the acid and chrome treatment tank (**Photo 33**). Also visible in Photo 33, coolers with samples from the chrome acid treatment. They were awaiting sample results prior to initiating discharge. PPI uses the building walls as secondary containment, with additional containment walls around the alkaline-cyanide holding tank (T-1). The tanks looked identical, and tank T-1 bore the manufacturers placard reading, in part, "Viatec Resin-Fab Tank" (**Photo 34**). Mr. Spisak told us they send treated wastewater to the clear water holding tank, and then discharge to sewer from that tank.

We entered the containment area and saw the filter press used to de-water the sludge from the treatment tanks (**Photo 35**). We also saw an open cubic yard box accumulating the sludge. By definition, wastewater treatment sludges from electroplating operations are hazardous waste with the waste code F006.⁹ I looked into the open box and saw accumulated sludge and an inline filter (**Photo 36**). I stepped back and observed the open cubic yard box lacked hazardous waste and major risk labels or marking, and it lacked an accumulation start date (**Photo 37**). Also visible in Photo 37 are chemicals used in the treatment process, and containment pallets holding the waste and treatment chemicals. I looked under the opening of the filter press and saw uncontained sludge on the floor with staining and signs of corrosion (**Photo 38 and Photo 40**). I walked around the base of tank T-2 and saw additional staining and signs of corrosion, including scale build-up and peeling. I also saw sign of a darker staining, possibly oil, on the containment wall (**Photo 39**).

We left the wastewater treatment area and entered the non-destructive testing area, also called the non-destructing inspection area. Mr. Spisak explained operations in the area, including the use of penetrants to highlight potential flaws in examination. He said part of the process included using electric magnets to pull fines off parts. He also said that before testing, some parts are stripped using a sodium cyanide solution, and area operators use magnaflux zyglo as their penetrant. He showed a parts washer in the area, which he said was plumbed to PPI's evaporation system. Mr. Spisak told us PPI also uses potassium hydroxide as a degreaser and parts cleaner. Potassium hydroxide exhibits an extremely high pH requiring management as hazardous waste when it is initially discarded at the point

⁹ With the exception of sludges from these processes: 1. Sulfuric acid anodizing of aluminum; 2. Tin plating on carbon steel; 3. Zinc plating (segregated basis) on carbon steel; Aluminum or zinc-aluminum plating on carbon steel; 5. Cleaning/stripping associated with tin, zinc, and aluminum on carbon steel; 6. Chemical etching and milling of aluminum.

of generation. As PPI disposed of evaporator sludge in September 2022 as hazardous waste, the facility appeared to treat hazardous waste without a permit or meeting the conditions of exemption from permitting.

The inspection party moved outside the main PPI facility. We saw the two outdoor holding tanks used to accumulate the spent parts washer mixture (**Photo 41**). Both sat under cover and labeled, “waste water” and “holding tank.” Both holding tanks appeared stained and corroded; I also noted the concrete secondary containment. At the end of the series, Mr. Spisak showed us the evaporator (**Photo 42**). I asked Mr. Spisak if the nearby 55-gallon drum would hold leftover solids from the evaporator, he said he believed so, but that it was currently empty.

We left the evaporator area and continued around the western exterior of the PPI building. Mr. Spisak told us about a water leak at the facility, and that efforts to find the source of the leak had been unsuccessful. Mr. Spisak then showed us outdoor chemical storage lockers PPI uses for additional material storage. We looked inside the locker that had a DOT oxidizer placard on the front and saw numerous product containers. We also saw an open, approximately 5-gallon metal container labeled anhydrous chromium trioxide (**Photo 43**). The container appeared approximately 75% empty and the lid sat on top of a nearby bucket. The material in the container appeared a deep red or violet, though on the top of the viscous liquid I saw a lighter, bright red hardened component beading on the surface of the material (**Photo 44**). I told Mr. Spisak it appeared PPI stored the material in a waste like manner and would need to complete a waste characterization. Discarded chromium designates as toxic hazardous waste with the waste code D007.

We then moved into the hazardous waste storage area, or central accumulation area (CAA), which is only accessible from the outside. I observed on overview that the area appeared nearly full, and Mr. Spisak said he thought they planned to arrange an off-site shipment soon (**Photo 45**). By the front door of the CAA we saw an aerosol puncturing device screwed into the bung of a drum labeled as flammable hazardous waste. The lid of the puncturing device had been left open (**Photo 46**). On the wall behind the drum, I saw an extensive amount of paint overspray from can puncturing (**Photo 47**). On the leftmost wall of the CAA, viewed from the main door, I saw two drums of oil product with dispensing pumps stored on containment pallets. At the base of the pallets sat an open, labeled pail holding residual oil (**Photo 48**).

