



# FLORIDA DEPARTMENT OF Environmental Protection

Northeast District  
8800 Baymeadows Way West, Suite 100  
Jacksonville, Florida 32256

**Ron DeSantis**  
Governor

**Jeanette Nuñez**  
Lt. Governor

**Shawn Hamilton**  
Secretary

January 18, 2023

Sent electronically to: [rick.poinsatte@steeldynamics.com](mailto:rick.poinsatte@steeldynamics.com)

Mr. Richard Poinsatte  
New Millennium Building Systems, LLC  
7575 W. Jefferson Boulevard  
Fort Wayne, IN 46804

**SUBJECT: Department of Environmental Protection v. New Millennium Building Systems, LLC**  
**OGC File No.: 21-0974**  
**EPA/DEP ID: FLR000121624**

Dear Mr. Poinsatte:

Enclosed is a copy of the executed Consent Order to resolve Case Number 21-0974.

The effective date of this Order is January 18, 2023, and all time frames will be referenced from this date.

As a reminder, a Consent Order is a binding legal document and was voluntarily entered into by both parties.

Should you have any questions concerning the Consent Order, please contact Bonnie Bradshaw at (904) 256-1638, or [Bonnie.Bradshaw@floridadep.gov](mailto:Bonnie.Bradshaw@floridadep.gov). Your continued cooperation in the matter is appreciated.

Sincerely,

A handwritten signature in blue ink that reads "T G Kallemeyn".

Thomas G. Kallemeyn  
Assistant District Director

Enclosure: Executed Consent Order

cc: Justin Hoover ([justin.hoover@newmill.com](mailto:justin.hoover@newmill.com))

FDEP: Lea Crandall, Agency Clerk; Arlene Wilkinson, DEP\_NED



# FLORIDA DEPARTMENT OF Environmental Protection

Northeast District  
8800 Baymeadows Way West, Suite 100  
Jacksonville, Florida 32256

**Ron DeSantis**  
Governor

**Jeanette Nuñez**  
Lt. Governor

**Shawn Hamilton**  
Secretary

January 4, 2023

*Sent electronically to: [rick.poinsatte@steeldynamics.com](mailto:rick.poinsatte@steeldynamics.com)*

New Millennium Building Systems, LLC  
Mr. Richard Poinsatte  
7575 W. Jefferson Boulevard  
Fort Wayne, IN 46804

**SUBJECT: Department of Environmental Protection v. New Millennium Building Systems, LLC**  
**OGC File No.: 21-0974**  
**EPA/DEP ID: FLR 000 121 624**

Dear Mr. Poinsatte:

The State of Florida Department of Environmental Protection (“Department”) finds that New Millennium Building Systems, LLC (“Respondent”) did not conduct complete and accurate hazardous waste determinations on four waste streams, did not keep one hazardous waste satellite container closed, did not properly label four hazardous waste satellite containers, did not comply with 40 CFR 265 Subpart J for two hazardous waste accumulation tanks, did not properly label one hazardous waste accumulation container, disposed of three hazardous waste aerosol cans and one hazardous waste wipe in the trash, did not repair a leak of a process tank that periodically contains a waste stream that is a hazardous waste when disposed of, did not attempt to make emergency arrangements with and submit its Contingency Plan to local emergency authorities, did not keep one box of universal waste lamps closed, did not properly label one drum of used oil, did not use a registered used oil filter transporter to transport used oil filters to a registered used oil processor or end user and did not properly document the weekly inspections of the hazardous waste accumulation area. This is in violation of the rules and statutes cited in the attached Warning Letter (WL21-200). Before sending this letter, the Department requested that the Respondent undertake certain actions to resolve the violations. These actions have since been completed. However, due to the nature of the violations, the Respondent remains subject to civil penalties. The Respondent is also responsible for costs incurred by the Department during the investigation of this matter.

### **The Department’s Offer**

Based on the violations described above, the Department is seeking \$29,294.00 in civil penalties and \$500.00 for costs and expenses the Department has incurred in investigating this matter, which amounts to a total of \$29,794.00. The civil penalty in this matter includes one violation of \$2,000.00 or more.

### **Respondent's Acceptance**

If you wish to accept this offer and fully resolve the enforcement matter pending against the Respondent, please sign this letter and return it to the Department at 8800 Baymeadows Way West, Suite 100, Jacksonville, Florida, 32256, by January 11, 2023. The Department will then countersign it and file it with a designated clerk of the Department.

Once the document is filed with the designated clerk, it will constitute a final order of the Department pursuant to Section 120.52(7), Florida Statutes (F.S.), and will be effective unless a request for an administrative hearing is filed by a third party in accordance with Chapter 120, F.S., and the attached Notice of Rights.

By accepting this offer you, Mr. Poinatte:

- (1) certify that you are authorized and empowered to negotiate, enter into, and accept the terms of this offer in the name and on behalf of Respondent;
- (2) acknowledge and waive Respondent's right to an administrative hearing pursuant to Sections 120.569 and 120.57, F.S., on the terms of this offer, once final; and
- (3) acknowledge and waive Respondent's right to an appeal pursuant to Section 120.68, F.S.

The Department acknowledges that the Respondent's acceptance of this offer does not constitute an admission of liability for the violation(s) referenced above.

### **Respondent's Performance**

After signing and returning this document to the Department:

- (1) Respondent must pay \$29,794.00, in full, within 60 days from the execution date of this Order.
- (2) Respondent shall make all payments required by this Order by cashier's check, money order or on-line payment. Cashier's check or money order shall be made payable to the "Department of Environmental Protection" and shall include both the OGC number assigned to this Order and the notation "Water Quality Assurance Trust Fund." Payment shall be sent to the Department of Environmental Protection, 8800 Baymeadows Way West, Suite 100, Jacksonville, Florida, 32256. Online payments by e-check can be made by going to the DEP Business Portal at: <http://www.fldepportal.com/go/pay/>. It will take a number of days after this order is final and effective, by filing with the Clerk of the Department, before ability to make online payment is available.

The Department may enforce the terms of this document, once final, and seek to collect monies owed pursuant to Sections 120.69 and 403.121, F.S.

Until clerked by the Department, this letter is only a settlement offer and not a final agency action. Consequently, neither the Respondent nor any other party may request an administrative hearing to contest this letter pursuant to Chapter 120, F.S. Once this letter is clerked and becomes a final order of the Department, as explained above, the attached Notice of Rights will apply to parties, other than the Respondent, whose interests will be substantially affected.

Electronic signatures or other versions of the parties' signatures, such as .pdf or facsimile, shall be valid and have the same force and effect as originals. No modifications of the terms of this Order will be effective until reduced to writing, executed by both Respondent and the Department, and filed with the clerk of the Department.

Please be aware that if the Respondent declines to respond to the Department's offer, the Department will assume that the Respondent is not interested in resolving the matter and will proceed accordingly.

