

RCRA Compliance Evaluation Inspection Report

1) **Inspector and Author of Report**

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2) **Facility Information**

Peninsula Metal Finishing Inc.
2550 Dinneen Avenue
Orlando, FL 32804

County: Orange
Latitude: 28° 34' 36.3868"
Longitude: 81° 24' 40.537"
EPA ID Number: FLD982104812

Primary NAICS: 332813 – Electroplating, Plating, Polishing, Anodizing, and Coloring
SIC Code: 3471 – Plating and Polishing

3) **Responsible Official**

Francis Smith Coachman, President
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Phone: 407-293-3602

4) **Inspection Participants**

Parvez Mallick, US EPA Region 4
Michael Eckoff, Florida Department of Environmental Protection (FDEP)
Kristen Johannessen, FDEP
Francis Smith Coachman, President, Peninsula Metal Finishing Inc.

5) **Dates of Inspection**

July 14, 2021, 10:00 a.m.

6) **Applicable Regulations**

Resource Conservation and Recovery Act (RCRA) Sections 3002, 3005 and 3007 (42 U.S.C. §§ 6922, 6925 and 6927), and the regulations promulgated pursuant thereto at 40 Code of Federal Regulations (C.F.R.) Parts 260-270, 273 and 279.

Florida Statutes (F.S.) Chapter 403.702 et seq., and the regulations promulgated pursuant thereto and set forth at the Florida Administrative Code (Fla. Admin. Code Ann. r.), Chapters 62-710, 62-730 and 62-750.

As the State's authorized hazardous waste program operates in lieu of the federal RCRA program, the citations of those authorized provisions alleged herein will be to the authorized State program; however, for ease of reference, the federal citations will follow in brackets.

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.17], a LQG may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status, as required by Section 403.722 of the Florida Statutes, Fla. Stat. § 403.722 [Section 3005 of RCRA, 42 U.S.C. § 6925], provided that the generator complies with the conditions listed in Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.17] (hereinafter referred to as the "LQG Permit Exemption").

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.15(a)], a generator may accumulate as much as 55 gallons of non-acute hazardous waste in containers at or near the point of generation where wastes initially accumulate, which is under the control of the operator of the process generating the waste, without a permit or without having interim status, as required by Section 403.722 of the Florida Statutes, Fla. Stat. § 403.722 [Section 3005 of RCRA, 42 U.S.C. § 6925], and without complying with Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.16(b) or §262.17(a)], except as required in Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.15(a)(7) and (8)], provided that the generator complies with the satellite accumulation area conditions listed in Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.15(a)] (hereinafter referred to as the "SAA Permit Exemption").

7) **Purpose of Compliance Evaluation Inspection**

On July 14, 2021, Michael Eckoff and Kristen Johannessen, Florida Department of Environmental Protection (FDEP), and Parvez Mallick, U.S. EPA, conducted a routine compliance evaluation inspection of Peninsula Metal Finishing Inc. (Peninsula, PMF, or the facility) to determine the facility's compliance with state and federal hazardous waste regulations. This was an EPA lead inspection. Peninsula was represented by Mr. Francis Smith Coachman, President, Peninsula Metal Finishing Inc. Upon entering the facility, the inspectors introduced themselves, showed their credentials and explained the purpose of the visit and a description of the facility's process was discussed. The inspectors described the anticipated use of digital camera during the inspection. The inspectors briefly discussed the company's ability, pursuant to 40 C.F.R. § 2.203, to assert a business confidentiality claim for information submitted to EPA. The company did not assert a business confidentiality claim. The inspection participants also discussed health and safety protocols and required personal protective equipment before Mr. Coachman led the inspectors on a tour of the facility operations.

8) **Facility Description**

Peninsula Metal Finishing Inc. is an electroplating and metal finishing facility providing services such as anodizing, electroless plating, chromate conversion coatings, passivation, phosphating, zinc, nickel, copper, cadmium, and gold plating. The facility offers electroplating and metal finishing services to the automotive, theme parks, defense contractors, military and other commercial entities. Typical electroplating processes include cleaning, activation, neutralization, plating, and chromating with rinsing through-out the plating process. Highly alkaline and strong acids are used for cleaning and activation. Proprietary plating solutions are utilized to apply various finishes to the products processed at the facility. Peninsula has smaller process lines for gold and chrome plating.

The facility most recently notified FDEP of its waste activities on July 5, 2016 and originally received an EPA identification number FLD982104812 on June 5, 1987. Peninsula Metal Finishing Inc. is enclosed in a 9,000 square-foot building that has no floor drains. Each external entrance/exit has a containment barrier. The facility has been operating since 1985 and has 13 employees. Production operating hours are Monday through Friday 7:00 a.m. to 3:30 p.m. Shipping/receiving and business office hours are Monday through Friday 7:00 a.m. to 4:30 p.m. City of Orlando utilities provides potable water and sanitary sewer services.