I then began to go up and down the rows of containers stored in the CAA. I started on the left of the CAA, and worked my way to the right, as from the main door, or the view in Photo 45. The following represents a summary of concerns found during the inspection of the CAA:

- One drum labeled flammable hazardous waste (waste paint) lacked an accumulation start date (**Photo 49**).
- The drum in Photo 49 did not look to be in good repair or suitable for shipping; its lid appeared severely dented or warped (**Photo 50**).
- One drum labeled hazardous waste (waste paint) with an accumulation start date of “5/18/2024” lacked a risk label (**Photo 51**).
- One drum labeled hazardous waste (waste paint) with an accumulation start date of “5/21/2024” lacked a risk label (**Photo 52**).
- One drum bore a hazardous waste label over a flammable liquids label. An older, faded white label partly covered read “flammable liquids” and “heptane, isopropanol.” The description on the hazardous waste label read “Not a hazardous substance” with an accumulation start date of “05-16-2024” (**Photo 53**). The characterization of the waste was not apparent, and Mr. Spisak said he was unsure as to the contents of the drum.
- One drum labeled hazardous waste with a Class 9 label and an accumulation start date of “5-13-2024” (**Photo 54**). The label included the waste codes D006 and D008, though the drum lacked a risk label.

- One cubic yard box labeled hazardous waste (wastewater filter press) with an unclear accumulation start date lacked a risk label (**Photo 55**).
- Two black 55-gallon drums, both lacking risk labels (**Photo 56**). I could not read the probably hazardous waste label on the leftmost drum due to its orientation. The rightmost drum lacked a visible accumulation start date.
- One intermodal bulk container (tote) of corrosive hazardous waste (chromic acid flake) had an accumulation start date possibly reading “1-30-24” (**Photo 57**).
- One drum labeled toxic and corrosive hazardous waste (sodium cyanide and sodium hydroxide) had an accumulation start date reading, “2/29/24” (**Photo 58**).
- Next to the drum with the start date of February 29 I saw a black poly drum labeled toxic hazardous waste (wastewater filter press) with an accumulation start date reading “3/24/24” (**Photo 60**). I saw a visible buildup of the white, granular self-adhering material around the lip and bungs of the drum (**Photo 59**). The material appeared identical to the material we saw escaping from the lines at the cadmium cyanide plating line.
- One steel 55-gallon drum of hazardous waste (wastewater filter press) with an accumulation start date marking “4/25/24” without a major risk label (**Photo 61**).
- One drum of toxic hazardous waste (waste paints, solvents, and oils) lacked an accumulation start date (**Photo 62**).
- One drum of corrosive hazardous waste (waste corrosive solids) marked with an accumulation start date of “3-7-24” (**Photos 63 and 64**).
- One blue 55-gallon drum of hazardous waste lacked a risk label. The label recorded an accumulation start date of “2/26/24” (**Photo 65**). Inspector Chu held the nearly torn off label up to take the photo. I could not read the label without holding it in place.
- We saw three boxes sitting against the far wall (**Photo 67**). Inside each box were 6-8 approximately quart sized containers of JFoam C-614-R with listed expiration dates. A PPI applied label stated a use by date matching the product’s expiration date (**Photo 66**). I asked Mr. Spisak if all the material was expired and he said it was, and that this area held PPI’s expired chemical product.
- The backwall area of the CAA held a large amount of staged chemical containers (**Photos 68 – 71**). We saw a mixture of chemicals stored in the area, including compressed gas cylinders, adhesives, aerosol cans, paints, solvents, and acids. We also saw DOT classification placards on the wall above the staged chemical containers. Mr. Spisak told us they accumulate expired chemicals in this area, and their waste handlers come on-site to pack up the materials for disposal off-site.
- One drum of hazardous waste (solids with cadmium) lacking an accumulation start date (**Photo 72**). The drum also had a Class 9 label, as well as another label I could not see due to the orientation of the drum.
- One drum of flammable hazardous waste (containers with foam cuff mix) lacking an accumulation start date (**Photo 73**).
- One drum of flammable hazardous waste (waste paints, solvents, and oil) lacking an accumulation start date (**Photo 74**).
- Against a wall I saw an open, approximately 5-gallon red bucket (**Photo 75**). The bucket held an unidentifiable reddish-brown liquid. Mr. Spisak said he was unsure what the material was.
- We saw the current month’s weekly inspection log maintained in the area (**Photo 76**). I noted the log indicated all containers had appropriate risk labels, were within the 90-day accumulation timeframe, and had otherwise visible and readable labels. I asked Mr. Spisak if he thought the log was true and accurate and he said he did not.
- Inspectors Chu and Simmons measured the distance between pallets holding hazardous waste and I noted the aisle space was approximately 14 inches wide (**Photo 77 – 78**).

