

RCRA Inspection Report

1) Inspector and Author of Report

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U.S. Environmental Protection Agency,
Region 4
Enforcement and Compliance Assurance
Division
Chemical Safety and Land Enforcement
Branch
61 Forsyth Street, S.W.
Atlanta, Georgia 30303

2) Facility Information

Purecoat International, LLC
3301 Electronics Way
West Palm Beach, FL 33407

EPA ID # FLD980839013
NAICS # 332813 – Electroplating,
Plating, Polishing, Anodizing, and
Coloring

3) Responsible Officials

Johnny Keohan
Purecoat International, LLC,
Environmental Health & Safety
(EHS)
JKeohan@Purecoat.com

4) Inspection Participants

Johnny Keohan
Purecoat International
Environmental Health & Safety

Ronald Keohan,
Purecoat International, LLC
General Manager

Tom Mahoney
Purecoat International, LLC
President

Jeff Gregg Florida Department of
Environmental Protection (FDEP)

Kaitlyn Taylor, FDEP
Jade Knight, FDEP

Nereida Hernandez, USEPA Region 4

5) **Date of Inspection**

January 23, 2024

6) **Applicable Regulations¹**

Resource Conservation and Recovery Act (RCRA) Sections 3002 (42 U.S. Code – Annotated U.S.C.A. 6925 and 6927), and 40 Code of Federal Regulation (C.F.R.) Parts 260 - 270, 273, 278, & 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.

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. 62-730.185(1) [40 C.F.R. § 273.9], a “Small Quantity Handler of Universal Waste” (SQHUW) is a Universal Waste handler who does not accumulate 5,000 kilograms or more of Universal Waste (batteries, pesticides, mercury-containing equipment, or lamps, calculated collectively) at any time.

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 any 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] (hereinafter referred to as the “SAA Permit Exemption”).

7) **Purpose of Inspection**

The purpose of this inspection was to conduct an unannounced compliance evaluation inspection to determine Purecoat International compliance with the applicable requirements of RCRA and the corresponding Florida regulations. This was an EPA lead inspection supported by FDEP.

¹ As the State’s authorized hazardous waste program operates in lieu of the federal RCRA program, the citations of those authorized provisions will be to the authorized State program. However, for ease of reference, the federal citations will follow in brackets.

8) Facility Description

Purecoat International, LLC (hereinafter referred as Purecoat or the facility) is in West Palm Beach, Florida. Purecoat has been in production since 1987, occupies 50,000 square feet, and employs approximately 60 employees. Purecoat operates one shift, five days a week (Monday to Friday). Access to the facility is restricted. The facility has one private well and is connected to the public system as a backup. Visitors must register at the main office and must be escorted by facility personnel. Purecoat is an electroplating facility providing nickel, copper, chromate, silver, gold, tin, cadmium, tin lead coating, electroless plating, and anodizing services. The facility offers services to military and commercial entities. Purecoat has several independent plating lines and conducts quality control testing, grit blasting, polishing, painting, masking, and X-ray testing. Plating operations take place in the main plating area, new plating area, and "nibron" plating area. Products are moved to the masking and degreasing reflow areas after plating.

The most recent Hazardous Waste Generator Notification (EPA Form 8700-12) dated March 1, 2022 characterized the facility as a large quantity generator (LQG) of hazardous waste. Waste codes from the EPA Form 8700-12 include D001 (ignitable waste), D002 (corrosive), D003 (reactive), D006 (cadmium), D007 (chromium), D008 (lead), D010 (selenium), D011 (silver), D035 (methyl ethyl ketone), D036 (tetrachloroethylene), F003 (spent non-halogenated solvents), F005 (spent non-halogenated solvents), F006 (waste water treatment sludge from electroplating), F007 (spent cyanide plating bath), and F009 (spent stripping and cleaning solutions from electroplating). The facility also generates used oil and universal waste (lamps).

The facility operates under Air Permit 09900199 and the ICIS- National Pollutant Discharge Elimination System Permit FLRNEE050.

9) Previous Inspection History

Purecoat has been inspected since 1987. The most recent inspection was conducted by the FDEP on October 27, 2021. The inspector found fifteen apparent violations (facility was unable to provide a proper waste determination, containers open at time of the inspection, container in SAA not labeled with an indication of the hazardous content, facility not documenting the weekly inspections, flammable liquid waste accumulation appears to be less than 50 feet from the property line, containers in CAA area not marked with the accumulation starting date, containers in CAA more than 90 days, degreasing area appeared unmaintained, spills and litter on the floor, containers in plating line without adequate aisle space, documentation of arrangements with local authorities not provided, facility could not provide documentation of proof of sending QRG to local authorities, universal waste containers not properly labeled, universal waste containers not marked with the accumulation date). Facility was referred for enforcement. All violations were resolved, and a penalty payment submitted in July 2023.

