UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

MAY 31 2019

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Brad Hawkins
Continuous Improvement Engineer
Orchid Orthopedic Solutions Alabama, LLC
331 City Park Drive SE
Arab, Alabama 35016

SUBJ: RCRA Compliance Evaluation Inspection
Orchid Orthopedic Solutions Alabama, LLC
EPA ID # ALD063671093

Dear Mr. Hawkins:

On April 15, 2019, the U.S. Environmental Protection Agency, along with the Alabama Department of Environmental Management, conducted a CEI at Orchid Orthopedic Solutions Alabama, LLC located at 331 City Park Drive SE, Arab, Alabama, to determine the facility's compliance status with RCRA and applicable regulations.

Enclosed is the EPA RCRA inspection report, which indicates that deficiencies of RCRA were discovered during the inspection. A copy of this report has been forwarded to the Alabama Department of Environmental Management for follow-up.

If you have any questions regarding this matter, please contact Paula Whiting by phone at (404) 562-9277 or by email at whiting.paula@epa.gov.

Sincerely,

Alan A. Annicella

Alan A. Annicella
Chief, Land, Asbestos and Lead Section
Chemical Safety and Land Enforcement Branch
Enforcement and Compliance Assurance Division

Enclosure

cc: Corey Holmes, Industrial Hazardous Waste Program, ADEM Land Division

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MAY 31 2019

Vernon H. Crockett
Chief, Industrial Hazardous Waste Branch
Land Division
Alabama Department of Environmental Management
1400 Coliseum Boulevard
Montgomery, Alabama 36110-2059

SUBJ: Resource Conservation and Recovery Act (RCRA) Compliance Evaluation Inspection (CEI)
Orchid Orthopedic Solutions Alabama, LLC
EPA ID Number: ALD063671093

Dear Mr. Crockett:

On April 15, 2019, the U.S. Environmental Protection Agency, along with the Alabama Department of Environmental Management, conducted a CEI at the Orchid Orthopedic Solutions Alabama, LLC facility, located at 331 City Park Drive SE in Arab, Alabama, to determine the facility's compliance status with RCRA and applicable regulations.

Enclosed is the EPA's CEI report that indicates deficiencies of RCRA were discovered. Pursuant to the 2003 Hazardous Waste Civil Enforcement Response Policy, it appears that the facility is a significant non-complier (SNC). Please follow-up with Orchid Orthopedic Solutions Alabama, LLC to ensure the deficiencies have been addressed and pursue appropriate enforcement.

If you have any questions regarding this matter, please contact Paula Whiting by phone at (404) 562-9277 or by email at whiting.paula@epa.gov.

Sincerely,

Alan A. Annicella

Alan A. Annicella
Chief, Land, Asbestos and Lead Section
Chemical Safety and Land Enforcement Branch
Enforcement and Compliance Assurance Division

Enclosure

RCRA Inspection Report

1) Inspectors and Authors of Report

Paula A. Whiting
Environmental Engineer
U.S. Environmental Protection Agency, Region 4
Land, Asbestos and Lead Section
Chemical Safety and Land Enforcement Branch
Enforcement and Compliance Assurance Division
61 Forsyth Street, S.W.
Atlanta, Georgia 30303
(404) 562-9277

2) Facility Information

Orchid Orthopedic Solutions Alabama, LLC
331 City Park Drive SE
Arab, Alabama 35016
Sumter County
EPA ID: ALD063671093

3) Responsible Official

Brad Hawkins, Continuous Improvement Engineer

4) Inspection Participants

Brad Hawkins	Orchid Orthopedic Solutions Alabama, LLC
Corey Holmes	ADEM Land Division
Craig Schimmer	ADEM Land Division
Paula Whiting	US EPA Region 4 Atlanta

5) Date and Time of Inspection

April 15, 2019 at 10:22 a.m. CDT

6) Applicable Regulations

Subtitle C of the Resource Conservation and Recovery Act (RCRA) (42 U.S.C. §§ 6921 – 6939g), the Chapter 403 of the Florida Statutes (Fla. Stat.), Fla. Stat. §§ 403.702 et seq.; 40 Code of Federal Regulation (C.F.R.), Parts 260 - 270, 273 & 279, and Rule 62-730 et seq. of the Fla. Admin. Code Ann.

Alabama Hazardous Waste Management and Minimization Act of 1978, Ala. Code § 22-30-1 et seq., and rules 335-14-1 to 335-14-17 (2016 and 2018) of the Alabama Department of Environmental Management (ADEM) Administrative Code (ADEM Admin. Code).

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

Pursuant to ADEM Admin. Code r. 335-14-3-.01(7) [40 C.F.R. § 262.17], a LQG may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status, as required by Section 22-30-12(b) of the AHWMMA, Ala. Code § 22-30-12(b) [Section 3005 of RCRA, 42 U.S.C. § 6925], provided that the generator complies with the conditions listed in ADEM Admin. Code r. 335-14-3-.01(7) [40 C.F.R. § 262.17] (hereinafter referred to as the "LQG Permit Exemption").

Pursuant to ADEM Admin. Code r. 335-14-3-.01(5)(a) [40 C.F.R. § 262.15(a)], a generator may accumulate as much as 55 gallons of non-acute hazardous waste in containers at or near the point of generation where wastes initially accumulate, which is under the control of the operator of the process generating the waste, without a permit or without having interim status, as required by Section 22-30-12(b) of the AHWMMA, Ala. Code § 22-30-12(b) [Section 3005 of RCRA, 42 U.S.C. § 6925], and without complying with ADEM Admin. Code r. 335-14-3-.01(6)(b) or 335-14-3-.01(7)(a) [40 C.F.R. § 262.16(b) or §262.17(a)], except as required in ADEM Admin. Code r. 335-14-3-.01(5)(a)7. and 8. [40 C.F.R. § 262.15(a)(7) and (8)], provided that the generator complies with the satellite accumulation area conditions listed in ADEM Admin. Code r. 335-14-3-.01(5)(a) [40 C.F.R. § 262.15(a)] (hereinafter referred to as the "SAA Permit Exemption").

7) Purpose of Inspection

The purpose of the inspection was to conduct an unannounced RCRA compliance evaluation inspection (CEI) to determine the compliance of Orchid Orthopedic Solutions Alabama, LLC, EPA ID# ALD063671093 with the applicable regulations.

8) Facility Description

Orchid Orthopedic Solutions Alabama, LLC, (Orchid) in Arab, Alabama, specializes in the manufacturing of orthopedic instruments and implant medical devices (Picture 1). The manufactured parts are composed of metals such as stainless steel or titanium. Orchid operates many different lines to produce devices with a custom finish required for their customers' specifications.

Orchid provides machining technology that includes Swiss-style and conventional turning, milling, grinding, and electrical discharge machining (wire and sinker), as well as automated measuring systems, laser machining and welding, color coding, diamond coating, gun drilling and micro deburring. In addition, Orchid uses complex instrument assemblies such as DFM/DFA (Design for Manufacture/Assembly), CAD/CAM capability, finishing, chemical chrome coating and electropolish.

