ENVIRONMENTAL PROTECTION AGENCY
REGION 1 – NEW ENGLAND
5 POST OFFICE SQUARE, SUITE 100
BOSTON, MASSACHUSETTS 02109-3912

May 22, 2024

Scott Cleary, Vice President

Reliable Plating

80 Bishop Ave.

Bridgeport, CT 06607

Re: U.S. EPA-Region 1 Inspection Report of Reliable Plating, March 26, 2024

In accordance with current policy, I am providing you with a copy of the final inspection report summarizing observations made during the March 26, 2024, inspection of your facility.

This inspection was conducted under the authority of RCRA.

Please contact me at 617-918-1309 or maisano.ryan@epa.gov if you have any questions.

Sincerely,

RYAN MAISANO
Digitally signed by RYAN MAISANO
Date: 2024.05.22 16:41:43 -04'00'

Ryan Maisano, Physical Scientist
Waste and Chemical Compliance Section

cc: Joesph Schiavone, CT DEEP

Disclaimer: Unless otherwise noted, this report describes conditions at the facility/property as observed by EPA inspector(s), and/or through records provided to and/or information reported to EPA inspector(s) by facility representatives and as understood by the inspector(s). This report may not capture all operations or activities ongoing at the time of the inspection. This report does not make final determinations on potential areas of concern. Nothing in this report affects EPA's authorities under federal statutes and regulations to pursue further investigation or action.

ENVIRONMENTAL PROTECTION AGENCY
REGION 1 – NEW ENGLAND
5 POST OFFICE SQUARE, SUITE 100
BOSTON, MASSACHUSETTS 02109-3912

RCRA Compliance Inspection of:

Reliable Plating

80 Bishop Ave

Bridgeport, CT 06607

March 26, 2024
Date of Inspection

RYAN MAISANO Digitally signed by RYAN MAISANO Date: 2024.05.22 16:42:38 -04'00'

Ryan Maisano, Physical Scientist
Waste and Chemical Compliance Section

May 22, 2024
Date Inspection Report Approved

O'Donnell, Mary Jane Digitally signed by O'Donnell, Mary Jane Date: 2024.05.22 15:30:40 -04'00'

Mary Jane O'Donnell, Manager
Waste and Chemical Compliance Section

May 22, 2024
Date Inspection Report Finalized

May 23, 2024
Date Inspection Report Transmitted to Facility

Disclaimer: Unless otherwise noted, this report describes conditions at the facility/property as observed by EPA inspector(s), and/or through records provided to and/or information reported to EPA inspector(s) by facility representatives and as understood by the inspector(s). This report may not capture all operations or activities ongoing at the time of the inspection. This report does not make final determinations on potential areas of concern. Nothing in this report affects EPA's authorities under federal statutes and regulations to pursue further investigation or action.

RCRA HAZARDOUS WASTE INSPECTION REPORT

I. GENERAL INFORMATION

a. **Facility Name:** Reliable Plating ("Reliable Plating" or the "Facility")

b. **Inspection Date:** March 26, 2024

c. **Inspection Type:** RCRA Compliance Evaluation Inspection (CEI)

d. **EPA Inspectors:** Ryan Maisano, Physical Scientist

e. **EPA ID Number:** CTD001454032

f. **NAICS:** 332813-Electroplating, plating, polishing, anodizing, and coloring

g. **Street Address:** 80 Bishop Ave. Bridgeport, CT 06607

h. **Mailing Address:** 80 Bishop Ave. Bridgeport, CT 06607

i. **Facility Contacts:** Scott Cleary
Vice President
Email: scleary@reliableplatingvt.com
Phone: 203-366-5261

j. **Generator Status (per RCRAInfo):** large quantity generator (LQG)

k. **Date first notified as a generator (per RCRAInfo):** 08/11/1980

l. **Date of most recent notification in RCRAInfo:** 02/28/2022

m. **Current Property Owner:** JR Realty

n. **Current Operator:** Reliable Plating

- **Wastes generated (per most recent RCRAInfo notification)**: D002, D006, D007, D008, F002, and F006

Report Attachments:

ATTACHMENT 1 – Digital photo log of photos taken by EPA inspectors throughout the inspection.