Closing Conference

At approximately 2:15 PM, the inspection team returned to PPI's conference room for a brief closing conference. I thanked Mr. Spisak for his time showing us around the manufacturing floor, and in answering our questions. 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:

- The variety of hazardous waste container labeling issues we saw in multiple areas.
- The accumulation of acidic waste in the chrome plating line's secondary containment.
- The apparent expulsion of cadmium out of the cadmium cyanide plating water line and filter housing.
- The amount of waste on-site over 90 days.
- Expired hazardous materials stored in the CAA without a waste determination.
- Inadequate aisle space in the CAA.
- Two most recent DWARs not certified and completed.
- Inadequate contingency plan.
- Missing manifest exception reports.

After Inspectors Chu and Simmons shared their observations, we again thanked Mr. Spisak for his cooperation and departed PPI at approximately 2:45 PM.

Records Review

On June 28, 2024, I emailed my records request to Mr. Spisak and asked for a complete submission by close of business on July 12, 2024. I included the delivery receipt and read receipt option, and I received a delivery receipt that day. After not receiving a reply, I spoke with Mr. Spisak by phone on July 11 and re-sent the records request. Mr. Spisak emailed me on July 12 asking for an extension and stating he submitted most of the requested records. I spoke with Mr. Spisak by phone and told him that I had not received anything despite his attempt to submit them. I offered assistance for using the GoAnywhere FTP system and asked him to resubmit. I did not hear from Mr. Spisak again until I emailed him on August 12 asking on the status of the records submission. He wrote me back on August 14 and said he believed he submitted the records. I wrote him back the same day and separately sent a new FTP link to upload the records.

On August 27 I received the read receipt from my initial records request email on June 28. Later that day, I received notification from the GoAnywhere FTP system that Mr. Spisak had uploaded records. I included the submitted records in Attachment B under "Submitted Records." I emailed Mr. Spisak on the following day and asked for an estimated time for submitting the remaining records from the request. Mr. Spisak wrote me on August 29, the day after I contacted him again, and he said he was working on the request still and asked for specificity on the date of manifests. I wrote him back the same day and clarified by manifest tracking number which manifests I wanted to review. To date I have not heard back from Mr. Spisak.

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

- PPI submitted only January – May 2024 CAA weekly inspection logs. The inspector failed to sign the log for the inspection in the fourth week of January 2024.
- PPI did not submit any records pertaining to the spill in the parking lot.
- PPI did not submit the final facility signed manifests, or any exception reports.
- PPI did not provide evaporator logs from July 2022 – December 2023.
- PPI did not submit general facility inspection records, or the written schedule of inspection.
- PPI did not submit the requested training records.

- PPI did not submit an adequate, compliant training plan. The submitted Hazardous Waste Management Plan included a chapter on training. The chapter lacked elements required of a training plan, including the job title, description, and names of individuals for each position related to hazardous waste management at the facility.

