RESOURCE CONSERVATION RECOVERY ACT SUBTITLE - C INVESTIGATION

Former American Plating Corporation
4004 East Monument Street
Baltimore, MD

Inspection Date: Tuesday April 12, 2016

MDE Representatives
Brian Coblentz, Chief
Anthony Enweze, Inspector
Baruch Onyekwelu, Inspector

MDE Emergency Response Representatives
Geoffrey Donahue
Mike Imbierowicz
Robert Swann

Facility Representative
Artur Nagy, President, Plating and Anodizing Sales, Tenant

Introduction

The Maryland Department of the Environment's Land Management Administration (LMA) representatives Anthony Enweze, Baruch Onyekwelu and I (Brian Coblentz) met Artur Nagy who is current the tenant of 4004 East Monument Street in Baltimore City. The Maryland Department of the Environment's Emergency Response Division (ERD) was also in attendance upon LMA's request. ERD's representatives were Geoffrey Donahue, Mike Imbierowicz and Robert Swann. Mr. Nagy owned Plating & Anodizing that was previously located at 603 Dundalk Avenue in Dundalk, Maryland 21224. The current building's owner is David Laumann who owned American Plating which once operated an electroplating operation within the building. American Plating was listed as a Large Quantity Generator, EPA ID# MDD054909072.

Weather Conditions: Sunny, 50's degrees

Pre-Inspection

LMA inspectors arrived on-site at the 4004 East Monument location at approximately 10:15 am. We were met at the front gate by a gentleman who identified himself as Mr. Artur Nagy. We identified ourselves and Mr. Nagy opened the gate and let us in. Mr. Nagy advised us that his arm was bleeding from an injury he sustained while in his office. Mr. Nagy's arm was bleeding so I stated that he should take care of his arm while we waited for representatives from ERD to arrive. Mr. Nagy said thank you for our understanding and left for approximately 15 minutes. In the meantime, Geoffrey Donahue and Mike Imbierowicz arrived on site with their trucks. Lastly, Robert Swann arrived at approximately 10:30 am in his truck. Mr. Nagy returned from his office and took us to the back of the facility lot.

Inspection/Investigation

We started to look at roll-off cans, tanks and other miscellaneous equipment that were located in the rear of the facility adjacent to the AMTRAK rail lines. At that time, approximately 10:40 am, Mr. Nagy stated that his arm was infected and that he needed to take further care of his wounds. Mr. Nagy went to into office (see Photo #3). LMA and ERD looked at the rear of the facility while Mr. Nagy was in his office. We waited for about 20 minutes and then knocked on the office door several times and received no response. Finally, Mr. Nagy came out and apologized for keeping us waiting. Mr. Nagy's behavior seemed fairly erratic and he told us that he left his keys in the office. He asked to borrow a phone as his iPhone was dead. Mr. Swann gave him his phone upon which Mr. Nagy claimed to try and call his electrician and handyman. He apparently received no response but Mr. Donahue was able to open the door handle with no problem. We arrived in the office at approximately 11:10 am. The rear of the office smelled of cat urine and was disorganized. Mr. Nagy told us that he was not feeling well and that once he gets his health in order, his plans are to get his company (Plating & Anodizing Sales) up and running. The office had a couch and a box containing clothes. Mr. Nagy opened his lab office.

Plating Shop

We walked into the Plating Shop where there were shelves containing various bottles and containers of chemicals, namely acids (see photo #4). Mr. Nagy claimed that everything he had was good used products. I asked Mr. Nagy if we could take photos and he said “yes.” Mr. Nagy stated that even though the products were expired, he sells to customers, like the Navy’s NCIS, for a discount of 33-70% off. He stated that the products, even though expired, still are effective. I asked Mr. Nagy about what he does for water and he said that he collects all water from the roof and treats it in his own treatment system and then re-uses the water. He said that his bills to the City of Baltimore for water are zero. (it was LMA’s understanding that due to failure for Mr. Naumann to pay the overdue water bills, the City shut the water off). I asked Mr. Nagy how long he had been in the building and he said about 11 months. He said that he wants to buy the building from Mr. Naumann but does not want to be responsible for all the leftover products and waste from American Plating.

Electroplating Manufacturing Area

We next were taken to the part of the building where Mr. Nagy said he custom builds electroplating tanks. The tanks are made from fiberglass materials and heaters are placed in the bathing tanks (see Photo #10). The lights in the particular area were working. Mr. Nagy again stated that once he got his health in order, he would be selling more tanks.