II. FACILITY DESCRIPTION

Reliable Plating ("Reliable Plating" or "Facility") is a large quantity generator which engages in plating, polishing, passivating, anodizing, and electropolishing. Reliable Plating notified initially on 8/11/1980. The waste codes generated, per the most recent biennial report, are D002, D006, D007, D008, F002, and F006.

III. INSPECTION IN-BRIEF

EPA inspectors arrived at the Facility at 80 Bishop Ave. Bridgeport, CT 06607 around 0945 on March 26, 2024. The EPA inspection team ("inspection team") consisted of Ryan Maisano and Drew Meyer. The inspection team entered the building through the main entrance and presented EPA credentials to the person working at the front desk. The inspection team explained that they were on site to perform a RCRA compliance evaluation inspection (CEI). Employees at the front desk were able to contact Scott Cleary to meet the inspection team and escort them to the Lab Area. In the Lab Area, the inspection team presented their EPA credentials to Scott Cleary and Matt O'Toole, who joined the team. The team then gave out business cards at this time.

The following personnel were present at the in-brief:

EPA:	Ryan Maisano, Physical Scientist Drew Meyer, Environmental Scientist
Facility:	Scott Cleary, Vice President Matt O'Toole, Plant Manager

EPA inspectors started the briefing by providing an overview of the inspection. The team listed records that would be requested, areas of interest, photos, and CBI. The inspection team presented facility representatives with US EPA Small Business Resources Information Sheet, confidential business information (CBI) request form, and CBI frequently asked questions. The inspection team then explained they would ask questions about the processes at the facility, how waste is generated, what waste is generated, and how the waste is handled and stored. Reliable Plating has been in this location since the 1960s. Reliable Plating operates the business

and leases the building and land from JR Realty. The building is approximately 14,000 square feet and includes one hazardous waste accumulation area (HWAA). There are approximately five (5) satellite accumulation areas (SAA). The facility employs around 19 people, and their shifts are Monday through Friday 0700-1530. Mr. O'Toole's schedule normally is 0630 to 1600.

The facility is a job shop plating company that also performs anodizing, caustic etching, caustic cleaning, alkaline cleaning, passivation, and black oxide. Plating is done on-site using copper, nickel, zinc, and chrome. Reliable Plating takes custom orders from the customer. The facility can do plating for items including gold automobile engines, door handles, to submarine parts.

Reliable Plating does not treat hazardous waste on-site and there are no hazardous waste tanks on-site. There is a wastewater treatment plant in the building to comply with their discharge permit. Reliable Plating does not import or export hazardous waste. They do not recover any metals for recycling. Waste oil from compressors is hauled off site and not recycled. The facility does not crush aerosol cans on site, they are sent off-site as waste. Universal waste includes fluorescent bulbs. The hazardous waste transporters for Reliable Plating are US Republic, ENPRO, or Clean Earth.

Concentrated plating baths are drummed and sent out as waste. Larger baths can be sent as totes and drums. F006 waste from the wastewater treatment filter press is the largest waste stream on site. It is sent off-site in three cubic yard containers. A small amount of sand blasting is done on certain finished product. The dust from sandblasting is collected in 15-gallon cardboard cans and sent out as waste. A methylene chloride degreaser is located on site. The tank is pumped out and sent as waste. This is done about every two years. The facility has an air permit because of the air scrubbers for the degreaser tanks. The Lab is used for titrations for metals. The waste from this process is sent through the wastewater treatment system.

The in-brief discussion ended at 10:50, following which the inspection team conducted the walk-through portion of the inspection.

IV. FACILITY TOUR

This section consists of observations by EPA Inspectors during the physical tour of the Facility. Please see Attachment 2 for a digital photo log of photos taken throughout the inspection.

The tour of the Facility took place on March 26, 2024. The following personnel were present for all or part of the tour:

EPA:	Ryan Maisano, Physical Scientist Drew Meyer, Environmental Scientist
Facility:	Matt O'Toole, Plant Manager

Hazardous Waste Accumulation Area

The inspection team was led to the 90-day HWAA which was located in a larger area with the chemical storage and wastewater treatment system (See Photos 1-2). The Lab is located on the other side of the wastewater treatment area in the same larger room. All drums within the berm were 55 gallons. All drums were closed at the time of the inspection. A phone system is not in this room, but Mr. O'Toole said cell phones could be used in an emergency. There is a spill kit is in the area along with a fire extinguisher (See Photos #12-13).

