

OPTIMAX SYSTEMS INC. INSPECTION REPORT

Inspection Date(s):	6 June 2024	Inspection Announced: No
Facility or Site Name:	Optimax Systems Inc	
Facility/Site Physical Location:	6367 Dean Parkway, (585) 265-1020	
(city, state, zip code)	Ontario, NY 14519-8939	
Mailing address (if different from above):		
Facility/Site Contacts:	Junel Chan Environmental, Health and Safety Specialist JChan@optimaxsi.com O: 585.265.1020 ext. 362 C: 562.673.5649	
Website:	www.optimaxsi.com	
RCRA ID Number:	NYR000112953	
Latitude, Longitude:	43.02277163324939, -77.09040063806268	
Facility/Site Personnel Participating in Inspection:		
Junel Chan	Environmental, Health and Safety Specialist	
	Facilities Manager	
Inspector(s):		
Carl F. Plössl	US EPA, Enforcement Officer/Engineer	Plossl.Carl@epa.gov (212) 637-4088
Additional Inspection Report Elements:	Photos, HW Contingency Plan, HW Personnel Training Records and Job Descriptions, Details on NYSP2I & Optimax Research Project, Manifest tracking spreadsheet	
Inspection Report Author:		
Carl F. Plössl	Plossl, Carl Digitally signed by Plossl, Carl Date: 2024.08.15 15:18:39 -04'00'	
Team Leader		
Leonard Grossman	LEONARD GROSSMAN Digitally signed by LEONARD GROSSMAN Date: 2024.08.15 15:41:23 -04'00'	

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SECTION I – INTRODUCTION

Purpose of the Inspection Objective

A Compliance Evaluation Inspection (CEI) was conducted to determine the facility's compliance with the Resource Conservation and Recovery Act (RCRA) requirements for hazardous waste management.

Background

This Optimax Systems (Optimax) facility was last been inspected for RCRA compliance by the state on 15 May 2018 and has had a notification history as a large quantity generator (LQG)(notifications on 24 Jan 2019) and as an LQG in Annual Reports from 2020-2024. A review of the facility's waste manifest records shows a consistent generator status of LQG (on a monthly basis). The facility was never inspected under the Clean Air Act or the Clean Water Act. The facility is not in an environmental justice area.

Facility Name: Optimax Systems Inc
6367 Dean Pkwy, Ontario, NY 14519
County: Wayne
FRS: 110014358104
Inspection Required?: yes
Reason Required: LQG due for inspection
Gen. Status calculated by EPA: LQG
Generator Status in RCRAInfo: LQG
TSDF?: no
Most Recent RCRA Inspection: 5/15/2018
Last EPA Inspection:
Last State Inspection: 5/15/2018
Last Record Review:
Federal Facility?: no
Federal Agency Name:
Is the facility a LQG, but did not submit a Biennial Report?: no
LQG not inspected in the past 5 years?: yes
Most recent activity (enf action or inspection) was an informal EA?: no
Hot Spot Class: not significant
Flood Risk: none
RSEI Score:
NAICS:
In EJ area: no
CAA Permit Types:
Last EPA formal EA?:
Last EPA informal EA :
Last state formal EA: 12/4/2018
Last state informal EA : 5/29/2018
Last CAA inspection:
Last CWA inspection:
Last Notification: 3/1/2024

Notification History:

Dat...	Q	Source	Status	Q
3/1/24		Bi. Report	LQG	
3/1/23		Bi. Report	LQG	
2/28/22		Bi. Report	LQG	
2/22/21		Bi. Report	LQG	
2/24/20		Bi. Report	LQG	
1/24/19		Notification	LQG	
1/1/07		Implementer	SQG	
1/1/06		Implementer	SQG	
10/19/04		Bi. Report	SQG	
1/20/03		Notification	SQG	

Opening Conference

6 June 2024. I, EPA Region 2 RCRA inspector Plössl, arrived at the main entrance to the Optimax Systems facility at ~10:15 am for an unannounced inspection of the precision optics manufacturing plant. I announced and identified myself at the reception area and was connected with Junel Chan Environmental, Health and Safety Specialist. Ms. Chan had worked at Optimax since 2017 and was familiar with the nature of federal and state compliance inspections but less so of those conducted pursuant to RCRA federal and state hazardous waste regulations. Ms. Chan and I discussed the facility past and current operations, waste management and disposal practices, and the nature of RCRA inspections.