American Plating former electroplating area

We were next escorted into the part of the building where Mr. Nagy said American Plating once operated. This part of the building was dark so Mr. Nagy went back to his office to bring flashlights for three of us to use. There were drums throughout the warehouse. I asked Mr. Nagy if the inventory he sent Mr. Matthew Zimmerman of the Office of the Attorney General included the drums that were found in this part of the warehouse. Mr. Nagy said that he only inventoried his products from Plating & Anodizing and not anything from American Plating. Mr. Nagy stated that if we gave him two (2) weeks, he could titrate everything to determine was in the warehouse.

The next area we observed were large electroplating bath tanks that were once used by American Plating. All of the tanks were empty except 2 tanks. One was covered by a tarp (see Photos #12 & 13). Mr. Nagy said that the tanks contained cadmium dioxide solution. Another tank was uncovered and Mr. Nagy believed it was water only (Photo #14). The liquid was clear and was odorless.

The floors were wet due to roof leakage for which Mr. Nagy showed us the large tank that collects all the rain water.

Lastly, Mr. Nagy took us to the corner of the warehouse (which is the corner facing East Monument Street) which was full of 5 gallon totes and other “products.” Many of the products were expired having dates of 2011 on them. Mr. Nagy again reiterated that the products were still good. Mr. Nagy tried to turn the lights on but they did not come on. Mr. Nagy said that the room is carefully controlled where the temperature is never below 55 degrees or warmer than 100 degrees. Mr. Nagy showed us a fan that supposedly keeps the room cooler when needed and he said that he had a portable heater somewhere.

On the way out of the room, Mr. Nagy lifted up a blue tarp and underneath the tarp was blue container labeled zinc cyanide. Mr. Nagy quickly put the tarp back down so we were unable to see if that was the only container containing zinc cyanide (video taken)

Areas of Concern

Due to the fact that Mr. Nagy stated that the waste and/or products from the former American Plating Corporation were not characterized, Plating & Anodizing Sales is potentially in violation of Code of Maryland Regulations 26.13.03.02 for failing to make a waste determination. Additionally, since the products within the building are expired and Mr. Nagy was unable to provide any documentation of having viable markets for his so called products, then Plating & Anodizing Sales may be in violation of definition of speculative accumulation. Additionally, due to the leaking roof, the Facility failed to design, construct, maintain, and operate to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous constituents’ to air, soil, or surface water which could threaten human health or the environment, in violations of COMAR 26.13.03.05(E) (1) (g) and COMAR 26.13.05.03 (B).

End of tour

We went back outside through the rear the of the warehouse. We thanked Mr. Nagy for his time and Mr. Nagy again stated that he would get us the list of all products and/or waste that American Plating had left behind. ERD personnel left the facility and Mr. Nagy locked the gate behind us.

We left the facility at approximately 1 pm.

Photographs

Photo 1 – Front of the former American Plating Corporation, now rented by Artur Nagy trading as Plating & Anodizing Sales

Photo 2 – Rear of the facility showing the office for Artur Nagy and materials outside of the warehouse

Photo 3 – Inside photo of Mr. Nagy's office

Photo 4 – Inside the Plating Shop showing Mr. Nagy standing next to his work table and the shelves containing what Mr. Nagy refers to as products.

Photo 5 – Showing bottles that were not labeled “hazardous waste.” Mr. Nagy said that these bottles were for testing solutions and kits.

Photo 6 – Close-up of the so called “products”

Photo 7 – More so called “products”

Photo 8 – Shows the sink that Mr. Nagy said he uses for dilutions and for cleaning up. Mr. Nagy said that the water he uses is collected from the roof and any waste water is reclaimed and cleaned through his water filtration machine (next photo).