Orchid is located on 6 to 8 acres with 50,400 square feet of production area. Orchid employs approximately 166 employees. The facility operates 7 days per week, 24 hours per day and has three shifts.

Orchid's most recent Hazardous Waste Generator Notification (EPA Form 8700-12), dated June 12, 2018, characterized the facility as a large quantity generator (LQG) of hazardous waste.

Currently, Orchid generates used oil, universal wastes, paint and solvent waste, and other wastes which include EPA waste codes D001, D002, D007, F003 and F005 hazardous waste.

9) Previous Inspection History

This facility was previously last inspected on November 6, 2013 by ADEM. No violations were found during the inspection.

10) Findings

At approximately 10:22 a.m. CDT, the EPA and ADEM inspectors arrived at the Orchid facility, presented their credentials to the front desk and signed in. Mr. Brad Hawkins, Continuous Improvement Engineer greeted the inspectors and showed them to the conference room. Mr. Hawkins met with the inspectors for an opening conference before escorting them around the facility. The inspectors presented their credentials to Mr. Hawkins at 10:30 a.m. EDT.

At the opening conference, a brief explanation for the purpose of the inspection was given, as well as an introduction of the ADEM and EPA inspectors. The inspectors requested a description of the facility operations. The inspectors then performed a walk-through inspection of specific areas in the facility. Below is a description of the observations made during the walk-through.

10.1 Saw Room

The Saw Room is used to store the incoming raw material. The inspectors observed a 55-gallon drum of titanium chips to be recycled (Picture 2) and a blue hopper with scrap wire and metal for recycling (Picture 3). Mr. Baldwin stated that the recycled titanium would be sent to Sharpiro Metals, and the spent machine coolant would be recycled by Holcim. No hazardous waste was observed in this area.

10.2 Building A Production Area

Mr. Hawkins toured the inspectors through the Building A Production Area. This building mass produces one specific part. The inspectors observed the following:

- shavings/chips to be recycled (Picture 4),
- the coolant and shavings from the equipment (Picture 5),
- a 55-gallon drum of stainless-steel polishing waste generated from spent Scotch Brite pink fluff dust (Pictures 6-7),
- a red step can with used alcohol rags (Pictures 8-9),
- floor sweeping and chips in the garbage,
- ceramic chips used for smoothing and deburring parts in a tumbler, and
- a pot of tumbler media and spent tumbler media on the bottom (Pictures 10-11).

No hazardous waste was observed in this area.

10.3 Building A Polishing Area

The Polishing Area has a central collection area with spent Scotch Brite pink fluff dust. The dust is

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sent to an outside collector. This area also generates bead blast waste and the hydra-hone wastewater from sand and water blasting the parts. The wastewater is sent to the sewer.

10.4 Building A Shipping/Receiving Dock

The Shipping and Receiving Dock receives the incoming raw material, stores the fuel and oil used in the facility and houses the mop station. Mr. Hawkins explained that the mop water is discarded in the mop station sink. The mop water contains spent Qualichem, a blue coolant oil used in the machinery. The inspectors observed that piping from the mop stations discharges into an open 250-gallon tote labeled "Used Mop Water" (Pictures 12-14). Holston Environmental pumps and ships out the oily water with a vacuum truck every two months. The inspectors explained to Mr. Hawkins because the mop water contains spent Qualichem, the tote should be labeled as used oil, not used mop water.

Pursuant to ADEM Admin. Code r. 335-14-17-.03(4)(c)1. [40 C.F.R. § 279.22(c)(1)], containers and aboveground tanks used to store used oil at generator facilities must be labeled or marked clearly with the words "Used Oil."

The inspectors also observed a bulk oil distribution center in the Dock area. The secondary containment was filled with discarded and overspill oil and coolant (Picture 15). The inspectors stated that the secondary containment is designed to capture the largest container release for immediate cleanup and not overflow storage.

Pursuant to ADEM Admin. Code r. 335-14-17-.03(4)(d) [40 C.F.R. § 279.22(d)], upon detection of a release of used oil to the environment, the facility must clean up and manage properly the released used oil and other materials.

10.5 Building A Dust Collection Room

The Dust Collection Room is a locked room that contains the spent bead blast drums (Picture 16). Outside the room is the bead blast hoppers and the Scotch Brite hoppers (Pictures 17-18). The spent bead blast and the Scotch Brite pink fluff dust has been determined by the facility to be non-hazardous.

10.6 Building B Paint Booth

Building B manufactures a low volume and a high mixture of random parts. Painting and electroplating occur in this building. The inspectors observed the paint booth, a 5-gallon red step can with waste paint debris that was not labeled, a 55-gallon drum of waste paint debris and a 55-gallon drum of aluminum chips (Pictures 19-23). Mr. Hawkins explained that the contents of the step can are transferred to the SAA drum. The inspectors stated that the step can must be labeled and must be emptied at the end of every shift.

Pursuant to ADEM Admin. Code r. 335-14-3-.01(5)(a)5. [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.

10.7 Building B Electroplating

The Electroplating Area is an enclosed room containing tanks for chromic acid, sulfuric/phosphoric

acid, citric acid, sodium hydroxide, hydrochloric acid and water rinse tanks (Pictures 24-33). Mr. Hawkins introduced Mr. Chris Smith and Mr. Andrew Jung, the electroplating technicians and the hazardous waste handlers, and explained that the sulfuric/phosphoric acid wastes are constantly being pumped out and generated the bulk of the hazardous waste being shipped from the facility. The pump out generates two 55-gallon drums of acid waste. Sulfuric/phosphoric acid and rinse water was observed in the secondary containment (Picture 29).

The inspectors observed that all the tanks sat on a single secondary containment area. Any releases from the acid and rinse tanks went to the secondary containment and was subject to comingling. At the time of the inspection, the inspectors observed that underneath the chromic acid and rinse tanks was chromic acid sludge that had been stored inside the grated secondary containment for over a year (Pictures 24-25). The chromic acid sludge was observed dried and cracked (Pictures 30, 33). The inspectors stated that the chromic acid sludge was being stored in the secondary containment and had not been immediately cleaned out after a release. Thus, the secondary containment was operating as a hazardous waste tank storage.

Pursuant to ADEM Admin. Code r. 335-14-3-.01(7)(a)2. [40 C.F.R. § 262.17(a)(2)], which incorporates ADEM Admin. Code r. 335-14-6-.10 [40 C.F.R. Part 265, Subpart J], and is a condition of the LQG Permit Exemption, a generator accumulating hazardous waste in tank systems is required to comply with the applicable requirements of ADEM Admin. Code r. 335-14-6-.10 [40 C.F.R. Part 265, Subpart J], except ADEM Admin. Code r. 335-14-6-.10(8) [40 C.F.R § 265.197(c)] (closure and post-closure care) and ADEM Admin. Code r. 335-14-6-.10(11) [40 C.F.R § 265.200] (waste analysis and trial tests).

Pursuant to ADEM Admin. Code r. 335-14-3-.01(7)(a)5.(ii) [40 C.F.R. § 262.17(a)(5)(ii)], which is a condition of the LQG Permit Exemption, a generator must mark or label its tanks with the words "Hazardous Waste"; mark or label its tanks with an indication of the hazards of the contents; use inventory logs, monitoring equipment or other records to demonstrate that hazardous waste has been emptied within 90 days of first entering the tank; and keep inventory logs or records with the above information on site and readily available for inspection.

