

RCRA Inspection Report

1) Inspector and Author of Report

William Kappler
Physical Scientist
Enforcement and Compliance Assurance Division
Environmental Protection Agency, Region 4, AFC - 10th Floor
61 Forsyth Street
Atlanta, Georgia 30303
(404) 562-8498

2) Facility Information

Jackson Plating Company
228 West Lorenz Boulevard
Jackson, Mississippi 39213
Hinds County

EPA ID No.: MSD008181562

3) Responsible Officials

Mr. Walter Lydick
President
Jackson Plating Company
228 West Lorenz Boulevard
Jackson, Mississippi 39213
wlydick@mindspring.com
(601) 362-4623

Mr. Vince Barr IV
General Manager
Jackson Plating Company
228 West Lorenz Boulevard
Jackson, Mississippi 39213
vince.barr@jacksonplating.com
(601) 362-4623

4) Inspection Participants

Walter Lydick, Jackson Plating Company
Vince Barr IV, Jackson Plating Company
John Foster, Jackson Plating Company
Mike Dixon, Jackson Plating Company
Johnathan Slawson, Jackson Plating Company
Leigh Tanner, Mississippi Department of Environmental Quality

5) **Date and Time of Inspection**

October 21, 2021, at 9:00 a.m.

6) **Applicable Regulations**

Mississippi Code of 1972, Miss. Code Ann. § 17-17-1 *et seq.* [Resource Conservation and Recovery Act (RCRA) Sections 3002, 3004, 3005, 3007 and 3008, (42 U.S.C. §§ 6922, 6924, 6925, 6927 and 6928)] and the Mississippi Department of Environmental Quality, Office of Pollution Control, Mississippi Hazardous Waste Management Regulations (MHWMR), 11 Miss. Admin. Code Pt. 3, R. 1.1-1.24, which adopts and incorporates by reference 40 C.F.R. Parts 260-270, 273, and 279 [40 Code of Federal Regulations (C.F.R.) Parts 260-270, 273, and 279].

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 11 Miss. Admin. Code Pt. 3, R. 1.3 [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 Mississippi Code of 1972, Miss. Code Ann. § 17-17-27(4) [Section 3005 of RCRA, 42 U.S.C. § 6925], and without complying with 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.16(b) or §262.17(a)], except as required in 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.15(a)(7) and (8)], provided that the generator complies with the satellite accumulation area conditions listed in 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.15(a) (hereinafter referred to as the "SAA Permit Exemption").

Pursuant to 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.17], a large quantity generator (LQG) may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status, as required by Section 17-17-27 of the Mississippi Code of 1972, Miss. Code Ann. § 17-17-27 [Section 3005 of RCRA, 42 U.S.C. § 6925], provided that the generator complies with the conditions listed in 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.17] (hereinafter referred to as the "LQG Permit Exemption").

7) **Purpose of Inspection**

On October 20, 2021, the Mississippi Department of Environmental Quality (MDEQ) contacted Jackson Plating Company, informing them the Environmental Protection Agency, Region 4 and MDEQ will be conducting a RCRA compliance evaluation inspection (CEI) on October 21, 2021, at 9:00 a.m.

On October 21, 2021, EPA inspector William Kappler accompanied by MDEQ inspector Leigh Tanner conducted an announced CEI at Jackson Plating Company (hereinafter, "JPC" or the "facility") to determine the compliance status of the facility with the RCRA and the State of

Mississippi regulations. This was an EPA-lead inspection. Inspectors arrived at JPC at approximately 9:00 a.m. and JPC staff immediately received the inspectors. The inspectors were escorted to a meeting room for an opening conference. The inspectors introduced themselves, showed credentials, exchanged business cards, explained the purpose of the visit, the notification procedures due to the Covid-19, the EPA health and safety procedures, the general areas for inspection and the RCRA records needed for review. JPC discussed health and safety procedures, the required personal protective equipment, an overview of the facility's current process operations and the RCRA records.

