

RCRA Inspection Report

1) Inspector and Author of Report

Kayla Acosta, Physical Scientist
RCRA Enforcement Section
Chemical Safety and Land Enforcement Branch
Enforcement and Compliance Assurance Division
U.S. Environmental Protection Agency, Region 4
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2) Facility Information

Techno Coatings, Inc.
1865 N.E. 144th St.
North Miami Beach, Florida 33181
EPA ID No: FLD982173874

3) Responsible Officials

Francisco (Frank) Rojas, Technical Manager
Frank.Rojas@technoaerospace.com

4) Inspection Participants

Kayla Acosta, US Environmental Protection Agency, Region 4
Alannah Irwin, FL Department of Environmental Protection (FDEP)
Patrick Scott, FDEP
Frank Rojas, Techno Coatings, Inc.

5) Date of Inspection

January 27, 2022

6) Applicable Regulations

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

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

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

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

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

7) **Purpose of Inspection**

The purpose of this inspection was to conduct a compliance evaluation inspection to determine Techno Coatings, Inc.'s (hereinafter referenced as "TCI" or "the facility") compliance with the applicable requirements of RCRA and the corresponding FDEP regulations.

8) **Previous Inspection History**

The last RCRA CEI was conducted as a joint inspection by FDEP and the EPA on February 10, 2017, which resulted in 12 violations identified. The facility returned to compliance with an enforcement action. The following 12 violations were identified:

- 40 CFR 265.D - Interim Status Standards for Owners and Operators of HW TSDs: Contingency Plan and Emergency Procedures: 40 CFR 265.53(b) Submitted to local police, fire department, hospitals, etc.
- 40 CFR 265.D - Interim Status Standards for Owners and Operators of HW TSDs: Contingency Plan and Emergency Procedures: 40 CFR 265.52(e) List of emergency equipment at facility.
- 40 CFR 265.D - Interim Status Standards for Owners and Operators of HW TSDs: Contingency Plan and Emergency Procedures: 40 CFR 265.52(a) Describes actions to take in compliance with 265.51 and 265.56.
- 40 CFR 262.A - Standards Applicable to Generators of HW: General: 40 CFR 262.11 Generators must determine if their solid waste is a hazardous waste.
- 40 CFR 262.C - Standards Applicable to Generators of HW: Pre-Transport Requirements Applicable to Small and Large Quantity Generators: 40 CFR 262.34(a)(2) Date each period of accumulation begins is marked and visible.

- 40 CFR 265.I - Interim Status Standards for Owners and Operators of HW TSDs: Use and Management of Containers: 40 CFR 265.174 Weekly Inspections.
- 40 CFR 262.C - Standards Applicable to Generators of HW: Pre-Transport Requirements Applicable to Small and Large Quantity Generators: 40 CFR 262.34(c)(1)(ii) Accumulation of up to 55 gal. of hazardous waste or 1 qt. acutely hazardous waste at point of generation; provisions which must be complied with; procedure if quantity limit is exceeded
- 40 CFR 273.B - Standards for Universal Waste Management: Standards for Small Quantity Handlers: 40 CFR 273.13(d)(1) Lamp must be in containers that are structurally sound, adequate to prevent breakage & compatible; containers must remain closed & lack evidence of leakage, spillage or damage that could cause leakage.
- State Statutory or Regulatory requirements that are broader-in-scope than the federal RCRA requirements: 62-737.400(5)(b) F.A.C. Mercury-containers not labeled for Mercury Containing Devices.
- State Statutory or Regulatory requirements that are broader-in-scope than the federal RCRA requirements: 62-730.160(6) F.A.C. Hazardous waste—waste accumulation records.
- 40 CFR 265.I - Interim Status Standards for Owners and Operators of HW TSDs: Use and Management of Containers: 40 CFR 265.173(a) Closed container during storage.
- 40 CFR 262.C - Standards Applicable to Generators of HW: Pre-Transport Requirements Applicable to Small and Large Quantity Generators: 40 CFR 262.34(a) 90-day accumulation without a permit; specific provisions which must be met.