If you have any questions, contact Bonnie Bradshaw at (904) 256-1638, or via e-mail at [Bonnie.Bradshaw@FloridaDEP.gov](mailto:Bonnie.Bradshaw@FloridaDEP.gov).

Sincerely,



Thomas G. Kallemeyn  
Assistant District Director

FOR THE RESPONDENT:

New Millennium Building Systems, LLC, a foreign limited liability company,

By: Steel Dynamics Columbus, LLC, its sole member and a foreign limited liability company;

By: Steel Dynamics Enterprises, Inc., its sole member and a foreign for-profit corporation;

By:  Date: 5 JAN 2023

Name: Richard Poinsatte  
[Type or Print]

Title: VP and Assisit. Sec.  
[Type or Print]

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**FOR DEPARTMENT USE ONLY**

DONE AND ORDERED this 18th day of January 2023, in Duval County, Florida.

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL PROTECTION



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Gregory J. Strong  
District Director

TGK

Filed, on this date, pursuant to section 120.52, F.S., with the designated Department Clerk, receipt of which is hereby acknowledged.



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Clerk

January 18, 2023

Date

Attachments:        Notice of Rights  
                              Warning Letter WL21-200

Final clerked copy furnished to:

Lea Crandall, Agency Clerk ([lea.crandall@floridadep.gov](mailto:lea.crandall@floridadep.gov))

Arlene Wilkinson, FDEP NED ([arlene.wilkinson@floridadep.gov](mailto:arlene.wilkinson@floridadep.gov))

## NOTICE OF RIGHTS

Persons who are not parties to this Order, but whose substantial interests are affected by it, have a right to petition for an administrative hearing under Sections 120.569 and 120.57, Florida Statutes. Because the administrative hearing process is designed to formulate final agency action, the filing of a petition concerning this Order means that the Department's final action may be different from the position it has taken in the Order.

The petition for administrative hearing must contain all of the following information:

- a) The OGC Number assigned to this Order;
- b) The name, address, and telephone number of each petitioner; the name, address, and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding;
- c) An explanation of how the petitioner's substantial interests will be affected by the Order;
- d) A statement of when and how the petitioner received notice of the Order;
- e) Either a statement of all material facts disputed by the petitioner or a statement that the petitioner does not dispute any material facts;
- f) A statement of the specific facts the petitioner contends warrant reversal or modification of the Order;
- g) A statement of the rules or statutes the petitioner contends require reversal or modification of the Order; and
- h) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the Department to take with respect to the Order.

The petition must be filed (received) at the Department's Office of General Counsel, 3900 Commonwealth Boulevard, MS# 35, Tallahassee, Florida 32399-3000 within 21 days of receipt of this notice. A copy of the petition must also be mailed at the time of filing to the District Office at the address indicated above. Failure to file a petition within the 21-day period constitutes a person's waiver of the right to request an administrative hearing and to participate as a party to this proceeding under Sections 120.569 and 120.57, Florida Statutes. Mediation under Section 120.573, Florida Statutes, is not available in this proceeding.



# FLORIDA DEPARTMENT OF Environmental Protection

Northeast District  
8800 Baymeadows Way West, Suite 100  
Jacksonville, Florida 32256

**Ron DeSantis**  
Governor

**Jeanette Nuñez**  
Lt. Governor

**Shawn Hamilton**  
Secretary

September 30, 2021

*Sent via email: [justin.hoover@newmill.com](mailto:justin.hoover@newmill.com)*

Mr. Justin Hoover, Senior Environmental Engineer  
New Millennium Building Systems, LLC  
7575 West Jefferson Boulevard  
Fort Wayne, Indiana 46804

**RE: Warning Letter No. WL21-200 (Significant Non-Complier)  
New Millennium Building Systems  
EPA/DEP ID: FLR 000 121 624  
Columbia County – Hazardous Waste**

Dear Mr. Hoover:

A hazardous waste compliance inspection was conducted at your facility on July 1, 2021. During this inspection, possible violations of Chapters 376 and 403, Florida Statutes (Fla. Stat.), and Chapters 62-710, 62-730, and 62-737, Florida Administrative Code (Fla. Admin. Code), were observed.

During this inspection, Department personnel noted the following:

- The facility did not conduct complete and accurate hazardous waste determinations on three (3) waste streams.
- The facility did not keep one (1) hazardous waste satellite container closed.
- The facility did not properly label four (4) hazardous waste satellite containers.
- The facility did not comply with 40 CFR 265 Subpart J for two (2) hazardous waste accumulation tanks.
- The facility did not properly label one (1) hazardous waste accumulation container.
- The facility disposed of three (3) hazardous waste aerosol cans and one (1) hazardous waste wipe in the trash.

- The facility did not repair a leak of a process tank that periodically contains a waste stream that is a hazardous waste when disposed of.
- The facility did not attempt to make emergency arrangements with and submit its Contingency Plan to local emergency authorities.
- The facility did not keep one (1) box of universal waste lamps closed.
- The facility did not properly label one (1) drum of used oil.
- The facility did not use a registered used oil filter transporter to transport used oil filters to a registered used oil processor or end user.
- The facility did not properly document the weekly inspections of the hazardous waste accumulation area.

Violations of Florida Statutes or administrative rules may result in liability for damages and restoration, and the judicial imposition of civil penalties, pursuant to Sections 376.121 and 403.121, Florida Statutes.

Please contact Bonnie Bradshaw at (904) 256-1638, or via email at [Bonnie.Bradshaw@FloridaDEP.gov](mailto:Bonnie.Bradshaw@FloridaDEP.gov), within 15 days of receipt of this Warning Letter to arrange a meeting to discuss this matter. The Department is interested in receiving any facts that you may have which might assist in determining whether any violations have occurred. You may bring anyone with you to the meeting that you feel could help resolve this.

Please be advised that this Warning Letter is part of an agency investigation, preliminary to agency action in accordance with Section 120.57(5), Florida Statutes. We look forward to your cooperation in completing our investigation and resolving this as soon as possible.