Spent plating solutions and rinse bath in plating processes require pre-treatment prior to discharge into the sanitary sewer system of the City of Orlando, Florida. In the wastewater treatment system, plating and rinse baths are batch treated in 500-gallon tanks. Treatment consists of neutralization of strong bases and acids, coagulation, removal of cyanide, and metals precipitation. The sludge generated from these processes go through a filter press to reduce the volume of F006 electroplating sludge and ultimately disposed of as hazardous waste. The facility maintains a discharge permit issued by the City of Orlando.

Hazardous wastes generated at the facility are plating filter press cake, sludge (D006, D007, and F006); solids, cadmium and chromium (D006 and D007); ammonia solutions (D002); nitric acid (D001 and D002); methy ethyl ketone, xylene (D001, D035, F003, and F005); and universal waste lamps.

9) **Inspection Findings**

The walk-through inspection started in the parts receiving area. In the parts receiving area items are checked in and sent to the appropriate area for processing. The facility primarily has six main plating processing lines: zinc, nickel and copper, cadmium, anodizing, phosphating and chemical coatings.

There are two zinc plating process lines, small barrel and large barrel. In zinc plating, the substrate metal is subjected to two cleaning steps: “macro cleaning” consisting of a sodium hydroxide soak to remove large dirt particles, and a “micro cleaning” bath of sodium hydroxide under current (“electro cleaning”) to remove smaller, charged particles.

During the inspection, the small barrel line was in operation. According to Mr. Coachman, the large barrel line has been out of service for approximately two years. The inspectors observed rusted plating equipment and tanks in the large barrel line area. The equipment and open plating tanks contained plating solutions and dried up plating chemicals (Photos #1-13). The inspectors

informed Mr. Coachman to make waste determination of the plating solutions/materials left in the large barrel line tanks and dispose of the wastes accordingly.

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.11], a person who generates a solid waste, as defined in Fla. Admin. Code Ann. r. 62-730.030(1) [40 C.F.R. § 261.2], must make an accurate determination as to whether that waste is a hazardous waste in order to ensure wastes are properly managed according to applicable RCRA regulations articulated in Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.11].

After plating a compressor can be used to dry rinse water from parts. If a part is plated incorrectly, a strip line is used to strip the part of the zinc coating so that it can be run through the plating line again. The strip line consists of a tank containing 30% muriatic acid followed by a rinse tank. A safety shower/eye wash station was located near the zinc plating area.

Next to the zinc strip line, there were six 55-gallon poly drums, one labeled “Hazardous Waste” (Photos #14-15), one labeled “Acid CAD Satellite Accumulation Drum,” one labeled “acid cad satellite accumulation,” one labeled “trace elements rinse water,” one labeled “bright acid cad,” and one labeled “satellite accumulation bright acid cad.” Mr. Coachman explained the three drums with “satellite accumulation” written on the label were mislabeled. The drums contain rinse water and will be reused in the process. The drum marked “Hazardous Waste” is used to collect wastes generated from the zinc plating area and was being managed in a satellite accumulation area (SAA) but was not marked with the hazards of the contents.

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.15(a)(5)(ii)], which is a condition of the SAA Permit Exemption, a generator must mark or label its containers with the following: (ii) an indication of the hazards of the contents (examples include, but are not limited to, the applicable hazardous waste characteristic(s) (i.e., ignitable, corrosive, reactive, toxic); hazard communication consistent with the Department of Transportation requirements at 49 C.F.R. part 172 subpart E (labeling) or subpart F (placarding); a hazard statement or pictogram consistent with the Occupational Safety and Health Administration Hazard Communication Standard at 29 C.F.R. 1910.1200; or a chemical hazard label consistent with the National Fire Protection Association code 704).

Next, the inspectors walked to the cadmium plating area. In the cadmium plating area, there are five process lines, one for cad and four for chromate (clear, yellow, black, and olive black). After plating, a compressor can be used to dry rinse water from the parts. In the chemistry laboratory, plating bath samples are tested for proper concentrations/constituents to ensure optimal plating performance of the processes and quality control. Outside the laboratory were two plastic totes and one 5-gallon bucket (Photo #16). The inspectors observed liquid in each of the containers. Mr. Coachman pH tested the liquid and the result was over 6 Standard Units. Laboratory waste is collected in a 5-gallon container below a sink (Photo #17). The container was not marked and Mr. Coachman could not verify how the wastes were being managed. One 1-gallon container labeled “cyanide lab waste” was staged on the floor in a corner (Photos #18-19). The container was not marked “Hazardous Waste” and not marked with the hazards of the contents. One 1-gallon container under the corner of the sink was marked “acid strip spent” (Photo #20). Under the sink were approximately nine other 1-gallon containers and on a shelf under and to the left of the sink were multiple small containers with unknown contents (Photos #17, and 20-21).

