

RCRA Compliance Evaluation Inspection Report

1) **Inspector and Author of Report**

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2) **Facility Information**

Sandvik Palm Coast (SPC)
1 Commerce Boulevard
Palm Coast, Florida 32164-7961
County: Flagler
Latitude: 29.551731
Longitude: -81.263176
EPA ID Number: FLD984229716

Primary NAICS - 332618 – Other miscellaneous wire manufacturing
SIC Code: 3496 – Miscellaneous Fabricated Wire Products

3) **Responsible Official**

Charles Bateman, Environmental Health and Safety (EH&S) Coordinator

4) **Inspection Participants**

Daryl R. Himes U. S. EPA, Region 4
Luke Lewis, Florida Department of Environmental Protection (FDEP)
Emma Sacchitello, FDEP
Charles Bateman, Sandvik Palm Coast

5) **Dates of Inspection**

December 14, 2021, 9:00 a.m.

6) **Applicable Regulations**

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

Florida Statutes (F.S.) Chapter 403.702 *et seq.*, and the regulations promulgated pursuant thereto and set forth at the Florida Administrative Code (F.A.C.), Chapters 62-710 and 62-730.

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. § 262.10], a Large Quantity Generator (LQG) is a generator who generates greater than or equal to 1,000 kilograms (2200 lbs) of non-acute hazardous waste in a calendar month.

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

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

7) **Purpose of Compliance Evaluation Inspection**

On December 14, 2021, Luke Lewis and Emma Sacchitello of FDEP, and Daryl Himes, EPA, conducted a routine compliance evaluation inspection of Sandvik Palm Coast to determine the facility's compliance with state and federal hazardous waste regulations. This was an EPA lead inspection.

8) **Facility Description**

SPC is a nine-acre facility with two manufacturing buildings located on two contiguous properties located at 1 Commerce Boulevard and 3 Commerce Boulevard under one EPA ID Number. SPC has been at this location since 1992. The facility currently operates on three shifts, seven days a week and employs 104 individuals. SPC manufactures small diameter precision

wire (SDPW). A majority of the SDPW produced is made from copper wire. SPC also produces specialty SDPW. Specialty SDPW is manufactured from nickel, nickel alloys, stainless steel, aluminum, platinum, platinum iridium, and palladium silver. The facility's raw materials arrive in the form of large gauge metal wires which are drawn, to decrease its diameter, and/or flattened. Annealing of the drawn wire is used to strengthen and temper the wire products. Drawing and annealing may be repeated multiple times to achieve a wire product with a diameter which meets client specifications. All final products are quality control tested for conductivity, tensile strength and microfilament diameter. After passing quality control tests, the SDPW products are re-spooled, packaged and stored to await client shipment. Specialty SDPW products undergo the same initial process as the standard SDPW. The extra treatment processes for specialty microfilament wire can require an electro-polish, anodization, nickel and/or gold plating.

A significant amount of hazardous waste generated by the facility results from the two following practices which are performed in numerous locations in both facility buildings:

Nitric or sulfuric acid waste is generated from its use in small containers called acid pots. Acid in these pots is used to clean insulation from the ends of wires as well as helping to burn or form a tip on the end of the wire to assist in threading the wire through holes on mechanical equipment.

Isopropyl alcohol is used in ultrasonic machines which are used to clean dies that mechanically shape wire. The alcohol within the ultrasonic machine is used numerous times before it is determined to be spent. At that time, the spent isopropyl alcohol is placed into a container within a SAA.

SPC's most recent hazardous waste generator notification (EPA form 8700-12) submitted on May 12, 2020, characterized the facility as a large quantity generator (LQG) of hazardous waste, generating D001-D003, D005, D007, D008, D009, D011, D023, D024, D025, D026, F001, F003, F004, F005, F007 and F008 hazardous wastes.