Areas of Concern

The following areas of concern are based on my observations made during the inspection, conversations with facility representatives and 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. PPI failed to conduct a full characterization for these spent and discarded materials:
 - The medium dark viscous liquid in the unlabeled pail beneath the parts washer in the Blades area.
 - Residual solid material in the hard chrome plating tank.
 - The white, granular, self-adhering material escaping the cadmium plating line.
 - The discarded, hardened foam in the mixing area.
 - The reddish liquid in the unlabeled trays in the Large Propeller Assembly area.
 - The open container of chromium trioxide in the chemical storage locker.
 - The wide assortment of expired and spent materials accumulating in the CAA.
2. PPI failed to appropriately label containers of dangerous waste with accumulation start dates, hazardous waste labels, and major risk indicators throughout the facility.
3. PPI failed to keep these containers of dangerous waste closed:
 - The 2-gallon pail in the Incoming area with the modified lid.
 - The cubic-yard box of filter press sludge in the Wastewater Treatment area.
 - The 55-gallon drum used to accumulate punctured aerosol can residue.
4. PPI failed to store contaminated wipes/debris, and listed sludge in either containers or tanks.
5. PPI stored hazardous waste on-site over 90 days.
6. PPI accumulates hazardous waste in the secondary containment of their plating line.
7. PPI treats hazardous waste on-site in an evaporator without a permit or meeting the conditions of exemption from permitting.
8. PPI records inaccurate, CAA weekly inspection records, and failed to submit weekly inspection logs for the requested timeframe.
9. PPI failed to maintain adequate aisle space in the on-site CAA.
10. PPI operates with an inadequate contingency plan.
11. PPI failed to submit exception reports for at least two manifests in transit longer than 45 days.
12. PPI failed to submit DWARs by the due date.
13. PPI, in general, failed to submit the requested records within the requested timeframe.
14. PPI operates with an inadequate training plan.
15. PPI failed to retain and submit the required staff training records.
16. PPI fails to conduct and record general facility inspections.