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We then began a walk through and inspection of the facility.

Facility/Site Description

<https://www.optimaxsi.com/>

From the Optimax Systems website:

Precision Optics Fast & Accurate

Optimax is a world-class manufacturer of precision optics. Our capabilities incorporate a wide range of manufacturing technologies from which we can engineer solutions that best fit your requirements. Fabrication capabilities range from conventional machinery to highly deterministic CNC machining.



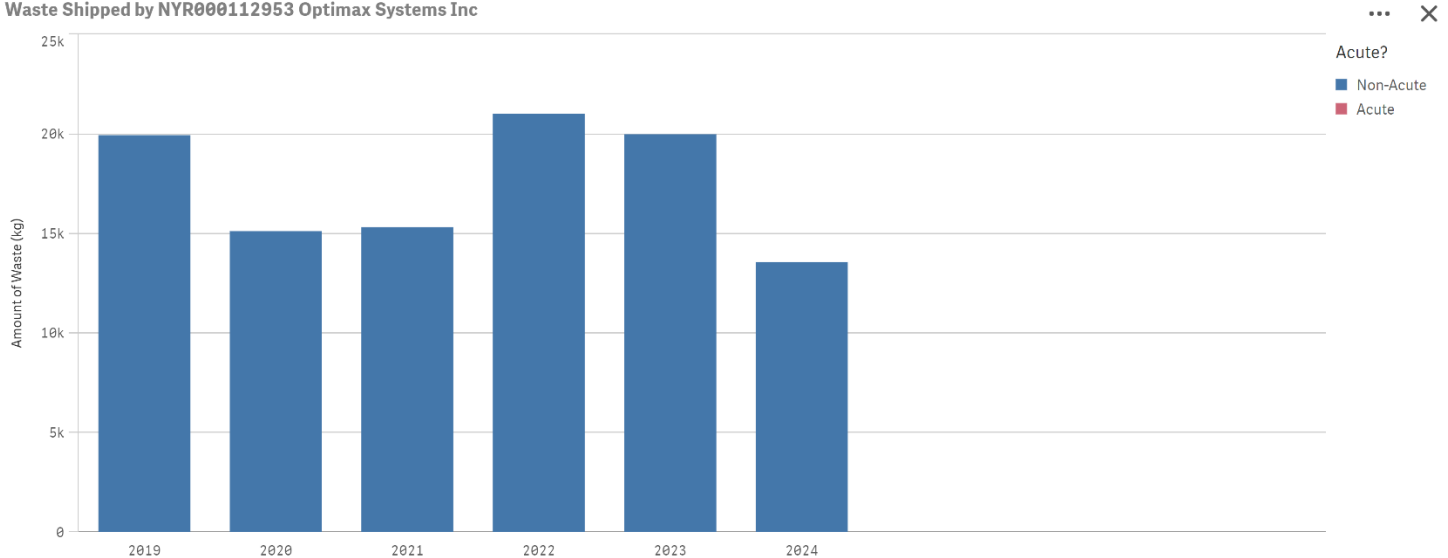
According to Mr. Chan:

- General
 - Optimax started operations at this site 1998.
 - Manufacturing operations are mainly precision optics grinding, polishing, and coating.
 - Optimax is the facility and property owner.
 - Facility employs 450-470 people in 3 shifts over 5 days.
 - Local emergency responders are the Ontario Fire Department.
 - The town of Ontario conducts annual or biennial site walk throughs and inspections
 - Wastewater discharges are thru the sewer to the Ontario POTW.
 - No onsite tanks (technically incorrect, see walk thru).
- Hazardous Waste generation
 - Primarily:
 - D004 ARSENIC
 - D005 BARIUM
 - D006 CADMIUM
 - D007 CHROMIUM
 - D008 LEAD
 - D010 SELENIUM
 - D011 SILVER
 - Barium, lead, and other metal wastes from spent polishing compounds
 - Secondary (less common) wastes;
 - D001 IGNITABLE
 - D018 BENZENE
 - D035 MEK
 - D040 TCE
 - F002 SPENT HALOGEN SOLVENT
 - The following spent halogenated solvents: Tetrachloroethylene, methylene chloride, trichloroethylene, 1,1,1-trichloroethane, chlorobenzene, 1,1,2-trichloro- 1,2,2-trifluoroethane, ortho-dichlorobenzene, trichlorofluoromethane, and 1,1,2-trichloroethane; ...
 - F003 SPENT NON-HALO SOLVENT
 - The following spent non-halogenated solvents: Xylene, acetone, ethyl acetate, ethyl benzene, ethyl ether, methyl isobutyl ketone, n-butyl alcohol, cyclohexanone, and methanol; ...
 - Unusual wastes (lab clean out):
 - D003 REACTIVE
 - P106 SODIUM CYANIDE Na(CN)
 - P121 ZINC CYANIDE Zn(CN)₂

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- Other:
 - Off-spec materials are lab packed
 - Materials Lab shutdown waste chemicals were lab packed
- HW accumulation locations
 - Satellite accumulation areas (SAA) thru-out
 - 90-day storage is in the Central Accumulation Area
- Universal waste generation
 - Fluorescent lamps and halogens
 - Batteries
- Other regulated wastes
 - Used oil mainly from vacuum pumps and gear boxes
 - Floor drains go to settling tank. From there, discharge to sewer
 - Facility is setting up a pump and centrifuge WWT system
- Waste dispositions
 - Manifests and LDR forms were provided
 - Online manifest records appeared complete
- Facility renotified in 2019, and is operating, as a large quantity generator. In 2023-2024 (June), the facility averaged some 4,062-lbs/month.

