

RCRA Inspection Report

1) Inspector and Author of Report

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2) Facility Information

Kyocera AVX Components Corporation
2201 Corporate Square BLVD
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Duval County

EPA ID#: FLD039677810
NAICS #: 334416- Electronic Coil, Transformer,
and other Inductor Manufacturing

3) Responsible Officials

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4) Inspection Participants

Wade Musgrave, Kyocera AVX
Yumi Highsmith, Kyocera AVX
James Frasier, Kyocera AVX
Michael Diehl, Kyocera AVX
Richard Gwaltney, Kyocera AVX

Alexis Wilson, USEPA
Tarin Tischler, USEPA
Emma Sacchitello, FDEP

5) Date of Inspection

March 4, 2025, 9:00am-5:00pm

6) Applicable Regulations¹

Resource Conservation and Recovery Act (RCRA) Sections 3002 (42 U.S. Code – Annotated U.S.C.A. 6925 and 6927), and 40 Code of Federal Regulation (C.F.R.) Parts 260 - 270, 273, 278, & 279; Chapter 403 of the Florida Statutes, Fla. Stat. § 403.702 *et seq.*, and rules 62.710.210 -.901, and 62-730 *et seq.* of the Florida Administrative Code Annotated (Fla. Admin. Code Ann.)

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

Pursuant to Fla. Admin. Code Ann. r. 62-730.020(1) [40 C.F.R. § 260.10], a large quantity generator of hazardous waste (LQG) is a generator who generates greater than or equal to 1,000 kilograms (2,200 pounds) of non-acute hazardous waste in a calendar month.

Pursuant to Fla. Admin. Code Ann. r. 62-730.185(1) [40 C.F.R. § 273.9], a small quantity handler of universal waste (SQHUW) is a universal waste handler who does not accumulate 5,000 kilograms or more of universal waste (batteries, pesticides, mercury-containing equipment, lamps, or aerosol cans, calculated collectively) at any time.

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

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

Pursuant to Section 62-730.030 of the Florida Statutes, Fla. Stat. § 62-730.030 [40 C.F.R. § 261.4(b)(18)], solvent-contaminated wipes, except for wipes that are hazardous waste due to the presence of trichloroethylene, that are sent for disposal are not hazardous wastes from the point of generation, provided that the conditions listed in Section 730.030 of the Florida Statutes, Fla. Stat. § 730.030 [40 C.F.R. § 261.4(b)(18)] are met (hereinafter referred to as the “Solvent-Contaminated Disposable Wipe Exclusion”).

Pursuant to Section 62-730.030 of the Florida Statutes, Fla. Stat. § 62-730.030 [40 C.F.R. § 261.6(a)(2)(iii)], recyclable materials that are reclaimed to recover economically significant amounts of gold, silver, platinum, palladium, iridium, osmium, rhodium, ruthenium, or any combination of these are regulated under Section 62-730.181 of the Florida Statutes, Fla. Stat. § 62-730.181 [40 C.F.R. § 266 - Subpart F] and all applicable provisions in parts 268, 270 and 124 of this chapter.

7) Purpose of Inspection

The purpose of this inspection was to conduct an unannounced compliance evaluation inspection to determine Kyocera AVX Components Corporation’s (hereafter referred to as “Kyocera” or “the facility”) compliance with the applicable requirements of RCRA and the corresponding Florida regulations. This was an EPA lead inspection.

8) Facility Description

The Kyocera AVX Components Corporation manufactures multi-layered capacitors (MLC). The facility has been operating at this location since 1980. The company was previously known as American Technical Ceramics then AVX acquired the company, and the name was changed to Kyocera AVX Components in October of 2021. The facility consists of 7 buildings across approximately 19 acres, including two wastewater treatment plants. The company currently employs approximately 53 people with three employees fulfilling roles responsible for hazardous waste management. The facility is open 24 hours a day for 5 days a week (Monday-Friday). The main entry to the building is locked and controlled by facility personnel; visitors must sign-in and obtain a visitor's badge after signing a liability waiver and non-disclosure agreement.

To briefly summarize the manufacturing process, several raw materials including ceramic powders and binder are mixed into a ceramic slurry (liquid). Ceramic slurries used at the facility include, K10 and K40. The K40 ceramic slurry is a toxic hazardous waste when disposed of and contains lead (D008) and barium (D005). The ceramic slurries are cast into a ceramic tape (solid). Ink made with precious metals (gold, silver, nickel, palladium, tin) are printed onto the tape. At the next phase, rotary machines layer sheets of ceramic tape together to form a block. The blocks go through a firing process, a corner rounding process, then quality assurance testing and shipping off-site to a sister-facility for final processing and quality testing. The facility has significantly reduced their operations; they stopped producing single layer capacitors and resistors in 2017 and thin film in 2020. The buildings associated with these processes were torn down and removed from the property. The facility manufactures less products that utilize the K40 ceramic slurry (it is now considered a legacy product) than it used to; the facility prioritizes the use of other slurries which are non-hazardous in its manufacturing process.

Hazardous Waste Generation and Management

Kyocera's most recent notification submitted on February 29, 2024, identified the facility as a large quantity generator (LQG) operating at the subject facility under the NAICS Code 334416 for electronic coil, transformer, and other inductor manufacturing, and may generate hazardous waste with one or more of the following EPA Waste Codes: D001, D002, and D005, D008, D009, D011, D026, F003, F006, and F007. This facility also manages excluded solvent contaminated wipes and sends materials (wipes, green chips, prints, gold plated media) for precious metal recovery. Based on e-Manifest records, Kyocera initiated 4 shipments in 2025 (~950 kg waste), 46 shipments in 2024 (~11,400kg of waste) and 49 shipments in 2023 (~15,000 kg of waste); this includes hazardous waste and materials sent for precious metal recovery. The TSDFs most routinely used by the facility are Enviroline of Ohio, Inc (EPA ID # OHD980568992) and Veolia Es Technical Solutions (EPA ID # TXD000838896).

The facility manages two central accumulation areas (CAAs) in Building 1 and Building 8. The facility has two wastewater treatment plants on the property: the Batch Wastewater Treatment Plant (BWWTP) and the Final Wastewater Treatment Plant (FWWTP) in Building 12.

Wastewater from manufacturing processes is treated in the BWWTP; solids are run through a

filter press which generates a filter cake disposed of as hazardous waste (D005/D008). Wastewater from the BWWTP system is piped to the FWWTP for additional treatment, where it is joined by wastewaters generated by the electroplating process before discharging to a Publicly Owned Treatment Works. The FWWTP also generates hazardous waste; solids are run through a filter press which generates a filter cake disposed of as hazardous waste (F006).