10) Opening Conference

On January 23, 2024, EPA inspector, Nereida Hernandez Morales, accompanied by FDEP

inspectors, Jeff Gregg, Kaitlyn Taylor, and Jade Knight, arrived at Purecoat International, LLC at approximately 9:30 a.m. After checking-in in the security office, Mr. Ronald Keohan, General Manager, received the inspectors. The inspectors were joined at the opening conference by Mr. Tom Mahoney, President, and Mr. Johnny Keohan, EHS. The inspectors introduced themselves, showed their credentials and explained the purpose of the visit.

The inspectors described the anticipated use of equipment (digital camera) during the inspection and provided a list of records to be reviewed as part of the recordkeeping. The EPA inspector also 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 facility did not assert business confidentiality claim.

Johnny Keohan provided an overview of the facility's history and current operations during the opening conference. Mr. Keohan also discussed health and safety protocols and the required personal protective equipment required for the inspection.

11) Inspection Observations

Purecoat manages several central accumulation areas (CAAs) and several satellite accumulation areas (SAAs) across the facility. All the wastes in the SAAs are moved to CAAs prior to shipment. The facility's main processes consist of surface coating and cleaning operations. Operations also include high temperature coatings for aircraft engine parts.

Emergency showers, eye wash stations, and spill kits were observed around the SAAs and CAAs at time of the inspection.

The following areas were inspected:

Raw Material Storage Area:

The inspectors visited the raw material storage area. Products are stored inside a building in metal, cardboard, plastics drums (different sizes) and bags. If raw material is received in a damaged container, it is placed in a secure container moved to the 90-day central accumulation area (CAA) and shipped back to the supplier as "damaged goods". The following was observed in this area:

One (55)-gallon container labeled as "hazardous waste" (nitric 50% mixed with water). According to Mr. Johnny Keohan, this container was still in use as raw material. If the material was in fact still in use, the inspectors recommended that the facility remove the hazardous waste label from the container. It can be confusing and treated as a satellite accumulation area instead of "raw material or material in use".

One (1)-cubic yard (approximately 173 dry gallons) bag/tote with vermiculite cat litter was observed to be closed and labeled as "hazardous waste". The indication of the hazards of the contents was missing on the container. The container was not full (less than 25 gallons) at the time of the inspection; however, it was dated as July 7, 2023. This waste came from a small spill that occurred in the area and was cleaned up with vermiculite cat litter. Photo #1. Per the

email received from Johnny Keohan on February 3, 2024, these containers were disposed of on February 12, 2024 (Manifest 018951392 FLE and Manifest 026124336JJK).

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 any 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] (hereinafter referred to as the “SAA Permit Exemption”).

The inspectors observed one 58-pound torn bag which was spilling “soda blasting” on the floor. In addition, waste from a damaged container was also observed in this area. This material had not yet been determined as waste or if it could be used as product. Photo #2. Per the email received from Johnny Keohan on February 3, 2024, the spill was addressed and processed by their waste treatment system.

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 40 CFR 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.

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.251], large quantity generator must maintain and operate its facility to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment.

One (55)-gallon container with “solid gold filters” was observed to be closed and labeled as “hazardous waste”, with the indication of the hazards of the contents (toxic). The container was dated as April 21, 2023, exceeding the 90 accumulation days. Photo #3. Per the email received from Johnny Keohan on February 3, 2024, these containers were disposed on February 12, 2024 (Manifest 018951392 FLE and Manifest 026124336JJK).

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.17(a)], which is a condition of the LQG permit exemption, a large quantity generator accumulates hazardous waste on site for no more than 90 days, unless in compliance with the accumulation time limit extension or F006 accumulation conditions for exemption in paragraphs (b) through (e) of this section.

One (55)-gallon container with raw material (sodium hydroxide, corrosive) was observed in deteriorated condition in the “nibron” storage area. The inspectors recommended that the

facility transfer the contents to a container that is in good condition. Per the email received from Johnny Keohan on February 3, 2024, the container was consolidated on February 22, 2024.

Wastewater Treatment Unit #1 and #2

The process consists of receiving the rinse waters from the plating lines and clarifying to settle the sludge. The spent liquid is sent to the filter press to separate the liquid from the solids. Wastewater generated during plating is contained in a holding tank and pumped into the wastewater treatment systems prior to discharging into the POTW. The treatment units are located within a secondary containment with a drain that discharges into the holding tank.

- Wastewater Treatment Unit #1 - The sludge removed from the filter press, is accumulated in two (1)-cubic yard bags/totes located underneath the filter press. The bags/totes were closed; however, were not labeled with the words “hazardous waste”, dated, or with the indication of the hazard of the contents. Due to the capacity of the bags/totes (1 cubic yard), this area shall be considered and inspected as a central accumulation area. Photo #4.

Pursuant to Fla. Admin. Code Ann. R. 62-730.160(1) [40 C.F.R. § 262.17], (a) and (c). (a) A large quantity generator accumulates hazardous waste on site for no more than 90 days, unless in compliance with the accumulation time limit extension or F006 accumulation conditions for exemption in paragraphs (b) through (e) of this section(a). (c) A large quantity generator who also generates wastewater treatment sludges from electroplating operations that meet the listing description for the EPA hazardous waste number F006, may accumulate F006 waste on site for more than 90 days, but not more than 180 days without being subject to parts 124, 264 through 267 and 270 of this chapter, and the notification requirements of section 3010 of RCRA, provided that it complies with all of the following additional conditions for exemption (1) through (4)(v).