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.11], a person who generates a solid waste, as defined in Fla. Admin. Code Ann. r. 62-730.030(1) [40 C.F.R. § 261.2], must make an accurate determination as to whether that waste is a hazardous waste in order to ensure wastes are properly managed according to applicable RCRA regulations articulated in Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.11]. The inspectors informed Mr. Coachman to make proper waste determination of the 1-gallon and 5-gallon containers stored in the laboratory and dispose of the wastes accordingly.

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.15(a)(5)(i-ii)], which is a condition of the SAA Permit Exemption, a generator must mark or label its containers with the following: (i) the words “Hazardous Waste;” (ii) an indication of the hazards of the contents (examples include, but are not limited to, the applicable hazardous waste characteristic(s) (i.e., ignitable, corrosive, reactive, toxic); hazard communication consistent with the Department of Transportation requirements at 49 C.F.R. part 172 subpart E (labeling) or subpart F (placarding); a hazard statement or pictogram consistent with the Occupational Safety and Health Administration Hazard Communication Standard at 29 C.F.R. 1910.1200; or a chemical hazard label consistent with the National Fire Protection Association code 704). The facility must mark the cyanide and acid strip waste containers with the words “Hazardous Waste” and an indication of the hazards of the contents.

In the anodize plating area, aluminum is etched in order to insert the desired color into the parts. After color insertion a protective coating is applied to the part. The inspectors observed one 55-gallon poly container of hazardous waste gloves, rags, debris, located in a SAA. The drum was marked “Hazardous Waste” but was not marked with the hazards of the contents (Photos #22-23).

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.15(a)(5)(ii)], which is a condition of the SAA Permit Exemption, a generator must mark or label its containers with the following: (ii) an indication of the hazards of the contents (examples include, but are not limited to, the applicable hazardous waste characteristic(s) (i.e., ignitable, corrosive, reactive, toxic); hazard communication consistent with the Department of Transportation requirements at 49 C.F.R. part 172 subpart E (labeling) or subpart F (placarding); a hazard statement or pictogram consistent with the Occupational Safety and Health Administration Hazard Communication Standard at 29 C.F.R. 1910.1200; or a chemical hazard label consistent with the National Fire Protection Association code 704).

Outside the building in this area, there is a covered sandblasting area that housed two large sandblasting units. According to Mr. Coachman, only one of the machines is currently in use. One unmarked 55-gallon container was in used to accumulate spent sand blasting media that was staged next to the sand blasting units. Mr. Coachman stated that the spent media is managed as non-hazardous waste. The inspectors requested that the facility conduct an analytical test of the spent blast media or apply knowledge of the hazard characteristics of the waste, or the process used to generate the waste, to determine that spent blast media is non-hazardous. A LQG must maintain records supporting its hazardous waste determinations, including records that identify whether a solid waste is a hazardous waste, as defined by 40 C.F.R. § 261.3.

Back inside the building was a spin drier located at the end of the anodize line. The drier had a 5-gallon container attached collecting wastes from the drying process. The container was labeled “Hazardous Waste” but was not marked with hazards of the contents (Photo #24).

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.15(a)(5)(ii)], which is a condition of the SAA Permit Exemption, a generator must mark or label its containers with the following: (ii) an indication of the hazards of the contents (examples include, but are not limited to, the applicable hazardous waste characteristic(s) (i.e., ignitable, corrosive, reactive, toxic); hazard communication consistent with the Department of Transportation requirements at 49 C.F.R. part 172 subpart E (labeling) or subpart F (placarding); a hazard statement or pictogram consistent with the Occupational Safety and Health Administration Hazard Communication Standard at 29 C.F.R. 1910.1200; or a chemical hazard label consistent with the National Fire Protection Association code 704).

Near the central accumulation area (CAA) and the nickel strip plating area, four 250-gallon containers of anodize plating wastes were awaiting treatment in the wastewater treatment system (Photos #25-29). Mr. Coachman stated there was a backlog in the treatment process and the wastes have been accumulating in the containers for approximately six to eight weeks. The containers were not marked “Hazardous Waste,” were not marked with hazards of the contents, were not marked with an accumulation start date, and were open.

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.17(a)(5)(i)(A-C)], which is a condition of the LQG Permit Exemption, a generator must mark or label its containers with the following: (A) the words “Hazardous Waste;” (B) an indication of the hazards of the contents (examples include, but are not limited to, the applicable hazardous waste characteristic(s) (i.e., ignitable, corrosive, reactive, toxic); hazard communication consistent with the Department of Transportation requirements at 49 C.F.R. part 172 subpart E (labeling) or subpart F (placarding); a hazard statement or pictogram consistent with the Occupational Safety and Health Administration Hazard Communication Standard at 29 C.F.R. 1910.1200; or a chemical hazard label consistent with the National Fire Protection Association code 704); and (C) the date upon which each period of accumulation begins clearly visible for inspection on each container.