10.8 Outside Non-Hazardous Waste Storage

The inspectors toured the outside non-hazardous waste storage area. The inspectors observed thirteen 55-gallon drums of titanium waste for recycling, two rusted 55-gallon drums of spent tumbler media and six empty coolant totes (Pictures 34-36). No hazardous waste was observed in this area.

10.9 Chip Shed

The Chip Shed contained a 20-cubic yard roll-off of metal shavings and chips to be recycled (Picture 37). The shavings and chips are dumped into the roll-off and the spent coolant drains off the chips into the secondary containment (Picture 38). The oily water is then pumped into totes marked as "Used Mop Water" (Picture 39).

Pursuant to ADEM Admin. Code r. 335-14-17-.03(4)(c)1. [40 C.F.R. § 279.22(c)(1)], containers and aboveground tanks used to store used oil at generator facilities must be labeled or marked clearly with the words "Used Oil."

10.10 Less Than 90-Day Hazardous Waste Storage Area

The less than 90-day hazardous waste storage area is in a standalone building. The inspectors observed "No Smoking" signs on three sides of the building but not on the front of the building.

Pursuant to ADEM Admin. Code r. 335-14-3-.01(7)(a)1. (vi)b. [40 C.F.R. § 262.17(a)(1)(vi)(B)], which is a condition of the LQG Permit Exemption, a generator must conspicuously place "No Smoking" signs wherever there is a hazard from ignitable or reactive waste.

Inside the hazardous waste storage area (HWSA), the inspectors observed nine 55-gallon drums of spent phosphoric/sulfuric acid, yellow storage bin for chrome containers sitting on drainage grate, and the secondary containment flooring coating in poor condition (Pictures 41-49). The oldest drum was dated March 11, 2019.

Pursuant to ADEM Admin. Code r. 335-14-6-.02(6)(c). [40 C.F.R. § 265.15(c)], the generator must remedy any deterioration or malfunction of equipment or structures which the inspection reveals on a schedule which ensures that the problem does not lead to an environmental or human health hazard. Where a hazard is imminent or has already occurred, remedial action must be taken immediately.

10.11 Loft/Maintenance

The universal waste lamps are kept in the Maintenance Loft. The inspectors observed one 4-foot spent fluorescent lamp leaning against a cardboard box, two 8-foot spent fluorescent lamps hanging in the rafters, one 4-foot spent fluorescent lamp leaning against a wall, and a broken fluorescent lamp on the floor (Pictures 50-55).

Pursuant ADEM Admin. Code r. 335-14-11-.02(4)(d) [40 C.F.R. § 273.13(d)], a small quantity handler of universal waste (SQHUW) must manage universal waste lamps in a way that prevents releases of any universal waste or component of a universal waste to the environment.

Pursuant ADEM Admin. Code r. 335-14-11-.02(4)(d)2. [40 C.F.R. § 273.13(d)(2)], a SQHUW must immediately clean up and place in a container any lamp that is broken and must place in a container any lamp that shows evidence of breakage, leakage, or damage that could cause the release of mercury or other hazardous constituents to the environment.

Pursuant to ADEM Admin. Code r. 335-14-11-.02(5)(c) [40 C.F.R. § 273.14(c)], a SQHUW must label or mark each lamp or container of lamps clearly with one of the following phrases: "Universal Waste-Lamp(s)," or "Waste Lamp(s)," or "Used Lamps."

Pursuant to ADEM Admin. Code r. 335-14-11-.02(6)(a) and (c) [40 C.F.R. § 273.15(a) and (c)], a SQHUW may accumulate universal waste no longer than one year and must to be able to demonstrate the length of time that the universal waste has accumulated from the date that it became a waste or was received.

In the Maintenance area, the inspectors observed random loose fluorescent lamps on the file cabinet. However, the lamps appeared unused.

Records Review

The inspectors requested the training records, the contingency plan, the daily and weekly inspection records, the waste profiles, the waste minimization plan, weekly inspection logs, the 2016-2019 hazardous, non-hazardous, and used oil manifests. The generator status notification (EPA Form 8700-12) was last updated June 12, 2018.

The inspectors requested the training records for the employees handling hazardous waste. Training records for Mr. Chris Smith were provided. Mr. Smith was provided of Hazardous Waste training by Great Southern Engineering in 2016-2018. The inspectors also reviewed the job title and descriptions for Chrome Group Lead and Chemical Finisher. Neither job provided duties for hazardous waste handling or the amount of hazardous waste training required.

Pursuant to ADEM Admin. Code r. 335-14-3-.01(7)(a)7.(iv) [40 C.F.R. § 262.17(a)(7)(iv)], which is a condition of the LQG Permit Exemption, the generator must maintain training records that include, among others: the job title for each position at the facility related to hazardous waste management, and the name of the employee filling each job; a written job description for each position; a written description of the type and amount of both introductory and continuing training that will be given to each person filling a position; and records documenting that the training required has been given to and completed by Facility personnel.

The inspectors requested the Emergency Contingency Plan for review. The plan included an emergency contact list, a current evacuation map, a fire extinguisher inspection list, a list of emergency response equipment, and documentation (i.e., green return receipt cards, emails) that copies of the contingency plan were provided to the local emergency response agencies (i.e., fire, police, hospital) were available.

In addition, the updated regulation under the Generator Improvement Rule, requires that the generator amending its contingency plan submit a Quick Reference Guide of the contingency plan to the local emergency responders to have the following information:

(1) The types/names of hazardous wastes in layman's terms and the associated hazard associated with each hazardous waste present at any one time (e.g., toxic paint wastes, spent ignitable solvent, corrosive acid);
(2) The estimated maximum amount of each hazardous waste that may be present at any one time;
(3) The identification of any hazardous wastes where exposure would require unique or special treatment by medical or hospital staff;
(4) A map of the facility showing where hazardous wastes are generated, accumulated and treated and routes for accessing these wastes;
(5) A street map of the facility in relation to surrounding businesses, schools and residential areas to understand how best to get to the facility and also evacuate citizens and workers;
(6) The locations of water supply (e.g., fire hydrant and its flow rate);
(7) The identification of on-site notification systems (e.g., a fire alarm that rings off site, smoke alarms); and
(8) The name of the emergency coordinator(s) and 7/24-hour emergency telephone number(s) or, in the case of a facility where an emergency coordinator is continuously on duty, the emergency telephone number for the emergency coordinator.

At the time, of the inspection, the contingency plan had not been updated after May 2017, and the Quick Reference Guide was not required at this time.

The inspectors reviewed the weekly inspection records for 2016-2018 for the facility. No issues were noted during the review of the hazardous waste storage checklist.

The waste minimization plan was requested. However, at the time of the inspection, the plan was not available for review.

Pursuant to ADEM Admin. Code r. 335-14-3-.02(7)(a) [40 C.F.R. § 262.27(a)], which is a condition of the LQG Permit Exemption, the generator who initiates a shipment of hazardous waste must certify to one of the following statements in Item 15 of the uniform hazardous waste manifest: "I am a large quantity generator. I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment."