Waste Shipped by NYR000112953 Optimax Systems Inc



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Optimax Inc												
Manifest Date	Waste Qty	Units	Waste (kg)	Waste Codes	TSDF ID	MTN*	Total Waste/shipment	Units	lbs/month			
6/27/2024	190 Pounds		86	D004 D005 D008 D010	OHD000816629	009201715SKS						
6/27/2024	59 Pounds		27	D005 D006 D008	OHD000816629	009201715SKS						
6/20/2024	3,630 Pounds		1,647	D004 D005 D008 D010	OHD000816629	009201870SKS						
6/20/2024	95 Pounds		43	D005 D006 D008	OHD000816629	009201870SKS	3,974	lbs	3,360	lbs	LQG	
5/15/2024	1,815 Pounds		823	D004 D005 D008 D010	OHD000816629	009201815SKS						
5/15/2024	255 Pounds		116	D004 D008 D010	OHD000816629	009201815SKS						
5/15/2024	225 Pounds		102	D005 D006 D008	OHD000816629	009201815SKS	2,295	lbs	2,495	lbs	LQG	
4/17/2024	1,510 Pounds		685	D004 D005 D008 D010	OHD000816629	009201960SKS						
4/17/2024	60 Pounds		27	D005 D006 D008	OHD000816629	009201960SKS						
4/17/2024	30 Pounds		14	D008	ILD980613913	009201962SKS						
4/17/2024	220 Pounds		100	D008 D018	KYD053348108	009201959SKS	1,820	lbs	2,518	lbs	LQG	
4/11/2024	2,225 Pounds		1,009	D004 D008 D010	OHD000816629	009201947SKS	2,535	lbs	3,507	lbs	LQG	
3/20/2024	95 Pounds		43	D001 F003	ILD980613913	009106784SKS						
3/20/2024	1,925 Pounds		873	D004 D005 D008 D010	OHD000816629	009106783SKS						
3/20/2024	55 Pounds		25	D005 D006 D008	OHD000816629	009106783SKS						
3/20/2024	25 Pounds		11	D008	ILD980613913	009106784SKS						
3/19/2024	9,685 Pounds		4,393	D004 D005 D006 D007 D008 D010	PAD067098822	019386062FLE	11,785	lbs	13,285	lbs	LQG	
2/21/2024	4,125 Pounds		1,871	D004 D005 D008 D011	OHD000816629	009106705SKS						
2/21/2024	150 Pounds		68	D005 D006 D008	OHD000816629	009106705SKS						
2/21/2024	400 Pounds		181	D008 D018	KYD053348108	009106707SKS	4,675	lbs	4,066	lbs	LQG	
1/17/2024	100 Pounds		45	D001 F003	ILD980613913	009106850SKS						
1/17/2024	2,445 Pounds		1,109	D004 D005 D008 D011	OHD000816629	009106849SKS						
1/17/2024	75 Pounds		34	D005 D006 D008	OHD000816629	009106849SKS						
1/17/2024	165 Pounds		75	D008	ILD980613913	009106850SKS						
1/17/2024	330 Pounds		150	D008 D018	KYD053348108	009106852SKS	3,115	lbs	2,709	lbs	LQG	
12/13/2023	510 Pounds		231	D001 D008	KYD053348108	009106946SKS						
12/13/2023	1,885 Pounds		855	D004 D005 D008 D011	OHD000816629	009106945SKS						
12/13/2023	715 Pounds		324	D005 D006 D008	OHD000816629	009106945SKS	3,110	lbs	3,381	lbs	LQG	
11/15/2023	3,555 Pounds		1,613	D004 D005 D008 D011	OHD000816629	008881185SKS						
11/15/2023	165 Pounds		75	D005 D006 D008	OHD000816629	008881185SKS						