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.17(a)(1)(iv)(A)], which is a condition of the LQG Permit Exemption, if the hazardous waste is placed in containers, the large quantity generator must comply with the following: (A) a container holding hazardous waste must always be closed during accumulation, except when it is necessary to add or remove waste.

Also in this area were two unlabeled containers (appeared to be 50 gallons each) and one 5-gallon container with unknown contents (Photos #30-34). The inspectors requested that the facility conduct a waste determination of the unknown liquids and dispose of it accordingly.

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.11], a person who generates a solid waste, as defined in Fla. Admin. Code Ann. r. 62-730.030(1) [40 C.F.R. § 261.2], must make an accurate determination as to whether that waste is a hazardous waste in order to ensure wastes are properly managed according to applicable RCRA regulations articulated in Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.11].

One part of the building contains several plating lines for either smaller parts or specialized parts. Lines include chromate, nickel black, brass, nickel, tin, electroless nickel, nickel strike, and wood nickel strike. In the chromate plating line small parts are plated similarly to barrel plating except parts are individually plated instead of being run in a barrel with multiple parts. Wastes

generated from the nickel black plating line cannot be treated in the waste treatment system. These wastes are manifested off-site as non-hazardous waste. There was a 55-gallon poly drum of hazardous waste filters in a SAA. The drum was marked "Hazardous Waste" but was not marked with the hazards of the contents (Photos #35-36).

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.15(a)(5)(ii)], which is a condition of the SAA Permit Exemption, a generator must mark or label its containers with the following: (ii) an indication of the hazards of the contents (examples include, but are not limited to, the applicable hazardous waste characteristic(s) (i.e., ignitable, corrosive, reactive, toxic); hazard communication consistent with the Department of Transportation requirements at 49 C.F.R. part 172 subpart E (labeling) or subpart F (placarding); a hazard statement or pictogram consistent with the Occupational Safety and Health Administration Hazard Communication Standard at 29 C.F.R. 1910.1200; or a chemical hazard label consistent with the National Fire Protection Association code 704).

The inspectors observed one 55-gallon container of hazardous waste rags, gloves in the nickel plating line SAA. The drum was not marked "Hazardous Waste" and not marked with the hazards of the contents (Photos #37-38).

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.15(a)(5)(i-ii)], which is a condition of the SAA Permit Exemption, a generator must mark or label its containers with the following: (i) the words "Hazardous Waste;" (ii) an indication of the hazards of the contents (examples include, but are not limited to, the applicable hazardous waste characteristic(s) (i.e., ignitable, corrosive, reactive, toxic); hazard communication consistent with the Department of Transportation requirements at 49 C.F.R. part 172 subpart E (labeling) or subpart F (placarding); a hazard statement or pictogram consistent with the Occupational Safety and Health Administration Hazard Communication Standard at 29 C.F.R. 1910.1200; or a chemical hazard label consistent with the National Fire Protection Association code 704).

In the nickel strike plating line, there was one 55-gallon poly drum of hazardous nitric acid, located in a SAA. The drum was marked "Hazardous Waste" but was not marked with the hazards of the contents (Photos #39-40).

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.15(a)(5)(ii)], which is a condition of the SAA Permit Exemption, a generator must mark or label its containers with the following: (ii) an indication of the hazards of the contents (examples include, but are not limited to, the applicable hazardous waste characteristic(s) (i.e., ignitable, corrosive, reactive, toxic); hazard communication consistent with the Department of Transportation requirements at 49 C.F.R. part 172 subpart E (labeling) or subpart F (placarding); a hazard statement or pictogram consistent with the Occupational Safety and Health Administration Hazard Communication Standard at 29 C.F.R. 1910.1200; or a chemical hazard label consistent with the National Fire Protection Association code 704).

The chemical inventory area was located near the smaller plating lines. There were several rusty containers noted in this area. The inspector informed Mr. Coachman to assess the containers for usability and make a proper waste determination. There was one 55-gallon drum of hazardous waste ammonium nitrate waste. The drum was closed, labeled "Hazardous Waste" but was not marked with the hazards of the contents and not marked with an accumulation start date (Photos

#41-42).

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.17(a)(5)(i)(B-C)], which is a condition of the LQG Permit Exemption, a generator must mark or label its containers with the following: (B) an indication of the hazards of the contents (examples include, but are not limited to, the applicable hazardous waste characteristic(s) (i.e., ignitable, corrosive, reactive, toxic); hazard communication consistent with the Department of Transportation requirements at 49 C.F.R. part 172 subpart E (labeling) or subpart F (placarding); a hazard statement or pictogram consistent with the Occupational Safety and Health Administration Hazard Communication Standard at 29 C.F.R. 1910.1200; or a chemical hazard label consistent with the National Fire Protection Association code 704); and (C) the date upon which each period of accumulation begins clearly visible for inspection on each container.