Hazardous and non-hazardous manifests were reviewed for 2016-2018.

Non-hazardous wastes were shipped to Republic Services Sand Valley Landfill in Collinsville, AL.

Hazardous and universal wastes were shipped to the following facilities:
Spring Grove Resource Recovery, Inc. (EPA ID OHD000816629) in Cincinnati, OH;
Clean Harbors Environmental, Inc. (EPA ID OHD000724153) in Cleveland, OH;
Clean Harbors Chattanooga (EPA ID TND982141392) in Chattanooga, TN; and
Giant Resources Recovery Attalla, Inc. (EPA ID ALD070513767) in Attalla, AL;
The land disposal restriction forms were reviewed.

11) Summary

The inspectors conducted the exit meeting with Mr. Hawkins. During this meeting, the EPA and ADEM presented the preliminary results of the inspection. Orchid Orthopedic Solutions Alabama, LLC was inspected as a large quantity generator of hazardous waste. Orchid Orthopedic Solutions Alabama, LLC appears to be deficient with some requirements of RCRA.

11) Subsequent to the CEI

On May 10, 2019, Mr. Hawkins emailed the inspectors the following statement:
"I have taken actions to resolve all but two issues we observed during your site inspection on 4/15/2019. Please see the attached report and let me know if you see any additional corrections that need to be made. The two issues I have not resolved that were noted on the preliminary inspection report pertain to the secondary containment system in the chrome shop you identified as being used as a tank. I am waiting to see what the determination is on that issue before moving forward."

In the report attached to the May 10, 2019, email, Mr. Hawkins provided documentation of the

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following actions taken subsequent to the CEI:

- a new 55-gallon SAA drum replacing the red step can used for paint debris;
- "No Smoking" signs on all visible sides of the HWSA;
- a designated collection box for the universal waste lamps;
- Job titles and descriptions of all handlers of hazardous waste;
- Repaired the HWSA secondary containment; and
- Contracted GSE to create a waste minimization plan.

12) Signed

Paula A. Whiting
Environmental Engineer

5/31/19
Date

Concurrence

Alan A. Annicella
Chief, Land, Asbestos and Lead Section
Chemical Safety and Land Enforcement Branch
Enforcement and Compliance Assurance Division

5/31/19
Date

ATTACHMENT A

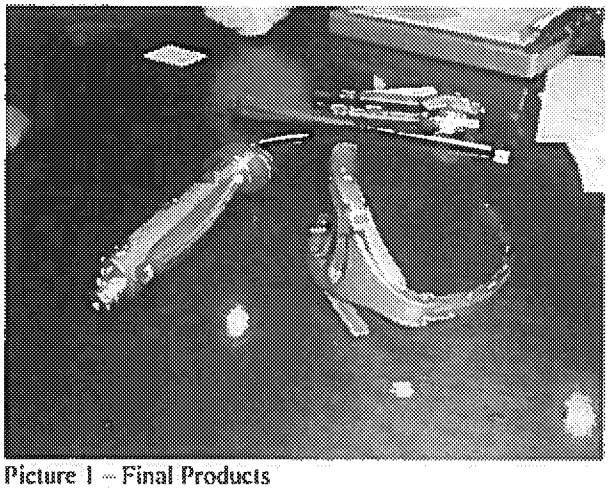
ORCHID ORTHOPEDIC SOLUTIONS ALABAMA, LLC

ARAB, ALABAMA

COMPLIANCE EVALUATION INSPECTION PHOTOGRAPHS

April 15, 2019

Photos taken by Paula A. Whiting
Camera Type: Olympus Tough
Serial Number: SC7374

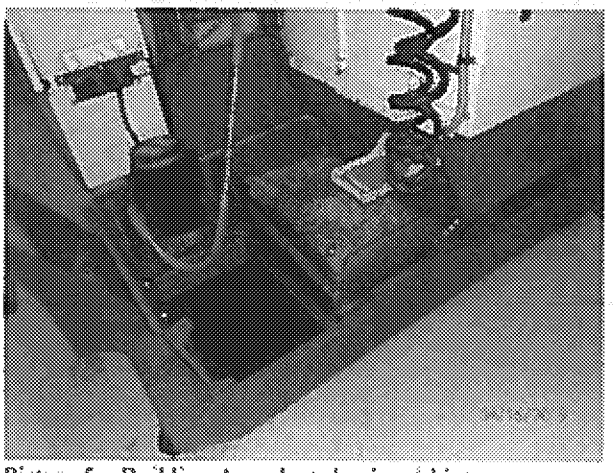


Picture 1 – Final Products

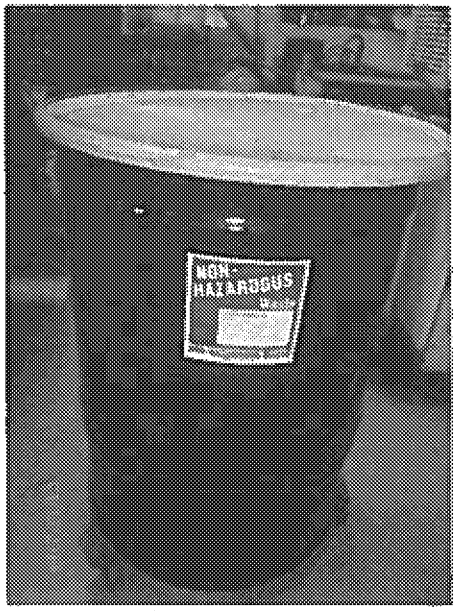
Picture 2 – Saw Room titanium chips for recycle

Picture 3 – Saw Room scrap metal hopper

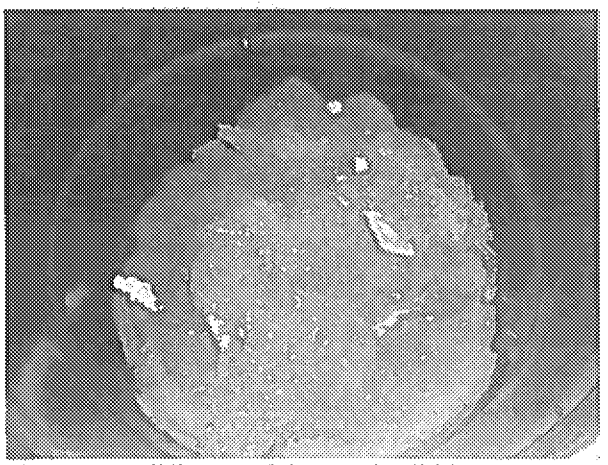
Picture 4 – Building A shavings/chips



Picture 5 – Building A coolant shavings/chips



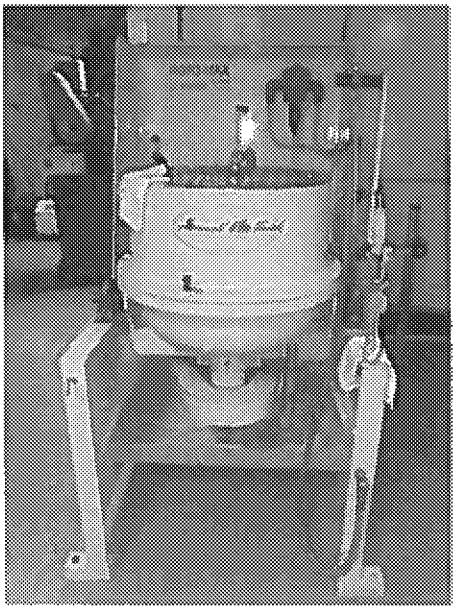
Picture 6 – Building A stainless steel polishing waste