11/15/2023	20 Pounds		9	D008	OHD000816629	008881185SKS	3,740	lbs	4,066	lbs	LQG	
10/18/2023	3,435 Pounds		1,558	D004 D005 D008 D011	OHD000816629	008881154SKS						
10/18/2023	140 Pounds		64	D005 D006 D008	OHD000816629	008881154SKS						
10/18/2023	945 Pounds		429	D008 D018	KYD053348108	008881155SKS	4,520	lbs	4,913	lbs	LQG	
9/20/2023	3,295 Pounds		1,495	D004 D005 D008 D011	OHD000816629	008894074SKS						
9/20/2023	330 Pounds		150	D005 D006 D008	OHD000816629	008894074SKS						
9/20/2023	40 Pounds		18	D008	OHD000816629	008894074SKS						
9/20/2023	290 Pounds		132	D008 D018	KYD053348108	008894075SKS	3,955	lbs	3,439	lbs	LQG	
8/16/2023	85 Pounds		39	D001 F003	OHD000816629	008912644SKS						
8/16/2023	3,742 Pounds		1,697	D004 D005 D008 D011	OHD000816629	008912644SKS						
8/16/2023	75 Pounds		34	D005 D006 D008	OHD000816629	008912644SKS	3,902	lbs	4,242	lbs	LQG	
7/19/2023	2,190 Pounds		993	D004 D005 D008 D011	OHD000816629	008912603SKS						
7/19/2023	250 Pounds		113	D005 D006 D008	OHD000816629	008912603SKS	2,440	lbs	2,652	lbs	LQG	
6/21/2023	95 Pounds		43	D001 F003	OHD000816629	008893752SKS						
6/21/2023	4,605 Pounds		2,089	D004 D005 D008 D011	OHD000816629	008893752SKS						
6/21/2023	120 Pounds		54	D005 D006 D008	OHD000816629	008893752SKS	4,820	lbs	4,232	lbs	LQG	
5/17/2023	2,685 Pounds		1,218	D004 D005 D008 D011	OHD000816629	008594394SKS						
5/17/2023	60 Pounds		27	D005 D006 D008	OHD000816629	008594394SKS						
5/17/2023	50 Pounds		23	D008	OHD000816629	008594394SKS						
5/17/2023	255 Pounds		116	D008 D018	KYD053348108	008594395SKS	3,050	lbs	3,316	lbs	LQG	
4/19/2023	3,425 Pounds		1,554	D004 D005 D008 D011	OHD000816629	008594346SKS						
4/19/2023	75 Pounds		34	D005 D006 D008	OHD000816629	008594346SKS	3,500	lbs	3,044	lbs	LQG	
3/15/2023	15 Pounds		7	D001 F002	ARD069748192	008594480SKS						
3/15/2023	3,330 Pounds		1,510	D004 D005 D008 D011	OHD000816629	008594479SKS						
3/15/2023	185 Pounds		84	D005 D006 D008	OHD000816629	008594479SKS	3,530	lbs	3,837	lbs	LQG	
2/15/2023	220 Pounds		100	D001 D004 D005 D008 D011 F003 F005	ARD069748192	008594449SKS						
2/15/2023	3,160 Pounds		1,433	D004 D005 D008 D011	OHD000816629	008594448SKS						
2/15/2023	105 Pounds		48	D005 D006 D008	OHD000816629	008594448SKS						
2/15/2023	30 Pounds		14	D008	ARD069748192	008594449SKS	3,515	lbs	3,821	lbs	LQG	
1/18/2023	2,550 Pounds		1,157	D004 D005 D008 D011	OHD000816629	008284363SKS						
1/18/2023	420 Pounds		191	D008 D018	KYD053348108	008284364SKS	2,970	lbs	10,044	lbs	LQG	
1/9/2023	1,000 Pounds		454	D004 D005 D007 D008	PAD067098822	016455062FLE	1,000	lbs	1,602	lbs	LQG	
12/21/2022	90 Pounds		41	D001 F003	ARD069748192	008284311SKS						