9) Inspection Findings

SPC was represented by Charles Bateman, EH&S Manager. Upon entering the facility, the inspectors logged into a computerized entry system and were subsequently greeted by Mr. Bateman. The inspectors introduced themselves, showed their credentials and were subsequently escorted to a conference room for an opening conference.

Opening Conference

An opening conference was then performed with each of the inspection participants in a conference room in the 3 Commerce Boulevard building. During the opening conference, the inspectors discussed operations performed by the facility prior to performing a walk-through inspection in order to identify potential solid and hazardous waste generation points.

A walk-through inspection of the facility was then performed with the SPC representative, Charles Bateman. Below is a description of the observations made in the various areas of the facility inspected.

During the walk-through inspection, numerous containers were observed within satellite accumulation areas (SAAs). Unless otherwise noted, each container observed within an SAA was observed to be closed and labeled with the words “Hazardous Waste” and an indication of the hazard contents of the container.

In addition, all containers observed within 90-Day Hazardous Waste accumulation areas were closed, labelled with the words “Hazardous Waste” and an indication of the hazard contents of the container and marked with accumulation start dates.

3 Commerce Boulevard Building

The 3 Commerce Building is located on the eastern side of the SPC complex. The 3 Commerce Building is comprised of: the Electronic Fabrication and Repair Shop; Die Room; Maintenance Shop; Shipping and Receiving Area; the Main Room consisting of Drawing, Annealing and Electro-Polishing Area; Custodial Room; Used Oil and Used Oil Filter Accumulation Area; and a 90-day Hazardous Waste Accumulation Area (90-day HWAA).

Used Oil Accumulation Area

Two 55-gallon containers of used oil were observed in this area. Each container was labeled with the words “Used Oil” and was closed at the time of the inspection.

90-Day Hazardous Waste Accumulation Area (1 of 3 in the 3 Commerce Boulevard Building)

One 55-gallon container of hazardous waste aerosol cans, one 30-gallon container of spent sulfuric acid and one 30-gallon container of ignitable hazardous waste were observed in this area (Photo 1).

Main Room

Various types of equipment used for the shaping of SPDW and the cleaning of equipment were observed in this area. Acid pots (Photo 2) and ultrasonic machines (Photo 3) were observed in various locations in this area. The acid pots were typically observed on top of a portable cart as shown in Photo 2. When the acid and solvent from their respective storage vessels becomes unusable, it is placed into a hazardous waste container within a SAA or a 90-day accumulation area.

Annealing machines used in the main room use hydrogen as a fuel to heat the wire for the annealing process. No hazardous waste is generated as a result of the annealing processes for SPDW performed at the facility.

The electro-polishing line located in the middle of this area was comprised of baths of sulfuric acid and sodium hydroxide. SPDW is passed through these baths and then through baths of deionized water rinses and re-spooled. The sulfuric acid solution, sludge and spent filters which are generated as part of this operation are changed every 24 hours or at the end of a production run. The sodium hydroxide solution is changed less frequently and is dependent on use. Spent sulfuric acid from the electro-polishing line was being placed into a 30-gallon container within a SAA in the area of the machine (Photo 4).

90-Day Hazardous Waste Accumulation Area located in the central part of the Main Area
(2 of 3 in the 3 Commerce Boulevard Building)

Hazardous wastes observed in this area included one 55-gallon container of acid solids, one 30-gallon container of alkaline solids, and one 30-gallon container of alkaline liquids were observed in this area (Photo 5). The 55-gallon container of hazardous waste acid solids was not labeled with an indication of the hazard contents of the container.

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.17(a)(5)(i)(B)], which is a condition of the LQG Permit Exemption, a generator must mark or label its containers with an indication of the hazards of the contents.

Medical Area

SDPW made primarily for equipment used within the medical field is manufactured in this area.

A 90-day hazardous waste accumulation area was maintained at the time of the inspection in the Medical Area (3 of 3 in the 3 Commerce Boulevard Building). Two 55-gallon drums of hazardous waste were observed in this area at the time of the inspection (Photo 6).