The following is a list of hazardous waste containers in the 90-day hazardous waste accumulation area (HWAA) at the time of the inspection:

#1	Container Type/Contents: • 1-Lined 3 cubic yard cardboard box, Non-regulated, sodium hydroxide solids, 3/5/2024, UN1823, PGII, 8 • 1-Lined 3-cubic yard cardboard box, non-DOT, non-RCRA anode base solid. 3/15/2024 • 5-55-gallon blue drum, hazardous waste, UN3264, D002, D007, sulfuric acid 3/5/2024 • 2–55-gallon black drum, hazardous waste, UN3264, D002, D007, sulfuric acid 1/26/2024 • 3-55-gallon blue drum, Hazardous waste, UN3266, waste corrosive liquid inorganic, NOS, sodium hydroxide, 8, PGII D002, D008 3/6/2024 • 1-55-gallon blue drum, hazardous waste, UN2810, waste poisonous liquids toxic reactive, copper strike solution D003, D011, F009, 1/12/2024

A secondary containment berm surrounds the HWAA, but it is cracked (See photos #6-8). The cracks were on the side of the berm and appeared to have full section that is damaged (See Photo #7). Drums were stored with no aisle space for inspection. The inspection team was not able to inspect all drums due to incompatible waste storage and aisle space not being sufficient for inspection. Incompatible wastes are stored within the berm. At the time of the inspection, there was no separation between acids and bases within the secondary containment. One 55-gallon drum of copper strike solution was dated 1/12/2023, Mr. O'Toole mentioned that it was a mistake, and the date should be 1/12/2024. All drains in the area discharge to the wastewater treatment system.

Cubic yard cardboard boxes of waste sodium hydroxide and waste anode base solids were not located within the berm (See Photo# 3). Both cubic yard boxes were labeled as non-DOT and non-RCRA.

A box of fluorescent bulbs was located near the bay doors of the HWAA room (See Photo# 14). The container was open at the time of the inspection and the inspection team could not check for a label because it was located behind various other containers.

There was a product storage area on the other side of the room. Various boxes and containers of virgin product were stored on shelving. Some of the product included hydrochloric acid, ammonium hydroxide, isopropyl alcohol, and Luster on Zincate #2(See Photos#15-19). Trench drains were located under the shelving and is hard piped to the wastewater treatment plant.

At the time of the inspection there were drums of waste stored near the product storage area that are listed below:

#2	Container Type/Contents: • 5–55 gallon blue drum, hazardous waste, UN3264, D002, D007, sulfuric strip solid 3/5/2024 • 3-55 gallon blue drum, non-hazardous waste, nickel acetate sludge

Mr. O'Toole mentioned the non-hazardous waste is sent out the same time as hazardous. The 55-gallon drum of sulfuric strip solid was open at the time of the inspection.

Cyanide Storage Area

This area of the room contained storage for sodium cyanide, potasium cyanide, and copper cyanide. This product is stored in a small closet area. A small container of calcium oxide also is located in the area. No waste is stored in this area. The copper cyanide will not be used and will be wasted with the next shipment according to Mr. O'Toole.

Wastewater Treatment Area

The wastewater treatment system is located between the Lab and the HWAA. Sodium hydroxide, chlorine, nitric acid, and sulfuric acid product are located in the area (See Photo #25). The wastewater treatment system is only operated during business hours when an operator is present. F006 waste is collected under the filter press (See Photos #23-24). Mr. Cleary and Mr. O'Toole are the operators of the system. Incompatible chemicals like nitric acid and sodium hydroxide were stored next to each other without a separation or berm in between.