The process begins in the MLC Batch Mix Area located in Building 1 where ceramic slurries are produced. The facility produces several slurries but only one has been determined to be toxic hazardous waste when disposed of, K40, which contains lead (D008) and barium (D005). The process using K40 slurry was last initiated on January 30, 2025. Hazardous waste generated in this area consists of K40 contaminated debris such as gloves and wipes, and mop water/floor stripper (D002/D005/D008). No hazardous waste is generated in the Mylar Casting Area (Building 1). Hazardous waste generated in the Casting Rotary area (Building 1) includes scrap and trimmings of K40 ceramic tape as well as K40 contaminated debris. Wipes used to clean machines may contain precious metals and are collected in bins labeled “reclaim only” or “green chips and prints” and sent off-site for precious metal recovery. Continuing along the process, no hazardous waste is generated in the Kiln Room (Building 1). Any unusable ceramic tape chips or sweepings generated in this area are sent for precious metal recovery. Lastly, wastewater from rinsing media used in the corner rounding process may be contaminated with K40. The rinsewater goes down the sink drain and is piped directly to the onsite wastewater treatment plant.

No hazardous waste is generated in the Termination area (Building 3); however, wipes with isopropyl alcohol (IPA) are used to clean machinery in this area. These wipes are managed as excluded solvent contaminated wipes. No hazardous waste is generated in the Oven Room (Building 3) but a reclaim bin is located in this area where any unusable materials with precious metals are accumulated before they can be sent for recovery. The Plating Area (Building 3) includes tin, nickel, and gold plating processes. No hazardous waste is generated in this area, but precious metal containing liquid generated through the electroplating process is pumped directly into a container from the machinery, collected, and sent to the Reclaim Room. Wastewater from cleansing machines and media is pumped directly to the onsite wastewater treatment plant. No hazardous waste is generated in the Ink Lab (Building 3) but there are reclaim bins for gold, silver, and palladium materials sent for precious metal recovery.

The Reclaim Room (Building 1) is where materials that contain precious metals (gold, silver, palladium) are brought by facility personnel once the containers are full. An internal transfer sheet is completed that details where in the facility the materials came from, who was responsible for transporting the material, and the date of transfer. The containers are weighed, sealed, and transferred off-site to a precious metal recovery facility; Kyocera typically sends their materials to Sabin Metal Corp (EPA ID # NYD067919340) and Abington Reldan Metals LLC (EPA ID # PAR000521294). Based on e-Manifest records, Kyocera made 23 shipments for metals recovery in 2024, 25 shipments in 2023, and 16 shipments in 2022. The facility typically ships material from the Reclaim Room monthly.

9) Previous Inspection History

Florida Department of Environmental Protection (FDEP) has conducted two RCRA CEIs at the subject facility between 2015 and 2020 and found 11 violations during those inspections. On June 23, 2020, FDEP conducted the most recent RCRA CEI at the subject facility and found nine apparent violations of RCRA's requirements for container management issues (labeling and open containers) and missing emergency equipment in satellite and central accumulation areas. The facility returned to compliance in October of 2020.

10) Opening Conference

On March 4, 2025, EPA inspector Alexis Wilson, accompanied by EPA Inspector Tarin Tischler and FDEP Inspector Emma Sacchitello, arrived at Kyocera at approximately 9:00 AM EST. Gretchen Quisenberry, HR Manager, immediately received the inspectors and asked inspectors to sign a liability waiver, sign-in sheet, and non-disclosure agreement for entry. Wade Musgrave, EHS Manager, entered the lobby; the inspectors introduced themselves, presented their credentials to Wade Musgrave, and explained the purpose of the visit. Inspectors explained they were not permitted to sign the non-disclosure agreement but would sign the liability waiver and sign-in sheet. Entry to the facility was granted and inspectors were shown to a conference room.

Wade Musgrave and the inspectors were joined by facility personnel Yumi Highsmith (Production Control Manager), James Fraiser (Plant Manager), Michael Diehl (Facilities Manager), and Richard Gwaltney (Quality Manager), for the opening conference. Wade Musgrave and Yumi Highsmith provided an overview of the facility's history, current operations, and any changes in hazardous waste management since the previous RCRA CEI during the opening conference. The inspection participants also discussed health and safety protocols and required personal protective equipment before Wade Musgrave and Yumi Highsmith led the inspectors on a tour of the facility operations.

The inspectors described the anticipated use of equipment (digital camera and iPad) during the inspection and provided a request for records. The EPA inspector explained that the Small Business Regulatory Enforcement Fairness Act's classification of a "small business" is generally set by the Small Business Administration using the business' SIC/NAICS code and annual receipts or number of employees. A copy of the EPA's information sheet for small businesses can be found at <https://www.epa.gov/sites/production/files/2017-06/documents/smallbusinessinfo.pdf>. The EPA inspector also discussed the company's ability, pursuant to 40 C.F.R. § 2.203, to assert a business confidentiality claim for information submitted to EPA. The company did not assert a business confidentiality claim.

11) Inspection Observations

Batch Mix Area- Building 1

The inspectors were led on a tour of the facility by Wade Musgrave (EHS Manager) and Yumi Highsmith (Production Control Manager). The walkthrough of Kyocera began in Building 1 in the Batch Mix Area. In this room, ceramic powders, raw materials, and other products are mixed into a ceramic slurry. Product is stored in the receiving area/powder room. There are several

ceramic slurries produced, but only one, K40, is hazardous waste when disposed due to toxic concentrations of barium and lead with EPA waste codes D005 and D008, respectively.

The K40 slurry is mixed in one ball mill within a caged area that is labeled with signage: “K40,” an emergency contact list, a spill protocol, and pictograms and hazards (Photos 1-3). Inspectors observed one 55-gallon container of non-hazardous ceramic slurry, to the left of the K40 caged area. Across from the K40 caged area was one 13-gallon container for satellite collection of K40 contaminated solids such as gloves or paper towels; the container was closed, labeled with the words hazardous waste, and three hazard indicator pictograms indicating a health hazard, harmful irritant, and aquatic toxicity (Photo 4). The Batch Mix Area also contained a sink where equipment that may be contaminated with K40 slurry is washed; rinsewater is piped directly to the onsite BWWTP (Photo 5). Another 13-gallon container for satellite collection of K40 contaminated solids was observed in the area; the container was closed, labeled with the words hazardous waste, and three hazard indicator pictograms indicating a health hazard, harmful irritant, and aquatic toxicity (Photo 6). Total capacity in the satellite area for hazardous waste was less than 55 gallons. A spill station and first aid kit were observed in the room.

Mylar Casting- Building 1

In this area slurry is injected into machinery which dries into a solid and is rolled onto a spool. Only non-hazardous slurry is managed in this area. No hazardous waste generation occurs in this area.

Casting Rotary Room- Building 1 (BMS block manufacturing)

The process continues in this room for both non-hazardous ceramic slurry and hazardous K40 slurry. Four 13-gallon containers for satellite collection of K40 contaminated solids were observed in the area; all containers were closed, labeled with the words hazardous waste, and three hazard indicator pictograms indicating a health hazard, harmful irritant, and aquatic toxicity (Photos 7-10). One ~10-gallon container for satellite collection of K40 contaminated solids was also observed in the area; the container was closed, labeled with the words hazardous waste, and three hazard indicator pictograms indicating a health hazard, harmful irritant, and aquatic toxicity (Photo 11).