Several dies for drawing wire were observed within containers of alcohol within the Medical Area at the time of the inspection for die cleaning purposes (Photo 7). When the alcohol becomes spent, it is transferred to a hazardous waste container in a SAA or 90-day hazardous waste accumulation area.

A still used for the reclamation of isopropyl alcohol (IPA) was observed in this area (Photo 8). According to Mr. Bateman, the still observed at the time of the inspection was recently purchased and was not currently in use.

SAA's within the Medical Area were observed to have a 55-gallon container of alkaline solids and a 55-gallon container of enamel solids (Photo 9). The alkaline solids were generated from an alkaline dip pot maintained within a Components Room located adjacent to the Medical Area for the removal of coatings from the surface of wires.

Components Room

Two 10-gallon, one 5-gallon and two 1-gallon containers of hazardous waste were observed in this area (Photo 10).

Shipping Area

No hazardous wastes were observed within this area at the time of the inspection.

Die Room

The Die Room is used for the resurfacing and resizing of diamond dies. Nitric acid in two 4-ounce jars is used to burn-off the ends of the tungsten wire used for re-alignment and polishing of dies. Two such jars were observed in this area. This process generates a liquid hazardous waste that was being accumulated in a 5-gallon satellite container (Photo 11).

An Ultrasonic Cleaning Machine was being used in this room to clean dies. A 3-gallon reservoir is located inside the machine where the dies are cleaned in a detergent solution. When spent, this waste solution is transferred to a 55-gallon liquid hazardous waste accumulation drum in a 90-day hazardous waste accumulation area.

Universal Waste Area

Universal waste generated within the 1 and 3 Commerce Boulevard buildings is maintained in the 3 Commerce Boulevard building.

Five 4-foot cardboard tubes of universal waste fluorescent bulbs were observed in this area. One of the tubes was labeled as broken bulbs (Photo 12). The EPA and FDEP inspectors informed Mr. Bateman that broken bulbs are not Universal Wastes and must be managed as hazardous wastes.

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.15(a)(5)], which is a condition of the SAA Permit Exemption, a generator is required to mark or label its containers (i) with the words “Hazardous Waste” and (ii) with an indication of the hazards of the contents.

One 55-gallon container of hazardous waste aerosol cans was observed in this area (Photo 13). The container was not labeled with an indication of the hazard contents of the 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 is required to mark or label its container with an indication of the hazards of the contents.

Eight containers of universal waste batteries and fluorescent bulbs were also observed in this area. One of the containers was labeled as broken bulbs (Photo 14). The EPA and FDEP inspectors informed Mr. Bateman that broken bulbs are not Universal Wastes and must be managed as hazardous wastes.

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.15(a)(5)], which is a condition of the SAA Permit Exemption, a generator is required to mark or label its containers (i) with the words “Hazardous Waste” and (ii) with an indication of the hazards of the contents.

1 Commerce Boulevard Building

The 1 Commerce Boulevard building is located on the west side of the SPC complex. The 1 Commerce Boulevard Building is comprised of: Precious Metal Rooms 1-8, a Plating Room, Coating Area, Anodizing Area, Mixing Room, Chemical Storage Room, Medical Clean Room, Mag Machine, Fine Wire Room, a 90-day HWAA and a Shipping and Receiving Area.

All satellite containers in this building, when full, are transferred to or into drums at the 90-day HWAA at 1 Commerce. Precious Metal Rooms In the Precious Metal Rooms 1-8, wire metal

stock from gold, platinum, platinum iridium, and palladium silver are drawn, annealed and coated.