9) **Facility Description**

TCI has been operating at this location since 1996. The TCI property is approximately 76,200 sq. ft. of which approximately 19,557 sq. ft. is manufacturing operations. The facility has 170 employees and is connected to city water and sewer.

TCI first notified as a Large Quantity Generator (LQG) of hazardous waste on August 14, 2008. The facility submitted their most recent notification with their biennial report on March 27, 2020. Hazardous wastes identified in the report include the following EPA waste codes: D001, D002, D003, D007, F003, F005, F006, and F007. The facility also generates excluded solvent-contaminated rags and universal waste, such as spent mercury-containing lamps. TCI operates under the NAICS Code: 332813 – Electroplating, plating, polishing, anodizing, and coloring.

TCI is a FAA-certified aircraft repair station (Certificate No. 19TR441B) and custom plating operation which provides metal finishing, electroplating, polishing, stripping, and sand blasting on a variety of decorative aircraft interior parts (e.g., seat belt latches, door handles, etc.). Components are plated with gold, rose gold, silver, chrome, black chrome, nickel brass, steel, and copper. Caustic soda, nitric acid, sulfuric acid, sodium bicarbonate, and methylene chloride are used in various stripping process. The facility also operates a wastewater pre-treatment plant. Hazardous wastes generated at the facility primarily consists of chromium and plating sludge (D007, F006), plating bath residue (F008), spent sulfuric acid and spent nitric acid mixtures (D002), spent cyanide solutions (F007, D002, D003), and spent solvent mixtures from lacquer operations (D001).

Areas that were inspected include: the Receiving Area, Polishing Area, Prepping/ Racking Area, Plating Process Lines, Clear Coating, Wastewater Pre-treatment Plant, Filter Press Area, and 90-day Central Accumulation Area 1 (CAA1), Laboratory, Shipping Area, Chemical Storage and CAA2, Stripping Area, and Storage Container Building.

10) **Opening Conference**

On January 27, 2022, EPA inspector Kayla Acosta accompanied by FDEP inspectors Alannah Irwin and Patrick Scott, arrived at TCI at approximately 10:25 a.m. Mr. Frank Rojas received the inspectors. The inspectors introduced themselves, showed their credentials, and explained the purpose of the visit. The inspectors described the anticipated use of a digital camera during the inspection, and discussed the company's ability, pursuant to 40 C.F.R. §2.203, to assert a business confidentiality claim for information submitted to the EPA. The company did not assert a business confidentiality claim.

Facility representatives provided an overview of the facility's history and current operations during the opening conference. The company 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. Therefore, the EPA inspectors did not provide a copy of the agency's information sheet for small businesses, which can be found at <https://www.epa.gov/sites/production/files/2017-06/documents/smallbusinessinfo.pdf>.

The inspection participants also discussed health and safety protocols and required personal protective equipment before Mr. Rojas led the inspectors on a tour of the Facility operations.

11) **Findings**

Receiving Area

Incoming parts are received and separated into "mini companies". For example, the Yellow Company are for parts that are 90% aluminum. No hazardous waste was observed in the receiving area.

Polishing Area

Parts undergo sanding and polishing for different mini companies. White, blue, or red polishing media can be used depending on the type of part that comes in. A solvent named Thinner 62 is applied on disposable rags for cleaning surfaces. According to the Safety Data Sheet (SDS) reviewed by the inspectors, the thinner contains 40% to less than 100% n-butyl acetate, 5% to less than 10% xylenes, and 1% to less than 5% ethylbenzene.

The inspectors observed two (2) 6-gallon closed containers for excluded solvent-contaminated rags (Photo 1), closed, and labeled. The containers were not dated to demonstrate that the excluded solvent-contaminated rags were not exceeding the 180-day accumulation time limit.