Wastewater pre-treatment system is located next to the chemical inventory area. The following waste containers were staged for treatment in the system:

- There were ten 5-gallon containers, two 15-gallon containers, and three 55-gallon poly drums (Photos #43-48). Four of ten 5-gallon containers, two 15-gallon containers, and two of three 55-gallon poly drums were not marked with the words “Hazardous Waste.” Ten 5-gallon containers, one of two 15-gallon container, and three 55-gallon poly drums were not marked with the hazards of the contents. Ten 5-gallon containers, two 15-gallon containers, and three 55-gallon poly drums were not marked with an accumulation start date; and
- One cubic yard box of plating filter cake/sludge marked “Hazardous Waste” but was not marked with the hazards of the contents and not marked with an accumulation start date (Photos #49-50).

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.17(a)(5)(i)(A-C)], which is a condition of the LQG Permit Exemption, a generator must mark or label its containers with the following: (A) the words “Hazardous Waste;” (B) an indication of the hazards of the contents (examples include, but are not limited to, the applicable hazardous waste characteristic(s) (i.e., ignitable, corrosive, reactive, toxic); hazard communication consistent with the Department of Transportation requirements at 49 C.F.R. part 172 subpart E (labeling) or subpart F (placarding); a hazard statement or pictogram consistent with the Occupational Safety and Health Administration Hazard Communication Standard at 29 C.F.R. 1910.1200; or a chemical hazard label consistent with the National Fire Protection Association code 704); and (C) the date upon which each period of accumulation begins clearly visible for inspection on each container.

The main central accumulation area (CAA), less than 90-day storage area, is located near the anodize plating area. There were no wastes accumulating in the area at the time of inspection. On July 12, 2021, the facility shipped of 2,099 lbs. of filter press cake/sludge (D006, D007, and F006), 139 lbs. of cadmium and chromium solids (D006 and D007), and 39 lbs. of universal waste lamps.

The inspectors observed one 55-gallon of “PM Rinse Solution” (Photos #51-52) near the main CAA and the chromate plating line. The container was marked “Hazardous Waste” and marked with an accumulation start date of 9/16/2016. Mr. Coachman stated that the container contained precious metal bearing electroplating wastewater for precious metal recovery. The facility could

not provide start accumulation date of PM Rinse Solutions or any documents that indicate percentage of solutions were reclaimed.

Pursuant to Fla. Admin. Code Ann. r. 62-730.181(1) [40 C.F.R. § 266.70(c)], persons who store recycled materials that are regulated under Subpart F - Recyclable Materials Utilized for Precious Metal Recovery, must keep the following records to document that they are not accumulating these materials speculatively (as defined in Fla. Admin. Code Ann. r. 62-730.030(1) [40 C.F.R. § 261.1(c)] of this chapter): (1) records showing the volume of these materials stored at the beginning of the calendar year; (2) the amount of these materials generated or received during the calendar year; and (3) the amount of materials remaining at the end of the calendar year.

Precious metals recovery is regulated under 40 C.F.R. Part 266 Subpart F. In order to claim that a material is not accumulated speculatively, the generator must document that 75% of that material was reclaimed in the calendar year. In this case, the calendar year would have been January 1, 2016 to December 31, 2016. It appears that the container of PM rinse solution is being accumulated speculatively and as referenced in 40 C.F.R. § 266.70(d), is subject to all applicable provisions of 40 C.F.R. Parts 262 through 265, 267, 270, and 124. *The 55-gallon container has been in storage at the facility for greater than 90 days without a permit.*

Record Review

Records were not reviewed at the time of the inspection but requested via email to Mr. Coachman on August 5, 2021 and follow-up emails on August 10, 2021 and August 18, 2021. On August 20, 2021, FDEP received a copy of records from Mr. Coachman by mail. Copies included non-hazardous waste manifests, training, job descriptions, notification to local authorities, contingency plan, and weekly inspection logs. A review of the submitted records revealed the following:

- A copy of manifest(s) for the past three years was not provided. Under 40 C.F.R. §262.40, the generator must keep a signed copy of the manifest for at least three years from the date the waste was accepted by the initial transporter. **Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.40(a)] and is a condition of the LQG Permit Exemption, a generator must keep a copy of each manifest signed in accordance with 40 C.F.R. § 262.23(a) for three years or until he receives a signed copy from the designated facility which received the waste. This signed copy must be retained as a record for at least three years from the date the waste was accepted by the initial transporter.**
- RCRA hazardous waste training at the facility is provided by Mr. Coachman. The inspectors reviewed training logs and hazardous waste training documents provided on August 20, 2021. The training documents indicated that personnel training occurs annually, however, it appears that the training is insufficient and did not to meet hazardous waste personnel training, requirement of 40 C.F.R. § 262.17(a)(7), due to the number of container management deficiencies noted facility-wide during the inspection and the facility training materials indicated that the facility has not implemented or trained employees in the EPA's Hazardous Waste Generator Improvements Rule of 2016, which was adopted by FDEP on June 18, 2018. **Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.17(a)(7)(i)(A-B)], which is a condition of the LQG Permit Exemption, (A) facility personnel must successfully complete a program of classroom instruction, online training (e.g., computer-based or electronic), or on-the-job**

- training that teaches them to perform their duties in a way that ensures compliance with this part. The LQG ensure that this program includes all the elements described in the document required under paragraph (a)(7)(iv) of this section; (B) this program must be directed by a person trained in hazardous waste management procedures, and must include instruction which teaches facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to the positions in which they are employed;
- Notifications to local authorities were not attempted until after the July 14, 2021, inspection. Specifically, an attempt was made to notify the local hospital, Advent Health, on August 19, 2021. Mr. Coachman stated attempts have not been made for the other organizations. **Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.17(a)(6)], which incorporates Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.256(a)], and is a condition of the LQG Permit Exemption, a LQG must attempt to make arrangements with the local police department, fire department, other emergency response teams, emergency response contractors, equipment suppliers, and local hospitals, taking into account the types and quantities of hazardous waste handled at the facility. Arrangements may be made with the Local Emergency Planning Committee, if it is determined to be the appropriate organization with which to make arrangements;**
 - The December 31, 2020, annual RCRA refresher training log indicates that Mr. Brian Venables, alternate emergency coordinator listed in the contingency plan, did not take part in the 2020 RCRA refresher training. In addition, Roosevelt Rivers and Mike Williams did not take part on December 31, 2020, RCRA refresher training. **Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.17(a)(7)(iii)], which is a condition of the LQG Permit Exemption, facility personnel must take part in an annual review of the initial training required in paragraph 40 C.F.R. § 262.17(a)(7)(i) of this section. A large quantity generator must ensure that this program includes all the elements described in the document required under paragraph (a)(7)(iv) of this section.**
 - The RCRA Job Description & Training document, dated August 13, 2021, does not appear to list Mr. Brian Venables, alternate emergency coordinator. Brian Venables is listed as an alternate emergency coordinator in the facility's contingency plan (CP), dated December 17, 2019. **Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.17(a)(7)(iv)(A)], and is a condition of the LQG Permit Exemption, the large quantity generator must maintain the following documents and records at the facility: (A) the job title for each position at the facility related to hazardous waste management, and the name of the employee filling each job.**
 - Mr. Coachman stated that a quick reference guide has not been prepared for the facility and an amended CP has not been sent to the local emergency planning committee. **Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.17(a)(6)], which incorporates Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.262(b)], and is a condition of the LQG Permit Exemption, a large quantity generator that first becomes subject to these provisions after May 30, 2017 or a large quantity generator that is otherwise amending its contingency plan must at that time submit a quick reference guide of the contingency plan to the local emergency responders identified at paragraph (a) of this section or, as appropriate, the Local Emergency Planning Committee. The quick reference guide must include the following elements: 1. The types/names of hazardous wastes in layman's terms and the associated hazard associated with each hazardous waste present at any one time**