Sincerely,



Gregory J. Strong  
District Director

Attachment: Final Inspection Report

cc: FDEP-NED: Bonnie Bradshaw, Cheryl Mitchell, Joni Petry, DEP\_NED  
New Millennium: Dan Olson – [dan.olson@newmill.com](mailto:dan.olson@newmill.com)





**Florida Department of  
Environmental Protection  
Hazardous Waste Inspection Report**

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**FACILITY INFORMATION:**

**Facility Name:** New Millennium Building Systems  
**On-Site Inspection Start Date:** 07/01/2021      **On-Site Inspection End Date:** 07/01/2021  
**ME ID#:** 18024      **EPA ID#:** FLR000121624  
**Facility Street Address:** 1992 NW Bascom Norris Dr, Lake City, Florida 32055-4888  
**Contact Mailing Address:** 7575 W Jefferson Blvd, Fort Wayne, Indiana 46804-4131  
**County Name:** Columbia      **Contact Phone:** (260) 969-3548

**NOTIFIED AS:**

LQG (>1000 kg/month)

**WASTE ACTIVITIES:**

**Generator:** LQG **Used Oil:** Used Oil, Oil Filters **Universal Waste:** Indicate types of UW generated and/or accumulated at the facility: **Generate/Accumulate:** Mercury Containing Lamps **Maximum quantity of UW handled or transported at any time:** Less than 5,000 kg (11,000 lbs); Small Quantity Handler (SQH)

**INSPECTION TYPE:**

Routine Inspection for LQG (>1000 kg/month) Facility  
Routine Inspection for Used Oil Generator Facility

**INSPECTION PARTICIPANTS:**

**Principal Inspector:** Bonnie M Bradshaw, Inspector  
**Other Participants:** Dan Olson, Safety Coordinator

**LATITUDE / LONGITUDE:** Lat 30° 11' 56.1" / Long 82° 39' 51.7"

**NAIC:** 332312 - Fabricated Structural Metal Manufacturing

**TYPE OF OWNERSHIP:** Private

**Introduction:**

New Millennium Building Systems, LLC (New Millennium, the facility) was inspected on July 1, 2021, as an unannounced hazardous waste compliance inspection. The facility was last inspected by the Department's Hazardous Waste Program on February 7, 2007, as a Small Quantity Generator (SQG) of hazardous waste. The facility notified as a Large Quantity Generator (LQG) of hazardous waste on August 21, 2018, and again most recently on February 19, 2020. Dan Olson (Safety Coordinator), Lorenzo Jones (Production Manger), Shawn Smyth (Deck Mill Supervisor) and Sarah Keith Valentine (DEP) were present throughout the inspection.

New Millennium owns the property and has operated at this location since 2005. The facility is connected to city water and city sewer. New Millennium has approximately 240 employees and operates Monday through Friday 24 hours a day and on Saturday, typically from 4:30 AM to 12:30 PM.

New Millennium manufactures steel joists and decking for the building construction industry. The facility consists of administrative offices, a Deck Plant, a 90-Day Hazardous Waste Accumulation Area (HWAA), a Joist Plant, a Maintenance Shop and a Yard.

**Process Description:**

Deck Plant

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The Deck Plant manufactures steel corrugated deck paneling. Coils (Photo 1), or rolls of flat, steel sheets, are delivered to the facility via truck or rail from steel mills throughout the country. These rolls may be treated with a rust inhibitor that may contain chromium prior to transport. Prior to use, the steel coils go through a washing

## New Millennium Building Systems Inspection Report

Inspection Date: 07/01/2021

process to remove the rust inhibitor.

A series of belts and equipment pull the steel off the roll and send it through a pre-wash tank. Fresh water is pumped to the pre-wash tank from a 9,000-gallon water tank in the wash tank area (Photo 2). Bulk Kleen 15 (pH 1.7) is added to the tank to aid in the cleaning process. The facility representative stated that the washwater is maintained at a pH of approximately 3 for ideal cleaning. QC Up (pH 14) and QC Down (pH 1) may be used to adjust the pH of the washwater during its use. The pH is monitored by a pH meter installed in the tank. Once spent, the washwater is pumped into either the 6,000-gallon or the 9,000-gallon accumulation tank, described below, for disposal. It takes approximately 2-6 weeks for the washwater to become spent.

At the time of inspection there was a significant quantity of washwater and sludge on the floor around the pre-wash tank (Photos 3 and 4) [40 CFR 262.251]. The facility representative stated that the pre-wash tank was leaking in an area of the tank where a catch pan could not be used to contain the leak. The washwater that leaks from the tank drains to a trench drain which drains to a sump that is pumped into the 6,000-gallon accumulation tank, described below. Staff squeegeed the wastewater into the trench at the time of inspection, but because the tank was leaking, it was expected to accumulate again.

Following the inspection, the facility analyzed a sample of liquid from the pre-wash tank and sludge from the floor in the area around the pre-wash tank. Based on the results, it appears that the leaked washwater and sludge around the pre-wash tank were non-hazardous wastes. However, the facility is reminded that the characterization of these wastestreams may change with continued use of the pre-wash tank. The facility representative stated that the tank was expected to be replaced by the end of September 2021.

Following the pre-wash step, the steel is fed into the wash tank (Photo 5). The wash tank also uses water, Bulk Kleen 15 and the associated additives to clean the steel, but this tank is equipped with spray nozzles. There can sometimes be overflows from this tank which are directed into a tote which is re-used in the process. The pH is monitored by a pH meter installed in the tank. Spent washwater is also pumped from the wash tank approximately every 2-6 weeks into either the 6,000-gallon or the 9,000-gallon accumulation tanks, described below, for disposal. This tank formerly used Bulk Kleen 841NA (pH >14), but this product was recently discontinued due to issues with foaming.

The final step in the washing process is a water rinse. The rinse tank is located in a baffled, in-line section of the wash tank. The pH is monitored by a pH meter installed in the tank. The spent rinsewater is pumped into either the 6,000-gallon or 9,000-gallon accumulation tanks, described below, for disposal, or pumped to the pre-wash or wash tanks to be re-used in the process.

Spent washwater and rinsewater from the pre-wash, wash and rinse tanks (wastewater) are individually piped to a collection pipe that is pumped into a 6,000-gallon cone-bottomed accumulation tank equipped with a mixer in the wash tank area (first tank in Photo 6). If this 6,000-gallon accumulation tank were to be full, the liquid would be pumped to the adjacent 9,000-gallon accumulation tank (second tank in Photo 6). The 9,000-gallon accumulation tank was empty at the time of inspection. The facility representative stated that they typically do not use the 9,000-gallon accumulation tank due to the flat bottom and lack of a mixer, but that the tank could be used should additional capacity be required. These tanks are also equipped with pH meters. Wastewater is shipped off-site from these tanks, as needed but approximately monthly, and either disposed of as D002/D007 hazardous waste or taken to a wastewater treatment facility according to a facility representative. The determination of whether the wastewater in these tanks is hazardous or non-hazardous is based on analysis of samples taken from the tanks and pH readings. However, the point of waste generation is the point at which a wastestream exits the manufacturing process. Since the facility does not analyze the waste at the point of exit from each process unit (i.e. the pre-wash tank, the wash tank and the rinse tank), the facility has not conducted a complete and accurate hazardous waste determination [40 CFR 262.11].