#1	Container Type/Contents: • 1-Lined 3-cubic yard cardboard box, hazardous waste solid, metal hydroxide sludge, 3/6/2024, NA3077 F006, 9, PGII

Plating Area

On the way to the Plating Area, the inspection team viewed the chrome destruction holding tank. The tank is a part of the wastewater treatment system but is located near a hallway to the Plating Area from the HWAA. The tank is approximately 700 gallons. The inspection team was then led to the Plating Area. Mr. O'Toole stated that anodizing is the main source of business for Reliable Plating. Drums of product were located in the Plating Area. These drums include sulfuric acid, Aquapure, and sodium metabisulfate.

The plating process includes an alkaline cleaner, water rinse, 5% hydrochloric acide, water rinse, cadmium, water rinse, copper cyanide, water rinse, zinc, 15% sulfuric acid, water rinse, nickel, water rinse, trivalent chromium, two water rinses, yellow chrome (cadmium/zinc mixture), trivalent clear chrome, and finally a water rinse. The concentrated tanks/baths are drummed and sent out as waste when spent. The rinses are sent to the wastewater treatment system. There is an SAA located in this area (See Photo #27). Mr. O'Toole stated that this waste accumulated very slowly. No signage for the SAA was located in the area. Labeling the drum as an SAA was written on the label of the drum. This drum was the DEOX tank sludge from cleanouts.

#1	Container Type/Contents: • 5-55 gallon metal drum, hazardous waste, UN2796, PG II D002, sulfuric acid, deoxidizer liquid

Another blue 55-gallon drum was also labeled as a satellite and hazardous waste on the label, but Mr. O'Toole stated that this was sodium cyanide product for use in the plating process (See Photo #26).

The inspection team then came across another SAA in the plating area. The satellite area was for waste sulfuric acid waste (See Photo #30).

#2	Container Type/Contents: • 5-55 gallon metal drum, hazardous waste, UN2796, PG II D002, sulfuric acid solids, deoxidizer liquid

Another SAA was observed as the inspection team walked the plating lines. This SAA includes the following containers (See Photo#28):

#3	Container Type/Contents: • 5-55 gallon black metal drum, hazardous waste, UN3262, PG II, 8, D002, black oxide soluable solid, corrosive solid, inorganic

No SAA signage is located at the SAA. Debris was observed on the floor near this SAA. During the closing conference, Mr. O'Toole and Mr. Cleary stated that the debris was carbon build up at the outside of the tanks. Reliable Plating is in the process of cleaning while the business has been slow recently. Mr. O'Toole and Mr. Cleary mentioned the debris would be drummed and sent off-site as waste (See Photo #29).

Black Oxide and Passivation Area

The process for black oxide includes a water rinse, alkaline clean, water rinse, hydrochloric acid, water rinse, sodium dichromate. The passivate process includes hot water rinse, cold water rinse two nickel acetate baths, two cyanide baths, two water rinses, nickel strike, and finally water rinse. All rinse baths go to wastewater treatment system and other baths are sent out as waste.

Anodized Aluminum

The inspection team was led to the anodized aluminum line. This process includes sodium hydroxide etching, water rinse, chemical deoxidizer, water rinse, sulfuric acid, water rinse, two black die sealer, and finally a hot water rinse. No SAA or waste drums were located in the area at the time of the inspection.

Electrolysis Nickel

The electrolysis nickel process starts off with an alkaline cleaner, water rinse, hydrochloric acid, water rinse, electrolysis nickel, cold water rinse, hot water rinse, and finally zinc catalyst. The zinc catalyst is the source of the aluminium. No waste drums were located in the area at the time of the inspection.

Polishing/Buffing Area

In the polishing area, a sand blasting machine is used to finish the product. The sand is reused. According to Mr. O'Toole this area in used infrequently and waste to the machine has not been shipped yet. A small drum of sand was located in the area.

Shipping and Receiving Area

The inspection team proceeded to the packing area for products and receiving virgin materials. This includes part packing. No SAA or waste drums were located in the area at the time of the inspection.

Near the shipping and receiving area there is a vapor degreaser system. Methylene chloride is used as the degreaser. This waste was only shipped once in the past four years according to Mr. O'Toole. When it is shipped, it is shipped as hazardous waste.

The inspection team arrived back to the Lab at 1230. This concluded the walk-through portion of the inspection.