The EPA inspector described the anticipated use of a digital camera during the inspection and the facility's ability, pursuant to 40 C.F.R. §2.203, to assert a business confidentiality claim for information submitted to the EPA. The facility did not assert a business confidentiality claim. JPC does not appear to meet the Small Business Regulatory Enforcement Fairness Act's classification of a "small business," which is generally set by the Small Business Administration using the business' SIC/NAICS code and annual receipts or number of employees. Health and safety protocols and required personal protective equipment were discussed.

Mr. Barr of JPC led the inspectors on a tour of facility's operations.

8) Facility Description

JPC is located at 228 West Lorenz Boulevard, Jackson, Hinds County, Mississippi. The facility has been at this location since 1961 and consists of approximately 2 acres of property. JPC owns the property. The facility employs 21 people and operates Monday through Friday from 7:30 a.m. to 5:00 p.m. The manufacturing operation is conducted in one building consisting of 25,000 square feet of space. Potable water and domestic waste services is provided by the City of Jackson. The primary NAICS code for the facility is 332813, electroplating, plating, polishing, anodizing, and coloring.

JPC's most recent notification of its regulated waste activity to MDEQ was on March 11, 2021, notifying as a large quantity generator (LQG) and small quantity handler of universal waste (SQHUW).

9) General Process Description

JPC specializes in electroplating steel, stainless steel and anodizing aluminum metal parts used in the military and commercial aircraft manufacturing industry. The facility can also plate steel with copper, nickel, bronze, chromium, zinc, tin, silver, or cadmium. The metals are deposited onto the surface of the metal part to evade corrosion and paint erosion. The main aircraft component the facility processes is for hydraulic pumps used in the Air Bus. The electroplating operation is primarily conducted on steel and stainless steel and the anodized operation is conducted on aluminum.

Electroplating operations consist of first cleaning the metal in a sodium hydroxide solution tank followed by rinsing with water. The metal is then processed in an electro-alkaline cleaner (charged with an electrical current) and rinsed, then processed in a hydrochloric acid tank to neutralize the electro-alkaline cleaner and rinsed, then processed in a plating tank to deposit the

specific metal (zinc, copper, tin, silver, cadmium, nickel, bronze) and rinsed, then processed in a hexavalent chrome or trivalent chrome tank and rinsed and then drying the deposited metal in hot water. Depending on the customer specification the metal part can also be processed in a dichromate solution and in a nickel acetate tank.

Anodizing operations consist of first converting the aluminum metal surface to aluminum oxide. The metal is then cleaned in tanks using several chemical solutions similar to the electroplating cleaning process to remove oil and grease with separate rinse stages. The metal is then processed in a deoxidation bath and rinsed, then processed in a ten percent solution of sulfuric acid and rinsed, then the metal is neutralized in a sodium carbonate bath and rinsed, then sealed in nickel acetate and rinsed, then depending on the customer specification, processed in a black dye tank, and rinsed.

Wastewater generated from the rinse stages is treated in a wastewater treatment facility using a precipitation, oxidation, and reduction process. Also, waste alkaline cleaners and waste acids are discharged to a separate 1,500-gallon tank for batch treatment in the wastewater treatment facility. The wastewater is adjusted for pH, coagulated, clarified, and filtered. The filtered solids generated from the treatment operation are determined by JPC as hazardous waste for the toxicity characteristic of chromium and determined as an F006 listed hazardous waste.

The facility has a pretreatment permit No. MSP090072, issued by MDEQ on August 7, 2015. The permit expired on July 31, 2020.

10) Previous Inspection History

JPC was last inspected by the MDEQ on August 18, 2017. No apparent hazardous waste violations were observed during the inspection.

JPC was last inspected by the EPA on December 14, 1995. The facility was cited for container requirements, RCRA manifest, training, and contingency plan requirements.

11) Findings

The information in this RCRA inspection report is based on the EPA's October 21, 2021, RCRA CEI.

Receiving and Shipping Area

The facility stores raw chemical products in this area. Products are received for processing and shipped out.

