

SOUTHEAST HOUSING COURT
COMMONWEALTH OF MASSACHUSETTS

The City of New Bedford

Plaintiff,

v.

Carlton Neves,

Carlton Neves, Trustee of K Seven
Realty Trust, and

Southcoast Plating, Inc.

Defendants.

CIVIL ACTION NO:
24H83CV00255NB

CONTEMPT COMPLAINT

Procedural History

1. In October 2024, the plaintiff instantiated the instant suit against the defendants, for the many hazards which they've created at 12 Coffin Avenue and 19 Coffin Avenue, New Bedford.
2. On November 29, 2024, this Court imposed a temporary restraining order and preliminary injunction. ATT-A. The defendants were ordered to, *inter alia*:
 - Cease conducting business at the properties, ATT-A, p. 6, ¶ 1;
 - board the Properties and prohibit entry to anyone except for those remediating safety violations, ATT-A, p. 6, ¶ 2;
 - “safely and lawfully dispose of all hazardous materials stored on the Properties,” ATT-A, p. 6, ¶ 3;
 - “diligently complete all necessary repairs,” ATT-A, p. 6, ¶ 5; and,
 - “maintain a 24-hour fire watch at both Properties” until fire protection and sprinkler systems are operational and monitored, ATT-A, p. 6, ¶ 6.

3. On May 5, 2025, a status hearing was held. The defendants advised the Court that, in accordance with the TRO/PI, they had disposed of hazardous materials and hired a structural engineer.
4. At that representation, the Court ordered the defendants to produce certain documents by May 19, 2025. ATT-B. More specifically, the Court ordered the defendants to provide:
 - Receipts for all hazardous materials which the defendants disposed of, (a “manifest”), as directed by the November 2024 order;
 - A copy of the defendants’ contract with PT Fabrication; and,
 - A structural engineering report.
5. On May 19, 2025, the defendants e-mailed undersigned counsel, providing nine attachments. ATT-C. None were responsive to the Court’s order. ATT-C. The only document bearing any relevance was an invoice from PT Fabrication, which included a quote relating to support beams. ATT-C, p. 17.

Factual Allegations

6. On May 9, 2025, firefighter Travis Rebello flew a drone over the Properties. ATT-D [hereinafter *Rebello*], p. 1, ¶ 3.
7. Thereafter, at about 11:00 am, Rebello reported to the properties. *Rebello*, p. 1 at ¶ 4.
8. Neither property was boarded. *Rebello*, p. 2, ¶ 10; ATT-E [hereinafter *Houghton*], p. 1, ¶ 6; see also ATT-F (photographs).
9. To the contrary, a U-Haul truck was accessing the loading area. *Rebello*, p. 1, ¶ 5. Men were loading pallets onto the truck from the loading dock. *Rebello*, p. 1, ¶ 5.
10. After Rebello drove by in his marked vehicle, the U-Haul truck and workers dispersed. *Rebello*, p. 1, ¶¶ 4, 7.
11. After the U-Haul truck departed, Rebello found a box near the loading door. *Rebello*, p. 2, ¶ 8. The box contained metal parts, which materials Southcoast Plating treats within its normal scope of business. *Rebello*, p. 2, ¶ 9; ATT-F, p.1.

12. Fire Captain Kurt Houghton arrived shortly after the U-Haul truck departed. *Houghton*, p. 1, ¶ 3.
13. Houghton contacted Carlton Neves and informed him that there was no fire watch in place. *Houghton*, p.1, ¶ 7.
14. Neves acknowledged that there was no fire watch and arranged for two individuals to report to the Properties. *Houghton*, p. 2, ¶ 8.
15. Houghton remained at the Properties until about 1:30 pm, at which time the two individuals arrived. *Houghton*, p. 2, ¶ 9.
16. Houghton told Neves that he would be issuing a citation and instructed him to provide a fire watch schedule, including contact information of those conducting the fire watch. *Houghton*, p. 2, ¶ 10.
17. Neves was issued a citation on May 9, 2025, which he never challenged. ATT-G.
18. Houghton informed Neves that he would be cited again if he continued to fail to conduct a fire watch. *Houghton*, p. 2, ¶ 11.
19. On May 17, 2025, Rebello once again found that no fire watch was occurring at the Properties. *Rebello*, p. 2, ¶ 12.
20. Neves was issued a second citation, which he never challenged. *Houghton*, p. 2, ¶ 12; ATT-H.