Provided records indicated that, for the period from August 10, 2018 to December 18, 2020, 43 out of 69 samples taken from the tanks were D007 hazardous waste. The pH is not logged, so records regarding the wastewater's corrosivity were not available. The facility representative stated that sampling was discontinued and all wastewater from these tanks was managed as hazardous waste beginning in 2021, due to the wastewater being consistently characterized as hazardous waste. Following the inspection, however, a sample from the 6,000-gallon accumulation tank was collected on July 2, 2021, and analyzed. This sample was determined to be non-hazardous and shipped as such.

Formerly and during the inspection conducted in 2007, the facility was operating these tanks as wastewater

## New Millennium Building Systems Inspection Report

Inspection Date: 07/01/2021

treatment units under an industrial pre-treatment permit issued by Lake City. The facility was treating the wastewater and discharging it to the POTW at that time. The facility representative stated that the wastewater treatment process was discontinued approximately five years ago, due to a lack of appropriate staffing, and that wastewater has been disposed of off-site since that time. The permit is still active with an expiration date of June 15, 2023, but batch discharges from the Deck Plant no longer occur. Because these tanks no longer meet the wastewater treatment unit exemption and are being used to accumulate hazardous waste periodically, the requirements and standards of 40 CFR 265 Subpart J, must be met. The facility, however, is not in compliance with all the requirements of this regulation [40 CFR 262.17(a)(2)]. The 6,000-gallon accumulation tank containing waste was also not labeled as "Hazardous Waste", or with an indication of the hazard of the contents. There was also no indication that the facility was properly labeling the tanks during the time periods when the tanks were used to store hazardous waste. This is an Area of Concern. Although following the inspection analysis indicated that the waste stored in the tank at the time of inspection was a non-hazardous waste, the facility did not know the status of the waste until the analysis was performed. If a generator is unsure if the waste being tested is a hazardous waste, the generator must manage it as hazardous waste and label the tanks/containers with an indication of the hazards of the contents and the words "hazardous waste" (or "hazardous waste pending analysis" to make it clear that testing is not yet complete). That way the generator will remain in compliance with the 40 CFR 262 labeling requirements if the waste is determined to be hazardous. If the waste is determined to be non-hazardous, the generator can remove the hazardous waste labels at that point. The facility maintains records of the accumulation start dates of the tanks. There was an eyewash and fire extinguisher in the area, and the tanks were installed within a secondary containment wall.

Following washing, the steel continues automatic feeding into the "Chem Coater" (Photo 7). The Chem Coater applies Bulk Bond NP250 (chromium chromate 6.8-15%, chromic acid 1.28-2.1%; pH 2.4), a rust inhibitor, to the steel. The NP250 is poured into trays and applied by an automatic roller system. Excess product left in the tray at the end of the day is pumped to a drum for reuse. The coating build-up must be removed from the Chem Coater as needed. The facility representative stated the coating would be scraped off and placed into the 55-gallon satellite accumulation drum, described below, for management as D007 hazardous waste. The Chem Coater feeds the steel to an oven for drying.

The steel is then fed to the "Prime Coater" where Armorhide WC Yellow Deck LH (flashpoint 250°F), Armorhide WC White Deck (flashpoint 250°F) or Armorhide WC Gray Deck (flashpoint 250°F) is applied via a similar tray/roller system as described above (Photo 8). The more heavily used Gray Deck is stored in a 6,000-gallon tank (third tank in Photo 6) located adjacent to the 6,000-gallon and 9,000-gallon accumulation tanks, described above. Yellow and White Deck are stored in totes. Excess product left in the tray at the end of the day is pumped to a drum for reuse. Paint is scraped off the Prime Coater as needed and placed into the 55-gallon satellite accumulation drum, described below, for management as D007 hazardous waste. The Prime Coater feeds the steel to another oven for drying and then to a quench tank for cooling. Water from the quench tank is pumped to the 9,000-gallon water tank, described above, for reuse.

The steel also receives a final coat of Armorhide WC White Deck or Armorhide WC Gray Deck in the "Finish Coater" (Photo 9). The paint is applied via a similar tray/roller system as described above. Galvanized steel is coated with Bulk RP-9100 (ammonium dichromate 2.1-5.8%) in lieu of paint in this machine. Excess product left in the tray at the end of the day is pumped to a drum for reuse. Paint is scraped off the Finish Coater as needed and placed into the 55-gallon satellite accumulation drum, described below, for management as D007 hazardous waste. The Finish Coater feeds the steel to another oven for drying and then to a quench tank for cooling. Water from this quench tank is also pumped to the 9,000-gallon water tank, described above, for reuse.

The steel is then fed to a roll former where it is cut and bent into decking, stacked and banded together with plastic bands. This process generates painted and unpainted metal grindings. These grindings are placed into the 55-gallon satellite accumulation drum, described below, for management as D007 hazardous waste. Larger excess pieces of steel are managed as scrap metal or sold as a product.

The final process in the Deck Plant involves coating the edges of the steel decking. Armorhide WA Clear Edge Coat (flashpoint 250°F) is sprayed by hand on the edges of the product. The spray heads are placed into a bucket of water, Armorchem Deck Cleaner (flashpoint 32°), or on occasion, Crown Paint Thinner (flashpoint 109°F). The facility representative stated that the bucket is used continuously and that no waste is generated by this process. The facility is reminded that spent Armorchem Cleaner and Crown Paint Thinner generate a D001 hazardous waste if disposed of or if no longer usable for their intended cleaning purpose. The coating area is scraped of dried coating approximately one time per week. This process generates approximately two 5-gallon buckets of waste. The waste is managed as a solid waste and placed into the "Special Waste" roll-off dumpster,

## New Millennium Building Systems Inspection Report

Inspection Date: 07/01/2021

described below. There were three non-empty aerosol cans of Talon Dry Moly Lubricant (methylene chloride 40-60%, toluene 2.5-10%, methanol 0.1-1%; flashpoint: -156°F.) and Cyclo Carb Clean (acetone 50-70%, toluene 20-30%; flashpoint <0°F) observed in a trash can located in this area (Photo 10) [40 CFR 262.20(a)(1)]. Non-empty cans of these products generate a D001 hazardous waste when managed as a waste. The facility is reminded that wipes used with Cyclo Carb are an F005 hazardous waste and wipes used with Talon Dry are an F002/F005 hazardous waste. The cans were removed from the trash and taken to the aerosol can puncturer for proper management at the time of inspection.

There is a small maintenance area located in the Deck Plant in the vicinity of the edge coating area. Tekusolv II Red (flashpoint >201°) solvent is used in a drum-top parts washer installed in the area used for cleaning oil and grease from parts. The spent parts washer solvent/sludge has never been disposed of. The facility is reminded to conduct a complete hazardous waste determination on this wastestream prior to disposal.