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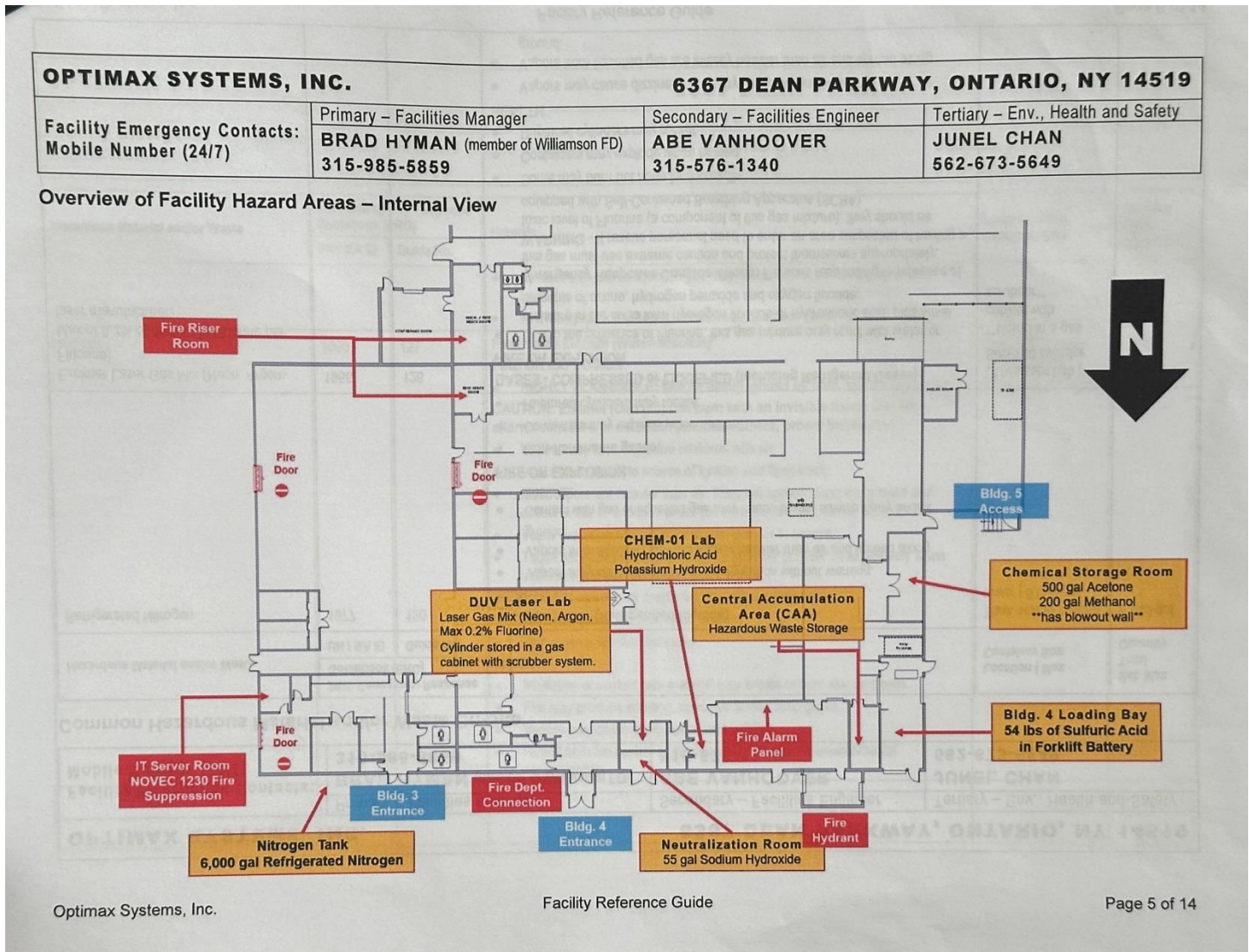
2024	HAZARDOUS WASTE INSPECTION CHECKLIST											
	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC
	Date	Inspector Name		Inspector Signature		Comments						
Week 1	1/5/24	Janel Chan										
Week 2	1/12/24	Janel Chan										
Week 3	1/18/24	Janel Chan				- wastes shipped on 1/17/24 1 barrel on dated 5/24						
Week 4	1/23/24	Janel Chan										
Week 5	N/A											
Review the list below and place a check (✓) mark in the appropriate box.				WK 1	WK 2	WK 3	WK 4	WK 5				
No signs of spills/leaks				✓	✓	✓	✓					
Containers in good condition (no rust/cracks/damage)				✓	✓	✓	✓					
Containers except those in use are closed				✓	✓	✓	✓					
Handled/stored to prevent rupture/leakage				✓	✓	✓	✓					
Waste compatible with container				✓	✓	✓	✓					
Containers legibly labeled with words "Hazardous Waste" and description of contents				✓	✓	✓	✓					
Accumulation start date clearly marked				✓	✓	see corrupts	✓					
All containers stored for less than 90 days				✓	✓	✓	✓					
Adequate aisle space maintained				✓	✓	✓	✓					
Incompatible wastes separated				✓	✓	✓	✓					
Fire extinguisher in area, with up-to-date inspections				✓	✓	✓	✓					
Emergency communication method accessible and working				✓	✓	✓	✓					
<u>Generally:</u> Corrosives should be segregated from flammables. Many corrosives are water-reactive.				<u>Examples of incompatible wastes:</u> Acids + Oil/Grease = Fire Acids + Caustics = Heat/spattering				Caustics + Epoxies = Extreme HEAT Flammable Liquids + Hydrogen Peroxide = Fire/explosion				