V. RECORDS REVIEW

The inspection team reviewed all documents on-site following the walk-through portion of the inspection.

Manifests/LDRs

The inspection team reviewed hazardous waste manifests and land disposal restriction notifications from shipments made by Reliable Plating during 2022-2024. Manifests reviewed by the inspection team for this time period were signed by Matt O'Toole. LDR notifications and all signed manifest copies were present at the time of the inspection.

Inspection Logs

The inspection team reviewed inspection logs for 2022-2024. The hazardous waste inspection logs checks conditions of the HWAA, SAA, Spill/Clean Up supplies, fire extinguishers, and conditions of containers. The Reliable Plating inspection form did not include a check for chemical compatibility or aisle space. The inspection logs did not note issues with chemical compatibility or aisle space. Matt O'Toole performs the site inspections and Mr. Cleary as a backup. Mr. O'Toole signed each inspection.

Training/Job Descriptions

The inspection team reviewed Reliable Plating's hazardous waste training certificates and training logs. Training certificates provided at the time of the inspection did not include Scott Cleary or Matthew O'Toole for any hazardous waste training post 2020. In a follow up email dated 4/5/2024, Mr. O'Toole mentioned they lapsed in their in-house RCRA training post 2020. Mr. O'Toole also shared training for himself and Mr. Cleary in follow up emails.

Contingency Plan

The inspection team reviewed Reliable Plating's contingency plan. Reliable Plating's contingency plan was prepared by Scott Cleary and Matthew O'Toole. The last update to the plan was done on 2/14/2024. Scott Cleary and Matthew O'Toole are listed as Emergency Coordinators. Home and office phone numbers are listed but addresses are not. Proof that the plan was distributed to local officials was not provided at the time of the inspection. In an email dated 4/25/2024, signed certified mail receipts were provided by Mr. O'Toole. The contingency plan was shared with the Bridgeport Police Department, Bridgeport Fire Department, CT DEEP, and City of Bridgeport Emergency Management. Mr. O'Toole mentioned in the email he is still awaiting the receipt from the Bridgeport Hospital.

Methylene Chloride Vapor Degreaser Air Calculations

Records for the vapor degreaser were reviewed by the inspection team from 2008-2024. Plans for the degreaser were also reviewed and were stored in the same binder as the calculations.

Spill Prevention, Control, and Countermeasure Plan (SPCC)

The SPCC was last updated in February 2024. It includes list of chemicals stored on site.

VI. INSPECTION OUTBRIEF

An out-brief conference was conducted on March 26, 2024, prior to leaving the facility. The following personnel were present for the closing conference:

EPA:	Ryan Maisano, Physical Scientist Drew Meyer, Environmental Scientist
Facility:	Scott Cleary, Vice President Matt O'Toole, Plant Manager

EPA Inspectors noted that compliance determinations are not made at the time of the inspection. EPA then relayed the following areas of concern that arose from observations throughout the inspection.

The inspection team discussed the following areas of concern that were observed during the inspection:

1. Incompatible chemical storage. The inspection team observed incompatible chemicals stored in the HWAA, Chemical storage areas, Wastewater Treatment Area, and the Lab.
2. The berm in the HWAA was cracked at the time of the inspection.

3. Aisle space in the HWAA was not sufficient for inspection of each container.
4. HWAA did not include an emergency contact list or evacuation map of the facility.
5. A box of universal waste fluorescents bulbs located near the HWAA was open and could not be inspected for a label.
6. A 55-gallon drum of sulfuric strip solid near the HWAA was open at the time of the inspection.
7. Training for Scott Cleary and Matthew O'Toole has not occurred since 2020.
8. A container of copper cyanide that has not been used in many years was located in the Cyanide Storage Area.
9. A blue 55-gallon drum in the Plating Area was also labeled as a satellite and hazardous waste on the label but Mr. O'Toole mentioned that this was sodium cynanide product for use in the plating process.
10. Debris located on floor near SAA requires a waste determination.

After discussing the above areas of concern, the inspection team reviewed the broad spectrum of all possible post-inspection follow-ups, including both informal and formal notices.

Following this discussion, the inspection team left the premises, concluding the on-site portion of the inspection.