**Pursuant to Fla. Admin. Code Ann. r. 62-730.030(1) [40 CFR 261.4(b)(18)(v)(B)],
Generators must maintain at their site the following documentation: (B) Documentation**

that the 180-day accumulation time limit in 40 CFR 261.4(b)(18)(ii) is being met.

UPDATE: Following the inspection on January 27, 2022, Mr. Rojas submitted photos of the containers with excluded solvent contaminated rags with accumulation start dates.

Excluded solvent-contaminated rags are consolidated into 55-gallon drums in CAA1 and CAA2 and are disposed of every 2-3 months according to Mr. Rojas. No hazardous waste was observed in this area.

Prepping Area

After sanding and polishing, parts are prepped for plating. In this area inspectors observed two (2) 6-gallon closed containers for excluded solvent-contaminated rags closed and properly labeled. The containers were not dated to demonstrate that the excluded solvent-contaminated rags were not exceeding the 180-day accumulation time limit.

Pursuant to Fla. Admin. Code Ann. r. 62-730.030(1) [40 CFR 261.4(b)(18)(v)(B)], Generators must maintain at their site the following documentation: (B) Documentation that the 180-day accumulation time limit in 40 CFR 261.4(b)(18)(ii) is being met.

UPDATE: Following the inspection on January 27, 2022, Mr. Rojas submitted photos of the containers with excluded solvent contaminated rags with accumulation start dates.

Plating Process Lines/ Racking Area

There are two plating lines, one for aluminum parts and one for non-aluminum parts. The aluminum parts line includes degreasing, treatment, activation and electroless nickel-base coating. The non-aluminum parts line includes degreasing and activation. Nickel and copper tanks are used for both the aluminum and non-aluminum lines. The final process is dipping parts in a variety of colors such as gold, rose gold, platinum, and almond gold for example. In the racking area for pure gold, the inspectors observed two (2) 6-gallon containers for excluded solvent-contaminated rags. The containers were both closed and properly labeled. The containers were not dated to demonstrate that the excluded solvent-contaminated rags were not exceeding the 180-day accumulation time limit.

Pursuant to Fla. Admin. Code Ann. r. 62-730.030(1) [40 CFR 261.4(b)(18)(v)(B)], Generators must maintain at their site the following documentation: (B) Documentation that the 180-day accumulation time limit in 40 CFR 261.4(b)(18)(ii) is being met.

UPDATE: Following the inspection on January 27, 2022, Mr. Rojas submitted photos of the containers with excluded solvent contaminated rags with accumulation start dates.

Clear Coating

Parts are clear coated in a spray booth. Clear coated parts are then cured in ovens. The inspectors observed two (2) 6-gallon containers and one (1) 18-gallon container for excluded solvent contaminated rags closed and labeled. The containers were not dated to demonstrate that the excluded solvent-contaminated rags were not exceeding the 180-day accumulation time limit.

Pursuant to Fla. Admin. Code Ann. r. 62-730.030(1) [40 CFR 261.4(b)(18)(v)(B)], Generators must maintain at their site the following documentation: (B) Documentation that the 180-day accumulation time limit in 40 CFR 261.4(b)(18)(ii) is being met.

UPDATE: Following the inspection on January 27, 2022, Mr. Rojas submitted photos of the containers with excluded solvent contaminated rags with accumulation start dates.

Wastewater Pre-treatment Plant

The wastewater pre-treatment plant consists of the following tanks:

- One (1) 500-gallon tank for chromium
- One (1) 400-gallon tank for cyanide
- One (1) 1,400-gallon tank for acid wastewater
- One (1) 1,500-gallon neutralization tank
- Two (2) 400-gallon holding tanks for cyanide and chromium respectively
- One (1) 2,500-gallon precipitation tank.