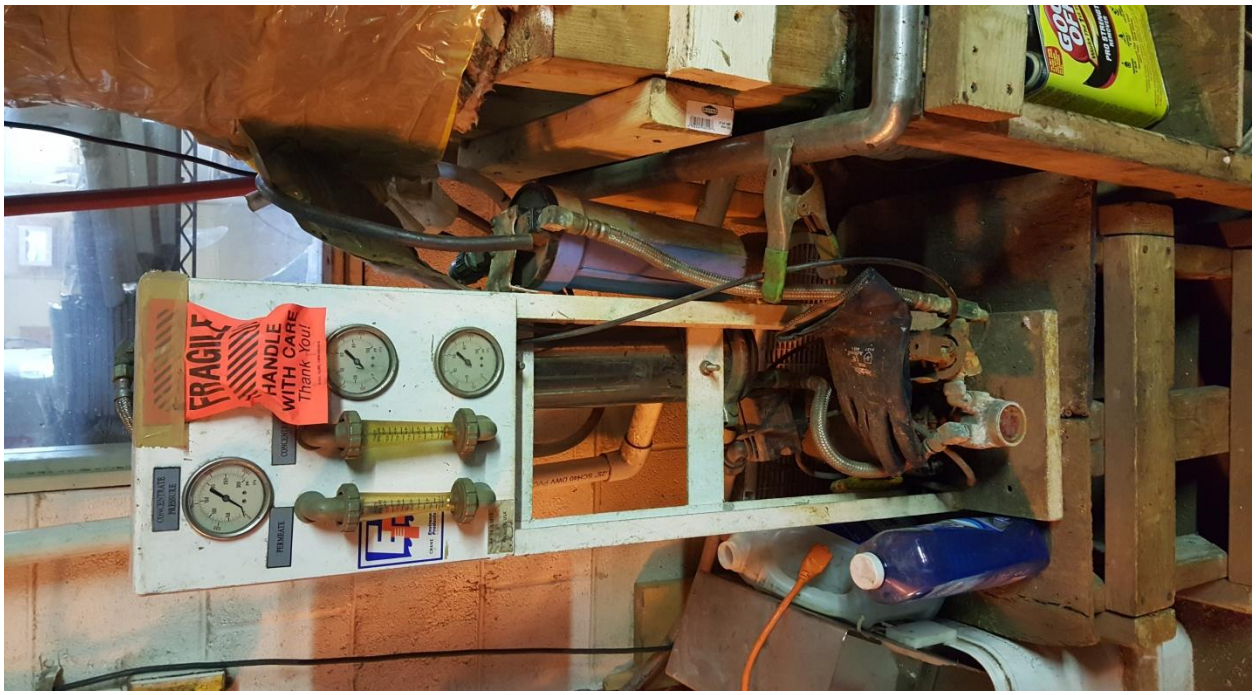


Photo 9 – Showing water filtration machine

Photo 10 – Showing custom built electroplating tanks

Photo 11 – Shows part of supply area for fiberglass to build custom electroplating tanks along with waste/products from American Plating