There was one 55-gallon satellite accumulation drum located at the beginning and behind the roll former process. Coating/paint scrapings, painted steel grindings, oil dry used to clean-up small spills of coating/paint and shop vacuum waste are deposited into this drum and managed as D007 hazardous waste. The drum was closed and labeled as "Hazardous Waste," but was not labeled with an indication of the hazards of the contents (Photo 11) [40 CFR 262.15(a)(5)]. The drum was properly labeled during the inspection. A sample collected following the inspection on August 2, 2021, and analyzed for RCRA metals via Toxicity Characteristic Leaching Procedure (TCLP) confirmed the D007 waste code assignment.

### HWAA

The HWAA is located on the west side of the Deck Plant building near door 38. There was one 55-gallon drum of D007 hazardous waste accumulating at the time of inspection. The drum was closed, labeled as "Hazardous Waste" and had been accumulating less than 90 days, but was not labeled with an indication of the hazards of the contents (Photos 12 and 13) [40 CFR 262.17(a)(5)(i)(B)]. The drum was properly labeled during the inspection. Emergency equipment was available. A "No Smoking" sign was posted and aisle space was adequate. The facility representative stated that waste is transported from the HWAA approximately every 45 days.

There was an aerosol can puncturing device being operated as an SAA located adjacent to the HWAA. Various aerosol cans are punctured and drained into a 55-gallon drum. Drained liquid is managed as D001/D005/D006/D007/D008/D035 hazardous waste. The empty cans are managed as scrap metal. The drum was closed and labeled as "Hazardous Waste," but was not labeled with an indication of all of the hazards of the contents (Photo 14) [40 CFR 262.15(a)(5)]. The drum was labeled as flammable, but was not labeled as toxic. The drum was properly labeled during the inspection.

### Joist Plant

The Joist Plant manufactures steel joists on three identical manufacturing lines. Coils or angled raw steel, without a rust inhibitor, are delivered to the facility via truck or rail from steel mills throughout the country. Coils are cut into narrower strips and then re-rolled. The steel is cut into strips using metal presses. Any steel scrap generated by this process is managed as scrap metal.

Roll formers are used to bend the metal to the desired shape. Neuform 807 Lite cutting fluid (flashpoint 129°), is used to keep the steel cool in the roll formers. This process generates a mill scale coolant sludge that is removed from the roll former trays as needed and placed into a 55-gallon drum for disposal as solid waste. There were two 55-gallon drums accumulating mill scale sludge at the time of inspection. The 55-gallon drums of mill scale sludge are managed as solid waste and are emptied into the "Special Waste" roll-off dumpster, described below. A sample collected on September 24, 2019, and analyzed for RCRA metals and volatiles via Toxicity Characteristic Leaching Procedure (TCLP) indicated that this was a non-hazardous waste. However, due to the flashpoint of the cutting fluid and because free liquids were observed in the waste drum at the time of inspection, the facility should test for ignitability to complete the hazardous waste determination [40 CFR 262.11].

The steel is then assembled into joists via gas metal arc welding using welding wire. This process does not generate a waste.

After assembly, the joists are primed with Armorhide WG-4 Gray Hybrid (no flashpoint) in batches using a dip

## New Millennium Building Systems Inspection Report

Inspection Date: 07/01/2021

tank (Photo 15). The primer is used continuously and 15-C-198B Reducer (flashpoint 201.2°F) and the associated additive, Armorhide 50/50 Ammonia Additive may be added to thin the primer. Rope is placed between the steel sections to allow the paint to seep in. Excess primer is allowed to drip off the joists back into the dip tank. Most additional drips are captured by disposable mats which are placed into the "Special Waste" roll-off dumpster, described below. Moran Environmental Recovery is contracted to drain the dip tank and chisel the solid paint waste from the tank approximately annually. The solid paint material is placed into the "Special Waste" roll-off dumpster, described below. There is also a smaller dip tank used for smaller parts that attach to the joists (Photo 16). The same materials and process described above are used.

Joist packages are banded together with plastic bands and placed on trailers for shipment.

Various aerosol paints and products are used throughout the Joist Plant to mark joists or maintain equipment. Waste aerosol cans are punctured and drained into a 55-gallon satellite accumulation drum located in the channel forming area of the Joist Plant. Drained liquid is managed as D001/D005/D006/D007/D008/D035 hazardous waste. The empty cans are managed as scrap metal. The drum was labeled as "Hazardous Waste," but was not labeled with an indication of the hazards of the contents [40 CFR 262.15(a)(5)]. The drum was properly labeled during the inspection. The puncturing device was not closed [40 CFR 262.15(a)(4)]. The device was closed during the inspection, but had to be hammered closed. The facility is reminded that the aerosol can puncturer should be operated and maintained in a manner that ensures that the waste accumulation container is closed at all times when not adding or removing waste.

There is a "Special Waste" roll-off dumpster located at the rear of the Joist Plant (Photo 17). The dumpster is used for the accumulation of dried joist coatings, mill scale sludge, used oil absorbents and RCRA-empty containers and is disposed of at Winfield Landfill, located in Lake City, Florida, which is a Class I and Class III solid waste landfill.

### Maintenance Shop

The Maintenance Shop is located in an area of the Joist Plant. Maintenance personnel conduct preventative maintenance and repair of equipment, primarily hydraulic equipment, and painting of safety equipment throughout the facility.

Tekusolv II Red solvent is used in a drum-top parts washer installed in the Maintenance Shop for cleaning oil and grease from parts. The spent parts washer solvent/sludge has not yet been disposed of. There was one drum of what maintenance personnel identified as spent parts washer solvent/sludge accumulating in the area. The drum was only labeled with the original solvent label. The facility representative stated that they planned on managing the solvent/sludge as a non-hazardous waste, but did not have an adequate hazardous waste determination to support this action [40 CFR 262.11].

Various aerosol products may be applied to parts to aid in cleaning or lubrication. Waste aerosol cans are punctured and drained into a 55-gallon satellite accumulation drum located in the shop and managed as D001/D005/D006/D007/D008/D035 hazardous waste. The empty cans are managed as scrap metal. The drum was closed and labeled as "Hazardous Waste," but was not labeled with an indication of the hazards of the contents (Photo 18) [40 CFR 262.15(a)(5)]. The drum was properly labeled during the inspection. Cyclo Carb Cleaner or SQ Carburetor Cleaner (20-30% toluene, 10-15% methanol; flashpoint: -4°F) may be used on a wipe to clean parts. Wipes used with Cylco Carb or SQ Carburetor Cleaners are an F005 hazardous waste. Wipes are placed into a 5-gallon bucket and disposed of as solid waste [40 CFR 262.20(a)(1)]. There was one rag accumulating in the 5-gallon bucket at the time of inspection (Photo 19). The facility is reminded that solvent-contaminated wipes may be managed under the Excluded Solvent Contaminated Wipes provisions of 40 CFR 261.4(b)(18) or 40 CFR 261.4(a)(26) if the conditions for the exclusion are met.