This plant (Photo #2) is used to pre-treat wastewater from the electroplating processes and is located along the east side of the plating process lines. The system is permitted by the Miami-Dade County Department of Regulatory and Economic Resources (DRER). The primary functions of the system are pH adjustment, cyanide destruction, and removal of heavy metals. Wastewater is sampled monthly. Wastewater sludge from the system is dewatered using a plate-and-frame filter press located in the back of the facility, near to the Stripping Area. No hazardous waste was observed in this area.

Filter Press Area and CAA1

The filter press and 90-day CAA is located towards the North-side of the facility. Dewatered F006 filter cake is collected beneath the filter press in an open-top metal 5'x4'x4' container (Photo #3). The metal container was closed and empty at the time of the inspection. The metal container had a hazardous waste label and a Class 9 Placard. The inspectors explained to Mr. Rojas that the Class 9 D.O.T. placard is described as "Miscellaneous" and does not indicate the hazard content of the material. We recommended to Mr. Rojas that when F006 filter cake is generated in the metal container, that a different indication of hazard be used to mark the container as described in 40 CFR 262.17(a)(5)(i)(B).

When the metal box is full, it is moved to an electrically heated sludge dryer for further dewatering (Photo #4 and #5). The dryer was identified as JWIJ-MATE J-210. After the filter cake is dried, it is transferred to a cubic yard plastic-lined cardboard shipping box. The metal container box under the sludge dryer was labeled "Hazardous Waste—Chromium Plating Sludge" and dated December 21, 2021. The container also had a Class 9 D.O.T. placard which represents "miscellaneous good" and does not specify the specific hazards.

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 CFR 262.17(a)(5)(i)(B)], A large quantity generator must mark or label its containers with the following: (B) An indication of the hazards of the contents (examples include, but are not limited to, the applicable hazardous waste characteristic(s) (i.e., ignitable, corrosive, reactive, toxic); hazard communication consistent with the Department of Transportation requirements at 49 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).

CORRECTED ONSITE: Mr. Rojas immediately marked the container with the word “Toxic”.

Additionally, the inspectors observed the following wastes in CAA1:

- Four (4) 55-gallon closed containers of wastewater treatment sludge with a hazardous waste label that contained the accumulation start date and marked for Toxic. Accumulation start dates were November 9, 2021, December 13, 2021, and January 25, 2022. (Photos #6, #7, #8, and #9)
- Two cardboard boxes of spent mercury lamps labeled “Universal Waste”, closed, and dated November 1, 2021. (Photo #10)
- One (1) 55-gallon closed container of excluded-solvent contaminated rags, labeled, but with no accumulation start date.
- One (1) 55-gallon closed container of Thinner 62 labeled “Excluded-Solvent Contaminated Plastics”.

Pursuant to Fla. Admin. Code Ann. r. 62-730.030(1) [40 CFR 261.4(b)(18)(v)(B)], Generators must maintain at their site the following documentation: (B) Documentation that the 180-day accumulation time limit in 40 CFR 261.4(b)(18)(ii) is being met.

UPDATE: Following the inspection on January 27, 2022, Mr. Rojas submitted photos of the containers with excluded solvent contaminated rags with accumulation start dates. (Photo #11)

NOTE: There is no solid waste exclusion for solvent-contaminated “plastics”. The exclusion and associated requirements only apply to excluded solvent-contaminated wipes as described in 40 CFR 261.4(a)(26) and 261.4(b)(18).

The inspectors asked Mr. Rojas what the excluded-solvent contaminated plastics were. He explained that they are empty containers of spent solvent Thinner 62. The empty containers of Thinner 62 are accumulated in 55-gallon drums and then disposed of as non-hazardous waste. The inspectors reviewed the SDS for the Thinner 62 to verify that it is non-hazardous when RCRA empty and disposed of. The inspectors agreed that if the containers are RCRA empty, they can be disposed of as non-hazardous waste.

Laboratory

The laboratory located south of the plating process lines is used for wastewater treatment and plating bath control. The laboratory is also used for titration of the plating baths. The laboratory is equipped with an Atomic Absorption (AA) analyzer used to analyze metal concentrations. The AA collection container is equipped with a lid that prevents spillage and overfilling. A digital X-ray machine is also used for quality control of the final product. No hazardous wastes were observed in this area.