Precious Metals Room-8

Wire undergoes a process called stiffening in this room. The stiffening process involves wire grinding, polishing, de-burring and rinsing. The grinding process roughens up the wire surface for polishing. Polishing removes most dirt and corrosion on the wire prior to de-burring. The de-burring process uses a dip pot of sodium hydroxide to resurface the wire. The last step before re-spooling is a deionized water rinse. The sodium hydroxide solution used in the deburring generates about three to four cups of hazardous waste waste alkaline liquids per day. Hydrochloric acid is used to adjust the pH of the alkaline liquids. The neutralized liquid is then accumulated in a 5-gallon container managed as hazardous waste alkaline liquids. PPE, gloves, shop wipes and solid materials generated from the stiffening process are managed as solid hazardous waste and accumulated in 5-gallon and 55-gallon satellite containers. A 5-gallon container of hazardous waste enamel solids was also observed in this area (Photo 15).

Precious Metals Room-1

Precious metal wire products are drawn to different diameters and annealed in this area. Nitric acid is used to burn-off the ends of the wire for threading into the machine. The 4-ounce container of nitric acid requires topping off during production runs. No waste is generated as a result of this process.

A machine in this room is used to cook silver chloride onto SPDW. The process generates hazardous waste into a 5-gallon container within a SAA.

Alkaline solids are generated in this room from a coating process in a 30-gallon container.

Nitric acid waste from acid pots is used in this room is deposited into a 2.5-gallon container of hazardous waste within a SAA.

An ultrasonic cleaning machine in this area is used to clean dies. A 5-gallon reservoir is located inside the machine where the dies are cleaned in a detergent solution. When spent, this waste solution is transferred to a 55- gallon liquid hazardous waste accumulation drum located in the 90-day HWAA. The solution is managed as hazardous waste because it may become contaminated with xylene.

Met Room

Cleaning applications which put coatings on SPDW are performed in this area.

A mixture of N-methyl-2-pyrrolidone (NMP) and water are used to perform cleaning activities on wire in this area. NMP has properties which allows it to dissolve surface coatings on wire.

Silver chloride used for wire coating purposes in this area result in hazardous wastes liquids being generated in one 30-gallon container (Photo 16) and one 30-gallon and one 5-gallon container of hazardous waste solids (Photo 17).

One 5-gallon container of hazardous waste enamel solids was also observed in this area (Photo 18).

Plating Room

Four plating lines were observed in this room. Line 3 and Line 4 are used for plating gold onto copper wire; Lines 5 and Line 6 are used for plating nickel onto steel wire. Each plating line consists of a series of tanks containing various chemicals or deionized water rinse (DIWR) bath solutions. The tanks are closed during the plating process. Each line of tanks is constructed within secondary containment. Wastes from both plating lines are managed as liquid hazardous waste and accumulated in 55-gallon satellite drums. When full, the drums are moved to the 90-day HWAA. Where possible, waste gold is reclaimed by Metallix Refining Inc. DIWR are not treated on-site in a wastewater treatment facility.

Containers of hazardous waste observed in this area included the following: one 5-gallon container of alkaline solids, one 5-gallon container of acid solids, one 55-gallon solids of nickel sulfamate solids, one 55-gallon container of gold plating solids (Photo 19) and one 55-gallon container of gold plating liquids (Photo 20).

One 55-gallon container of used oil labeled as “Used Oil” was observed in this area.

Primary Production Floor

The Primary Production Floor for the 1 Commerce Boulevard Building consisted of enameling, wire drawing, annealing and anodizing operations.

Anodizing operations performed place a film on aluminum wire that resists corrosion. SDPW is also annealed, enameled and re-spoiled for shipping in this area. The anodizing lines include individual tanks with bath solutions of sulfuric acid, sodium bicarbonate and DIWR. The tanks are kept closed during the anodizing process to prevent evaporation. Waste from the anodizing process includes corrosive liquids and PPE, gloves, spent filters, shop wipes and solid materials generated during the anodizing process. Rinsewaters and sodium bicarbonate water generated from the anodizing process are pH-adjusted and disposed of to the city sewer.