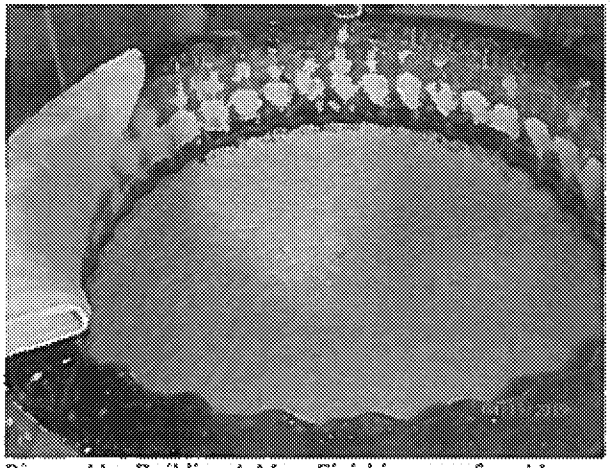
Picture 7 – Building A stainless steel polishing waste

Picture 8 – Building A spent alcohol rags

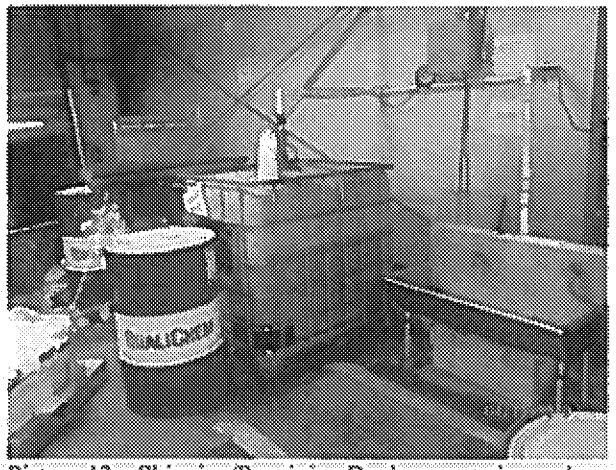
Picture 9 – Building A spent alcohol rags



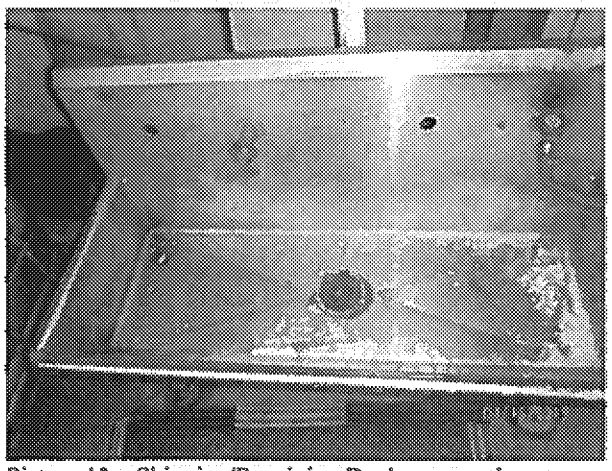
Picture 10 – Building A Mass Finishing pot of tumbler media/spent media in the bottom



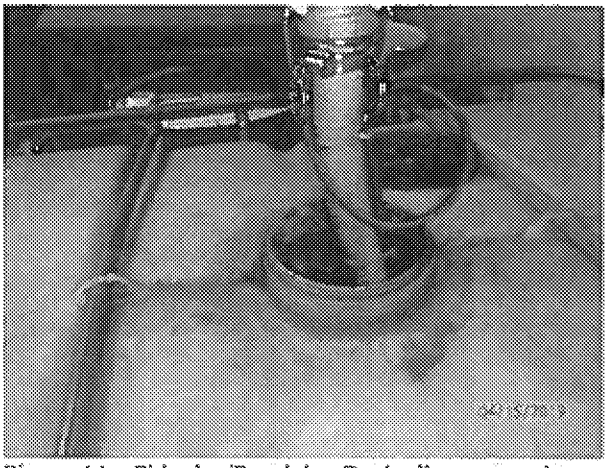
Picture 11 – Building A Mass Finishing pot of tumbler media



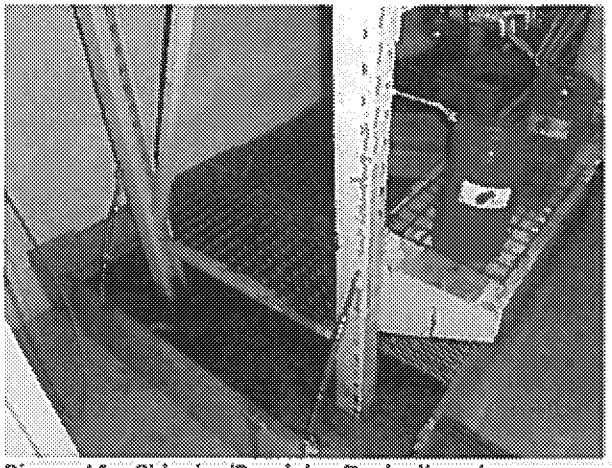
Picture 12 – Shipping/Receiving Dock mop station and oily water tank



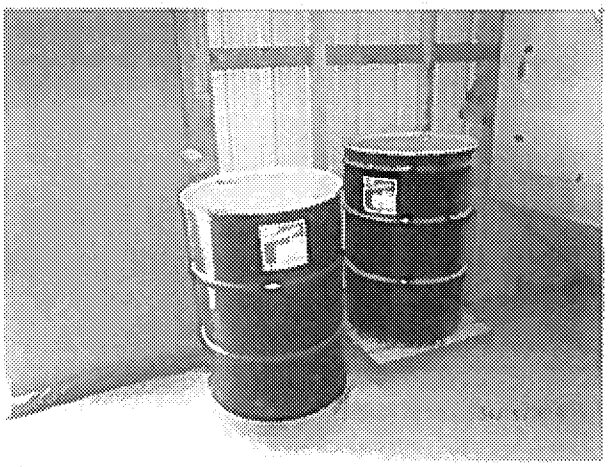
Picture 13 – Shipping/Receiving Dock mop station