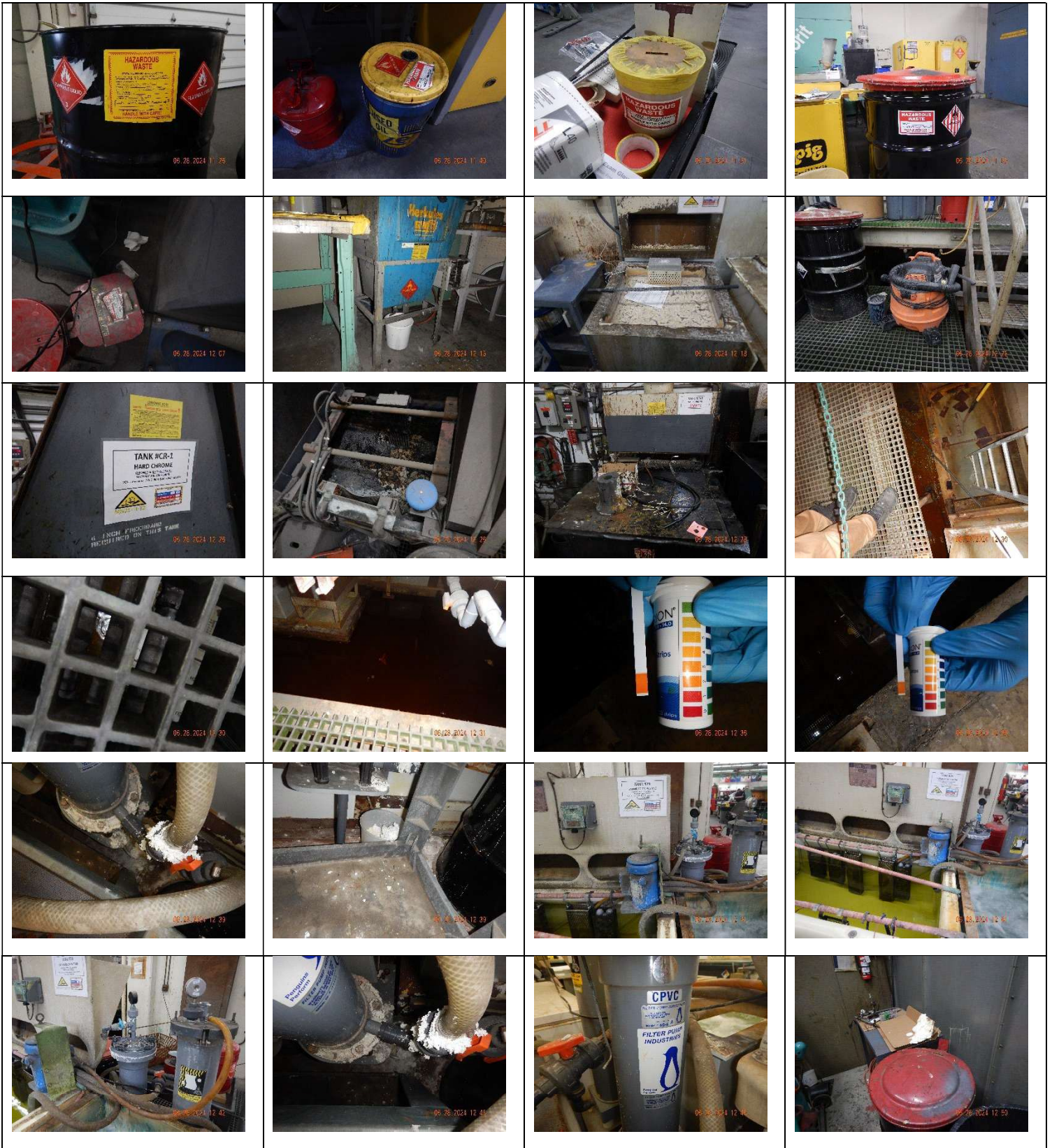
Attachment A: Photo Log

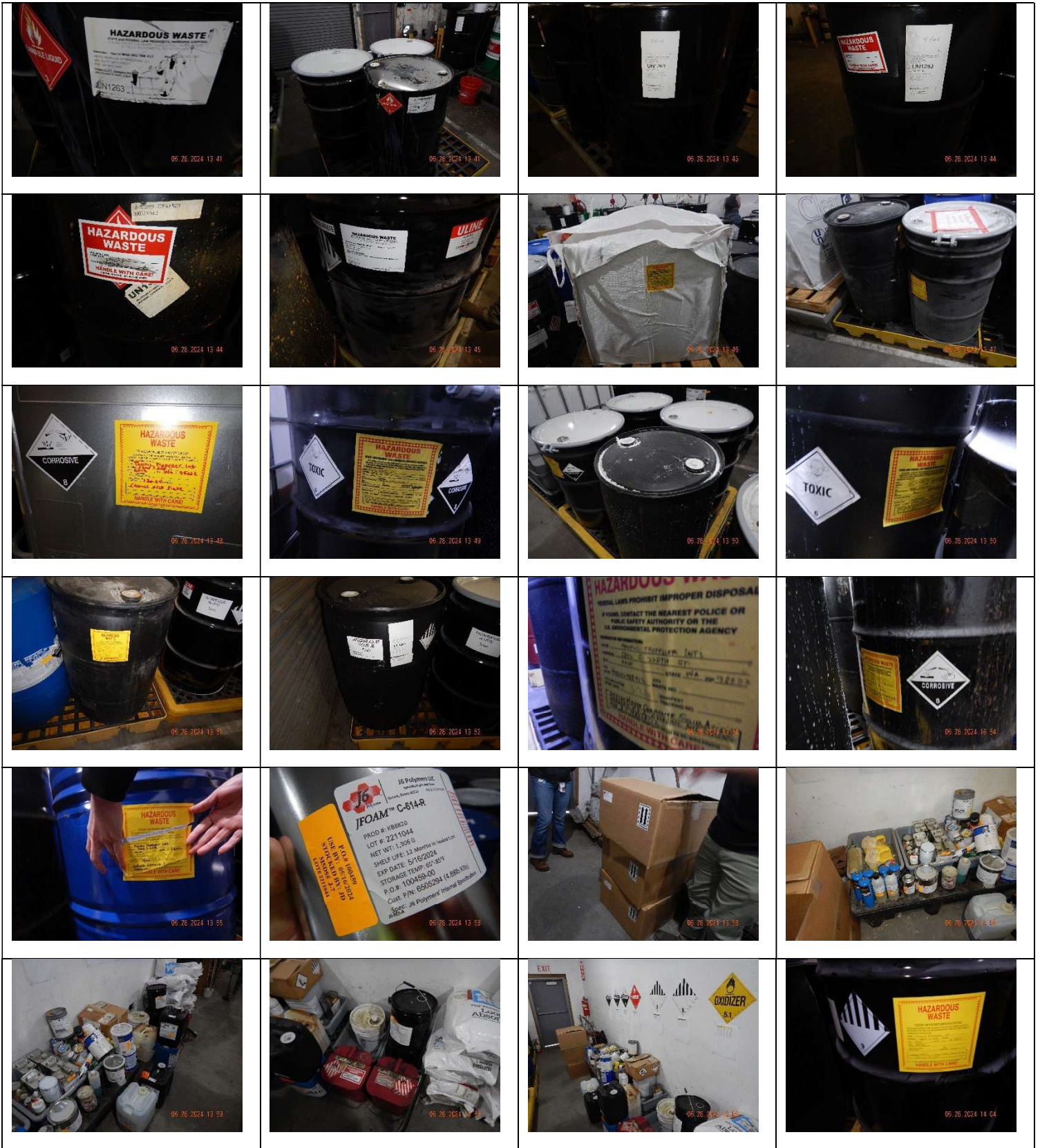
I took all photographs during the inspection with my EPA issued camera, a Nikon Coolpix AW120.