Contempt Charges

21. “To prove civil contempt a plaintiff must show, by clear and convincing evidence, that there was: (1) clear disobedience of (2) a clear and unequivocal command.” *Feinstein v. Feinstein*, 95 Mass. App. Ct. 230, 234 (2019).
22. Neves has committed at least six acts of contempt.

Count 1: Failure to Conduct Fire Watch on May 9

23. On May 9, 2025, the defendants failed to conduct a fire watch. *Rebello*, p.1, ¶¶ 3, 11.

24. When confronted by firefighters, Neves acknowledged that there was no fire watch and arranged for two individuals to report for duty. *Houghton*, p. 2, ¶¶ 7-9.
25. Neves did not appeal from the citation that he was issued.
26. The failure to conduct a fire watch constitutes clear disobedience of the Court's unequivocal TRO/PI order. ATT-A, p. 6, ¶ 6.

Count 2: Failure to Conduct Fire Watch on May 17

27. On May 17, 2025, Neves once again failed to conduct a fire watch. *Rebello*, p. 2, ¶ 12.
28. Neves did not appeal from the citation that he was issued.
29. The failure to conduct a fire watch constitutes clear disobedience of the Court's unequivocal TRO/PI order. ATT-A, p. 6, ¶ 6.

Count 3: Failure to Board Building

30. On November 29, 2024, the Court ordered Neves to “board[] up” the properties “immediately” and to prohibit entry to anyone except for the purpose of remediating safety violations. ATT-A, p.6, ¶ 2.
31. On May 9 and 17, 2025, the buildings were still not boarded. *Houghton*, p. 1, ¶ 6.
32. In fact, a U-Haul truck was accessing a building through a large, opened garage door. *Rebello*, p. 1, ¶ 5.
33. The failure to board constitutes clear disobedience of the Court's unequivocal order. ATT-A, p. 6, ¶ 2.

Count 4: Failure to Prohibit Entry

34. On November 29, 2024, the Court ordered Neves to prohibit entry to anyone except for the purpose of remediating safety violations. ATT-A, p.6, ¶ 2.
35. On May 9, 2025, Neves permitted men driving a U-Haul to enter and haul away boxes of metal materials from the building. *Rebello*, p.2, ¶ 5.

36. It cannot be the case that the men removing hauling hazardous materials. Neves has provided no documentation that he has arranged for the lawful disposition of hazardous waste. See ATT-C; see also ATT-B. Consequently, the conduct was not excepted by the portion of the order that permits entry for remediation. See ATT-A, p. 6., ¶ 2.
37. Permitting entry is clear disobedience of the Court's unequivocal TRO/PI order. ATT-A, p. 6, ¶ 2.

Count 5: Continuing to Conduct Business

38. On November 29, 2024, the Court ordered Neves to cease business operations. ATT-A, p. 6, ¶ 1.
39. On May 9, 2025, workers shipped pallets with fresh boxes of materials from the properties. *Rebello*, p.1, ¶ 5.
40. When the fire department arrived and the workers dispersed, they left a box near the loading door. *Rebello*, p. 1, ¶¶ 6-7. That box contained metal materials which would be treated with plating services. *Rebello*, p. 1, ¶¶ 8-9.
41. Conducting business operations is clear disobedience of the Court's unequivocal TRO/PI order. ATT-A, p. 6, ¶ 1.

Count 6: Failure to Provide Proof of Compliance

42. On May 5, 2025, this Court ordered the defendants to provide: (1) receipts for the hazardous materials it claimed that it had disposed and (2) a copy of its contract with PT Fabrication, along with a copy of a structural engineering report. ATT-B, ¶¶ 1-2.
43. The May 5 order was issued to ensure that the defendant was actively complying with the TRO/PI, which required him to lawfully dispose of hazardous materials and diligently fix the Properties. ATT-B, ¶ 1.
44. The May 5 order clearly and unequivocally required the defendants to provide specific documents, which would corroborate the defendants' in-court report that they were complying with the TRO/PI. See ATT-B.

45. The defendants' response contained nine documents, none of which were remotely responsive. ATT-C.
46. It seems the defendants' purpose was to trick the plaintiff and this Court, by creating the false appearance of compliance. See ATT-C.
47. Regardless, the defendants clearly disobeyed the clear and unequivocal command. Compare ATT-B, ATT-C.