Photo 12 – Shows former American Plating Company electroplating bath tanks

Photo 13 – The tank that supposedly contained cadmium oxide

Photo 14 – Second bath tank that supposedly only contained water

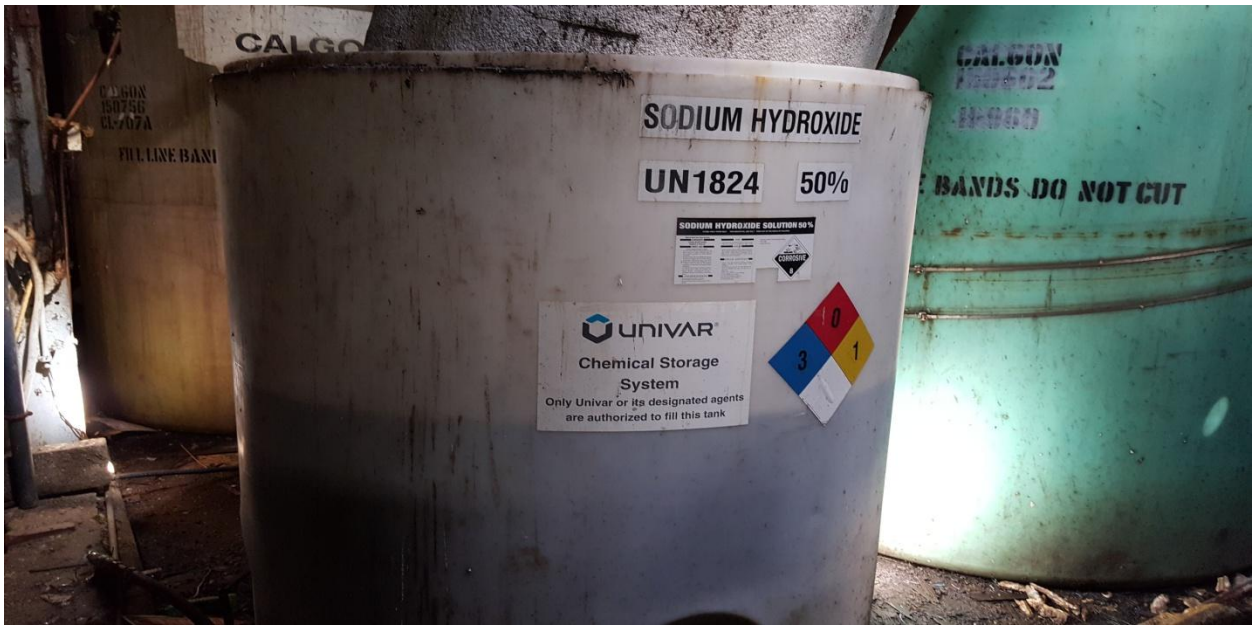
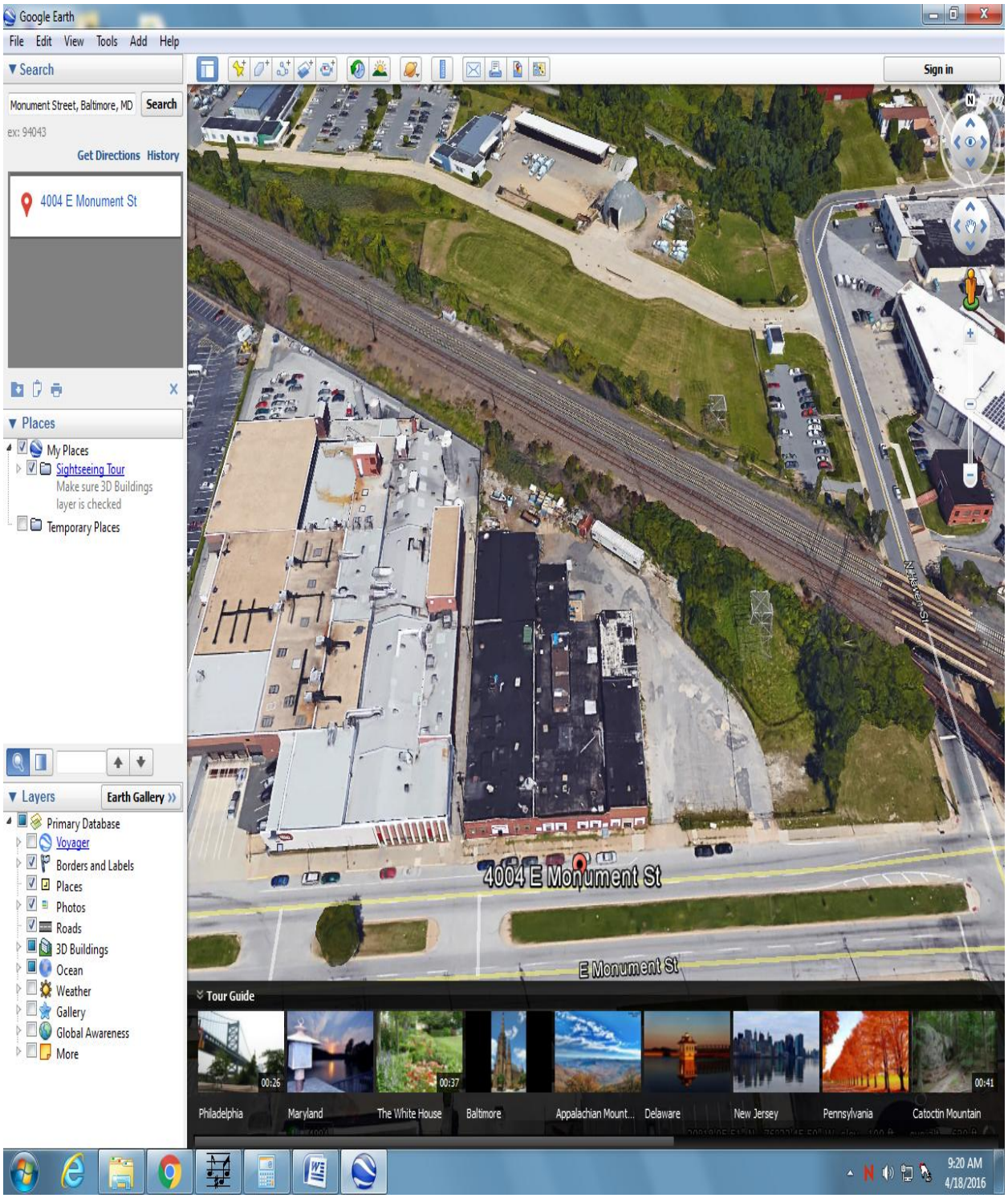


Photo 15 – Large tanks with so called “product”



Google Earth Image showing 4004 East Monument Street, former American Plating Corporation (red brick building), now rented by Artur Nagy as Plating & Anodizing Sales