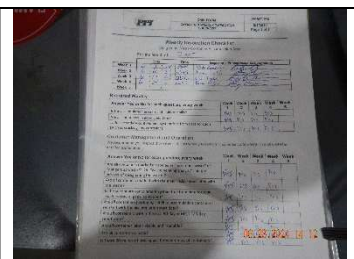
1. DSCN0619.JPG – One full 55-gallon drum labeled flammable hazardous waste paint recently moved out of its satellite accumulation area lacking an accumulation start date.
2. DSCN0620.JPG – One approximate 5-gallon bucket with lid labeled as both used oil and flammable hazardous waste.
3. DSCN0621.JPG – One approximate 2-gallon bucket labeled as hazardous waste with a hole cut into its lid.
4. DSCN0622.JPG – One 5—gallon drum labeled as flammable hazardous waste holding paint rags and containers.
5. DSCN0623.JPG – One approximately 5-gallon step can labeled as hazardous waste solvent rags with additional spent rags on the floor.
6. DSCN0624.JPG – One approximately 5-gallon bucket, open and unlabeled, sitting beneath the bottom valve of a parts washer.
7. DSCN0625.JPG – One open plating tank with a company paper sitting on top.
8. DSCN0626.JPG – One approximately 5-gallon unlabeled shop vacuum used to clean out plating tank bottoms.
9. DSCN0627.JPG – The side of one of two plating tanks formerly used in a “hard chrome” process
10. DSCN0628.JPG – The inside of one of two plating tanks formerly used in a “hard chrome” process, with view of accumulated solids; same plating tank as shown in Photo 9.
11. DSCN0629.JPG – The second of two plating tanks formerly used in a “hard chrome” process, covered, with spent process debris, cotton tips, accumulating on cover.
12. DSCN0630.JPG – Standing on grated floor of plating line, looking into secondary containment with accumulated wastewaters.
13. DSCN0631.JPG – Zoomed in view looking into plating line containment, photo shows apparent dripping as if from equipment or line leak.
14. DSCN0632.JPG – Alternative view of plating containment area with debris.
15. DSCN0633.JPG – Results of pH paper test on accumulated wastewaters, results indicative of pH at or around 1.5.
16. DSCN0634.JPG – Similar to Photo 15, slightly zoomed out.
17. DSCN0635.JPG – White material around plating line clamp/filter fixture. Also on nearby flange, and the floor below.
18. DSCN0636.JPG – White material accumulating in open bucket beneath line and fixture shows in Photo 17, material on local surfaces.
19. DSCN0637.JPG – Tank #29 in cadmium plating line, with plating line filter assembly behind with white material apparently blowing out.
20. DSCN0638.JPG – Alternative view of Tank #29 showing sodium cyanide sign.
21. DSCN0639.JPG – From front of Cadmium plating line like Photos 19 and 20, centered on plating line filter assembly.
22. DSCN0640.JPG – Similar to Photo 17, showing name of plating line filter pump.
23. DSCN0641.JPG – Fuller view of filter pump housing in Photo 22.
24. DSCN0642.JPG – Hardened blown foam on cardboard surface next to flip-top 55-gallon satellite waste accumulation container.
25. DSCN0643.JPG – Contents of the drum shown in Photo 24.
26. DSCN0644.JPG – Hardened blown foam on shop floor.
27. DSCN0645.JPG – Segment of shop floor with foam and dried paint.
28. DSCN0646.JPG – Close-up of secondary containment pallet with accumulated oil.
29. DSCN0647.JPG – Overview of secondary containment pallet.
30. DSCN0648.JPG – Approximately 5-gallon bucket connected to blasting cabinet.
31. DSCN0649.JPG – One 55-gallon drum labeled hazardous waste with a Class 9 DOT placard and risk label facing wall.
32. DSCN0650.JPG – Overview of two approximately 5,000-gallon wastewater holding tanks.