Picture 14 – Shipping/Receiving Dock oily water tank open



Picture 15 – Shipping/Receiving Dock oil product secondary containment

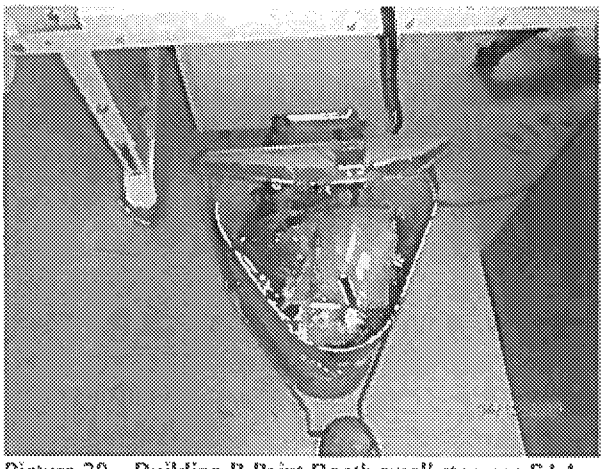


Picture 16 – Bead Blast Hopper used bead media drums

Picture 17 – Bead Blast Hopper Scotch Brite waste drums

Picture 18 – Bead Blast Hopper used bead media waste drum

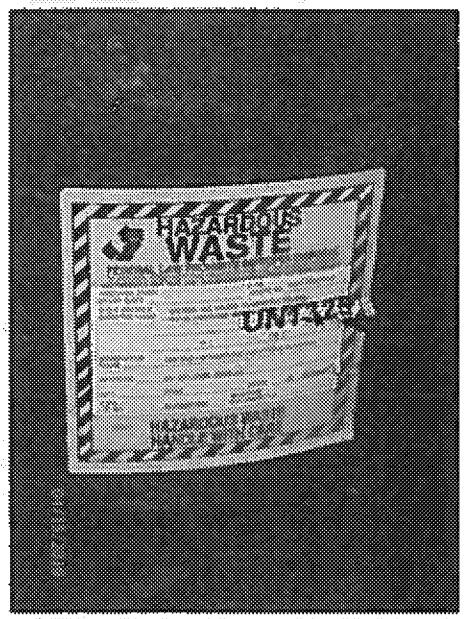
Picture 19 – Building B Paint Booth



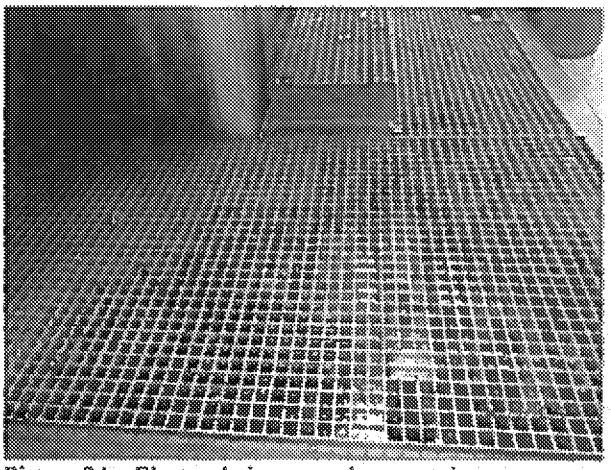
Picture 20 – Building B Paint Booth small step can SAA

Picture 21 – Building B Paint Booth small step can SAA

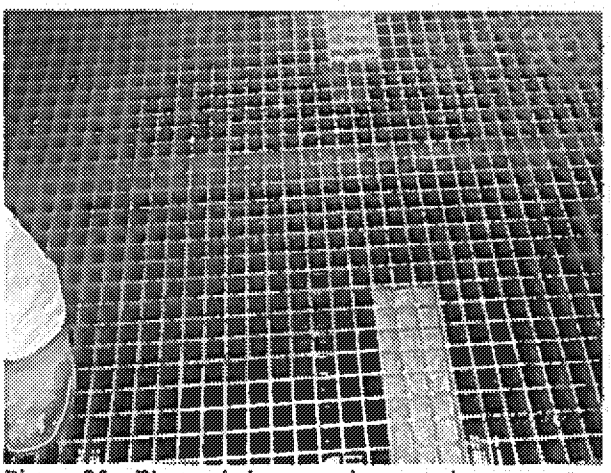
Picture 22 – Building B Paint Booth SAA drums



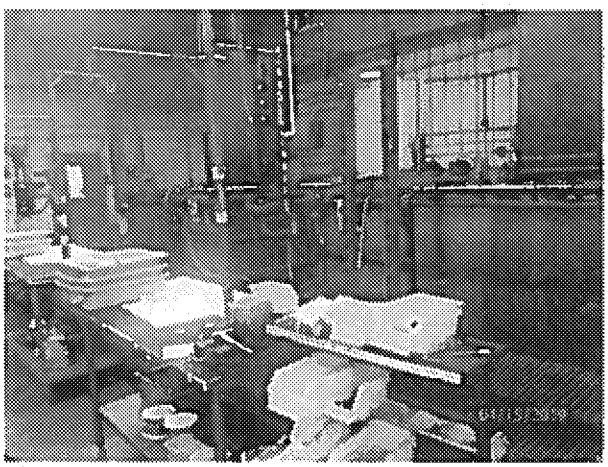
Picture 23 – Building B Paint Booth paint debris SAA



Picture 24 – Electroplating secondary containment

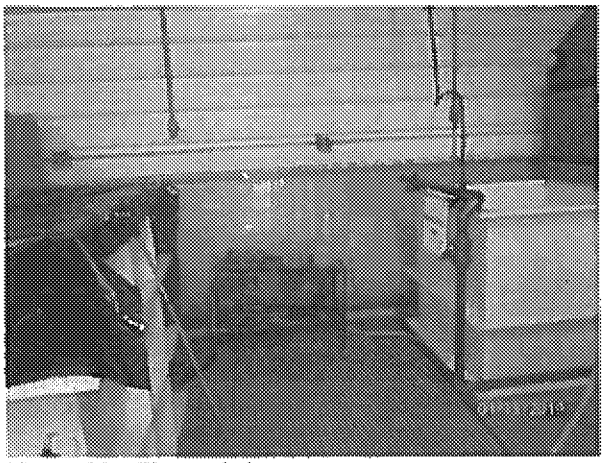


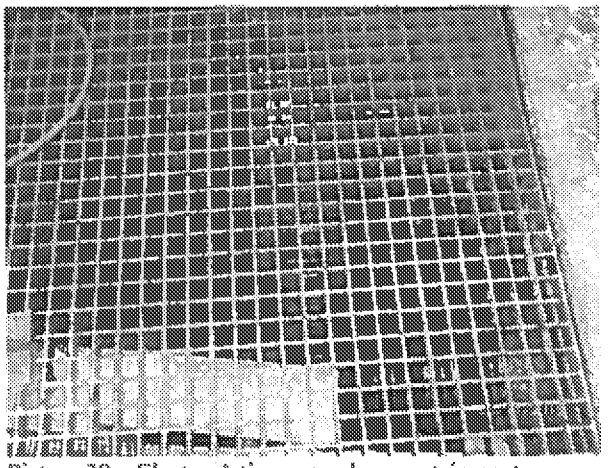
Picture 25 – Electroplating secondary containment