K40 slurry is processed inside of an enclosed rotary machine (Photo 12); there were four rotary machines in the room. The K40 ceramic tape is trimmed, and the waste (D005/D008) falls into an open 3-gallon hazardous waste container inside the rotary machine enclosure (Photo 13). At the time of the inspection, no K40 waste was accumulating in the container, but inspectors did observe that the container was not labeled with the words “Hazardous Waste” or an indication of the hazard(s). The facility was reminded that satellite containers must be labeled with the words “Hazardous Waste” and with an indication of the hazard of the contents.

Next to the rotary machine was one, closed, ~10-gallon container for satellite collection of K40 hazardous waste. The container was not labeled with the words “Hazardous Waste” or an indication the hazard(s) (Photo 14).

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.

Throughout the Casting Rotary Room, inspectors observed 12 containers (~10 gallons) for materials with precious metals that will be sent for reclaim/recovery; labels included “reclaim wipes,” “reclaim only,” and “green chips and prints” (Photo 15 and 16).

Within the room was a flammable cabinet with signage stating it was a satellite accumulation area for Lecithin hazardous waste (Photo 17). Inside the cabinet was one ~5-gallon container labeled as Lecithin hazardous waste. The container was closed and labeled with the words “Hazardous Waste” but was not labeled with an indication of the hazards (Photo 18). However, Wade Musgrave stated that Lecithin is non-hazardous and the container, as well as the flammable cabinet, was improperly labeled. Inspectors requested the Safety Data Sheet/Waste Profile for Lecithin during the closing conference and in a follow-up, email sent on March 6, 2025, to Wade Musgrave. Wade Musgrave provided the Safety Data Sheet for Lecithin via email on March 12, 2025, which indicates the substance, Standard Soy Lecithin Fluid, is non-hazardous. The facility stated the Lecithin container observed during the inspection was new product and not a waste. A photo was provided to demonstrate the container was relabeled simply as “Lecithin” and the hazardous waste label was removed (Photo 1B).

Kiln Room- Building 1

In this area the ceramic tape chips are dried in large kilns. No hazardous waste is generated through this process. Any unusable chips are placed in a reclaim bin and sent for precious metal recovery.

Corner Rounding- Building 1

In this area ceramic tape chips are spun with media in a machine to round the corners. No hazardous waste is generated through this process. The media is cleaned in a sink after every use. The wastewater, including wastewater from cleaning hazardous K40 media, is piped directly to the on-site wastewater treatment plant.

MLC 90-day Storage CAA- Building 1 (inside the cage)

The facility manages two central accumulation areas (CAA) on site. One is located inside Building 1 and is designated as the MLC 90-day storage CAA which contains hazardous waste, reclaim material, and product (Photos 19 and 20). The CAA is located inside of a locked room that requires key card access for entry; in addition, the hazardous waste is contained within a locked, caged area. Inspectors observed a spill kit, eye wash station, a fire extinguisher (last inspected on 2/10/2025), no smoking sign, emergency contact list, and danger-keep out sign (Photos 21-25). The area has an alarm system in case of emergency and personnel have radios and cell phones as communication devices.

Inspectors observed 13 containers within the caged area:

one 55-gallon, closed container of solvent contaminated wipes (typically IPA) which are generated in the machine shops and termination areas. The container was closed, labeled only as “non-hazardous waste excluded wipes” and was not labeled with an accumulation start date (Photos 26 and 27).

Pursuant to Fla. Admin. Code Ann. r. 62-730.030(1) [40 CFR 261.4(b)(18)(i)] Solvent-contaminated wipes, except for wipes that are hazardous waste due to the presence of trichloroethylene, that are sent for disposal are not hazardous wastes from the

point of generation provided that (i) the solvent-contaminated wipes, when accumulated, stored, and transported, are contained in non-leaking, closed containers that are labeled “Excluded Solvent-Contaminated Wipes.”

The CAA held three hazardous waste containers. On the wall above the storage area where the hazardous waste containers were located was signage indicating the type of hazardous waste (Photo 28). Container A was a 55-gallon closed container of mixed solvent (IPA/Naptha) waste generated in the ink lab; the container was labeled with the words “Hazardous Waste,” an accumulation start date of January 28, 2025, three hazard indicator pictograms indicating a health hazard, harmful irritant, and aquatic toxicity, and a flammable liquid hazard indicator. The container had a funnel attached and the lid was closed (Photos 29 and 30). Container B was a 55-gallon closed container of hazardous K40 ceramic slurry; the container was labeled with the words “Hazardous Waste,” an accumulation start date of January 22, 2025, and four hazard indicator pictograms indicating a health hazard, harmful irritant, corrosivity, and aquatic toxicity (Photos 31 and 32). Container C was a 55-gallon closed container of lead (D008), and barium (D005) contaminated ceramic tape; the container was labeled with the words “Hazardous Waste,” an accumulation start date of January 6, 2025, three hazard indicator pictograms indicating a health hazard, harmful irritant, and aquatic toxicity, and a flammable liquid hazard indicator (Photos 33 and 34).

Within the CAA were also five 55-gallon containers for solid reclaim material sent for precious metal recovery (Photo 35). The containers were labeled with codes created by the facility to identify the area/process from which the reclaim material originated (Photo 36). On the wall above the storage area where the reclaim containers were located was signage indicating the type of reclaim material (Photo 37).

The CAA also contained four closed, ~5-gallon containers for IPA product that is used throughout the facility (Photo 38). Facility personnel do bulk transfers from these larger containers of product into smaller containers to use throughout the facility.

Termination Area- Building 3

No hazardous waste is generated in the Termination Area, but solvent (IPA) contaminated wipes are generated from cleaning machines. Inspectors observed one closed, ~15-gallon container for solvent contaminated wipes; it was labeled “non-hazardous waste excluded solvent contaminated wipes” but was not labeled with an accumulation start date (Photo 39).

Oven Room- Building 3

No hazardous waste is generated in the Oven Room. The area contained one, closed ~5-gallon reclaim bin for materials sent for precious metal recovery (Photo 40).

MLC Plating- Building 3

In this area, plating processes using tin, nickel, and gold are conducted. No hazardous waste is generated in this area. Any unusable material is pumped directly from the machine into a container. That container is transferred to the Reclaim Room for processing and shipment off-site. The wastewater from cleaning machines and media is piped directly to the on-site wastewater treatment plant.

Ink Lab- Building 3

No hazardous waste is generated in this area. Inspectors observed two, closed ~ 15-gallon containers for reclaim material sent for precious metal recovery (Photo 41).

Reclaim Room- Building 7

The Reclaim Room holds containers of material to be shipped off-site for precious metal recovery. The materials are carefully tracked and monitored throughout the process. At the time of the inspection the inspectors observed four 55-gallon containers and two 15-gallon containers of reclaim material (Photos 42-44).