- 33. DSCN0651.JPG – Overview of wastewater treatment tanks.
- 34. DSCN0652.JPG – Overview of the clear water holding tank.
- 35. DSCN0653.JPG – Filter press used to de-water tank bottoms (sludges), with open cubic yard box holding sludge.
- 36. DSCN0654.JPG – Interior view of cubic yard box holding sludge and wastewater line filter.
- 37. DSCN0655.JPG – Exterior view of cubic yard box holding sludge, no labels apparent.
- 38. DSCN0656.JPG – View of wastewater treatment area floor with loose sludge and staining.
- 39. DSCN0657.JPG – View of base of the “Acid and Chrome” waste holding tank with corrosion and staining.
- 40. DSCN0658.JPG – Reverse side of filter press and cubic yard box of sludge (from Photo 35).
- 41. DSCN0659.JPG – Wastewater holding tanks exterior of building, plumbed to evaporator.
- 42. DSCN0660.JPG - Evaporator
- 43. DSCN0661.JPG – Interior of one outside chemical storage locker showing open, approximately 3-gallon container labeled “Chromium Trioxide, Anhydrous.” The material appeared a deep red to violet color.
- 44. DSCN0662.JPG – Top view of container in Photo 43; material appears to have lighter red solid film beading on top surface.
- 45. DSCN0663.JPG – Overview of central accumulation area (CAA).
- 46. DSCN0664.JPG – One 55-gallon drum labeled flammable hazardous waste with an aerosol can puncture device installed. The aerosol puncture device appeared open.
- 47. DSCN0665.JPG – Overview of aerosol can puncture device area within the CAA with overspray on nearby surfaces.
- 48. DSCN0666.JPG – One open, unlabeled 5-gallon pail holding unidentified oily substance.
- 49. DSCN0667.JPG – One 55-gallon labeled as flammable hazardous waste (waste paint) without an accumulation start date stored in the CAA.
- 50. DSCN0668.JPG – Overview of drum in Photo 49; drum appears heavily dented and possibly unfit for transport.
- 51. DSCN0669.JPG – One 55-gallon drum labeled hazardous waste (waste paints, solvents, and oils) with an accumulation start date of, “5/18/2024” lacking a risk label, i.e. hazard indicator.
- 52. DSCN0670.JPG – One 55-gallon drum labeled hazardous waste (waste paints, solvents, and oils) with an accumulation start date of, “5/21/2024” lacking a risk label.
- 53. DSCN0671.JPG – One 55-gallon drum labeled hazardous waste with an accumulation start date of “05-16-2024,” and a marking reading “Not a hazardous substance.”
- 54. DSCN0672.JPG – One 55-gallon drum labeled hazardous waste (plastic media with paint chips” and an accumulation start date reading, “5-13-2024,” lacking a risk label.
- 55. DSCN0673.JPG – One cubic yard box labeled hazardous waste (wastewater filter press) with an unclear May accumulation start date lacking a risk label.
- 56. DSCN0674.JPG – Two 55-gallon drums on spill control pallet; leftmost appeared to have a hazardous waste label only, rightmost had a hazardous waste label with no viewable accumulation start date or risk label.
- 57. DSCN0675.JPG – One intermodal bulk container (tote) labeled hazardous waste (Chromic acid flake) with a corrosive risk label and unclear accumulation start date.
- 58. DSCN0676.JPG – One 55-gallon drum labeled hazardous waste (waste toxic solid), with risk labels reading “Toxic,” and “Corrosive,” also had an accumulation start date reading, “2/29/24.”
- 59. DSCN0677.JPG – One black, poly, 55-gallon drum lacked visible labels and appeared to have a white material emerging from a bung hole and accumulating on lip of drum lid.
- 60. DSCN0678.JPG – One 55-gallon drum labeled toxic hazardous waste (wastewater filter press), had an accumulation start date reading, “3/21/2024.”
- 61. DSCN0679.JPG – One 55-gallon drum labeled hazardous waste (wastewater filter press) with an accumulation start date of 4/25/24 lacked a risk label.
- 62. DSCN0680.JPG – One 55-gallon drum labeled toxic hazardous waste (waste paints, solvents, oils) lacked an accumulation start date.