Plating Room

The electroplating lines were constructed in 1994. Line one operates as a rack and barrel plating line consisting of 23 chemical and rinse tanks, each at approximately 400-gallons. Line two was decommissioned in 2014 and Mr. Barr indicated the line is no longer used.

Anodizing Room

The anodizing line was constructed in 2007. The line operates as a manual rack anodizing line consisting of 21 chemical and rinse tanks, each at approximately 900-gallons.

The inspectors observed two 20-gallon part washers containing methyl ethyl ketone (MEK) in this area next to the wall. The MEK is used to clean the aluminium part. Inspectors observed four 55-gallon containers next to the anodizing line accumulating waste MEK generated from the part washers. Mr. Mike Dixon who works in this area indicated that each 55-gallon container was accumulating a different amount of waste MEK. The inspectors observed waste MEK was not being added or removed from the containers and the containers were not kept closed. The inspectors also observed the containers were not labeled or marked with the words hazardous waste and the containers were not labeled or marked with a date. The containers were labeled with a hazard indicator (Photographs 1 through 7). The inspectors ask Mr. Barr and Mr. Johnathan Slawson to determine the amount of waste MEK in each 55-gallon container and would return after inspecting the other areas of the facility.

The inspectors return to this area and Mr. Johnathan Slawson who works in the maintenance department indicated that three 55-gallon containers were accumulating waste MEK at the time of the inspection. The facility consolidated the waste MEK from three 55-gallon containers into two 55-gallon containers (one was full the other was three-quarters full). The containers were transferred to the Tool Room's 90-Day Accumulation Area.

Pursuant to 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.15(a)(4)], which is a condition of the SAA Permit Exemption, a generator is required to keep containers of hazardous waste closed at all times during accumulation, except when adding, removing, or consolidating waste; or when temporary venting of a container is necessary for the proper operation of equipment, or to prevent dangerous situations, such as build-up of extreme pressure.

Pursuant to 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.15(a)(5)(i)], which is a condition of the SAA Permit Exemption, a generator is required to mark or label its containers with the words "Hazardous Waste".

Pursuant to 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.15(a)(6)], which is a condition of the SAA Permit Exemption, a generator who accumulates either acute hazardous waste listed in § 261.31 or § 261.33(e) of this chapter or non-acute hazardous waste in excess of the amounts listed in 40 C.F.R. § 262.15(a) of this section at or near any point of generation must do the following:

Pursuant to 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.15(a)(6)(iii)], which is a condition of the SAA Permit Exemption, during the three-consecutive-calendar-day period the generator must continue to comply with 40 C.F.R. § 262.15(a)(1) through (5) of this section. The generator must mark or label the container(s) holding the excess accumulation of hazardous waste with the date the excess amount began accumulating.

Chemistry Laboratory

John Foster is the laboratory chemist. General wet chemistry is conducted on samples obtained from the plating and anodizing line to determine the chemical's concentration. Mr. Foster

indicated the samples and any laboratory waste generated is manually taken to the wastewater treatment facility for treatment.

Wastewater Treatment Facility

The wastewater treatment facility (WWTF) operates continuously treating wastewater generated from the electroplating and anodizing rinse operations. The wastewater from the process is discharged through a pipeline to a 2,300-gallon surge tank for level control. The wastewater is then treated in a 900-gallon tank to reduce hexavalent chrome to trivalent chrome in an oxidation/reduction tank. The wastewater is then pH adjusted in a 900-gallon tank using calcium chloride and flocculant is added. The wastewater is then pH adjusted in a 900-gallon tank using sodium hydroxide and the addition of polymer to promote precipitation. The wastewater is then treated in a clarifier to remove the solids from the wastewater and sampled in a collection tank to determine if it can be discharged to the sanitary sewer. Also, waste alkaline cleaners and waste acids are discharged to a separate 1,500-gallon tank for batch treatment in the wastewater treatment facility. The treated wastewater from the 1,500-gallon tank is combined with the treated wastewater in the sample collection tank.