90-day storage CAA- Building 8

This CAA is located inside Building 8 which contains hazardous waste, excluded solvent contaminated wipes, e-waste, and non-hazardous waste such as expired product and ceramic slurry (Photo 45). The CAA is located inside of a locked building and entry is restricted to facility personnel. There is an additional locked gate inside the building to secure the area specific to waste with signage such as a no smoking sign and danger-keep out sign (Photo 46). Inspectors observed a spill kit, eye wash station, and a fire extinguisher (last inspected on 2/10/2025) (Photos 47-49). The area has an alarm system in case of emergency and personnel have radios and cell phones as communication devices.

Inspectors observed a pile of e-waste including televisions and computer components which facility personnel stated is ultimately recycled (Photo 50). Near the e-waste was a 55-gallon container labeled as "Hazardous Waste" and "crushed bulbs", it has a bulb crusher connected to the top and four hazard indicator pictograms indicating a health hazard, toxicity, corrosivity, and aquatic toxicity (Photos 51 and 52). Facility personnel stated the crushed mercury lamps are managed as hazardous waste not as universal waste, and the material is sent for recycling once the container is full. The process of crushing the bulbs appears to meet the definition of treatment. Crushing equipment may be used without a permit *if* the lamps are managed as universal waste. Universal waste crushed lamps must be labeled as "Crushed Mercury Lamps" (pursuant to Fla. Admin. Code Ann. r. 62-737.400(5)(b)).

Pursuant to Florida Statute 403.727(1)(b) [40 CFR 270.1(c)] RCRA requires a permit for the "treatment," "storage," and "disposal" of any "Hazardous Waste" as identified or listed in 40 CFR part 261, by failing to comply with the "LQG Permit Exemption" conditions in 40 CFR 262.17 for a generator of greater than or equal to 1,000 kilograms of hazardous waste in a calendar month and therefore required a RCRA permit or RCRA interim status.

The non-hazardous and hazardous waste was organized into three rows of waste containers positioned on top of pallets. The first row had 11 containers: six 55-gallon containers of non-hazardous ceramic slurry (Photo 53), one 15-gallon container of non-hazardous nickel-plating solution (Photo 54), one 55-gallon non-hazardous K10 (ceramic slurry) debris, one 55-gallon container of non-hazardous expired product (binder) (Photo 55), one 55-gallon container of non-hazardous silicone waste, and one 55-gallon container of excluded solvent contaminated wipes. The container was closed, labeled only as "non-hazardous waste excluded wipes" and was not labeled with an accumulation start date (Photos 56 and 57).

Pursuant to Fla. Admin. Code Ann. r. 62-730.030(1) [40 CFR 261.4(b)(18)(i)] Solvent-contaminated wipes, except for wipes that are hazardous waste due to the presence of trichloroethylene, that are sent for disposal are not hazardous wastes from the point of generation provided that (i) the solvent-contaminated wipes, when accumulated, stored, and transported, are contained in non-leaking, closed containers that are labeled “Excluded Solvent-Contaminated Wipes.”

The second row had eight containers: three 55-gallon containers of non-hazardous expired product (binder), two 12-gallon containers of non-hazardous product (ultra coolant) (Photo 58), two large containers (350 kg capacity and 1650 kg capacity) of non-hazardous ceramic slurry (Photo 59), and one 55-gallon container of excluded solvent contaminated wipes. The container was closed, labeled only as “non-hazardous waste excluded wipes” and was not labeled with an accumulation start date (Photos 60 and 61).

Pursuant to Fla. Admin. Code Ann. r. 62-730.030(1) [40 CFR 261.4(b)(18)(i)] Solvent-contaminated wipes, except for wipes that are hazardous waste due to the presence of trichloroethylene, that are sent for disposal are not hazardous wastes from the point of generation provided that (i) the solvent-contaminated wipes, when accumulated, stored, and transported, are contained in non-leaking, closed containers that are labeled “Excluded Solvent-Contaminated Wipes.”

The third row had four hazardous waste containers. Inspectors observed one 55-gallon hazardous waste container of caustic debris; it was closed, labeled with the words “Hazardous Waste,” an accumulation start date of February 27, 2025, and affixed with a corrosive hazard indicator (Photos 62 and 63). Inspectors observed three 55-gallon hazardous waste containers of floor stripper; all containers were closed, labeled with the words “Hazardous Waste,” corrosive hazard indicators, and accumulation start dates of January 23, 2025, January 25, 2025, and February 3, 2025 (Photos 64-69). Wade Musgrave stated that the floor stripper may also contain barium (D005) and lead (D008) from cleaning certain areas of the facility. At the time of the inspection the three containers of floor stripper did not contain a toxic hazard indicator.

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

In documentation provided via email by Wade Musgrave on March 12, 2025, the waste profile for “Floor stripper and mop water” was updated to include EPA waste codes D005 and D008 for barium and lead. A photo was also provided which shows a toxic hazard indicator was added to a hazardous waste container of floor stripper (Photo 2B).

Machine Shop- Building 4

No hazardous or universal waste is generated in the machine shop. Inspectors observed a pile of aluminum shavings/scrap from a computer numeric control machine that are eventually sent for recycling as scrap metal (Photo 70).

Final Wastewater Treatment Plant- Building 12

The FWWTP treats wastewater piped directly from buildings across the property and water from the Batch Wastewater Treatment Plant for additional treatment before discharge.

Through the wastewater treatment process, solids are pressed into a filter cake using a filter press and the liquid is removed to continue treatment. The filter cake produced here is a hazardous waste with EPA waste code F006. At the time of the inspection, there was no F006 filter cake hazardous waste accumulating. Typically, the operator will place a 55-gallon container under the filter press (Photo 71) and use a tool to scrape the waste into a funnel placed on top of the container (photo 72). The waste container stays in the FWWTP until it is full and then it is moved to a CAA.

Chemical Distribution Room

This area contained one 55-gallon SAA drum with an aerosol can crusher attached to the top (Photo 73). The container was affixed with a label with the words "Hazardous Waste" and "paint residue" and four hazard indicator pictograms indicating a health hazard, harmful irritant, corrosivity, and aquatic toxicity. The facility personnel stated they sometimes recycle the paint cans scrap metal.

Batch Wastewater Treatment Plant

The BWWTTP is a small processing area located outside of Building 1. The plant treats water piped directly from the Batch Mix Area. Through the wastewater treatment process, solids are pressed into a filter cake using a filter press and the liquid is removed to continue treatment in the FWWTP. The filter cake produced here is a hazardous waste with EPA waste codes D005 (barium) and D008 (lead) associated with the hazardous K40 ceramic slurry. Inspectors observed one ~1 cubic yard sized container located under the filter press which contained hazardous filter cake and contaminated debris (i.e. gloves) (Photo 74 and 75). The container was labeled with the words "Hazardous Waste," "filter cake," an accumulation start date of 1/27/2025, and four hazard indicator pictograms indicating a health hazard, harmful irritant, corrosivity, and aquatic toxicity; the photo of the label was provided by Wade Musgrave (Photo 3B). There was an item on top of the container acting as a lid however it was shaped in a way that left parts of the container open to the environment and did not fully close the container (Photo 76).

