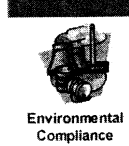




CHROMIUM ELECTROPLATING/ANODIZING



COMPLIANCE INSPECTION CHECKLIST

INSPECTION TYPE: ANNUAL (INS1, INS2) COMPLAINT/DISCOVERY (CI)
 RE-INSPECTION (FUI) ARMS COMPLAINT NO: _____

AIRS ID#: 1190032 **DATE:** 02122009 **ARRIVE:** 1415 **DEPART:** 1530

FACILITY NAME: REBEL GUN REFINISHING

FACILITY LOCATION: 4020 CR 124A, Unit# 3
WILDWOOD 34785

OWNER/AUTHORIZED REPRESENTATIVE: KENNETH SAMANIEGO **PHONE:** (352)330-0268

CONTACT NAME: _____ **PHONE:** _____

ENTITLEMENT PERIOD: _____ / _____
(effective date) (end date)

PART I: INSPECTION COMPLIANCE STATUS (check only one box)

IN COMPLIANCE MINOR Non-COMPLIANCE SIGNIFICANT Non-COMPLIANCE

PART II: CLASSIFICATION – Rule 62-213.300 FAC
 Facility type(s)/applicable standard as indicated on notification form:

1. **Hard Chromium Plating**

a. **Existing Large** (0.015 mg/dscm) b. **Existing Small** (0.03 mg/dscm) -----
 c. **New** (0.015 mg/dscm) ----- d. **Alternative Standard** for existing facilities
 (0.03 mg/dscm) using a rolling average of
 rectifier capacity (less than 60 million A-hr/year)

2. **Decorative Chromium Plating/Anodizing**

a. **Chromic Acid Bath**

1) Emissions of ≤ 0.01 mg/dscm (4.4×10^{-6} gr/dscf) -----
 2) Surface tension of ≤ 45 dynes/cm (3.1×10^{-3} lb-f/ft) -----
 (May only be selected if a wetting agent is used.)

b. **Trivalent Chromium Bath**

1) With wetting agent -----
 2) Without wetting agent ≤ 0.01 mg/dscm (4.4×10^{-6} gr/dscf)

c. **Chromium Anodizing**

1) Emissions of ≤ 0.01 mg/dscm (4.4×10^{-6} gr/dscf) -----
 2) Surface tension of 45 dynes/cm (3.1×10^{-3} lb-f/ft) -----
 (May only be selected if a wetting agent is used.)

PART III: CONTROL TECHNOLOGY – Rule 62-213.300 FAC

(Select control device)

DEVICE IN USE?

- 1. Composite Mesh Pad ----- Yes No
- 2. Fiber Bed Mist Eliminator ----- Yes No
- 3. Packed Bed Scrubber ----- Yes No
- 4. Packed Bed Scrubber/Composite Mesh Pad ----- Yes No
- 5. Foam Blanket Fume Suppressant ----- Yes No
- 6. Fume Suppressant w/ Wetting Agent ----- Yes No

Has the facility conducted an initial performance test to establish monitoring parameters? Yes No N/A
(Not required for sources using a wetting agent or 1-inch foam blanket thickness)

PART IV: RECORDKEEPING/REPORTING REQUIREMENTS – Rule 62-213.300(3)

Has the responsible official maintained the following records?

- 1. Quarterly inspection records for add-on air pollution control devices and monitoring equipment. *(applicable only to a facility using a packed bed scrubber, fiber-bed mist eliminator, or composite mesh pad)* ----- Yes No N/A
- 2. Operations and Maintenance Plan (OMP). *(applicable only to a facility using a packed bed scrubber, fiber-bed mist eliminator, or composite mesh pad)* ----- Yes No N/A
- 3. Maintenance records for the source, add-on pollution control devices, and monitoring equipment (equipment identified, date performed, description). ----- Yes No
- 4. Records of date of occurrence, duration, cause, and corrective action of each malfunction of process, add-on pollution control device, and monitoring equipment. Yes No
- 5. Results of all performance tests. ----- Yes No N/A
- 6. Records of monitoring data. *(not applicable to trivalent chromium baths using a wetting agent)* ----- Yes No N/A

Composite Mesh Pad

Measure the pressure drop across the CMP daily. ----- Yes No

Packed Bed Scrubber

Measure the pressure drop across the PBS and the inlet velocity daily. ----- Yes No

Fiber-Bed Mist Eliminator

Measure the pressure drop across the FBME and the upstream device daily. --- Yes No

Packed Bed Scrubber/Composite Mesh Pad

Measure the pressure drop across the CMP daily. ----- Yes No

Foam Blanket Fume Suppressant

Measure the foam blanket thickness at the appropriate interval.. ----- Yes No

Fume Suppressant w/ Wetting Agent

Measure the surface tension at the appropriate interval. ----- Yes No

- 7. Purchase records of wetting agent components. ----- Yes No N/A
- 8. Records of the date and time that fume suppressants are added to the bath. ---- Yes No N/A
- 9. Records of rectifier capacity, if used to determine facility size. ----- Yes No N/A
- 10. Records of the total process operating time. ----- Yes No
- 11. Records identifying specific periods of excess emissions. ----- Yes No
- 12. Startup, Shutdown & Malfunction Plan. ----- Yes No