The settled solids from the batch and continuous treatment process are pumped to a sludge thickener tank and then dewatered in a plate and frame press. The filter cake is accumulated in a 134-gallon portable metal collection hopper positioned under the plate and frame press. The waste filter cake is then transferred to a one-cubic yard container through a hopper, which is attached above the one-cubic yard container. Effluent from the sludge thickener and press are pumped back to the headworks.

Tool Room

The WWTF's plate and frame press and the 90-Day or Less Accumulation Area are in the Tool Room.

The plate and frame press generates hazardous waste filter cake from the WWTF. Inspectors observed a 134-gallon portable metal collection hopper positioned under the plate and frame press. Hazardous waste filter cake is initially accumulated in the hopper and transferred to a one-cubic yard container in the 90-Day or Less Accumulation Area. The inspectors observed the hopper was empty (Photograph 10).

90-Day or Less Accumulation Area

The 90-Day or Less Accumulation Area (90-Day Area) is in the Tool Room. The inspectors observed a one cubic yard container on a pallet accumulating hazardous waste filter cake (D006, F006). The inspectors observed the container was connected to a chute and position under an open hopper. The inspectors observed the container was in good condition, labeled with the words hazardous waste, labeled with a hazard indicator, marked with the word "toxic", and marked with the date October 6, 2021 (Photographs 8, 9, and 11).

Pursuant to 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.17(a)(1)(iv)(A)], which is a condition of the LQG Permit Exemption, a container holding hazardous waste must always be closed during accumulation, except when it is necessary to add or remove waste.

The inspectors observed the two 55-gallon containers accumulating waste MEK were transferred from the Anodizing Room to the 90-Day Area. The containers were closed, in good condition, labeled with the words hazardous waste, labeled with a hazard indicator, and marked with the date October 21, 2021 (Photographs 12, 13, and 14).

12) **Waste Management Practices**

Based on the most recent notification of its regulated waste activity JPC generates D002, D003, D006, D011, F006, F007, F008, and F009 hazardous waste. The facility generates hazardous waste filter cake from the WWTF (D006, F006), waste cyanide-spent plating solution, waste corrosive potassium hydroxide liquid, waste chromium trioxide, and waste corrosive copper and cadmium liquid. The facility generates universal waste lamps and batteries.

The facility manages hazardous waste in SAA containers located in the Anodizing Room and in a one-cubic yard container in the Tool Room. Full containers are transferred to the 90-Day Area, and the facility prepares the hazardous waste for packaging and on-site management, prior to shipping the hazardous waste using the manifest system to a treatment, storage, or disposal facility (TSDF).

JPC used the following transporters in 2018 through 2021.

Clean Harbors Environmental Services, LLC – MAD039322250

Robbie D. Wood, Inc – ALD067138891

JPC used the following TSDF in 2018 through 2021.

Clean Harbors LaPorte – TXD982290140

Clean Harbors Deer Park, LLC – TXD055141378

Clean Harbors El Dorado, LLC – ARD069748192

Clean Harbors Reidsville, LLC – NCD000648451

13) **Record Review**

Hazardous Waste Manifest Records

The inspectors reviewed hazardous waste manifests and land disposal restrictions records from 2018 to 2021.

There were no hazardous waste manifests available for review in EPA's E-Manifest Record System.

Contingency Plan

The inspectors reviewed the contingency plan (Plan). The Plan was revised on October 31, 2018. The inspectors observed the facility had not developed a quick reference guide (QRG) since the last revision to the Plan.

The inspectors explained that the Plan should include a QRG. Inspectors explained that as an existing LQG a QRG should be included when they otherwise update and submit their contingency plan.

Quick Reference Guide

The inspectors observed the facility did not develop a quick reference guide. The contingency plan was revised on October 31, 2018.

Pursuant to 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.17(a)(6)], which incorporates 11 Miss. Admin. Code Pt. 3, R. 1.3 [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 elements outlined in 40 C.F.R. § 262.262(b)(1-8).

Arrangements with Local Authorities

The inspectors requested to review the records on the arrangements with the local authorities. The inspectors observed it appeared the arrangement with the local authorities, with State and local emergency response teams and as appropriate, the Local Emergency Planning Committee were not made.