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.17(a)(5)(i)], 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.

Photo with new label was received by email on February 3, 2024; however, the container was not labeled or marked with the appropriate hazard indicator. Instead, it

was labeled with the Class 9 (miscellaneous) Department of Transportation (DOT) label. Recent guidance from the EPA (February 2023), states that the Class 9 DOT label, by itself, does not adequately indicate the hazard associated with the container's content. Per an email dated, March 1, 2024 – a new toxic label was attached.

One (55)-gallon container, one (5)-gallon container (with liquid), and a small bucket (less than 5 gallons with sludge) were observed opened, not labeled with the words "hazardous waste", or with the indication of the hazard of the contents. Photos #5 and #6.

One (5)-gallon container was observed (outside the secondary containment), opened, with gloves and sludge. The container was not labeled with the words "hazardous waste", or with the indication of the hazard of the contents. Photo #7.

In an email from Johnny Keohan dated March 1, 2024 (All small buckets) - chemicals were used in the wastewater treatment system and the containers were currently empty. The bucket that contained F006 sludge was added to the F006 container, and the bucket had been washed with all rinse water being fed back into the wastewater treatment system.

Pursuant to Fla. Admin. Code Ann. R. 62-730.160(1) [40 C.F.R. § 262.15(a)(4)], which is a condition of the SAA permit exemption, a container holding hazardous waste must be closed at all times during accumulation, except: (i) When adding, removing, or consolidating waste; or (ii) when temporary venting of a container is necessary.

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 container with the following: (i) the words "Hazardous Waste", and (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 CFR 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 CFR 1910.1200; or a chemical hazard label consistent with the National Fire Protection Association code 704).

Furthermore, a small container (drip pan) with used oil (from the machine maintenance) was observed to be opened, and without label in Wastewater Treatment Unit #1. Photo #8. In an email dated, February 3, 2024 – The oil was transferred to a new container and labeled as "Used Oil".

Pursuant to Fla. Admin. Code Ann. R. 62-710.401(6) [40 C.F.R. § 279.22(c)(1)], containers and aboveground tanks used to store used oil at generator facilities must be labeled or marked clearly with the words "Used Oil."

- Wastewater Treatment Unit #2 - The sludge removed from the filter press, is accumulated in one (1)-cubic yard bag/tote located underneath the filter press. The

bag/tote was opened; was not labeled with the words “hazardous waste”, dated, nor identified with the indication of the hazard of the contents (Photo #9). There was a pump that was leaking at the time of the inspection. The liquid is contained in the secondary containment that has a drain that connects to the holding tank (Photo #10). Due to the capacity of the bag/tote (1 cubic yard), this area shall be considered and inspected as a central accumulation area. A LQG may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status.

A photo with new label was received by email (from Johnny Keohan) on February 3, 2024; however, the bag/tote was not labeled or marked with the appropriate hazard indicator. Instead, it was labeled with the Class 9 (miscellaneous) Department of Transportation (DOT) label. Recent guidance from the EPA (February 2023), states that the Class 9 DOT label, by itself, does not adequately indicate the hazard associated with the container’s content. On March 3, 2024, a photo with a “toxic label” to mark the container was received by email. The leak on the pump was repaired.

Pursuant to Fla. Admin. Code Ann. R. 62-730.160(1) [40 C.F.R. § 262.17], (a) and (c). (a) A large quantity generator accumulates hazardous waste on site for no more than 90 days, unless in compliance with the accumulation time limit extension or F006 accumulation conditions for exemption in paragraphs (b) through (e) of this section(a). (c) A large quantity generator who also generates wastewater treatment sludges from electroplating operations that meet the listing description for the EPA hazardous waste number F006, may accumulate F006 waste on site for more than 90 days, but not more than 180 days without being subject to parts 124, 264 through 267 and 270 of this chapter, and the notification requirements of section 3010 of RCRA, provided that it complies with all of the following additional conditions for exemption (1) through (4)(v).

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.17(a)(5)(i)], 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)(6)], which incorporates Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.251], and is a condition of the LQG Permit Exemption, a generator is required to maintain and operate its facility to minimize the possibility of a fire, explosion, or any unplanned

sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment.

Per Mr. Johnny Keohan, the filters in the wastewater treatment units are washed every five years and disposed as non-hazardous without receiving a waste determination. The liquid waste is sent to the holding tank. A waste profile and Standard Operating Procedure were requested and not provided at the time of the inspection.

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 40 CFR 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.

Cyanide Room:

The Cyanide Room consists of an approximately 1000-gallon microfiltration feed tank, as well as a sludge degreaser tank. The following was observed at the time of the inspection. One central and one satellite accumulation area was inspected.