M. Pickering

Inspector's Name (Please Print)

Date of Inspection

Joseph V. Panetta *M. Pickering*

Inspector's Signature

Approximate Date of Next Inspection

COMMENTS: A FUI Inspection was conducted by Joseph V. Panetta accompanied by Malik Pickering. This is a follow up to the 10/23/2008 inspection. After the 10/23/2008 inspection our office Enforcement Coordinator Cindy Falandyz and Compliance Manager, Danielle Henry have had multiple phone conversations with Mr. Samaniego about paying fine.

During the FUI it was found that the facility is closed. Spoke with Alan Stewart (landlord) and he verified the solutions used in the chrome plating process is still in the facility. Mr. Stewart said Mr. Samaniego will not be operating and has been talking with our Hazardous waste Section for removal of the waste caused by the process.

Returning to the office I spoke with Bob Soich of the hazardous waste section. Mr. Soich is very familiar with the situation at Rebel Gun. Mr. Soich forwarded an email (attached) from Beth Knauss (hazardous waste section) to Mr. Samaniego (R/O) and copied Jim Dregne (hazardous waste section). This email explains to R/O about removing waste from the building.

After verifying the facility is closed and Mr. Samaniego cannot be found by landlord, Hazardous Waste or our Air Section, we may consider removing this from our inspection list.

From: [Soich, Robert](#)
To: [Panetta, Joe](#)
Subject: FW: Waste Disposal Issues
Date: Thursday, December 11, 2008 3:51:51 PM

Joe:

FYI

From: Dregne, James
Sent: Monday, December 08, 2008 3:39 PM
To: Soich, Robert; Foster, Rebecca
Subject: FW: Waste Disposal Issues

FYA

From: Knauss, Elizabeth
Sent: Monday, December 08, 2008 3:12 PM
To: Dregne, James
Subject: FW: Waste Disposal Issues

Forgot to cc you.

From: Knauss, Elizabeth
Sent: Monday, December 08, 2008 3:11 PM
To: 'rebelgun1968@aol.com'
Subject: Waste Disposal Issues

Dear Mr. Samaniego:

To follow up on our earlier conversation, I am letting my supervisor know of your eviction situation. If you are unable to find someone who can use your process solutions, they will have to be disposed of as hazardous waste. This includes your three drums of chrome waste, but also any acids or caustics on site which are corrosive. Your nickel solutions may also be hazardous if they contain heavy metals like chromium or cadmium that exceed the toxicity characteristic levels. It may be more cost effective to manage them as hazardous rather than pay for an analysis. This should be discussed with your disposal company.

As we discussed, I recommend immediately notifying the bankruptcy court of this situation. I understand you do not intend to abandon any materials, but do not currently have the funds to pay for disposal. Your landlord, Alan Stewart of Stewood LLC should be advised that the materials are on site, and that they may only be disposed of to a permitted hazardous waste facility. Hazardous waste may not be moved from the property except by a registered hazardous waste transporter. If he chooses, he may make these arrangements.

As you do not have an EPA identification number at your current address (4070 CR 124A, Unit 3, Wildwood), either you or he would need to obtain a temporary EPA identification number for a one-time cleanup. The form to apply for a number can be found at the link below. Either one of

you can complete the form and fax it to the FDEP Southwest District Hazardous Waste Program at 813/632-7664.

http://www.dep.state.fl.us/waste/quick_topics/forms/documents/62-730/emergency_ID.pdf

It may take several weeks to arrange for hazardous waste disposal. You can either ship to a permitted facility in state or use a registered transporter to ship to an out of state facility. There are a limited number of permitted facilities in Florida.

Clean Harbors 170 Bartow Airport Bartow 863-533-6111	Commercial Hazardous Waste storage facility, solvent recycling, fuel blending. Company has out of state treatment, incineration facility and landfill. General Chemical Treatment and Disposal
EQ of Florida Inc. 2002 N. Orient Rd. Tampa 813-623-5302	Commercial Storage Facility General Chemical Treatment and Disposal
Perma Fix of Florida 1904 N.W. 67th Place Gainesville 1-800-365-6066	Storage facility, incineration of waste solvents and ignitables. General Chemical Treatment and Disposal
653 Rocket Blvd. Orlando 407-859-4441	General chemical treatment and disposal

You can find whether a transporter is registered by the link below.

http://approd.dep.state.fl.us/www_rcra/reports/CommHWTransport.asp

If you or your landlord need more information, please call me at 813/632-7600 ext 383 or you can view a number of Department publications at

http://www.dep.state.fl.us/waste/quick_topics/publications/default.htm

Most hazardous waste program staff will be out of the office at a workshop tomorrow, but a number of us will be back in the office on Wednesday.