Pursuant to 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.17(a)(6)], which incorporates 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.256(a)], and is a condition of the LQG Permit Exemption, the large quantity generator must submit a copy of the contingency plan and all revisions to all local emergency responders (i.e., police departments, fire departments, hospitals, and state and local emergency response teams that may be called upon to provide emergency services). This document may also be submitted to the Local Emergency Planning Committee, as appropriate.

Weekly Container Inspection Records

The inspectors reviewed weekly container inspection records for 2017, 2019, 2020 and 2021. The inspectors observed the container inspections records for 2018, were not available for the record review.

Pursuant to 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.17(a)(1)(v)], and is a condition of the LQG Permit Exemption, a generator is required to, at least weekly, inspect central accumulation areas looking for leaking containers and for deterioration of containers caused by corrosion or other factors.

Personnel Training

The inspectors reviewed the hazardous waste training and training records. The inspectors reviewed the training given by Mr. Ronnie Fulcher of Hazcats, Inc., to Vince Barr, Mike Foster, John Foster, Johnathon Slawson, and Rick Dyse on Hazardous Communication and DOT Hazardous Material Transportation. This training was given in June 2020. The inspectors reviewed the training presentation and observed most of the training was on hazardous materials. The inspectors observed some training slides consisted of the hazardous waste definition, the hazardous waste characteristics, general marking, labeling and placarding standards, hazard indicators on packaging, emergency response and responding to spills, using spill kits, transferring hazardous waste to storage areas, and the management of containers. The inspectors

observed at the time of the inspection that training records were not available for 2018 and 2019 and personnel training had not been given in 2021. The inspectors observed the job titles and position descriptions had not been developed.

Pursuant to 11 Miss. Admin. Code Pt. 3, R. 1.3 [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.

Pursuant to 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.17(a)(7)(iv)(A)(B)], which is a condition of the LQG Permit Exemption, the large quantity generator must maintain the following documents and records at the facility: 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, and a written description of the type and amount of both introductory and continuing training that will be given to each person filling a position listed under paragraph (a)(7)(iv)(A) of this section.

On November 1, 2021, EPA received an email from the facility with the training certificates for Vince Barr, Mike Foster, John Foster, Peyton Wisner, and Rick Dyse showing they were given RCRA Solid, Hazardous, and Universal Waste Training by ENSAFE on October 28, 2021.

Annual Report

The facility submitted an annual report to the MDEQ on March 11, 2021.

Waste Minimization Plan

The inspectors observed a waste minimization plan was not available at the time of this inspection.

Land Disposal Restriction Notice

The land disposal restriction documents were reviewed.

14) Closing Conference

Upon conclusion of the inspection, a closing conference was conducted in the presence of Jackson Plating Company representatives. The inspectors informed the facility of their preliminary conclusions at the time of the inspection.

15) Sampling Overview

Sampling was not conducted at this facility.

16) Conclusion/Summary of Violations

Based on the CEI conducted on October 21, 2021, Jackson Plating company, was inspected as a large quantity generator of hazardous waste and a small quantity handler of universal waste.