- SAA-Two quarter-bags/totes (approximately 43 dry gallons), from the “nibron” plating were observed to be opened, labeled as “hazardous waste (“nibron” cleanup solids and hazardous chromate waste). The bags/totes were not labeled with the indication of the hazard of the contents (Photo #11). Furthermore, one 5-gallon shop vacuum container was observed to be closed and labeled with the words “for nitric holding tank cleaning”. The vacuum was not labeled with the words “hazardous waste” and with an indication of the hazards of the contents (Photo #12).

Pursuant to Fla. Admin. Code Ann. R. 62-730.160(1) [40 C.F.R. § 262.15(a)(4)], which is a condition of the SAA permit exemption, a container holding hazardous waste must be closed at all times during accumulation, except: (i) When adding, removing, or consolidating waste; or (ii) when temporary venting of a container is necessary.

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 container with the following: (i) the words “Hazardous Waste”, and (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 CFR 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 CFR 1910.1200; or a chemical hazard label consistent with the National Fire Protection Association code 704).

- CAA-Two (1)-cubic yard bags/totes (one opened and one closed) were observed to be full. The bags/totes were not marked with words “hazardous waste”, with the indication of the hazard of the contents, or dated. Photo #13.

Pursuant to Fla. Admin. Code Ann. R. 62-730.160(1) [40 C.F.R. § 262.17], an 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. § 262.17(a)(5)(i)], 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.

Per the email received from Johnny Keohan on February 3, 2024, these containers were disposed of on February 12, 2024 (Manifest 018951392 FLE and Manifest 026124336JJK).

90 Days Central Accumulation Area (CAA):

The inspectors visited the 90 days CAA located inside the building. The area was identified with a sign that read “Hazardous Waste” and with the National Fire Protection Association code 704 at the entrance. At the time of the inspection, the hazardous waste storage area consisted of three lines (plus few containers against the walls) of containers with adequate aisle space between sections. Unless specified otherwise, the containers in this area were observed to be closed, labeled with the words “hazardous waste”, and dated. However, most of these containers were not marked with the indication of the hazard of the contents.

Line #1 (left side) – Approximately, sixteen (55) -gallon containers were observed in this line. Three containers were empty, five were labeled as non-hazardous, and one was dated April 25, 2023, exceeding the 90 accumulation days. Photo #14.

Line #2 (middle) – Approximately, twenty-five (55)-gallon containers were observed in this line. Twelve containers were pending of analysis, and one was marked as non-hazardous (electroless nickel). Photo #14.

Line #3 (right side) – Approximately, thirty-five (55)-gallon containers were observed in this line. Photo #14.

On the back wall to the left – one quarter bag/tote (material from spills) was not labeled with the words “hazardous waste”, not marked with the indication of the hazard of the contents and

not dated. One (1)- cubic yard bag/tote was observed with a label that read “waste pending characterization” and dated May 20, 2022. Photo #15.

On the wall (right side) – Expired material. Five (55)-gallon and nine (5)-gallon containers were marked with the indication of the hazard of the contents but were not labeled with the words “hazardous waste” and not marked with the accumulation starting date. Photo #16.

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.17(a)(5)(i)], 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 F.A.C. Chapter 62-730.160(1) [40 C.F.R. § 262.17(a)], which is a condition of the LQG Permit Exemption, a large quantity generator may accumulate hazardous waste on site without a permit or interim status, and without complying with the requirements of parts 124, 264 through 267, and 270 of this chapter, or the notification requirements of section 3010 of RCRA, provided the following condition for exemption is met: A large quantity generator accumulates hazardous waste on site for no more than 90 days, unless in compliance with the accumulation time limit extension or F006 accumulation conditions for exemption in paragraphs (b) through (e) of this section.

Per the email received from Johnny Keohan on February 3, 2024, these containers were disposed of on February 12, 2024 (Manifest 018951392 FLE and Manifest 026124336JJK).

The CAA is equipped with an internal communication or intercom system capable of providing immediate emergency instruction to facility personnel; it is equipped with portable fire extinguishers, fire control equipment, spill control equipment, and it is equipped with water to supply water hose streams. Fire extinguishers were last inspected in July 2022.

Flammable Waste Storage Area - Central Accumulation Area:

The flammable liquid waste is stored outside of the facility next to the outdoor holding tank (Photo #17). This area is covered and has three low walls with a fence between the walls and overhead covering and is surrounded by a secondary containment. The fourth wall is open facing to the parking lot to add or remove waste from the area. The area had a wall in the center separating flammable product on the right from the flammable waste on the left. Signage of “No Smoking”, “Hazardous Waste Containment Area” posted at the gate. The following was observed in this area:

One (55)-gallon container with two different dates: October 23, 2023 and December 18, 2023.

The container was marked with the words “hazardous waste”, and with the indication of the hazard of the contents. The facility was informed that this container should be removed within three calendar days, and next time to have a label with the proper accumulation starting date.

Per the email received from Johnny Keohan on February 3, 2024, these containers were disposed of on February 12, 2024 (Manifest 018951392 FLE and Manifest 026124336JJK).

One (55)-gallon container marked with the words “hazardous waste”, with the indication of the hazard of the contents, and dated November 6, 2023.