- Additional records requested during inspection:
 - Recent waste manifests and associated LDR's for the past year (received copies during inspection)
 - Sample HW Inspection Log (see above)(received by email)
 - HW Contingency Plan (copy received during inspection – source of above facility map)
 - HW Personnel Training Records and Job Descriptions
 - Details on NYSP2I & Optimax Research Project
 - Other requests detailed in Post-Inspection Emails (Appendix 1)

SECTION II – OBSERVATIONS

The accompanying *OPTIMAX SYSTEMS, INC Inspection Photo Album-June 2024.pptx* document is the complete set of inspection observations made during the facility walkthrough with Ms Chan.

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SECTION III – AREAS OF CONCERN

Concerns (see *OPTIMAX SYSTEMS, INC Inspection Photo Album-June 2024.pptx* for additional details)

- Facility did not meet the 6 CRR-NY 372.2 Standards applicable to generators of hazardous waste, including:
 - Hazardous waste determination - 372.2(a)(2)
 - Determination had not yet been made for waste sludge/paste observed in a centrifuge basket (Slide 7) and expired chemicals (Slide 60).
 - Accumulation Area Requirements - 372.2(a)(8)(i)
 - 90 Day Storage - 372.2(a)(8)(ii) and 373-3.9(b)
 - All wastes in containers and tanks are shipped off-site to an authorized treatment, storage or disposal facility (TSDF) in 90 days or less - 372.2(a)(8)(ii).
 - See Slide 31, for example

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- The date upon which each period of accumulation begins is clearly marked and visible for inspection on each container and tank - 372.2(a)(8)(ii), 373-1.1(d)(1)(iii)(c)(2), 373-1.1(d)(1)(iv)(d).
 - Numerous hazardous waste drums lacked accumulation start dates.
- All containers except those in use are closed - 373-3.9(d)(1).
 - See Slide 26, for example
- Containers are marked with the words "Hazardous Waste" and with other words that identify the contents of the containers - 373-3.9(d)(3).
 - The clarity of certain of the hazardous waste labels was lacking
- Personnel Training - 373-3.2(g)
 - a written job description for each position - 373-3.2(g)(4)(ii);
 - a written description of the type and amount of both introductory and continuing training that will be given to each person related to hazardous waste management -
 - 373-3.2(g)(4)(iii); and
 - records that document that the training or job experience required has been given to and completed by facility personnel - 373-3.2(g)(4)(iv). Also
 - Facility personnel have taken part in an annual review of the initial training required - 373-3.2(g)(3).
 - The requirements of this section were not fully met.
- Preparedness and Prevention - 373-3.3
 - Facility communications or alarm systems, fire protection equipment, and spill control equipment are tested and maintained as necessary to assure their proper operation in time of emergency - 373-3.3(d).
 - As discussed, fire extinguisher inspections lacked consistency.
- Contingency Plan - 373-3.4
 - Names, addresses and office and home phone numbers of all persons qualified to act as emergency coordinator; 373-3.4(c)(4).
 - Plan lacked addresses and office phone numbers.
- Regarding the experimental tank and treatment system, the facility did not meet the
 - Assessment of Tank Systems or Components Installed after 7/14/86 - 373-3.10(c),
 - Secondary Containment Requirements - 373-3.10(d),
 - Annual Leak Test or Tank Integrity Examination - 373-3.10(d)(9),
 - General Operating Requirements - 373-3.10(e),
 - Inspections: - 373-3.10(f), or
 - Air Emission Standards requirements.

Closing Conference

Ms Chan and I reviewed my findings and we discussed any follow up. Ms Chan said that she would email me the requested documents shortly and would immediately begin work on the concerns we discussed (see Appendices). We agreed that we would correspond by email regarding any additional issues.

INSPECTION PHOTOGRAPHS: See *OPTIMAX SYSTEMS, INC Inspection Photo Album-June 2024.pptx*

FOLLOW UP EMAILS: See Appendix 1

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PROVIDED RECORDS: See Attachments

APPENDICES

- **Appendix 1: Facility Emails re Requested Documents**

ATTACHMENTS:

- **Attachment 1: *OPTIMAX SYSTEMS, INC Inspection Photo Album-June 2024.pptx***
- **Attachment 2: *RCRA Contingency Plan***
- **Attachment 2: *TRI Report***
- **Attachment 3: *Facility Manifests as Provided to EPA***
- **Attachment 4: *Personnel Training Records 2023, 2024***
- **Attachment 5: *HW Trained Personnel: Names, Job Titles, Job Descriptions***
- **Attachment 6: *NYSP2I & Optimax Research Project***

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Appendix 1: Follow Up Email Chain

From: Junel Chan <JChan@optimaxsi.com>
Sent: Monday, June 10, 2024 1:01 PM
To: Plossl, Carl <Plossl.Carl@epa.gov>
Cc: Brad Hyman <BHyman@optimaxsi.com>
Subject: Optimax Systems Inc. - NYR000112953- 06.06.24 Inspection
Importance: High

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

Hi Carl,

I hope you had a safe trip back to Brooklyn and had a relaxing weekend! It was a pleasure meeting you last week. Attached are the documents you requested and below are corrective actions I've noted for us to cover.

I will look into the regulations, but if you have any guidance regarding the labeling of containers for used acetone prior to being placed into the solvent distillation unit – should it be labeled with “hazardous waste”?