63. DSCN0681.JPG – One 55-gallon drum labeled hazardous waste (waste corrosive solid) had an accumulation start date of “3-7-24.”
64. DSCN0682.JPG – Same drum shown in Photo 63, showing risk indicator.
65. DSCN0683.JPG – One blue 55-gallon drum labeled hazardous waste, with the label nearly torn off, lacked a risk label, and had an accumulation start date reading, “2/26/24.”
66. DSCN0684.JPG – One cannister of JFOAM C-614-R apparently expired on 5/16/24 sitting in the top most box shown in Photo 67.
67. DSCN0685.JPG – Three fiber boxes holding approximately 18-24 smaller containers of expired JFOAM materials.
68. DSCN0686.JPG – Overview of variety of expired materials awaiting waste characterization and proper storage and labeling.
69. DSCN0687.JPG – Second overview photo of expired materials (to the right of Photo 68) showing many expired materials on the floor of the CAA.
70. DSCN0688.JPG – Third overview photo showing items awaiting characterization, and two step cans labeled flammable hazardous waste lacking accumulation start dates.
71. DSCN0689.JPG – Broader overview of items awaiting characterization with approximate DOT shipping category placards on wall above.
72. DSCN0690.JPG – One 55-gallon drum labeled hazardous waste, with a DOT Class 9 label, lacking an accumulation start date.
73. DSCN0691.JPG – One 55-gallon drum labeled flammable hazardous waste (containers with foam cuff mix) lacking an accumulation start date.
74. DSCN0692.JPG – One 55-gallon drum labeled flammable hazardous waste (waste paints, solvents, oils) lacking an accumulation start date.
75. DSCN0693.JPG – One red approximately 5-gallon pail sitting open, without labels or markings, containing an apparent oily substance.
76. DSCN0694.JPG – Copy of June 2024 weekly CAA inspection log which states all containers are in good condition, appropriately labeled, and within the 90-day accumulation timeframe.
77. DSCN0695.JPG – Tape measure showing distance between spill pallets is approximately 14 inches.
78. DSCN0696.JPG – Overview of CAA showing narrow aisle space.







Attachment B: Document Log

I submitted the following records request (numbered) the day after the inspection, Friday, June 28, 2024, and asked for a response on July 12. Taylor Spisak submitted some of the records (bulleted) on August 27, 2024.

Requested records:

1. A description of the foam mixing process, including products used, specification of application (for instance how long is a mix “good” before it goes stale or hardens and is no longer applicable)
2. Contingency Plan
3. Written records relating the spill in the parking lot approximately 4 months ago.
4. Manifests, final facility signed copies of 000435439DAT and 000434609DAT.
5. Any written exception reports from the past 5 years
6. Weekly inspection logs going back 5 years.
7. Evaporator logs going back 5 years.
8. Wastewater treatment and discharge logs going back 5 years.
9. General facility inspection logs and the schedule for inspection
10. Training Plan
11. Training records going back 5 years for these staff –
 - a. Yourself, Taylor Spisak
 - b. Plating staff – Chaka Goshu; “Cane” (full name Steve Carlson)
 - c. Byron Forbes
 - d. Shawn Blain
 - e. Robert Neiley
 - f. Robert Garrity

Submitted records:

- 01 January 2021.pdf
- 02 February 2021.pdf
- 03 March 2021.pdf
- 04 April 2021.docx
- 04 April 2021.pdf
- 05 May 2021.pdf
- 06 June 2021.pdf
- 07 July 2021.pdf
- 08 August 2021.pdf
- 09 September 2021.pdf
- 1-31-2022.pdf
- 10 October 2021.pdf
- 10-31-2022.pdf
- 11 November 2021.pdf
- 11-30-2022.pdf
- 12 December 2021.pdf
- 12-31-2022.pdf
- 2-28-2022.pdf
- 3-31-2022.pdf
- 4-30-2022.pdf
- 5-31-2022.pdf
- 6-30-2022.pdf
- 7-31-2022.pdf

- 8-31-2022.pdf
- 9-30-2022.pdf
- Dec 2023.pdf
- Disaster Recovery Plan - PPI 2021-04-02.docx
- EMERGENCY ACTION AND CONTINGENCY PLAN REV 13.pdf
- Evap Log Scan.pdf
- Evaporator Log May 2021 to July 2022.pdf
- Hazardous Waste Management Plan Rev5_edited.docx
- Jul 2023.pdf
- Jun 2023.pdf
- NDT-143 EVAPORATOR LOG_10-5-2015(1).doc
- Nov 2023.pdf
- PPI 14 Day Report for Discharge Violation April 2021.pdf
- april 2024 discharge.pdf
- delegation.pdf
- foam cuff.pdf
- inspection logs 2024.pdf
- jan 2024 discharge.pdf
- trainging.pdf
- waste discharge permit.pdf

Attachment C – Site Map