90-Day Hazardous Waste Accumulation Areas

Eight 55-gallon and three 30-gallon containers of hazardous wastes were observed in two separate 90-Day Hazardous Waste Accumulation Areas within the Primary Production Floor. In addition, three 55-gallon and one 5-gallon container of hazardous waste was observed in separate SAAs within the Primary Production Floor (Photos 21 -24).

Mag Area

A Mag Machine is located in this area which performs drawing, annealing, and enameling of metal wire stock all within the same piece of equipment.

At the time of the inspection, one 55-gallon container of hazardous waste enamel solids was observed within a SAA in this area (Photo 25).

Triple O Area

Very fine SPDW is produced in this area. At the time of the inspection, one 5-gallon container of solvent wipes, one 10-gallon container of enamel solids, one 2.5 gallon container of IPA ultrasonic and one 2.5-gallon container of enamel solid hazardous wastes were being accumulated in SAAs in this area. At the time of the inspection, the 5-gallon container of solvent wipes was not labeled with an indication of the hazards contents of the container (Photo 26).

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 is required to mark or label its container with an indication of the hazards of the contents.

Precious Metals Rooms 5 and 6

In these rooms, SDPW is coated with enamel and baked. Prior to being coated with enamel, spools of SDPW are placed inside of a 1-gallon container filled half-way with IPA. The IPA is used to clean and briefly lubricate the wire prior to being coated with enamel.

Hazardous wastes observed within SAAs within Precious Metals Room 5 at the time of the inspection included one 30-gallon and one 5-gallon container of enamel solids, one 2.5 gallon container of enamel liquids and one 2.5 gallon container IPA ultrasonic waste (Photo 27). No hazardous wastes were observed within Precious Metals Room 6.

Precious Metals Room 7

Precious Metals Room 7 is a self-contained room for medical wire. Wire testing for quality control of wire specifications is performed in this area. No hazardous waste was being generated or accumulated in this area at the time of the inspection.

Trifilar Area

Stranding, chemical stripping, enamelling and testing of SDPW is performed in this area. One 55-gallon and one 5-gallon container of alkaline liquid hazardous waste and one 5-gallon container of ultrasonic IPA hazardous waste was observed in this area (Photo 28).

Precious Metals-3

Precious metal wire may be tested and re-spooled for shipment in this area. Wire products are tested for conductivity and tensile strength. Finished SDPW is mounted and evaluated under a microscope for quality control testing. Samples are saved in labeled plastic bags and provided for the customer to review. No hazardous waste is generated or accumulated in this area.

Precious Metals-4

A coating of silver chloride paste is baked onto SDPW in this area. The coated SDPW then passes through dies that remove and recycle excess silver chloride coating. The SDPW then passes through a heating unit that cures the silver chloride coating. The metal and dried silver chloride paste was accumulating in a 5-gallon container at the time of the inspection.

Record Review

A review of the facility's contingency plan found that the evacuation routes were not identified within the plan.

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. 62-730.180(2) [40 C.F.R. § 262.261(f)], and is a condition of the LQG Permit Exemption, the contingency plan must include an evacuation plan for generator personnel where there is a possibility that evacuation could be necessary. This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes (in cases where the primary routes could be blocked by releases of hazardous waste or fires).

A review of the facility's hazardous waste manifests for 2019 and 2020 did not find any discrepancies.

A review of the facility's weekly container inspection logs did not find any discrepancies.

A review of the facility's hazardous waste training for employees Daryl James and Alex Gilbert found that Daryl James was missing refresher training for 2018.

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.17(a)(7)], which is a condition of the LQG Permit Exemption; (iii) Facility personnel must take part in an annual review of the initial training required by this section and records documenting that the training required has been given to and completed by Facility personnel.

At the time of the inspection, the facility did not have a Quick Reference Guide which included a map of the facility showing where all hazardous wastes are generated, accumulated and treated and routes for accessing these wastes.