One (55)-gallon container marked with the words “hazardous waste”, with the indication of the hazard of the contents, and dated October 23, 2023. The facility was informed that this container should be removed within three calendar days.

Per the email received from Johnny Keohan on February 3, 2024, these containers were disposed of on February 12, 2024 (Manifest 018951392 FLE and Manifest 026124336JJK).

Nibron Plating Line:

The Nibron Plating Line is where electroless nickel-thallium-boron coating is applied. Eleven (55)-gallon containers were observed in the hallway, and ready for disposal. These containers were dated January 22, 2024. Another (55)-gallon container labeled as “hazardous waste”, waste corrosive liquid, acidic, inorganic, and dated January 17, 2024 was also observed in this area. These containers were picked up in the afternoon (Manifest 018959467 FLE).

The following was observed in the SAAs:

- One closed (55)-gallon container, labeled as “hazardous waste”, nibron filters, and with a chemical hazard label consistent with the National Fire Protection Association code 704 was observed on the wall.
- One closed (55)-gallon container, labeled as “hazardous waste”, cadmium filters. It was observed that the container was not labeled or marked with the appropriate hazard indicator. Instead, it was labeled with the Class 9 (miscellaneous) Department of Transportation (DOT) label. Recent guidance from the EPA (February 2023), states that the Class 9 DOT label, by itself, does not adequately indicate the hazard associated with the container’s content. Photo #18.
- One closed (55)-gallon container, labeled as “hazardous waste”, EN filters and without the indication of the hazard of the contents. Photo #19.

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 container 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 CFR 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 CFR 1910.1200; or a chemical hazard label consistent with the National Fire Protection Association code 704).

A photo was received by email (from Johnny Keohan) on February 3, 2024; with container labeled or marked with the indication of the hazards of the contents.

Blasting Room #1:

Blasting Room #1 is used to do sandblasting. The dust generated in this area is disposed of as non-hazardous. No waste profile was provided at the time of the inspection. One (55)-gallon container was observed in this area without labeling.

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 40 CFR 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.

Degreasing Area:

Products are brought to this area after plating to clean and localize plating. Secondary containment around the degreasing area appeared unmaintained and contained oil spills filling over half of the containment. Four (55)-gallon containers were observed in this area as follows:

Two closed (55)-gallon containers not labeled with the words “hazardous waste” and one of them was not marked with the indication of the hazards of the contents. Photo #20.

Two closed (55)-gallon containers (one with funnel on top) with methyl ethyl ketone (MEK) were not labeled with the words “hazardous waste” and one of them was not marked with the indication of the hazards of the contents. Photo #20.

A photo was received by email (from Johnny Keohan) on February 3, 2024; with containers labeled or marked with the with the indication of 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 container 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 CFR 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 CFR 1910.1200; or a chemical hazard label consistent with the National Fire Protection Association code 704).

Polishing Area:

The Polishing Area is the finishing process for military aviation parts after plating. Some debris or residues from the polishing process were observed in this area. According to Mr. Johnny Keohan, this material is disposed of as regular trash. Photo #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 40 CFR 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.

Quality Control Room:

Parts are checked and cleaned with alcohol after plating. The facility uses a towel with alcohol to clean the parts, then the towels are thrown into a garbage as regular trash. No waste was observed at time of the inspection. However, the facility 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.

A photo was received by email (from Johnny Keohan) on February 3, 2024 with a container labeled or marked as “excluded solvent contaminated wipes”.

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 40 CFR 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.

One (55)-gallon container labeled as “dry paint” was observed closed in this area. The container was closed; however, it was not labeled with the words “hazardous waste” and with the indication of the hazards of the contents. Photo #22.

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 container with the following: (I) with 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 CFR 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 CFR 1910.1200; or a chemical hazard label consistent with the National Fire Protection Association code 704).

Laboratory:

The laboratory is used to test the parts. No hazardous waste was observed at the time of the inspection.

Main Plating Area:

Baths in the main plating area include tin lead and cyanide plating. The lines in this area are on a metal grid providing a secondary containment for spills in the main plating area. The secondary containment is connected to sump pumps to be collected in the wastewater treatment systems. The following was observed in this area:

One (15)-gallon container was observed closed, labeled with the words “hazardous waste”,

ferric chloride, and dated June 28, 2023, exceeding the 90 accumulating days. The container was not marked with the indication of the hazard of the contents. Photo #23.

Per the email received from Johnny Keohan on February 3, 2024, the container was disposed on February 12, 2024 (Manifest 018951392 FLE and Manifest 026124336JJK).

Six (55)-gallon containers with silver, stripper, nitric acid 50%, tarni ban filters, nitric bifluoride, tarni ban liquid, and cadmium filters, were observed closed, labeled with the words hazardous waste”, and with the indication of the hazard of the contents. One of these containers was not labeled or marked with the appropriate hazard indicator. Instead, it was labeled with the Class 9 (miscellaneous) Department of Transportation (DOT) label. Recent guidance from the EPA (February 2023), states that the Class 9 DOT label, by itself, does not adequately indicate the hazard associated with the container’s content. This waste stream comes from the precious metal aluminum line. Photo #24.