Wire welding is sometimes conducted. This process does not generate a waste. Metal grindings and turnings generated from machining are collected with magnets and managed as scrap metal.

Used oil and used oil filters are generated when oil is changed in forklifts and various equipment throughout the facility. Used oil is collected in drip pans and drained into an approximately 275-gallon, double-walled tank located in the shop. The used oil tank was full and properly labeled. There was also a 55-gallon drum of used oil accumulating in the shop. Maintenance personnel stated that they begin accumulating used oil in the 55-gallon drum because the tank was full. The drum was not labeled as "Used Oil" (Photo 20) [40 CFR 279.22(c)(1)]. The drum was stored inside the building on an impervious surface, but was not stored within

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secondary containment. The inspector recommended relocating the drum to the secondary containment pallet due to the drum's proximity to a roll-up door. Used oil filters are drained into the Used Oil tank/drum and, according to a facility representative, managed as scrap metal. No used oil filters were observed during the inspection. The facility is reminded that used oil filters must be stored in above ground containers that are clearly labeled "Used Oil Filters" and which are in good condition. The storage containers must be sealed or otherwise protected from weather and stored on an oil-impermeable surface.

Used oil absorbents, used to clean up drips or spills of hydraulic oil, and oily shop rags are generated by maintenance staff throughout facility. Analysis has indicated that both wastestreams are non-hazardous and these wastes are disposed of in the "Special Waste" roll-off dumpster, described above.

Vehicles and trucks are serviced by a contractor off-site, so no spent antifreeze is generated.

Painting is conducted primarily with aerosol cans, but Rustoleum High Performance Protective Enamel in Safety Yellow (flashpoint 105.8°F) may be sprayed with a gun. Excess or unused Rustoleum generates a D001 hazardous waste when managed as a waste. The spray guns are cleaned with Jasco Green Odorless Mineral Spirits (NFPA flammability: 0). The spent solvent/paint mixture may generate a D001 hazardous waste and is placed into the aerosol can liquid waste drum.

Bulbs may be changed throughout the facility by maintenance personnel. There was one box containing four spent bulbs accumulating at the time of inspection (Photo 21). The box was not closed [40 CFR 273.13(d)(1)].

### Yard

The Yard is used for staging of joists, decking and equipment. There are two bulk welding gas tanks installed in the yard. There is also a trailer used for storage of product in the Yard. The trailer contains an approximately 120-gallon, double-walled used oil tank where used oil generated by changing oil of equipment stored in the Yard is placed. The tank was closed and properly labeled.

### Records

The facility is operating as an LQG of hazardous waste. The last shipment of D007 hazardous waste occurred on May 28, 2021, when 2,800 pounds was transported by Safety-Kleen Systems, Inc (TXR 000 081 205) and Clean Harbors (MAD 039 322 250) to Clean Harbors Deer Park (TXD 055 141 378). The last shipment of D002/D007 hazardous wastewater generated by the Deck Plant occurred on June 9, 2021, when 5,000 gallons was transported by Moran Environmental Recovery, LLC (FLD 092 718 576) to Chemical Waste Management, Inc. (ALD 000 622 464). Records indicate that the Deck Plant wastewater was shipped as a non-hazardous waste intermittently from 2018-2020, but that all shipments that occurred in 2021, were as a hazardous waste with the exception of the shipment that occurred on July 22, 2021, following the inspection. The documentation of the hazardous waste determinations for the Deck Plant wastewater that were reviewed were insufficient to demonstrate which shipments were hazardous waste and which shipments were non hazardous waste [40 CFR 262.11]. In addition, Deck Plant wastewater pH readings are not logged and therefore a complete hazardous waste determination is not documented [40 CFR 262.11]. Non-hazardous wastewater is shipped to Water Recovery, LLC (FLR 000 069 062) for treatment.

Safety-Kleen transports the facility's used oil for recycling. The last shipment of 300 gallons occurred on January 28, 2021. Safety-Kleen also transports the facility's universal waste lamps. The last shipment of 20 pounds occurred on February 10, 2021.

There were no records of used oil filter disposal available. According to the facility representative, used oil filters are managed as scrap metal. Scrap metal is managed by OmniSource, the facility's sister company. Each generator of used oil filters whose solid waste is typically disposed of in a landfill shall either register as a used oil filter processor or shall ensure that its filters are transported by a registered used oil filter transporter and processed by a registered used oil filter processor or end user. Used oil filters may not be disposed of in Florida landfills. Neither New Millennium, nor OmniSource are registered to transport used oil filters in Florida, nor appear to be registered as used oil filter processors or end users [62-710.850(2), FAC].

Although the facility was conducting weekly inspections of the 90-day HWAA located in the Deck Plant, inspections were not documented in accordance with the requirements [62-730.160(3), FAC]. Training records reviewed appeared in order.

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The facility had documented attempts to make emergency arrangements with the local authorities in 2007, when the facility was operating as an SQG of hazardous waste, but did not have documentation of such arrangements since becoming an LQG [40 CFR 262.256(a)]. The facility representative stated that arrangements had been made with the local fire authority, but documentation was not available. The facility also did not have documentation that the Contingency Plan was submitted to local authorities [40 CFR 262.262(a)].

\*\*\*\*\*

Please note that 40 CFR 262.18 requires re-notification for LQGs as follows:  
LQGs - notify by March 1 of each even-numbered year, or via submittal of a Biennial Report.

\*\*\*\*\*

## For Outstanding Items of Potential Non-Compliance

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Please review the following section – New Potential Violations and Areas of Concern. This section includes potential violations observed at your facility during this inspection. For any potential violations below that have not been corrected, please refer to the Corrective Action for each item that is suggested to bring your facility into compliance. Once the corrective action has been completed, please send documentation to the Principal Inspector listed on page 1 of this Inspection Report. This documentation includes, but is not limited to, photos of corrected items, manifests, SDSs or other documents that will show that each potential violation has been fully addressed.

## Areas of Concern:

1. Deck Plant: The 6,000-gallon accumulation tank containing waste was not labeled as "Hazardous Waste", or with an indication of the hazard of the contents. There was also no indication that the facility was properly labeling the 6,000-gallon or 9,000-gallon accumulation tanks during the time periods when the tanks were used to store hazardous waste. If the facility is unsure if a waste being tested is a hazardous waste, the facility should manage it as hazardous waste and label the tanks/containers with an indication of the hazards of the contents and the words "hazardous waste" (or "hazardous waste pending analysis" to make it clear that testing is not yet complete). No further action is required. The facility labeled the tank containing waste at the time of inspection, per an email dated August 23, 2021.