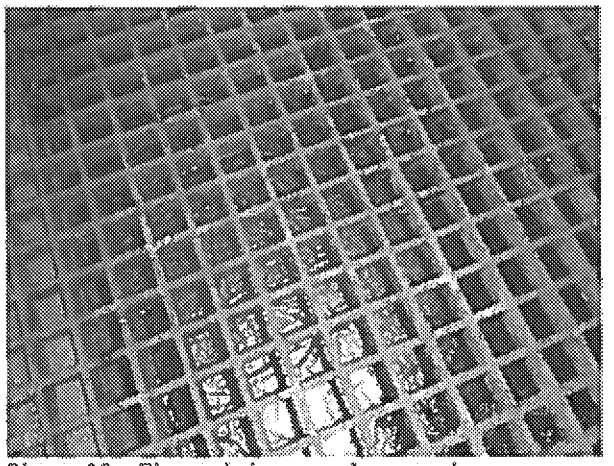


Picture 26 – Electroplating

Picture 27 – Electroplating

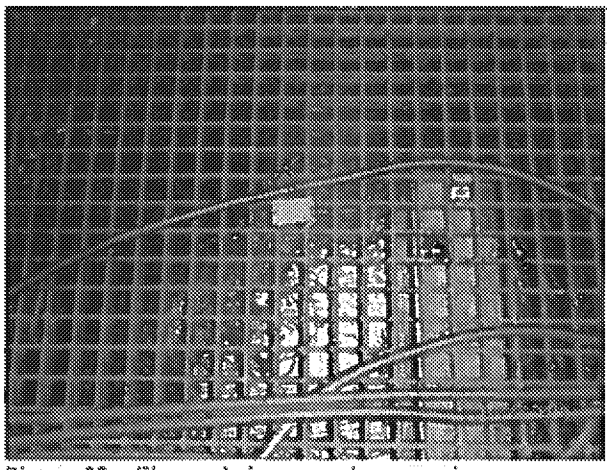

Picture 28 – Electroplating


Picture 29 – Electroplating secondary containment


Picture 30 – Electroplating secondary containment

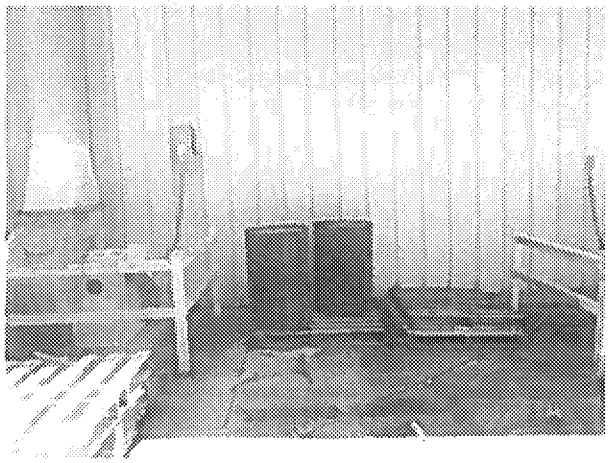
Picture 31 – Electroplating

Picture 32 – Electroplating



Picture 33 – Electroplating secondary containment

Picture 34 – Outside Non HW Storage titanium waste drums

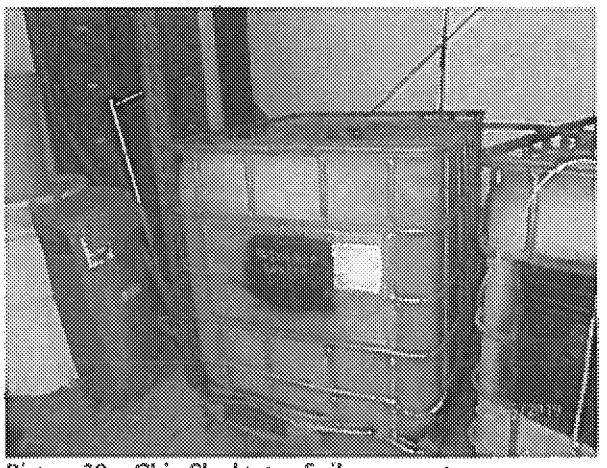


Picture 35 – Outside Non HW Storage tumbler media waste

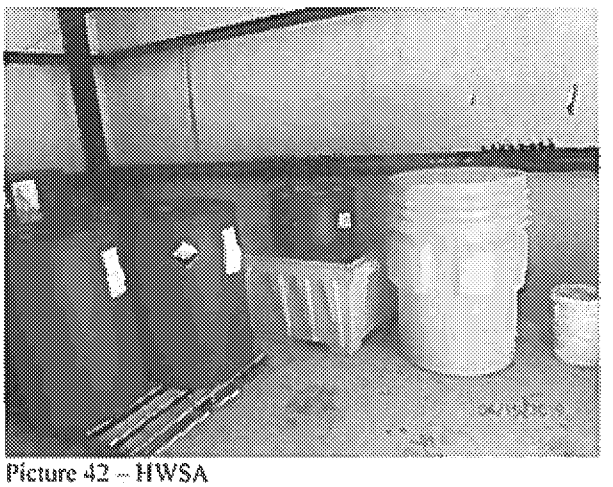
Picture 36 – Outside Non HW Storage empty coolant totes

Picture 37 – Chip Shed roll-off

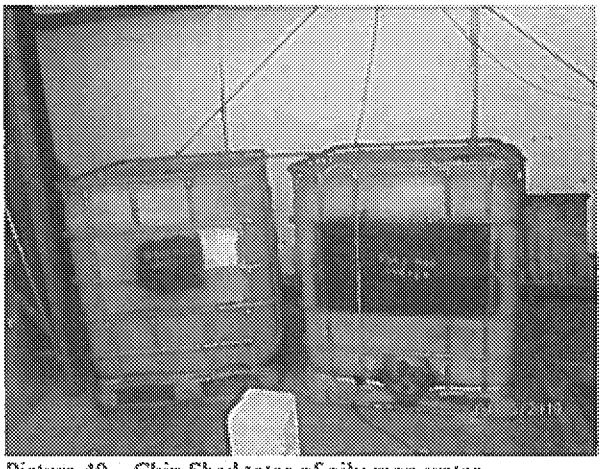
Picture 38 – Chip Shed secondary containment with oily water



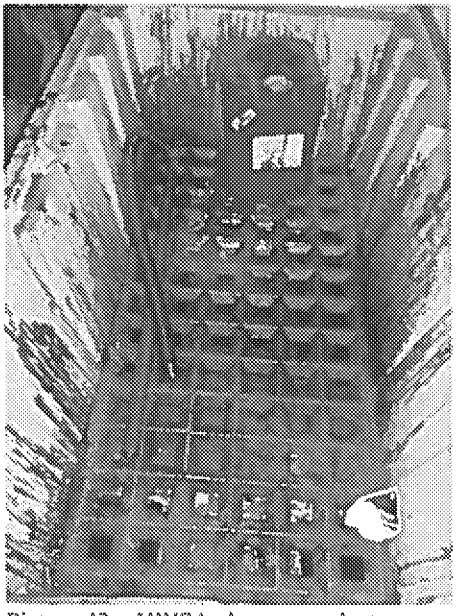
Picture 39 – Chip Shed tote of oily mop water