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.17(a)(6)], which incorporates Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.262(b)(4)], and is a condition of the LQG Permit Exemption, A large quantity generator that first becomes subject to these provisions after May 30, 2017 or a large quantity generator that is otherwise amending its contingency plan must at that time submit a quick reference guide of the contingency plan to the local emergency responders identified at paragraph (a) of this section or, as appropriate, the Local Emergency Planning Committee. The quick reference guide must include the following elements: A map of the facility showing where hazardous wastes are generated, accumulated and treated and routes for accessing these wastes.

Closing Conference

At the conclusion of the walkthrough inspection and record review, a brief closing conference was conducted with each of the facility participants identified above. During the conference, the areas of concern identified during facility walkthrough were identified and discussed.

10) Signed

DARYL HIMES Digitally signed by DARYL HIMES
Date: 2022.01.20 19:58:10 -05'00'

Daryl R. Himes
Inspector and Author of Report

Date

11) Concurrence and Approval

**ARACELI
CHAVEZ** Digitally signed by ARACELI
CHAVEZ
Date: 2022.01.21 08:10:40
-05'00'

Araceli B. Chavez
Chief
RCRA Enforcement Section

Date

ATTACHMENT A

Sandvik Palm Coast

Palm Coast, Florida

COMPLIANCE EVALUATION INSPECTION

FLD984229716

December 14, 2021

Photos taken by Daryl R. Himes
Photos taken with Canon Power Shot Elph 360 HS



Photo 1 – Commerce 3 90-Day Accumulation Area in Corner of Main Room



Photo 2 - Commerce 3 Acid Pot on Cart in Main Room



Photo 3 - Commerce 3 Ultrasonic Machine in Main Room



Photo 4 – Commerce 3 30-gallon drum for spent acid from the electropolishing line in the Main Room



Photo 5 - Commerce 3 90-Day Accumulation Area in central area of Main Room



Photo 6 - Commerce 3 90-Day Accumulation Area in Medical Area



Photo 7 – Commerce 3 Alcohol Baths used for die cleaning within the Medical Area



Photo 8 – Commerce 3 IPA Still within the Medical Area



Photo 9 – Commerce 3 Satellite Accumulation Areas for Alkaline Liquids (on left) and Alkaline Solids (on Left) in Medical Area



Photo 10 – Commerce 3 Satellite Accumulation Area within Components Room



Photo 11 – Commerce 3 5-gallon container of spent nitric acid from pointing in Die area