Shipping Area

The shipping area is located outside on the west side of the facility. This is where parts are delivered in boxes and where final products are shipped out. No hazardous waste was observed in this area.

Chemical Storage and CAA2

The Chemical storage is a cargo container building located next to the Shipping Area. The building has signage that reads “Waste Storage” and “Hazardous Material Storage Area” with an NFPA placard. Fire extinguishers, a spill kit, and an eyewash station are located near the CAA as well as throughout the facility. The chemical storage contains chemical products and the second 90-day CAA for hazardous waste (Photo #12, #13, and #14). Adequate aisle space was observed. The inspectors observed the following waste:

- Four (4) 55-gallon closed drums of nickel/ copper hazardous waste solids, labeled “Hazardous Waste”, with the earliest date being November 1, 2021, and marked with an indication of hazard.
- One (1) 55-gallon closed drums of spent nitric acid labeled “Hazardous Waste”, dated November 19, 2021, and marked with an indication of hazard.
- One (1) 55-gallon closed drums of spent plating filters labeled “Hazardous Waste”, dated December 30, 2021, and marked with an indication of hazard.
- One (1) 55-gallon closed drum of excluded solvent-contaminated rags, labeled, no accumulation start date (Photo 15).
- One (1) 55-gallon closed drum of excluded solvent-contaminated plastics.

Pursuant to Fla. Admin. Code Ann. r. 62-730.030(1) [40 CFR 261.4(b)(18)(v)(B)], Generators must maintain at their site the following documentation: (B) Documentation that the 180-day accumulation time limit in 40 CFR 261.4(b)(18)(ii) is being met.

UPDATE: Following the inspection on 01/27/2022, Mr. Rojas submitted photos of the containers with excluded solvent contaminated rags with accumulation start dates. (Photo #16).

Recommendations:

All hazardous waste containers in CAA2 were properly labeled; however, some hazardous waste containers on pallets needed to be shifted in order to be able to display the hazardous waste label properly during the inspection. For hazardous waste containers stored in CAA2, it was recommended that all containers are shifted to display the hazardous waste labels more easily during weekly container inspections. The inspectors observed “No Smoking Signs” surrounding the facility perimeter and recommended to place a “No Smoking” sign directly onto the chemical storage cargo container so that it is more clearly visible and noticeable, pursuant to 40 CFR 262.17(a)(1)(vi)(B).

Stripping Area

Parts are cleaned and stripped in this area using acid and alkaline solutions. The secondary containment is cleaned out monthly. An air pollution control (APC) unit is located on the east side of this area and is used to capture fumes from the various stripping tanks. Wastewater from the APC unit is collected in a drum and the water's pH is adjusted and then recirculated back to the APC unit. The inspectors observed one satellite accumulation area (SAA) which contained

one (1) 55-gallon closed drum of sulfuric acid, labeled “Hazardous Waste”, and marked with an indication of hazard (Photo #17).

Cargo Container Storage

This is another cargo container which stores various supplies and universal waste batteries. The inspectors observed one (1) 3-gallon closed container of universal waste batteries, labeled, and dated December 6, 2021 (Photo #18).

Records Review

Disposal Records:

Hazardous waste manifests were available for review. Original generator signed copy and final signed copy of manifests along with Land Disposal Restriction notifications were available for review. One hazardous waste shipping manifest dated April 29, 2020, was missing the final signed copy:

Manifest Tracking No.	021322263JJK
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The final signed copy of the hazardous waste manifest was submitted to the inspectors via email.