Pursuant to F.A.C. Chapter 62-730.160(1) [40 C.F.R. § 262.17(a)], which is a condition of the LQG Permit Exemption, a large quantity generator may accumulate hazardous waste on site without a permit or interim status, and without complying with the requirements of parts 124, 264 through 267, and 270 of this chapter, or the notification requirements of section 3010 of RCRA, provided the following condition for exemption is met: A large quantity generator accumulates hazardous waste on site for no more than 90 days, unless in compliance with the accumulation time limit extension or F006 accumulation conditions for exemption in paragraphs (b) through (e) of this section.

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 container 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 CFR 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 CFR 1910.1200; or a chemical hazard label consistent with the National Fire Protection Association code 704).

Precious Metal Line:

This area consists of three lines: precious metals tin/lead, aluminum, and precious metals tin/lead again. Waste generated here was specified in the Main Plating Area (6 containers).

New Precious Metals Line:

The New Precious Metal Line consists of a gold and silver lines. Cyanide is used to stabilize the bath. Two SAAs were observed in this area:

The first SAA consisted of five (55)-gallon containers (silver bath filters, cooper filters, gold filters, and gold strip) that were observed closed, four were labeled with the words “hazardous

waste”, and with the indication of hazard of the contents (toxic). One container was labeled as non-hazardous (pyro cooper bath filters). Photo #25.

The second SAA consisted of three (55)-gallon containers (bright dip, nickel sulfamate, nickel strike), which were observed closed, with the words “hazardous waste”. Two of them were marked with the indication of hazard of the contents (corrosive), and one was not marked with the indication of hazard of the contents. The container labeled as bright dip was dented/imploded at the time of the inspection.

A photo was received by email, the container was marked with the indication of the hazards of the contents and the contents of the dented/imploded container were transferred to another container.

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 container 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 CFR 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 CFR 1910.1200; or a chemical hazard label consistent with the National Fire Protection Association code 704).

Pursuant to Fla. Admin. Code Ann. R. 62-730.160(1) [40 C.F.R. §262.15(a)(1)], which is a condition of the SAA permit exemption, a generator If a container holding hazardous waste is not in good condition, or if it begins to leak, the generator must immediately transfer the hazardous waste from this container to a container that is in good condition.

Paint Booth:

The paint area consists of two small spray paint booths connected to the exhaust hood with four paint filters each (Photo #26). Filters are changed quarterly and is disposed as hazardous waste (flammable). One closed (55)-gallon container, was observed in this area. The container was not labeled with the words “hazardous waste”, or the marked with the indication of hazard of the contents, it just read “dry filter” on top of the lid. Photo #27.

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 container 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 CFR 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 CFR 1910.1200; or a chemical hazard label consistent with the National Fire Protection Association code 704).

Masking Area:

In this area, certain parts are covered to prevent certain areas of an item from been electroplated. This area was not operating, and no waste was observed at time of the inspection. When in use, the facility uses alcohol to clean the parts. Therefore, the facility 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.

X-Ray Room:

The facility uses different machines to test certain parts. No hazardous waste is generated in this area.

Universal Waste Storage Area-Maintenance Shop:

The facility generates universal waste lamps that are stored in the Maintenance Shop Area. The facility crushed the lamps (Light-Emitting Diodes (LED)) using a 55-gallon container. LED lamps do not contain mercury; however, is recommended to label the container with the words "Universal Waste—Lamp(s)," "Waste Lamp(s)," or "Used Lamp(s)" on the box (non-crushed) and "Crushed Non-Mercury Lamps" on the container used to crush the lamps. Photo #28.

Pursuant to Fla. Admin. Code Ann. r. 62-730.185(1) [40 C.F.R. § 273.14(e)], each lamp or a container or package in which such lamps are contained must be labeled or marked clearly with one of the following phrases: "Universal Waste - Lamp(s)," "Waste Lamp(s)," or "Used Lamp(s)". Pursuant to Fla. Admin. Code Ann. r. 62-737.400(5)(b) requires that crushed universal waste lamps must be labeled as "Crushed Mercury Lamps."

At the time of the inspection, the facility was puncturing aerosol cans with screw drivers. However, the facility could not show to the inspectors where the remaining liquid and the cans are stored.

Pursuant to Fla. Admin. Code Ann. r. 62-730.185(1) [40 C.F.R. § 273.13(e)(1) through (4)], a small quantity handler of universal waste must manage universal waste aerosol cans in a way that prevents releases of any universal waste or component of a universal waste to the environment.

12) Records Review:

After the walk-through, the inspectors reviewed the following records:

Contingency Plan and Quick Reference Guide (QRG):

The facility maintains a contingency plan (CP) that describes the actions that facility personnel must take in response to fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste. The Contingency Plan was last revised in June 2021; however, the facility changed operations and the CP had not been reviewed or amended since then.