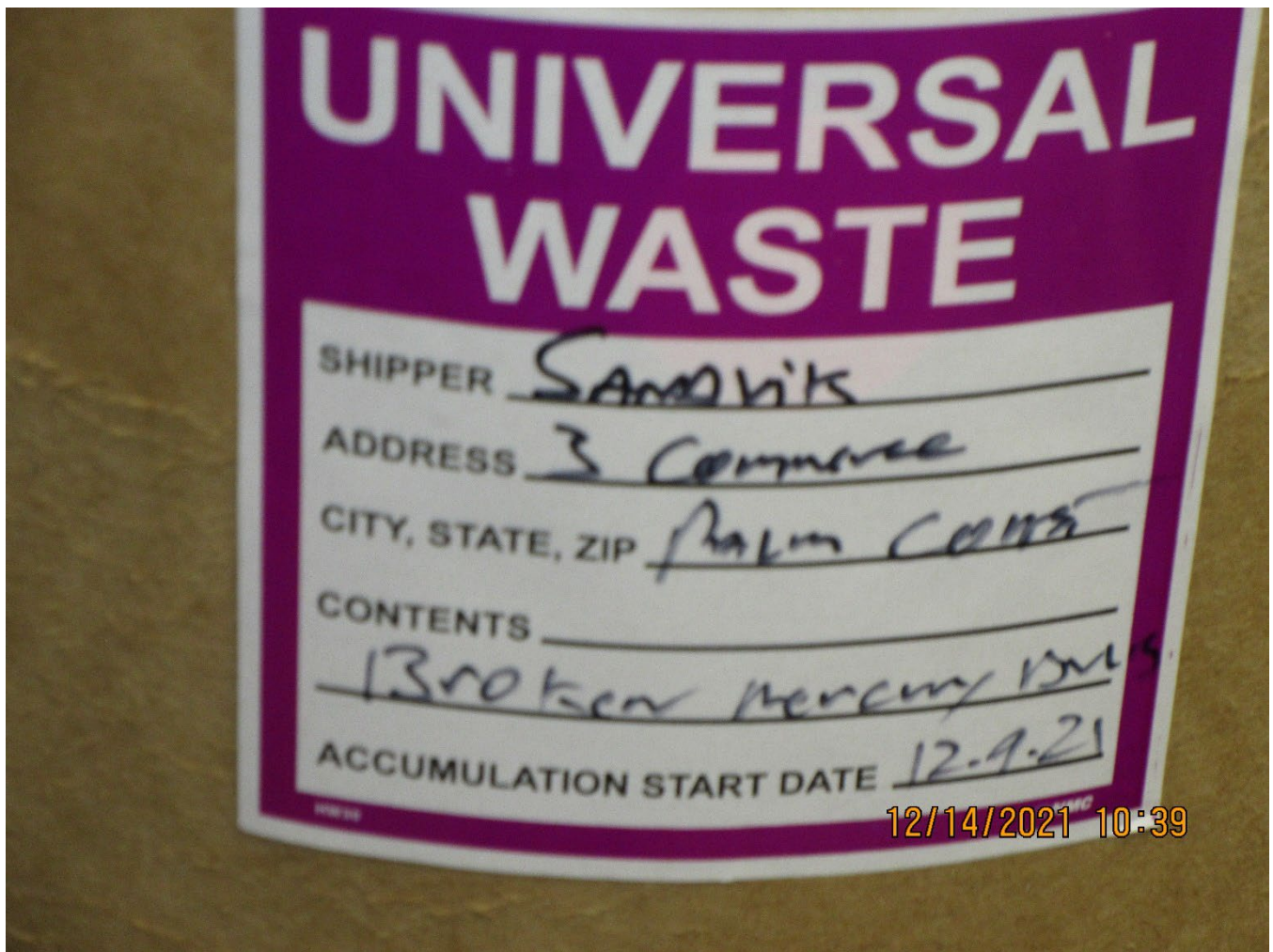


Photo 12 – Commerce 3 One tube of broken fluorescent bulbs in Universal Waste Area



Photo 13 - Commerce 3 One drum of hazardous waste aerosol cans in the vicinity of the Universal Waste Area



Photo 14 - Commerce 3 Eight containers of universal waste batteries and bulbs and broken bulbs in Universal Waste Area



Photo 15 – Commerce 1 Precious Metals Room 8



Photo 16 – Commerce 1 Met Room Hazardous Waste Liquids



Photo 17 – Commerce 1 Met Room Hazardous Waste Solids



Photo 18 - Commerce 1 Met Room Hazardous Waste Enamel Solids



Photo 19 - Commerce 1 Plating Room Gold Plating Solids



Photo 20 - Commerce 1 Met Room Hazardous Waste Gold Plating Liquids



Photo 21 - Commerce 1 Primary Production Floor 90-Day Hazardous Waste Accumulation Area



Photo 22 - Commerce 1 Primary Production Floor 90-Day Hazardous Waste Accumulation Area



Photo 23 - Commerce 1 Primary Production Floor 90-Day Hazardous Waste Accumulation Area



Photo 24 - Commerce 1 Primary Production Floor 90-Day Hazardous Waste Accumulation Area



Photo 25 - Commerce 1 Enamel Solids in the Mag Area
Hazardous Waste Accumulation Area

Primary Production Floor 90-Day



Photo 26 - Commerce 1 SAs in Triple O area



Photo 27 - Commerce 1 SAA in the Precious Metals 5 Room



Photo 28 - Commerce 1 SAA in the Trifilar Area