Contingency Plan:

The actions that facility personnel should take in response to an emergency are described in the facility’s Hazardous Waste Contingency Plan. It includes a list of emergency coordinators and contact information. Equipment list and capabilities addressed including fire response, spill response, and communication. The location of fire control equipment was included in the plan and identified on an evacuation map of the facility. The map also included the location of the CAAs and other hazardous waste SAAs and generation points throughout the facility. The contingency plan also included a Quick Reference Guide (QRG). Copies of the contingency plan were accepted and signed by North Miami Police, Aventura Hospital and Medical Center, and Miami-Dade Fire Rescue.

Employee training / annual training and position descriptions:

Training records for online hazardous waste training and position descriptions were available for review and are current for 2021. Records were reviewed for Mr. Frank Rojas.

Weekly Inspections:

Weekly container inspections were reviewed for the past three years. Inspections appeared to be conducted on a weekly basis and documented all the required inspection elements.

12) Closing Conference

An exit meeting was held at the end of the inspection with Mr. Rojas to discuss preliminary conclusions and to go over the findings.

13) **Inspection Findings**

Based on the observations made during the inspection, Techno Coatings, Inc. was apparently deficient with the following RCRA requirements:

Pursuant to Fla. Admin. Code Ann. r. 62-730.030(1) [40 CFR 261.4(b)(18)(v)(B)], Generators must maintain at their site the following documentation: (B) Documentation that the 180-day accumulation time limit in 40 CFR 261.4(b)(18)(ii) is being met.

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 CFR 262.17(a)(5)(i)(B)], A large quantity generator must mark or label its containers with the following: (B) An indication of the hazards of the contents (examples include, but are not limited to, the applicable hazardous waste characteristic(s) (i.e., ignitable, corrosive, reactive, toxic); hazard communication consistent with the Department of Transportation requirements at 49 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).

14) **List of Appendices**

Appendix 1 – Photo Log:
{18} Photos taken on: [January 27, 2022]
Photos taken by: Kayla Acosta
Photos taken with: Olympus Tough Digital Camera
EPA Property Tag: S75903

15) **Signed**

 Digitally signed by KAYLA ACOSTA
ACOSTA
Date: 2022.03.28 11:05:48 -04'00'

Kayla Acosta
Enforcement and Compliance Specialist

Date

Concurrence

 Digitally signed by ARACELI CHAVEZ
CHAVEZ
Date: 2022.03.28 11:09:54 -04'00'

Araceli Chavez
Chief
RCRA Enforcement Section

Date



Photo 1: Two (2) 6-gallon closed containers for excluded solvent-contaminated rags, closed, and labeled. The containers were not dated to demonstrate that the excluded solvent-contaminated rags were not exceeding the 180-day accumulation time limit.



Photo 2: Wastewater Pre-treatment Plant.



Photo 3: Dewatered F006 filter cake is collected beneath the filter press in an open-top metal 5'x4'x4' container. CAA1.



Photo 4: Electrically heated sludge dryer: JWIJ-MATE J-210. CAA1.



Photo 5: The metal container box under the sludge dryer was labeled “Hazardous Waste—Chromium Plating Sludge” and dated 12/21/2021. The container also had a Class 9 D.O.T. placard which represents “miscellaneous good” and does not specify the specific hazards.



Photo 6: Wastewater treatment sludge with a hazardous waste label that contained the accumulation start date and marked for Toxic. CAA1.



Photo 7: Close-up of hazardous waste label of wastewater treatment sludge marked toxic.



Photo 8: Wastewater treatment sludge with a hazardous waste label that contained the accumulation start date and marked for Toxic. CAA1.