- (e.g., toxic paint wastes, spent ignitable solvent, corrosive acid); 2. The estimated maximum amount of each hazardous waste that may be present at any one time; 3. The identification of any hazardous wastes where exposure would require unique or special treatment by medical or hospital staff; 4. A map of the facility showing where hazardous wastes are generated and accumulated, and routes for accessing these wastes; 5. A street map of the facility in relation to surrounding businesses, schools and residential areas to understand how best to get to the facility and also evacuate citizens and workers; 6. The locations of water supply (e.g., fire hydrant and its flow rate); 7. The identification of on-site notification systems (e.g., a fire alarm that rings off site, smoke alarms); and 8. The name of the emergency coordinator(s) and 7/24-hour emergency telephone number(s) or, in the case of a facility where an emergency coordinator is continuously on duty, the emergency telephone number for the emergency coordinator. In addition, pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.17(a)(6)], which incorporates Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.263(d)], and is a condition of the LQG Permit Exemption, the contingency plan must be reviewed, and immediately amended, if necessary, whenever: (d) the list of emergency coordinators changes.
- Weekly inspection logs were provided for the following dates: December 21, 2018 (no other inspection logs were provided for 2018, specifically, from the weeks of July 15, 2018 to December 9, 2018, and December 23, 2018), January 4, 2019, June 28, 2019, and July 2, 2019 (no other inspection logs were provided for 2019, specifically, from the weeks of January 6, 2019 to June 16, 2019, July 7, 2019 to December 22, 2019), and January 3, 2020, January 10, 2020, May 29, 2020, and June 5, 2020 (no other inspection logs were provided for 2020, specifically, from the weeks of January 12, 2020 to May 17, 2020. Mr. Coachman stated weekly inspections have not been conducted since June 5, 2020. Pursuant to Fla. Admin. Code Ann. r. 62-730.160(3), generators of hazardous waste who accumulate hazardous waste on-site under 40 C.F.R. § 262.16, and § 262.17 [as adopted in subsection 62-730.160(1), F.A.C.], shall maintain written documentation of the inspections required under 40 C.F.R. Part 265 [as adopted in subsection 62-730.180(2), F.A.C.], and 40 C.F.R. § 262.16 and § 262.17 [as adopted in subsection 62-730.160(1), F.A.C.]. The generator shall keep the written documentation of the inspections under this section for at least three years from the date of the inspection. At a minimum, this documentation shall include the date and time of the inspection, the legibly printed name of the inspector, the number of containers, the condition of the containers, a notation of the observations made, and the date and nature of any repairs or other remedial actions; and
 - Mr. Coachman stated the 2019 Biennial report, required to be submitted to FDEP by March 1, 2020, was not filed. A further review of Biennial report indicated that the facility also did not submit 2017 Biennial report to FDEP in 2018. Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.41(a)] and is a condition of the LQG Permit Exemption, a generator who is a large quantity generator for at least one month of an odd-numbered year (reporting year) who ships any hazardous waste off-site to a treatment, storage or disposal facility within the United States must complete and submit EPA Form 8700-13 A/B to FDEP by March 1 of the following even-numbered year and must cover generator activities during the previous year.

10) Closing Conference

A closing conference was conducted at the conclusion of the inspection. The inspectors requested Mr. Coachman to email facility records (manifests, training records, job description, and contingency plan) to the inspectors for review. The observations made during the inspection were discussed and the inspection was concluded. Peninsula was inspected as a large quantity generator of hazardous waste.

11) Signed

**PARVEZ
MALLICK**

Digitally signed by PARVEZ
MALLICK
Date: 2021.09.14 11:35:47
-04'00'

Parvez Mallick
Inspector and Author of Report

Date

12) Concurrence and Approval

**ARACELI
CHAVEZ**

Digitally signed by
ARACELI CHAVEZ
Date: 2021.09.14
11:31:53 -04'00'

Araceli B. Chavez
Chief
RCRA Enforcement Section

Date

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Compliance Evaluation Inspection photos taken by Parvez Mallick, EPA (Canon PowerShot SD980 IS - EPA Property Number S75319) and Michael Eckoff, FDEP



Photo #1 – Out of service zinc plating large barrel line tanks.



Photo #2 – Out of service zinc plating large barrel line tank.



Photo #3 – Out of service zinc plating large barrel line tanks.



Photo #4 – Out of service/rusted zinc plating large barrel line tanks.



Photo #5 – Out of service zinc plating large barrel line tank.



Photo #6 – Out of service zinc plating solutions stored in the large barrel line tanks.



Photo #7 – Rusted out of service zinc plating large barrel line equipment.



Photo #8 – Out of service zinc plating large barrel line tanks.



Photo #9 – Out of service zinc plating solutions stored in the large barrel line tanks.



Photo #10 – Out of service zinc plating solutions stored in the large barrel line tank.



Photo #11 – Out of service zinc plating large barrel line tank.



Photo #12 – Out of service zinc plating large barrel line tank.



Photo #13 – Out of service zinc plating solutions stored in the large barrel line tanks.



Photo #14 – Hazardous waste drum in SAA.

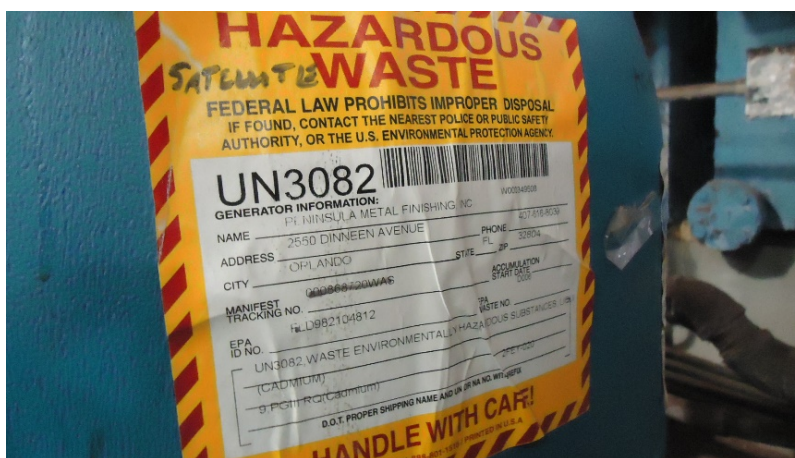


Photo #15 – Close-up of hazardous waste label.