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(a)-(e)], and is a condition of the LQG Permit Exemption, the contingency plan must be reviewed, and

immediately amended, if necessary, whenever (c) the generator facility changes - in its design, construction, operation, maintenance, or other circumstances - in a way that materially increases the potential for fires, explosions, or releases of hazardous waste or hazardous waste constituents, or changes the response necessary in an emergency.

Waste Manifest and Land Disposal Restriction (LDR) Records:

The inspectors reviewed available hazardous waste manifest records and land disposal restriction forms for shipments of hazardous waste sent from January 2020 to January 2024. The last shipment was on January 23, 2024, and the facility used EQ Industrial Services (MIK435642742) as transporter and US Ecology in Tampa (FLD981932494) was used for the disposal of their hazardous waste. The manifests were also verified in RCRAInfo for final signature, and a least four manifests (006275556 GBF, 006275555 GBF, 006275554 GBF, and 022973429 JJK) were not found and/or were not provided with the final signature.

Pursuant to F.A.C. Chapter 62-730.160(1) [40 C.F.R. § 262.42(a)], a LQG (1) who does not receive a copy of the manifest with the handwritten signature of the owner or operator of the designated facility within 35 days of the date the waste was accepted by the initial transporter must contact the transporter and/or the owner or operator of the designated facility to determine the status of the hazardous waste. (2) must submit an Exception Report to the EPA Regional Administrator for the Region in which the generator is located if he has not received a copy of the manifest with the handwritten signature of the owner or operator of the designated facility within 45 days of the date the waste was accepted by the initial transporter.

Waste Profiles:

No waste profile documents were available for review at the time of the inspection. Copy of the waste profiles were requested at the time of the inspection but has not been provided.

Training Records:

Training records were available for review at the time of the inspection. Job descriptions for each employee handling hazardous waste were available for review. The last training was provided on January 13, 2022.

Pursuant to F.A.C. Chapter 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 by this section; and/or (iv) the generator must maintain training records that include, among others: the job title for each position at the facility related to hazardous waste management, and the name of the employee filling each job; a written job description for each position; a written description of the type and amount of both introductory and continuing training that will be given to each person filling a position; and records documenting that the required training has been given to and completed by Facility personnel.

Weekly and Daily Inspection Records:

Purecoat is conducting weekly inspections of the CAAs. The inspectors reviewed the records of inspections of the CAAs from March 13, 2023 to January 22, 2024. The container inspection log included the date and time of inspection, the name of the staff member conducting the inspection, any corrective actions taken, and the total number of containers.

Since the containers (located underneath the filter press) used in the wastewater treatment units #1 and #2 are greater than 55-gallons, these areas shall be considered as central accumulation areas and shall be inspected weekly. Furthermore, the containers in the CAA the Flammable Waste Storage Area are located on a grid that serves as secondary containment, the secondary containment shall be inspected (weekly) as well.

Pursuant to Fla. Admin. Code Ann. R. 62-730.160(1) [40 C.F.R. § 262.17(a)(1)(v)], at least weekly, the large quantity generator must inspect central accumulation areas. The large quantity generator must look for leaking containers and for deterioration of containers caused by corrosion or other factors. See paragraph (a)(1)(ii) of this section for remedial action required if deterioration or leaks are detected.

Biennial/Annual Reports Record:

The biennial/annual reports for the facility's hazardous waste activities in 2021 and 2023 were available to review on-site.

13) Closing Conference

After the inspection, the inspectors had their exit briefing with Tom Mahoney, Ronald Keohan, and Johnny Keohan. During the meeting, the inspectors discussed the observations made during the inspection and the inspection was concluded.

14) List of Attachments

Attachment 1 – Photo Log:

Photos taken on: January 23, 2024

Photos taken by: Nereida Hernandez Morales

Photos taken with: Cell Phone

15) Signed

NEREIDA HERNANDEZ MORALES
Digitally signed by NEREIDA
HERNANDEZ MORALES
Date: 2024.03.21 17:11:25 -04'00'

Nereida Hernandez Morales
Life Scientist

16) Concurrence

ARACELI CHAVEZ
Digitally signed
by ARACELI
CHAVEZ
Date: 2024.03.22
10:23:15 -04'00'

Araceli B. Chavez
Chief
RCRA Enforcement Section

Appendix 1 – Photo Log

Photos taken on: January 23, 2024

Photos taken by: Nereida Hernandez Morales

Photos taken with: Cell Phone



Photo #1 – One cubic yard bag/tote with vermiculite cat litter material from a small spill occurred in the raw material storage area



Photo #2 – one bag of 58-pounds broken and spilling “soda blasting” on the floor

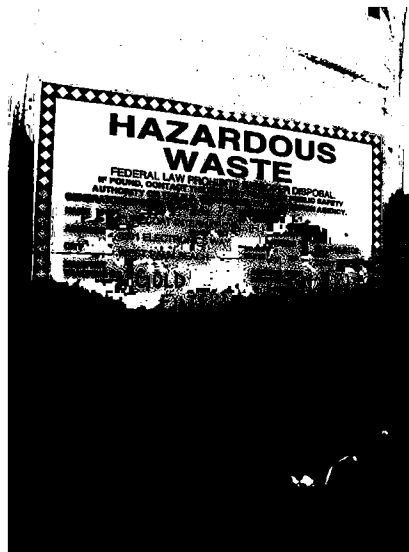


Photo #3 – Container dated as April 21, 2023, exceeding the 90 accumulation days



Photo #4 – Wastewater Treatment Unit #1: two (1)-cubic yard bag/tote located underneath the filter press



Photo #5 – 55-gallon container and 5-gallon container opened and without marking



Photo #6 – small bucket (less than 5 gallons with sludge)



Photo #7 – One (5)-gallon container with gloves and sludge.