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.17(a)(1)(iv)], which is a condition of the LQG Permit Exemption, (A) a container holding hazardous waste must always be closed during accumulation, except when it is necessary to add or remove waste; and (B) A container holding hazardous waste must not be opened, handled, or stored in a manner that may rupture the container or cause it to leak.

Inspectors observed filter cake waste accumulating on top of the "lid", this waste was open to the environment (Photo 77).

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.17(a)(6)], which incorporates Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.251], and is a condition of the LQG Permit Exemption, a generator is required to maintain and operate its facility to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment.

12) Records Review

Contingency Plan and Quick Reference Guide (QRG):

The actions that facility personnel should take in response to an emergency are described in the facility's contingency plan. The plan describes actions facility personnel must take to prevent or respond to fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water at the facility. At the time of the inspection, the plan stated the list of emergency equipment and the location of that equipment at the facility could be found in an addendum which was not attached to the contingency plan. Wade Musgrave provided the emergency equipment list via email on March 12, 2025, and that list includes fire extinguishing systems, spill control equipment, communications and alarm systems, decontamination equipment, and adequate water supply. The plan includes an evacuation plan for personnel. This plan describes signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes.

The contingency plan describes the hazardous waste generation and storage activities at the facility. The contingency plan is typically revised every three months; the next revision is due by the end of March 2025. The contingency plan includes the name and telephone number of the individual identified as the emergency coordinator, and of the individuals identified as alternate emergency coordinators. The plan describes arrangements agreed to with the local police department, fire department, and local emergency management agency. Wade Musgrave provided documentation via email on March 12, 2025, which indicates copies of the contingency plan and QRG were last sent to the Jacksonville Sheriff Office and Memorial Hospital in Jacksonville, FL on February 7, 2025.

The QRG includes the types/names of hazardous waste in layman's terms and the associated hazard associated with each hazardous waste present at any one time; the estimated maximum amount of each hazardous waste that may be present at any one time; the locations of water supply; the identification of on-site notification systems; and the name of the emergency coordinator(s) and emergency telephone number(s).

Training Records:

The inspectors reviewed facility job descriptions and employee names that were provided for the three positions which pertain to hazardous waste management. Each description included the requisite skill, education, or other qualifications, and duties of facility personnel assigned to that position.

Kyocera provided a written description of the type and amount of both introductory and continuing training to be given to each person filling the positions listed above. The training included 40-hour HAZWOPER training, an annual 8-hour refresher, DOT training (completed every 3 years next due in April 2025), and annual RCRA training. The inspectors reviewed records of employee hazardous waste training completed in 2023, 2024, and 2025; records indicate all training topics were covered, all employees received training in those years, and the records were maintained.

Waste Manifest and Land Disposal Restriction (LDR) Records:

Inspectors reviewed a Land Disposal Restriction form dated January 14, 2025, for hazardous waste with EPA waste codes D001, D011, and F003, manifest #017656846JJK.

Inspectors reviewed manifest records for the years 2023 (11 shipments), 2024 (10 shipments), and 2025 (1 shipment). Hazardous waste manifest records show that hazardous waste with EPA waste codes D001, D002, D005, D008, D011, D026, F003, F006, and F007, are routinely shipped to Enviroline of Ohio, Inc (OHD980568992) and Veolia Es Technical Solutions (TXD000838896) and the most recent shipment was made on January 21, 2025.

Manifests are most routinely signed by Doug Lipscomb (DOT training is up to date). Manifest records included non-hazardous shipments of waste such as ceramic slurry and expired product (binder). The facility is registered with e-Manifest, in compliance with the requirement that large quantity generators register and maintain an account starting January 22, 2025. Before the inspection, EPA inspector generated a random sample of 12 manifest tracking numbers from 2023-2025, nine of which were for hazardous waste. All nine manifests were present at the inspection and reviewed.

Physical copies of the manifest records were maintained for the past three years, and the facility's records included signed return copies.

Weekly Inspection Records:

The inspectors reviewed Kyocera's available records of inspections of the hazardous waste central accumulation areas since January 3, 2023. The inspection log includes a checklist to record observations about leaking containers and for deterioration of containers caused by corrosion or other factors. The inspection log includes a checklist to record observations about (1) the date and time of the inspection, (2) the legibly printed name of the inspector, (3) the number of containers, (4) the condition of the containers, (5) a notation of the observations made, and (6) the date and nature of any repairs or other remedial actions. No inspection records were provided for the week of January 3, 2023, or any weeks in February 2025 (5 missing weeks total). The CAA weekly inspection for the first week of March had not been completed at the time of the inspection but was scheduled to be completed by the end of the week. The facility voluntarily conducts weekly inspections of their satellite accumulation areas; weekly inspections for February 2025 were also not conducted.

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(3) [40 C.F.R. § 262.17(a)(1)(v)], which 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.

Excluded Solvent-Contaminated Disposable Wipes:

The inspectors observed one satellite accumulation container (~15-gallon) of excluded solvent contaminated disposable wipes in the Termination Area. The container was closed, and it was labeled "excluded solvent contaminated wipes." The inspectors observed one 55-gallon container of used solvent contaminated disposable wipes in the CAA in Building 1. The container was closed, and it was not labeled "excluded solvent contaminated wipes" instead it

was labeled “excluded wipes.” The container was not labeled with an accumulation start date. The inspectors observed two 55-gallon containers of used solvent contaminated disposable wipes in the CAA in Building 8. The container was closed, and it was not labeled “excluded solvent contaminated wipes” instead it was labeled “excluded wipes.” The container was not labeled with an accumulation start date.

Kyocera did not provide any documentation of the name and address of the landfill or combustor that is receiving the solvent-contaminated wipes; documentation that the 180-day time limit in Fla. Admin. Code Ann. r. 62-730.030(1) 40 CFR 261.4(b)(18)(ii) is being met; or a description of the process the generator is using to ensure the solvent-contaminated wipes contain no free liquids at the point of being transported off-site for disposal.

Pursuant to Fla. Admin. Code Ann. r. 62-730.030(1) [40 CFR 261.4(b)(18)(v)], generators must maintain at their site the following documentation: (a) Name and address of the landfill or combustor that is receiving the solvent-contaminated wipes; (b) Documentation that the 180 day accumulation time limit in 40 CFR 261.4(b)(18)(ii) is being met; (c) Description of the process the generator is using to ensure solvent-contaminated wipes contain no free liquids at the point of being transported for disposal.

In a response document sent via email by Wade Musgrave on March 12, 2025, the facility stated that they completed a new waste determination based on generator knowledge on the excluded solvent contaminated wipes and determined that the wipes are precious metal recovery exclusion wipes due to their use as cleanup wipes for precious metal ink residue. The reclaim container in the Termination Area was relabeled as “reclaim wipes” (Photo 4B). The facility stated in the document that all employees were informed of the new determination and management of the wipes.