Thank you for your time and feedback during the inspection last week. It's greatly appreciated and will aid us in improving our procedures. Please let me know if you require additional information or have questions/suggestions.

1. Documentation Requested

- a. Contingency Plan
 - i. See attachment “Facility Contingency Reference Guide”
- b. Maintenance Personnel Names, copy of job description, and training records
 - i. See attachment “Maintenance Personnel and Training.zip”
 - ii. Corrective Action: Schedule site specific in-house training to maintenance personnel moving containers from satellite accumulation areas to 90-day storage. Schedule annual refresher.
 1. Timeline: To be conducted the week of June 10th, but no later than June 28th
- c. Year-to-Date Weekly Inspection Record of Central Accumulation Area (CAA - 90-day storage)
 - i. See attachment “2024 YTD – CAA HazWaste Inspection Checklist”
 - ii. Corrective Action: Weekly inspection will be alternated between Junel Chan and Chris Masi on a monthly basis to ensure there is a fresh set of eyes.
 1. Timeline: Alternate will start July 2024
 - iii. Corrective Action: Monthly inventory of containers in 90-day storage
 1. Timeline: Week of June 10th
 - iv. Corrective Action: On a quarterly basis, another employee who's role is not related to hazardous waste will accompany inspections to provide another set of eyes.
 1. Timeline: Starting July 2024
- d. NYS Pollution Prevention Institute Project Report
 - i. See attachment “NYS2PI Supports Optimax with Reducing Costs and Hazards”
 - ii. Let me know if you'd like the report for the partnership study we did with NYS Pollution Prevention in regards to antifouling coatings on membranes

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- iii. Corrective Action: Will purchase a covered tank and determine feasibility of recirculation without intermediary tank/container that's currently open
 - 1. Timeline: By end of July 2024
- e. Safety Data Sheet for UltraCool Coolant – from observed coolant change waste stored in 55-gal stored outside of CAA
 - i. See attachment “LaPelSolutions UltraCool Coolant SDS”
 - ii. Corrective Action: Move (2) 55-gal coolant waste barrels into CAA. Spoke with Maintenance Team Leader. This will be covered during training with the maintenance team.
 - 1. Status: Completed
- f. Full TCLP result for waste sludge/paste observed in a centrifuge basket - PENDING
 - i. Will provide once this analysis is complete
 - ii. Request from inspection: Provide full TCLP analysis report from a representative sample of the waste sludge/paste contained in centrifuge baskets.
 - iii. Corrective Action: Representative sampling to be conducted. Sample will be taken from area observed during inspection.
 - 1. Timeline: Will have sampling done as soon as possible with environmental lab. Report will be sent as soon as possible.

2. Verbal Notice During Closing Conference

- a. Two barrels noted to be over 90 days
 - i. Corrective Action: Remove wastes stored over 90-days
 - 1. Timeline: By end of June 2024
 - ii. Corrective Action: Implementation of monthly inventory of 90-day storage
 - 1. Timeline: Will start Week of June 17th
- b. Movement of container from SAA to CAA
 - i. Corrective Action: Quantity of waste in barrel will be checked during weekly SAA inspections. If close to full, the barrel will be swapped out for the area during that time.
 - 1. Timeline: To be implemented during SAA inspection the week of June 10, 2024
- c. Labeling on containers in SAA
 - i. Corrective Action: Modify labels used in satellite accumulation areas to indicate waste constituents and/or hazards and make written accumulation dates more legible
 - 1. Timeline: By end of June 2024

3. Other Actions

- a. Fire extinguisher inspections
 - i. Corrective Action: Monthly inspections has been transferred to a different employee. Inspections were conducted on 06-07-24.
 - 1. Timeline: Completed
- b. Aerosol puncture barrel in chemical storage room
 - i. Corrective Action: Implement easy visual of when filter was last changed
 - 1. Timeline: By Week of July 1st

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- c. Solvent (acetone) container for collected used acetone
 - i. Corrective Action: Purchase and implement funnel system with closed top for use when collecting used acetone
 - 1. Timeline: By Week of June 24th

Junel Chan

Env., Health and Safety Specialist

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