## New Potential Violations and Areas of Concern:

## Violations

Type:	Violation 1
Rule:	262.11
Explanation:	Deck Plant: The facility failed to conduct a hazardous waste determination on the pre-wash, wash and rinse tank wastewater at the point of generation, before any dilution or mixing occurs; the facility failed to maintain records supporting its hazardous waste determinations with regards to the corrosivity of the wastewater; and the facility failed to provide sufficient hazardous waste determination records to demonstrate on which occasions the wastewater was a hazardous waste. Joist Plant: The facility failed to conduct a complete and accurate hazardous waste determination on the mill scale coolant sludge. Maintenance Shop: The facility failed to conduct a complete and accurate hazardous waste determination on the parts washer spent solvent/sludge.
Corrective Action:	Deck Plant: In order to return to compliance, the facility should analyze samples used to support the hazardous waste determination at the point of generation (i.e. when the wastewater exits the pre-wash, wash and rinse process tanks) and fully document such determinations. A representative sample of each waste stream should be analyzed separately by a certified laboratory for the following:  -Toxicity Characteristic Leaching Procedure (TCLP) for RCRA metals, pursuant to 40 CFR 261.24, via method 6010; and -pH, pursuant to 40 CFR 261.22, via method 9040C or 1110A

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In addition, the facility should provide additional analysis records that can be cross-referenced to previous off-site shipments to support its determinations.

Joist Plant: In order to return to compliance, the facility should conduct and fully document a hazardous waste determination of the mill scale coolant sludge by having a representative sample of the waste stream analyzed separately by a certified laboratory for the following:

-flashpoint, pursuant to 40 CFR 261.21, via methods 1010 or 1020

Maintenance Shop: In order to return to compliance, the facility should conduct and fully document a hazardous waste determination of the parts washer spent solvent/sludge by having a representative sample of the waste stream analyzed separately by a certified laboratory for the following:

- TCLP for RCRA metals, pursuant to 40 CFR 261.24, via method 6010;
- TCLP for RCRA volatiles, pursuant to 40 CFR 261.24, via method 8260;
- TCLP for RCRA semi-volatiles, pursuant to 40 CFR 261.24, via method 8270; and
- flashpoint, pursuant to 40 CFR 261.21, via methods 1010 or 1020

A copy of the results of these waste determinations should be submitted to DEP. None of these wastes are to be disposed of until written approval has been given by DEP. The waste should be disposed of in a proper manner once written approval has been given by DEP. Hazardous waste should be sent off-site to a permitted treatment, storage, or disposal facility.

NOTE: None of the samples are to be composites. The samples are to be collected and analyzed in accordance with EPA publication SW#846 "Test Methods for Evaluating Solid Waste" 3rd Edition. All sampling and analysis shall be conducted in accordance with Rule 62-160, FAC. A National Environmental Laboratory Accreditation Program (NELAP) certified laboratory should analyze the samples. Alternative methods for hazardous waste determinations should be approved by DEP.

Type: Violation 2  
 Rule: 262.15(a)(4)  
 Explanation: Joist Plant: One 55-gallon hazardous waste aerosol container was not closed.  
 Corrective Action: No further action is required. The facility returned to compliance at the time of inspection by closing the container. The facility also provided an email dated August 23, 2021, demonstrating that the aerosol puncturing device that was difficult to close had been replaced.

Type: Violation 3  
 Rule: 262.15(a)(5)  
 Explanation: Deck Plant: One 55-gallon D007 hazardous waste satellite accumulation container was not labeled with an indication of the hazards of the contents.  
 HWAA: One 55-gallon aerosol can hazardous waste satellite accumulation container was not labeled with an indication of all of the hazards of the contents.  
 Joist Plant: One 55-gallon aerosol can hazardous waste satellite accumulation container was not labeled with an indication of the hazards of the contents.  
 Maintenance Shop: One 55-gallon aerosol can hazardous waste satellite accumulation container was not labeled with an indication of the hazards of the contents.  
 Corrective Action: No further action is required. The facility returned to compliance by labeling all of the containers with all of the hazards of the contents at the time of inspection.

Type: Violation 4



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Rule: 262.17(a)(2)

Explanation: Deck Plant: The facility failed to comply with 40 CFR 265 Subpart J for the 6,000-gallon and 9,000-gallon tanks used to accumulate hazardous waste.

Corrective Action: In order to return to compliance, the facility should:

- Obtain a written assessment reviewed and certified by a qualified Professional Engineer in accordance with 40 CFR 270.11(d) attesting that the system has sufficient structural integrity and is acceptable for the storing and treating of hazardous waste, in accordance with 40 CFR 265.192;
- Provide documentation that the secondary containment system meets the requirements of 40 CFR 265.193;
- Provide documentation that appropriate spill and overflow prevention controls in accordance with 40 CFR 265.194 are in place; and
- Initiate and document the inspections required by 40 CFR 265.195.

If any of the above cannot be provided, the tanks should be repaired or replaced with tanks that meet the requirements of 40 CFR 265 Subpart J or use of the tanks systems as hazardous waste accumulation tanks should be discontinued.

Type: Violation 5

Rule: 262.17(a)(5)(i)(B)

Explanation: HWAA: One 55-gallon drum of D007 hazardous waste was not labeled with an indication of the hazards of the contents.

Corrective Action: No further action is required. The facility returned to compliance by labeling the drum at the time of inspection.

Type: Violation 6

Rule: 262.20(a)(1)

Explanation: Deck Plant: The facility disposed of three non-empty aerosol cans of D001 hazardous waste in the trash.

Corrective Action: Maintenance Shop: The facility disposed of one F005 hazardous waste wipe in the trash. Deck Plant: No further action is required. The facility returned to compliance at the time of inspection by removing the aerosol cans from the trash and properly disposing of them.

Maintenance Shop: In order to return to compliance, the facility should manage wipes used with F-listed solvents in accordance with the solvent-contaminated wipes exclusions in either 40 CFR 261.4(b)(18) or 40 CFR 261.4(a)(26), or manage this wastestream as F005 hazardous waste.

Type: Violation 7

Rule: 262.251

Explanation: Deck Plant: There was wastewater and sludge on the floor in the area around the pre-treatment tanks caused by a leak in the pre-treatment tank. Although analysis indicated the waste was non-hazardous at the time of inspection, the pre-treatment tank has the potential to generate a hazardous wastewater.

Corrective Action: In order to return to compliance, the facility should repair the leak to ensure hazardous waste is properly containerized at all times.

Type: Violation 8

Rule: 262.256(a) , 262.262(a)

Explanation: The facility failed to document and/or attempt to make emergency arrangements with and submit the Contingency Plan to the local police, fire, hospital and local emergency planning committee authorities.

Corrective Action: In order to return to compliance, the facility should document emergency arrangements or

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attempts to make emergency arrangements with the local emergency authorities to familiarize them with the layout of the facility, the properties of the hazardous waste handled at the facility and associated hazards, places where personnel would normally be working, entrances to roads inside the facility, and possible evacuation routes as well as the types of injuries or illnesses which could result from fires, explosions, or releases at the facility. The facility should submit a copy of the Contingency Plan to the local emergency authorities.