Recyclable Materials Utilized for Precious Metal Recovery

The facility sends several materials for precious metal recovery including solvent wipes used to clean machines and any unusable materials with gold, silver, and palladium such as ceramic tape chips, floor sweepings, ink injectors, or spent plating bath.

The inspectors observed: 12 satellite accumulation containers (~5-gallon) for reclaim material in the Casting Rotary Room, one satellite container in the Oven Room (~5-gallons), and two satellite containers in the Ink Lab (~15 gallons). Satellite containers are labeled “reclaim only” or “green chips and prints.” The inspectors observed five 55-gallon containers of reclaim material in the CAA in Building 1. The inspectors observed four 55-gallon containers and two 15-gallon containers in the Reclaim Room.

The facility ships their reclaim material using a hazardous waste manifest; EPA waste codes include D001, D011, F003, and F007. Destination facilities most routinely used are Sabin Metal Corp (EPA ID # NYD067919340) and Metallix Refining Inc (EPA ID # NCD095119210). During the inspection, inspectors reviewed 12 manifests from 2024 and 11 manifests from 2023. Before the inspection, EPA inspector generated a random sample of 12 manifest tracking numbers from 2023-2025, three of which were for metals recovery. All three manifests were present at the inspection and reviewed.

Physical copies of the manifest records were maintained for the past three years but the facility's records did not include signed return copies of the five outbound hazardous waste manifests listed in Table 1. This list was provided to facility personnel during the inspection, but the signed copies were not provided by the end of the closing conference. The signed copies for all five manifests were provided via email by Wade Musgrave on March 12, 2025, retrieved through e-Manifest.

Table 1: Manifests in Kyocera's records missing a copy with the handwritten signature of the owner or operator of the designated facility.

Manifest Number	Waste Codes	Date of Shipment (MM/DD/YY)
017656609JJK	D001, D011, F003	9/17/24
017656453JJK	D001, D011, F003	3/20/24
017656782JJK	D001, D011, F003	7/18/23
024499273JJK	D001, D005, D011, F003	3/16/23
017656431JJK	D001, D011, F003, F007	2/21/23

The facility has an internal tracking system and recordkeeping process for materials sent for precious metal recovery. The material is transferred from the point of generation or a CAA to the Reclaim Room where it is weighed and sealed. The facility personnel complete an internal transfer sheet that details where in the facility the materials came from, who was responsible for transporting the material, and the date; inspectors observed one of the transfer sheets during the inspection. The facility also has an internal reclaim form which documents the generator name and information and material description (ex: AU plated media), physical and reactive characteristics, and chemical composition. The material is shipped with the manifest and reclaim form/profile attached.

Via an internal system, the facility also carefully tracks the initial weight of the material, the estimated composition of each metal (troy ounce) in the material, and how much return (\$) they estimate receiving. Once the shipment is processed, they document the actual composition of the material and how much money they received. This information is compiled and retained for each month. Inspectors Alexis Wilson and Emma Sacchitello accompanied Wade Musgrave to his office and observed the reclaim records for January 2024, February 2024, March 2024, and December 2024. The facility has reclaimed records since 2021 when they began monthly tracking. With this system, records show the volume of these materials stored at the beginning of the calendar year, the amount of these materials generated during the calendar year and the amount of materials remaining at the end of the calendar year.

13) Closing Conference

The inspectors conducted the exit meeting at approximately 4:45pm EST. The closing conference was attended by EPA inspectors Alexis Wilson and Tarin Tischler, FDEP inspector Emma Sacchitello, and Kyocera personnel Wade Musgrave, Yumi Highsmith, and Richard

Gwaltney. During this meeting, the inspectors stated their preliminary conclusions of the inspection. The inspectors requested digital copies of records such as waste profiles, excluded solvent contaminated wipes records, and manifests, due by March 12, 2025, which facility personnel agreed to provide. At the time of the closing conference, facility personnel were given the Closing Conference Agenda Form- Requested Information Section which had a written list of requested documents filled out by Alexis Wilson. On March 6, 2025, via email Alexis Wilson provided a detailed list of requested records and instructions on how the facility can provide them to Wade Musgrave.

On March 12, 2025, Wade Musgrave provided a subset of the requested records (7 files) in an email addressed to Alexis Wilson, Tarin Tischler, and Emma Sacchitello. On March 19, 2025, Wade Musgrave provided, via email, 5 image files to EPA and FDEP inspectors.

14) List of Attachments

Attachment 1: Photo Log A and B

15) Signed

ALEXIS WILSON Digitally signed by ALEXIS WILSON
Date: 2025.05.02 11:29:06 -04'00'

Alexis Wilson
Physical Scientist

16) Concurrence

ARACELI CHAVEZ Digitally signed by ARACELI CHAVEZ
Date: 2025.05.05 07:57:46 -04'00'

Araceli B. Chavez
RCRA Enforcement Section

Attachment 1

Photo Log A

77 Photos taken on: March 4, 2025

Photos taken by: Alexis Wilson

Photos taken with: Canon PowerShot G7X

EPA Property Tag: SX8073



Photo 1: Ball mill within a caged area where K40 slurry is mixed, located in the Batch Mix Area.



Photo 2: Another angle of the K40 ball mill.



Photo 3: Signage on the K40 ball mill cage (spill protocol, emergency contact, pictograms/hazards)



Photo 4: one 13-gallon satellite container for K40 contaminated solids, located in the Batch Mix Area.



Photo 5: a sink where equipment that may be contaminated with K40 slurry is washed, located in the Batch Mix Area.



Photo 6: one 13-gallon satellite container for K40 contaminated solids, located in the Batch Mix Area.



Photo 7: one 13-gallon satellite container for K40 contaminated solids, located in the Casting Rotary Room.



Photo 8: one 13-gallon satellite container for K40 contaminated solids, located in the Casting Rotary Room.



Photo 9: one 13-gallon satellite container for K40 contaminated solids, located in the Casting Rotary Room.



Photo 10: one 13-gallon satellite container for K40 contaminated solids, located in the Casting Rotary Room.



Photo 11: one ~10-gallon satellite container for K40 contaminated solids, located in the Casting Rotary Room.



Photo 12: enclosed rotary machine which processes K40 slurry is processed, located in the Casting Rotary Room.



Photo 13: open 3-gallon hazardous waste container inside the rotary machine enclosure where K40 ceramic tape falls after it is trimmed.



Photo 14: one, closed, ~10-gallon container for K40 hazardous waste. The container was not labeled with the words "Hazardous Waste" or indication the hazard(s), located in the Casting Rotary Room.



Photo 15: ~10-gallon container for materials with precious metals that will be sent for reclaim/recovery; labels included "reclaim wipes," and "reclaim only," located in the Casting Rotary Room.



Photo 16: ~10-gallon container for materials with precious metals that will be sent for reclaim/recovery; labels included "reclaim wipes," "reclaim only," and "green chips and prints", located in the Casting Rotary Room.