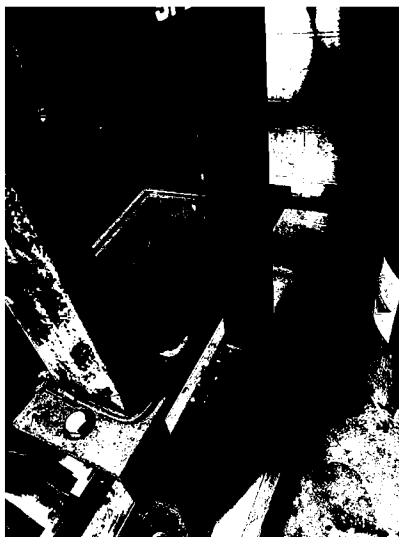
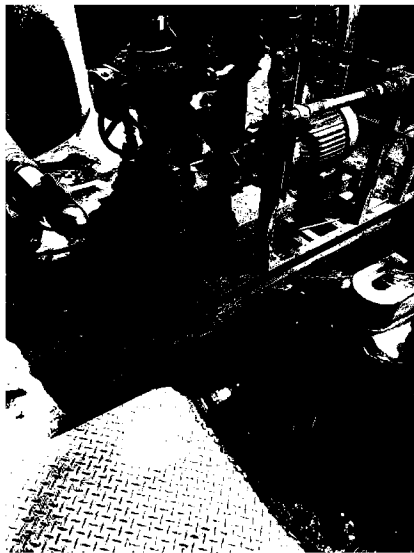


Photo #8 – Used Oil



Photo #9 – Wastewater Treatment Unit #2 - one (1)-cubic yard bag/tote located underneath the filter press



Leaking pump



Pump repaired

Photo #10 – Wastewater Treatment Unit #2



Photo #11 – SAA in the Cyanide Room: Two quarter-bag/tote (approximately 43 dry gallons), from the “nibron” plating



Photo #12 – A 5-gallon shop vacuum container in the Cyanide Room



Photo #13 – CAA in Cyanide Room: Two (1)-cubic yard bag/tote



Photo #14 – 90 days CAA



Photo #15 – CAA: one quarter bag/tote and one (1)- cubic yard bag/tote



Photo #16 – CAA: On the wall (right side) – Expired material.



Photo #17 – CAA: Flammable Waste Storage Area



Photo #18 – SAA Nibron Plating Area: container not labeled or marked with the appropriate hazard indicator

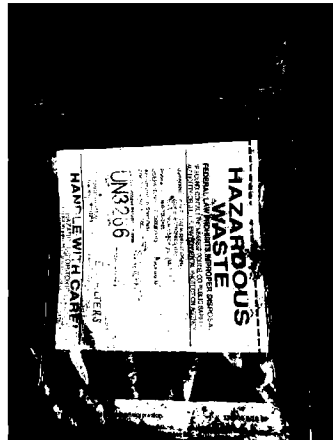


Photo #19 – SAA Nibron Plating Area: EN filters and without the indication of the hazard of the contents.



Photo #20 – Degreasing Area



Photo #21 – Polishing Area



Photo #22– Dry Paint

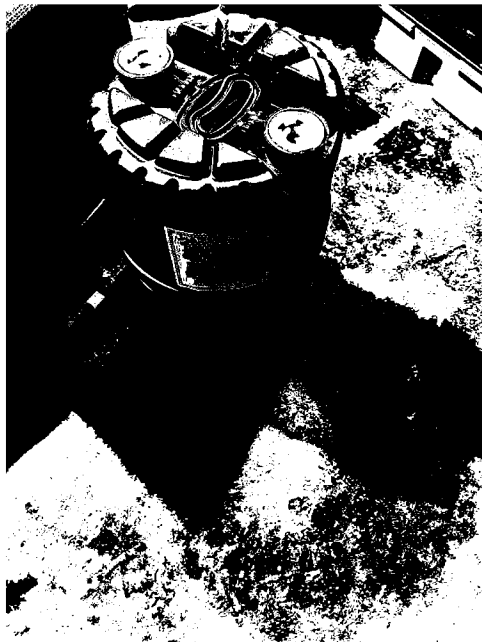


Photo #23 – Main Plating Area: container not marked with the indication of the hazard of the contents



Photo #24 – SAA: Main Plating Area



Photo #25 – SAA: New Precious Metals Line



Photo #26 – Paint Booth



Photo #27 – Paint Booth container



Photo #28– Universal Waste Lamps