17) **Signed**

William Kappler
Physical Scientist
RCRA Enforcement Section

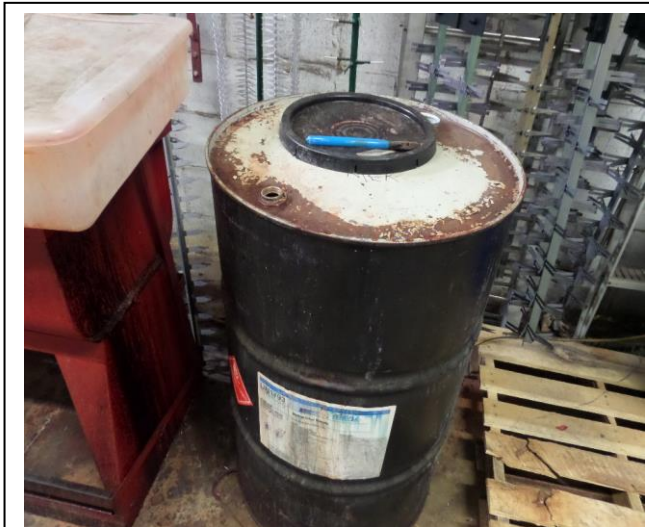
Date

18) **Concurrence**

for Araceli B. Chavez
Chief
RCRA Enforcement Section

Date

Jackson Plating Company
MSD008181562
October 21, 2021
RCRA CEI Photographs
Photographs by William Kappler
Camera Model: Samsung WB250F
Property Tag #: S75917



Jackson Plating Company (JPC). Anodizing Room. Inspectors observed a 55-gallon container next to a part washer accumulating waste MEK. The container was not closed and not labeled/marked with the words hazardous waste. Photograph 1 taken at 11:02 a.m.



JPC. Anodizing Room. Anodizing Room. Inspectors observed a 55-gallon container near the Anodizing Line accumulating waste MEK. The container was not closed and not labeled/marked with the words hazardous waste. Photograph 2 taken at 11:02 a.m.



JPC. Anodizing Room. One 55-gallon container, near the Anodizing Line accumulating waste MEK, was not closed and not marked with the words hazardous waste. Photograph 3 taken at 11:02 a.m.



JPC. Anodizing Room. Inspectors observed four 55-gallon containers near the Anodizing Line. One 55-gallon container appeared to be accumulating waste MEK. The container was not closed and not labeled/marked with the words hazardous waste. Photograph 4 taken at 11:03 a.m.



JPC. Anodizing Room. Inspectors observed four 55-gallon containers near the Anodizing Line. One 55-gallon container appeared to be accumulating waste MEK. The container was not closed and not labeled/marked with the words hazardous waste. Photograph 5 taken at 11:03



JPC. Anodizing Room. Inspectors observed four 55-gallon containers near the Anodizing Line. One 55-gallon container appeared to be accumulating waste MEK. The container was not closed and not labeled/marked with the words hazardous waste. Photograph 6 taken at 11:03 a.m.



JPC. Anodizing Room. Inspectors observed four 55-gallon containers near the Anodizing Line. One 55-gallon container appeared to be accumulating waste MEK. The container was not closed and not labeled/marked with the words hazardous waste. Photograph 7 taken at 11:03 a.m.



JPC. Tool Room 90-Day Area. Inspectors observed a one-cubic yard container accumulating of F006 filter cake. The hopper above the container was not closed. Photograph 8 taken at 11:18 a.m.



JPC. Tool Room 90-Day Area. Inspectors observed a one-cubic yard container accumulating of F006 filter cake. The hopper above the container was not closed. The facility closed the top of the hopper. Photograph 9 taken at 11:23 a.m.



JPC. Tool Room 90-Day Area. Inspectors observed a one-cubic yard container accumulating of F006 filter cake. The hopper above the container was not closed. Photograph 10 taken at 11:23 a.m.



JPC. Tool Room 90-Day Area. Inspectors observed a 134-gallon portable metal collection hopper positioned under the plate and frame press. The hopper was empty. Photograph 11 taken at 11:23 a.m.



JPC. Tool Room 90-Day Area. Inspectors observed the containers of waste MEK were closed, in good condition, labeled with the words hazardous waste, labeled with a hazard indicator and marked with the date October 21, 2021. Photograph 12 taken at 12:58 p.m.



JPC. Tool Room 90-Day Area. Inspectors observed the containers of waste MEK were closed, in good condition, labeled with the words hazardous waste, labeled with a hazard indicator and marked with the date October 21, 2021. Photograph 13 taken at 12:58 p.m.



JPC. Tool Room 90-Day Area. Inspectors observed the containers of waste MEK were closed, in good condition, labeled with the words hazardous waste, labeled with a hazard indicator and marked with the date October 21, 2021. Photograph 14 taken at 12:58 p.m.