Relief Sought

48. Upon finding a contempt, a judge has "broad equitable powers to fashion appropriate remedies." *Feinstein*, supra at 234.
49. The City requests that:
 - a. Each defendant be held in contempt;
 - b. Each defendant be fined \$100 every day that they remain in contempt;
 - c. Defendant Neves be committed to custody and held until he purges his contempt;
 - d. Trial be expedited and scheduled for October 6, 2025;
 - e. City of New Bedford Fire Department to conduct fire watch at the Defendants' expense, to both ensure fire safety and that defendants have ceased business operations; and,
 - f. Defendants open an escrow account and fund it with money sufficient to cover fire watch expenses; and
 - g. Defendants be held responsible for paying attorney's fees related to this contempt proceeding. See *Ventresca v. Town Manager of Billerica*, 68 Mass. App. Ct. 62, 65 (2007) (awarding attorney's fees and costs is appropriate in successful contempt proceeding).

Respectfully submitted,
City of New Bedford
By its attorney,



Owen J. Murphy, BBO #685700
Assistant City Solicitor
133 William Street
New Bedford, MA 02740
owen.murphy@newbedford-ma.gov

Dated: June 23, 2025

CERTIFICATE OF SERVICE

I, Owen J. Murphy, counsel for the plaintiff, The City of New Bedford, hereby certify that this contempt complaint will be personally served upon the defendants to the attorney of record, Christopher T. Saunders, Law Offices of Christopher T. Saunders, P.C., 700 Pleasant Street, New Bedford, MA 02740.



Owen J. Murphy
Assistant City Solicitor

Dated: June 23, 2025

A

THE TRIAL COURT
COMMONWEALTH OF MASSACHUSETTS

BARNSTABLE, SS
BRISTOL, SS
DUKES, SS
NANTUCKET, SS
PLYMOUTH, SS

HOUSING COURT DEPARTMENT
SOUTHEASTERN DIVISION
Docket No. 24H83CV0255NB

CITY OF NEW BEDFORD, *
 Plaintiff *
 *
 v. *
 *
 CARLTON NEVES, TRUSTEE OF K SEVEN *
 REALTY TRUST, *
 *
 CARLTON NEVES, and *
 *
 SOUTHCOAST PLATING, INC., *
 Defendants *

ORDER FOR TEMPORARY AND PRELIMINARY INJUNCTION

This is a civil action filed by the plaintiff, City of New Bedford (the “City” or “Plaintiff”), seeking a temporary restraining order and preliminary injunction against the defendants, Carlton Neves, Trustee of K Seven Realty Trust (“Trustee”), Carlton Neves, individually (“Neves”), and Southcoast Plating, Inc. (“Southcoast”) d.b.a. Star Plating (collectively, the “Defendants”), arising from the use of the commercial properties located at 12 Coffin Avenue (“#12”) and 19 Coffin Avenue (“#19”), New Bedford, Massachusetts (collectively, the “Properties”) and the manufacturing activities conducted thereon. Plaintiff alleges Defendants’ use of the Properties, their dangerous condition, and the use and storage of certain hazardous materials therein pose a threat to the well-being of neighboring residents, employees, first responders and the general public.

This action was commenced upon filing of Plaintiff's Complaint and Motion for Temporary Restraining Order and Preliminary Injunction on October 17, 2024. After notice, the parties appeared for several hearings, following which the Plaintiff filed an Amended Complaint ("Amended Complaint") together with a new Motion to Temporary Restraining Order and Preliminary Injunction ("Motion"). Evidentiary hearings were held on November 1, November 8 and November 22, 2024. The Court heard testimony from multiple witnesses and also considered the trial exhibits offered by Plaintiff and Defendants. Plaintiff appeared represented by counsel; Neves originally appeared self-represented on November 1, 2024, and thereafter the Defendants appeared represented by counsel.

Discussion

I. Standard for issuing preliminary injunction.

Where, as here, the party requesting injunctive relief is a governmental entity, the plaintiff must show: 1) a likelihood of success on the merits; and 2) the requested relief "promotes the public interest, or, alternatively, that the equitable relief will not adversely affect the public." *LeClair v. Town of Norwell*, 430 Mass. 328, 331–32 (1999), quoting *Commonwealth v. Mass. CRINC*, 392 Mass. 79, 89 (1984); *Edwards v. Boston*, 408 Mass. 643, 646-647 (1990) (when governmental entity acts to enforce a statute or policy irreparable harm not required element for injunctive relief).