Photo 17: a flammable cabinet with signage stating it was a satellite accumulation area for Lecithin hazardous waste, located in the Casting Rotary Room.



Photo 18: Inside the flammable cabinet was one ~5-gallon container of Lecithin hazardous waste. The container was closed and labeled with the words “Hazardous Waste” but was not labeled with an indication of the hazards.



Photo 19: MLC 90-day storage CAA in building 1 which contains hazardous waste, reclaim material, and product.



Photo 20: Another angle of the MLC 90-day storage CAA in building 1.

	Photo 21: Signage on the MLC 90-day CAA cage.
	Photo 22: Signage on the MLC 90-day CAA cage.
	Photo 23: Spill Kit in the MLC 90-day CAA.



Photo 24: eye wash station in the MLC 90-day CAA.



Photo 25: fire extinguisher in the MLC 90-day CAA.



Photo 26: one 55-gallon, closed container of solvent contaminated wipes; the container was closed, labeled only as “non-hazardous waste excluded wipes” and was not labeled with an accumulation start date, located in the MLC 90-day CAA.



Photo 27: a closer image of the label on the container of solvent contaminated wipes (Photo 26).



Photo 28: signage indicating the type of hazardous waste on the wall above the storage area where the hazardous waste was located.



Photo 29: a 55-gallon closed container of mixed solvent (IPA/Naptha) waste; the container was labeled with the words “Hazardous Waste”, an accumulation start date of January 28, 2025, and three hazard indicator pictograms. The container had a funnel attached and the lid was closed, located in the MLC 90-day CAA.



Photo 30: a closer image of the label on the container of mixed solvent (Photo 29).



Photo 31: a 55-gallon closed container of hazardous K40 ceramic slurry; the container was labeled with the words “Hazardous Waste”, an accumulation start date of January 22, 2025, and four hazard indicator pictograms, located in the MLC 90-day CAA.

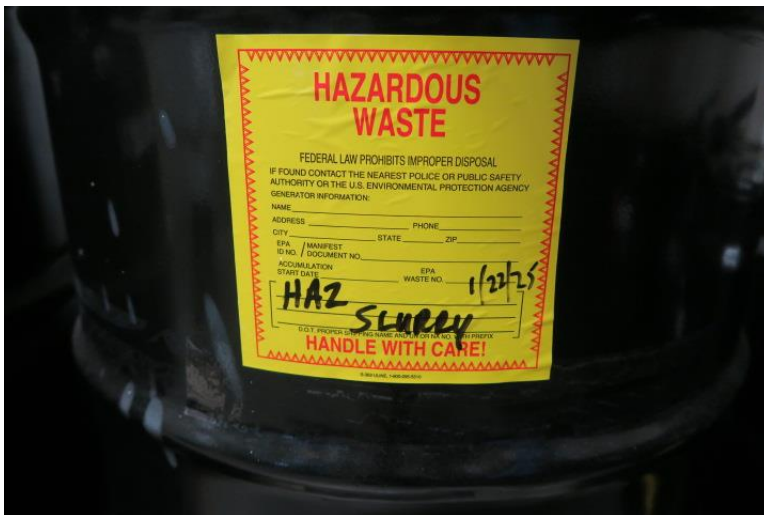


Photo 32: a closer image of the label on the container of hazardous slurry (Photo 31).



Photo 33: a 55-gallon closed container of lead (D008) and barium (D005) contaminated ceramic tape; the container was labeled with the words “Hazardous Waste,” an accumulation start date of January 6, 2025, and three hazard indicator pictograms, located in the MLC 90-day CAA.



Photo 34: a closer image of the label on the container of hazardous ceramic tape (Photo 33).

	Photo 35: five 55-gallon containers for solid reclaim material sent for precious metal recovery, located in the MLC 90-day CAA.
	Photo 36: example of the codes created by the facility to identify the area/process from which the reclaim material originated.

	Photo 37: signage on the wall above the storage area where the reclaim containers were located indicating the type of reclaim material.
	Photo 38: four closed, ~5-gallon containers for IPA product that is used throughout the facility, located in the MLC 90-day CAA.



Photo 39: one closed, ~15-gallon container for solvent contaminated wipes; it was labeled “non-hazardous waste excluded solvent contaminated wipes” but was not labeled with an accumulation start date, located in the Termination Area.



Photo 40: one, closed ~5-gallon reclaim bin for materials sent for precious metal recovery, located in the Oven Room.



Photo 41: one of the two reclaim bins located in the Ink Lab, ~15-gallons.



Photo 42: two 55-gallon containers and one 15-gallon container of material to be shipped off-site for precious metal recovery, located in the Reclaim Room.

	Photo 43: two 55-gallon containers (same as pictured above in photo 42) and one 15-gallon container of material to be shipped off-site for precious metal recovery, located in the Reclaim Room.
	Photo 44: two 55-gallon containers of material to be shipped off-site for precious metal recovery, located in the Reclaim Room.



Photo 45: overview shot of the CAA located inside building 8 which contains hazardous waste, excluded solvent contaminated wipes, e-waste, and non-hazardous waste such as expired product and ceramic slurry (row 1-3 from left to right)



Photo 46: signage on the additional locked gate inside building 8 to secure the CAA specific to waste.



Photo 47: eye wash station located in the CAA in Building 8.



Photo 48: spill kit located in the CAA in Building 8.



Photo 49: fire extinguisher located in the CAA in Building 8.

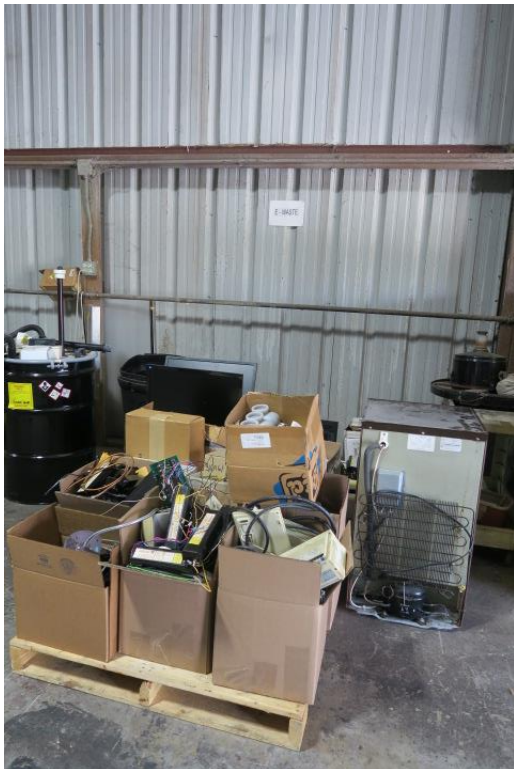


Photo 50: e-waste located in the CAA in Building 8.



Photo 51: a 55-gallon container labeled as “Hazardous Waste” and “crushed bulbs”, it has a bulb crusher connected to the top and four hazard indicator pictograms, located in the CAA in Building 8.