Photo #16 – Containers outside the chemistry laboratory.



Photo #17 – Laboratory sink and waste containers.

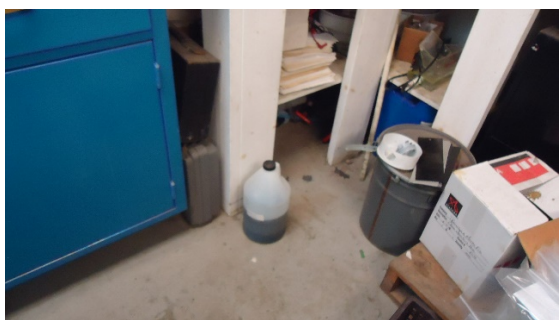


Photo #18 – Container of cyanide lab waste.



Photo #19 – Close up of container (Photo #18).



Photo #20 – Containers of spent acid strip.



Photo #21 – Container under the sink.



Photo #22 – Hazardous waste Container in SAA.



Photo #23 – Close up of SAA container (Photo #22).



Photo #24 – Hazardous waste container in SAA.



Photo #25 – Hazardous plating waste containers staged for wastewater treatment system.



Photo #26 – Hazardous plating waste containers staged for wastewater treatment system.



Photo #27 – One of the containers in Photo #25, contained dried up plating sludge.



Photo #28 – Contents of the containers (plating waste).



Photo #29 – Contents of the containers (plating waste).



Photo #30 – Spent sleeve/filter in 5-gallon container.



Photo #31 – Unknown contents of 5-gallon container (Photo #30).

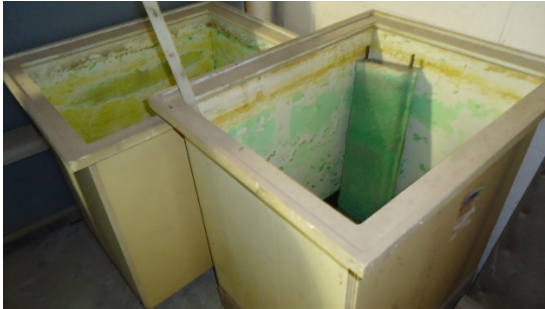


Photo #32 – Two containers with unknown contents.



Photo #33 – Contents of the container (Photo #32).



Photo #34 – Contents of the container, (Photo #32).



Photo #35 – Hazardous waste container in SAA.

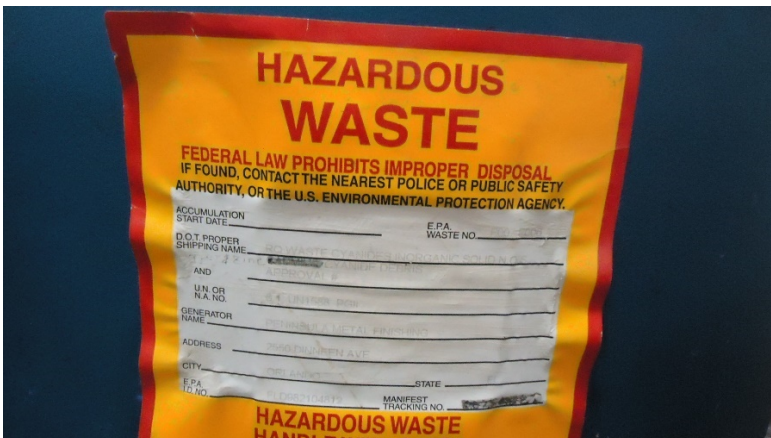


Photo #36 – Close up of Photo #35.



Photo #37 – Hazardous waste drum in SAA.



Photo #38 – Close up of Photo #37.



Photo #39 – Hazardous waste drum in SAA.



Photo #40 – Close up of Photo #39.



Photo #41 – Hazardous waste drum in SAA.



Photo #42 – Close up of Photo #41.



Photo #43 – Hazardous plating waste containers in the wastewater treatment system area.



Photo #44 – Close up of containers Photo #43.



Photo #45 – Close up of containers Photo #43.



Photo #46 – Close up of containers Photo #43.



Photo #47 – Close up of containers Photo #43.



Photo #48 – Hazardous waste label of one of the containers in Photo #43.



Photo #49 – F006 filter cake sludge stored in a 250-gallon tote.



Photo #50 – Close up label of Photo #49.



Photo #51 – Hazardous waste containers.



Photo #52 – Hazardous waste label from one of the containers in Photo #51.