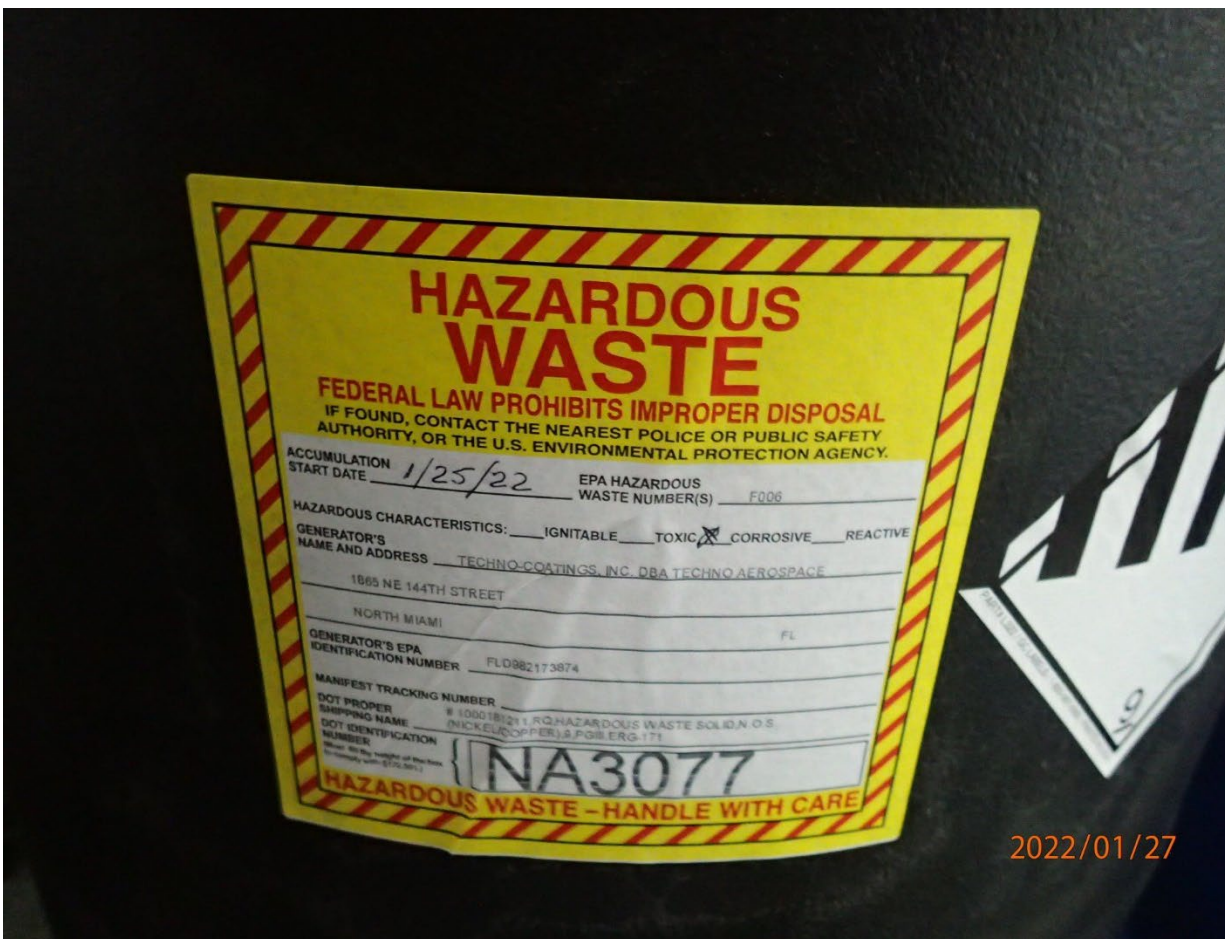


Photo 9: Close-up of wastewater treatment sludge hazardous waste label marked toxic.



Photo 10: Two cardboard boxes of spent mercury lamps labeled “Universal Waste”, closed, and dated 11/01/2021. CAA1.



Photo 11: Excluded solvent contaminated rags with accumulation start dates. CAA1.



Photo 12: Chemical storage and CAA2.



Photo 13: CAA2



Photo 14: CAA2



Photo 15: CAA2—excluded solvent contaminated rags with no start accumulation date.



Photo 16: Excluded solvent contaminated rags with accumulation start dates.



Photo 17: One (1) 55-gallon closed drum of sulfuric acid, labeled “Hazardous Waste”, and marked with an indication of hazard