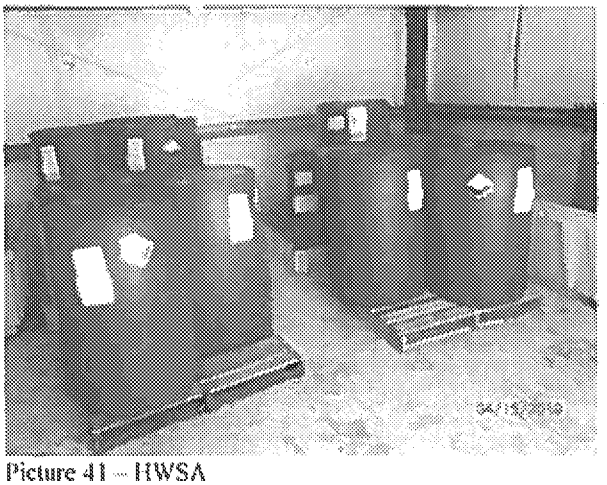
Picture 42 – HWSA



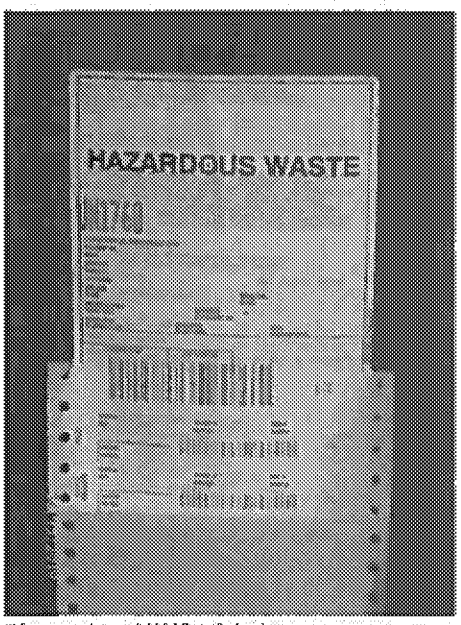
Picture 40 – Chip Shed totes of oily mop water



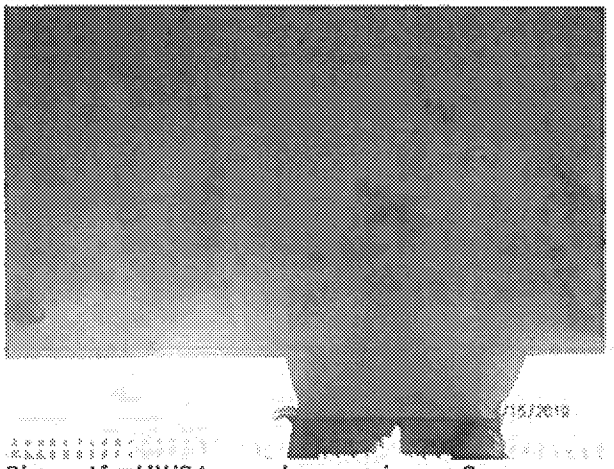
Picture 43 – HWSA chrome product storage



Picture 41 – HWSA



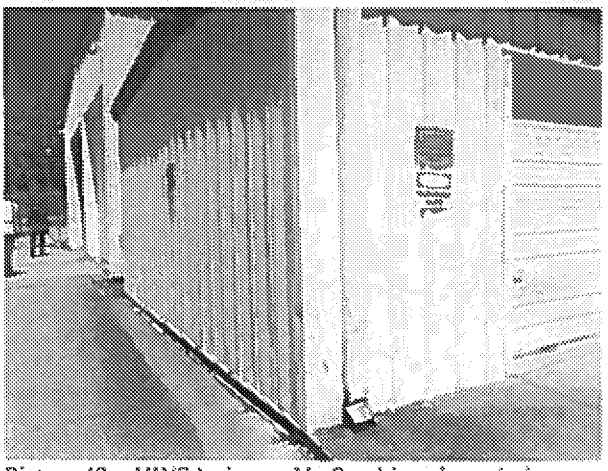
Picture 44 – HWSA label

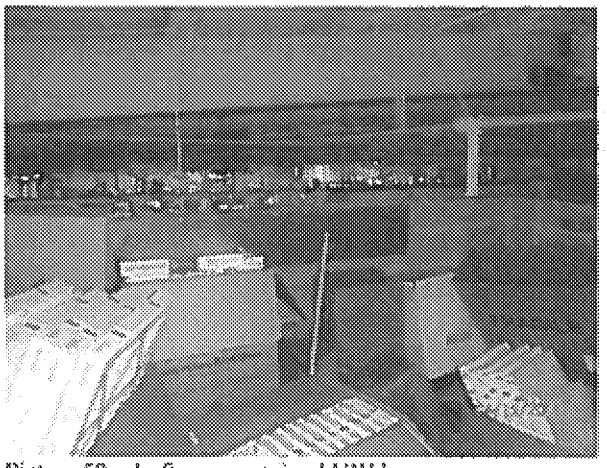

Picture 45 – HWSA secondary containment floor

Picture 46 – HWSA secondary containment floor

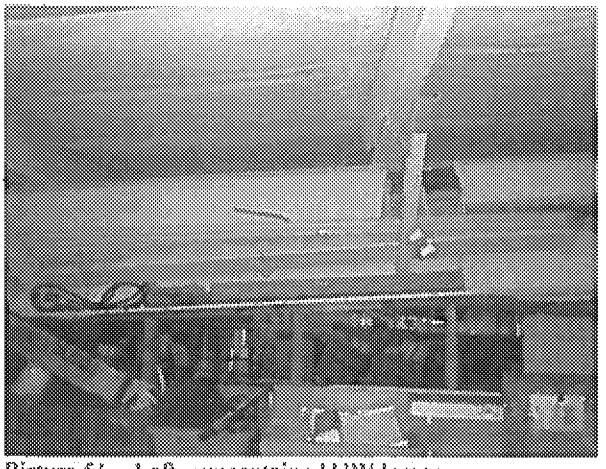
Picture 47 – HWSA secondary containment floor

Picture 48 – HWSA secondary containment floor


Picture 49 – HWSA signs – No Smoking sign missing



Picture 50 – Loft – uncontained UW lamp

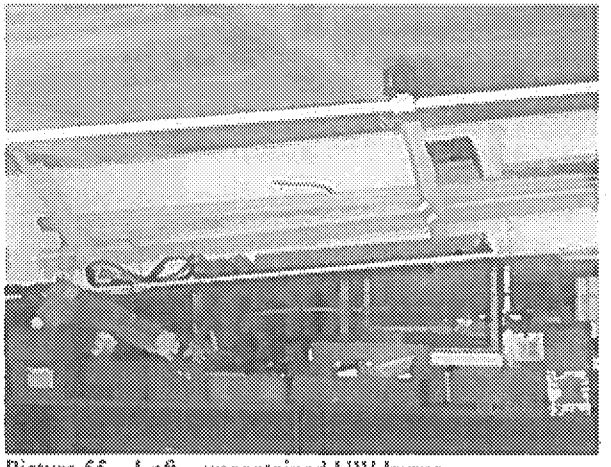


Picture 51 – Loft – uncontained UW lamps

Picture 52 – Loft – uncontained UW lamps

Picture 53 – Loft – uncontained UW lamp

Picture 54 – Loft – uncontained UW lamp broken



Picture 55 – Loft – uncontained UW lamps