Type: Violation 9  
 Rule: 273.13(d)(1)  
 Explanation: Maintenance Shop: There was one box of universal waste lamps that was not closed.  
 Corrective Action: Maintenance Shop: No further action is required. The facility returned to compliance via an email dated September 14, 2021.

Type: Violation 10  
 Rule: 279.22(c)(1)  
 Explanation: Maintenance Shop: One 55-gallon drum of used oil was not labeled as "Used Oil."  
 Corrective Action: In order to return to compliance, the facility should label the drum as "Used Oil" or demonstrate that the drum has been shipped off-site for recycling.

Type: Violation 11  
 Rule: 62-710.850(2)  
 Explanation: The facility failed to use a registered used oil filter transporter to transport used oil filters to a registered used oil processor or end user.  
 Corrective Action: In order to return to compliance, the facility should used a registered used oil filter transporter to transport used oil filters to a registered used oil processor or end user.

Type: Violation 12  
 Rule: 62-730.160(3)  
 Explanation: The facility did not properly document the weekly inspections of the HWAA.  
 Corrective Action: In order to return to compliance, the facility should maintain written documentation of the inspections that include the date and time of inspection, the legibly printed name of the inspector, the number of containers, the condition of the containers, a notation of the observations made, and the date and nature of any repairs or other remedial actions.

**PHOTO ATTACHMENTS:**

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Photo 1



Photo 2



Photo 3



Photo 4

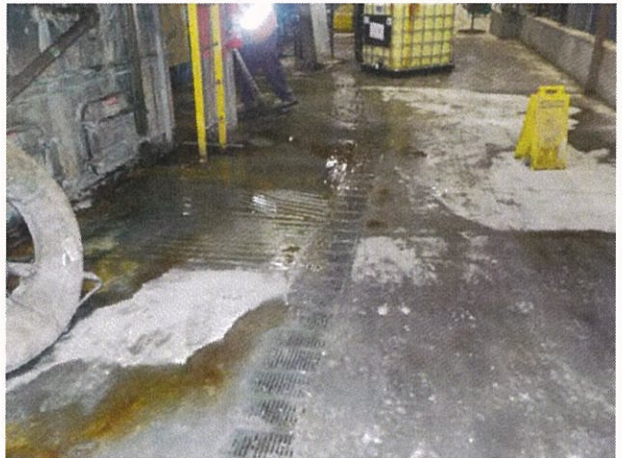


Photo 5



Photo 6



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Photo 7



Photo 8



Photo 9



Photo 10



Photo 11



Photo 12



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Photo 13



Photo 14

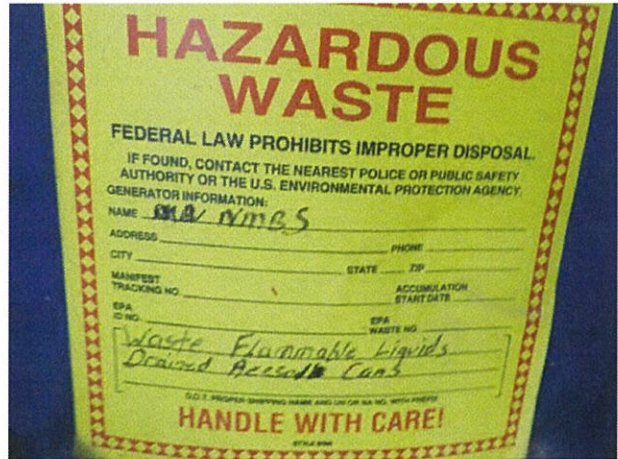


Photo 15



Photo 16

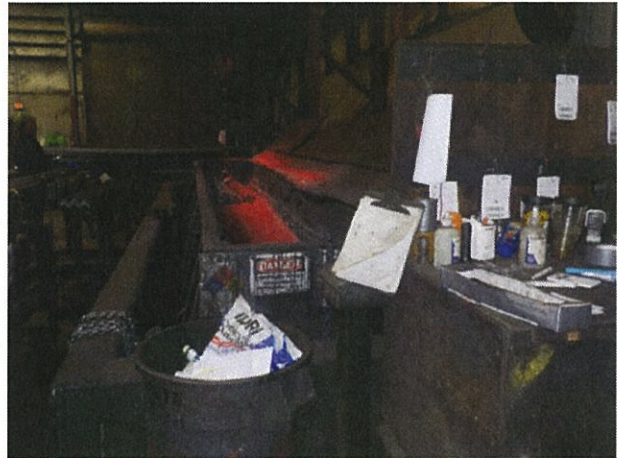


Photo 17



Photo 18



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Photo 19



Photo 20



Photo 21



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**1.0: Pre-Inspection Checklist**

## Requirements:

The requirements listed in this section provide an opportunity for the Department's inspector to indicate the conditions found at the time of the inspection. A "Not Ok" response to a requirement indicates either a potential violation of the corresponding rule or an area of concern that requires more attention. Both potential violations and areas of concern are discussed further at the end of this inspection report.

**Note: Checklist items with shaded boxes are for informational purposes only.**

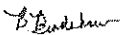
Item No.	Pre-Inspection Review	Yes	No	N/A
1.1	Has the facility notified with correct status? 262.18(a)	✓		
1.2	Has the facility notified of change of status? 62-730.150(2)(b)	✓		
1.3	Did the facility conduct a waste determination on all wastes generated? 262.11			✓

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**Signed:**

A hazardous waste compliance inspection was conducted on this date, to determine your facility's compliance with applicable portions of Chapters 403 & 376, F.S., and Chapters 62-710, 62-730, 62-737 & 62 -740 Florida Administrative Code (F.A.C.). Portions of the United States Environmental Protection Agency's Title 40 Code of Federal Regulations (C.F.R.) 260 - 279 have been adopted by reference in the state rules under Chapters 62-730 and 62-710, F.A.C

Bonnie M Bradshaw	Inspector	
<b>Principal Investigator Name</b>	<b>Principal Investigator Title</b>	
	DEP	09/14/2021
<b>Principal Investigator Signature</b>	<b>Organization</b>	<b>Date</b>
<hr/>		
Dan Olson	Safety Coordinator	
<b>Representative Name</b>	<b>Representative Title</b>	
	New Millennium Building Systems	
	<b>Organization</b>	

NOTE: By signing this document, the Site Representative only acknowledges receipt of this Inspection Report and is not admitting to the accuracy of any of the items identified by the Department as "Potential Violations" or areas of concern.

**Report Approvers:**

<b>Approver:</b>	Bonnie M Bradshaw	<b>Inspection Approval Date:</b>	09/14/2021
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