Photo 52: a closer image of the label on the container pictured in photo 51.



Photo 53: an example of one of the six 55-gallon containers of non-hazardous ceramic slurry, located in the CAA in Building 8 (row 1).



Photo 54: one 15-gallon container of non-hazardous nickel-plating solution, located in the CAA in Building 8 (row 1).



Photo 55: one 55-gallon container of non-hazardous expired product (binder), located in the CAA in Building 8 (row 1).



Photo 56: one 55-gallon container of excluded solvent contaminated wipes. The container was closed, labeled only as “non-hazardous waste excluded wipes” and was not labeled with an accumulation start date, located in the CAA in Building 8 (row 1).

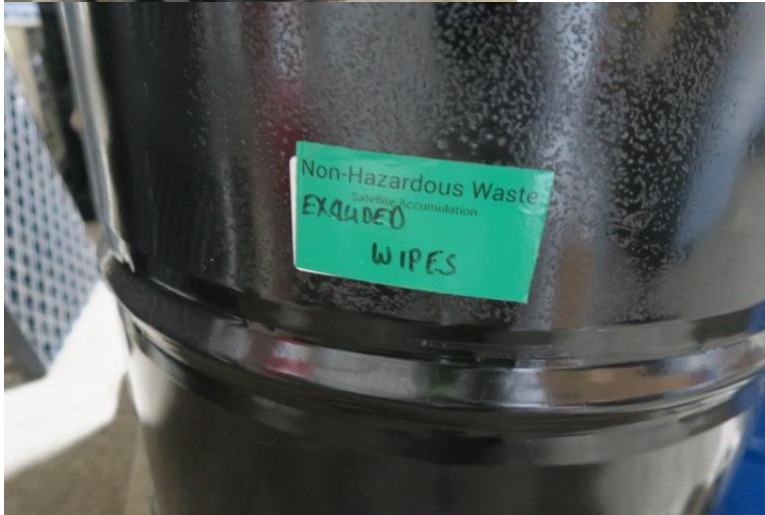


Photo 57: a closer image of the label on the container pictured in photo 56.



Photo 58: example of one of the two 12-gallon containers of non-hazardous product (ultra coolant), located in the CAA in Building 8 (row 2).



Photo 59: one of two large containers (1650 kg capacity) of non-hazardous ceramic slurry. located in the CAA in Building 8 (row 2).



Photo 60: one 55-gallon container of excluded solvent contaminated wipes. The container was closed, labeled only as “non-hazardous waste excluded wipes” and was not labeled with an accumulation start date, located in the CAA in Building 8 (row 2).

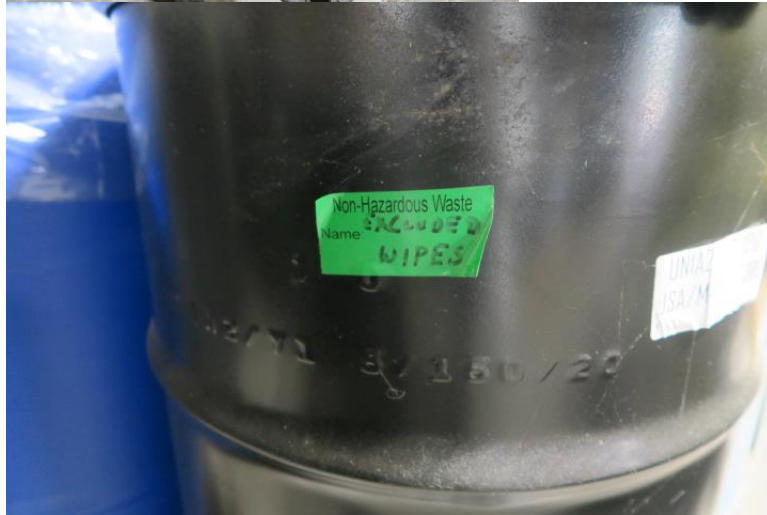


Photo 61: a closer image of the label on the container pictured in photo 60.



Photo 62: observed one 55-gallon hazardous waste container of caustic debris; it was closed, labeled with the words “Hazardous Waste,” an accumulation start date of February 27, 2025, and affixed with a corrosive hazard indicator, located in the CAA in Building 8 (row 3).



Photo 63: a closer image of the label on the container pictured in photo 62.



Photo 64: a 55-gallon hazardous waste container of floor stripper; closed, labeled with the words “Hazardous Waste,” corrosive hazard indicators, and accumulation start date of January 23, 2025, located in the CAA in Building 8 (row 3).



Photo 65: a closer image of the label on the container pictured in photo 64.



Photo 66: a 55-gallon hazardous waste container of floor stripper; closed, labeled with the words “Hazardous Waste,” corrosive hazard indicators, and accumulation start date of January 25, 2025, located in the CAA in Building 8 (row 3).



Photo 67: a closer image of the label on the container pictured in photo 66.



Photo 68: a 55-gallon hazardous waste container of floor stripper; closed, labeled with the words “Hazardous Waste,” corrosive hazard indicators, and accumulation start date of February 3, 2025, located in the CAA in Building 8 (row 3).

Photo 69: a closer image of the label on the container pictured in photo 68.



Photo 70: a pile of aluminum shavings/scraps from a computer numeric control machine that are eventually sent for recycling, located in the Machine Shop.



Photo 71: filter press in the final wastewater treatment plant.



Photo 72: the funnel that is placed on top of a waste container that goes under the filter press pictured in photo 71 to collect hazardous filter cake waste.



Photo 73: one 55-gallon drum with an aerosol can crusher attached to the top. The container was affixed with a label with the words "Hazardous Waste" and "paint residue" and four hazard indicator pictograms, located in the Chemical Distribution Room.



Photo74: one ~1 cubic yard sized container located under the filter press which contained hazardous filter cake and contaminated debris (i.e. gloves), located in the BWWTP.



Photo 75: hazardous filter cake and contaminated debris (i.e. gloves) inside of the ~1 cubic yard sized container located under the filter press in the BWWTP.



Photo 76: item on top of the container acting as a lid, it was shaped in a way that left parts of the container open to the environment and did not fully close the container.



Photo 77: Inspectors observed filter cake waste accumulating on top of the “lid”, this waste was open to the environment.

(This image is a cropped version of Photo 76 to enlarge the area on top of the lid for visualization purposes, image cropped using Microsoft Word by Alexis Wilson on 3/24/2025.)

Photo Log B

4 Photos taken by: Kyocera Personnel



Photo 1B: Lecithin container re-labeled after non-hazardous waste determination was made by the facility, located in the flammable cabinet in the Casting Rotary Room.



Photo 2B: a toxic hazard indicator was added to a hazardous waste container of floor stripper by facility personnel.



Photo 3B: Hazardous waste container at the BWWTP under the filter press. The container was labeled with the words "Hazardous Waste," "filter cake," an accumulation start date of 1/27/2025, and four hazard indicator pictograms.



Photo 4B: The reclaim container in the Termination Area was relabeled as “reclaim wipes.”