II. Findings supporting preliminary injunction.

The Court finds the preponderance of the evidence established the following facts:

1. The Defendants use the subject mill style buildings to operate a manufacturing business known as Star Plating on the Properties. Star Plating treats metals with chemicals to make those metals more durable.

2. The Properties are located in an industrial zoned district within a densely populated residential overlay area. A portion of the #19 building shares a common wall with the Whaler's Cove Assisted Living Facility ("Whaler's Cove"). Many of the residents of Whaler's Cove have mobility issues.
3. In June 2024, residents of Whaler's Cove complained of a chemical odor emanating from a shed labeled "hazardous waste" on #19. Inside the shed was a dumpster containing a solid reddish material. After an investigation by Travis Rebello, the Hazardous Materials Coordinator for the City of New Bedford Fire Department ("Rebello"), Mr. Rebello determined, among other things, that Defendants were improperly storing large quantities of sodium hydroxide, nitric acid and sulfuric acid within the Properties, together with unlabeled open drums filled with unknown chemicals. He observed liquids leaking from some of the containers and spillage on the ground in the area of the process line. Drums of nitric acid were stored on wooden pallets and there were piles of trash surrounding an active chimney. There were no working sprinklers or fire alarms serving the Properties. Some of the structural pillars were cracked or dislodged from their footings. A portion of the ceiling and roof of #12 was damaged and open to the elements. Mr. Rebello testified that while the chemicals stored on the Properties might not be flammable if stored separately, the compatibility of such chemicals if combined could pose a serious fire risk.
4. As a result of his investigation, Mr. Rebello issued an Order of Notice to Southcoast d.b.a. Star Plating on September 30, 2024 requiring that it obtain a hazardous materials processing permit. (Plaintiff's Exhibit C). Defendants did not contest the

Order of Notice nor was a permit obtained by the time of the November 22, 2024 hearing.

5. Captain Kurt Houghton of the City New Bedford Fire Department (“Houghton”) also inspected the Properties as part of the Plaintiff’s joint investigation. Among other things, Captain Houghton determined that the fire alarm and sprinkler systems serving #12 were not monitored or working properly and because there was no water service to #19 the existing sprinkler system could not function. As a result of his findings, Captain Houghton issued two Orders of Notice to Neves as Trustee on June 18, 2024 and September 4, 2024. (Plaintiff’s Exhibits D and E). Defendants were ordered to maintain a 24-hour fire watch detail and to restore functioning fire protection and sprinkler systems at the Properties. Defendants did not contest the Orders of Notice nor were permits applied for or the fire protection and sprinkler systems restored and monitored by the time of the November 22, 2024 hearing.
6. City of New Bedford Building Inspector Matthew J. Silva (“Inspector Silva”) also inspected the Properties on August 14 and September 4, 2024 as part of the City’s joint investigation. He observed the same conditions noted by firefighters Rebello and Houghton. In particular, Inspector Silva observed in #12 that multiple wooden support columns were dislodged from their footings in the area of the roof, which was open, leaking, rotting and in danger of collapse. In one portion of #12 the brick firewall was hammered through to make a doorway. There were large debris piles throughout comprised of chemical debris and other materials which impeded egress and blocked the electrical panels, nonfunctional exit signs and emergency lighting and a nonfunctional ventilation system. Inspector Silva testified that he also observed

a chemical haze in the air that made him feel sick. In #19, in addition to there being nonfunctional exit signs and emergency lighting and a nonfunctional ventilation system, Inspector Silva observed that the basement support beams were covered with a foreign substance which appeared to be decomposing the wood and compromising the beam stability. He also noted that the concrete floor above was leeching through the steel pan in the basement ceiling. Defendants did not contest the violation notice nor were permits applied for or the violations corrected by the time of the November 22, 2024 hearing.

7. Although Neves questioned the Plaintiff's motivation for taking enforcement action against the Properties, he acknowledged there are problems to be addressed and that Defendants do not have a permit to use hazardous materials.

Based on the foregoing, the Court finds the Plaintiff met its burden of demonstrating a likelihood of success on the merits of its Amended Complaint. The overwhelming evidence showed the Defendants are engaged in a manufacturing process that involves the use of hazardous chemicals for which they do not have a permit within facilities that are structurally unsound, dangerous and not serviced by sprinklers or a monitored fire protection system. In their current condition, the Properties pose a substantial risk to the Defendants, their employees, the neighbors, including the mobility impaired residents of Whaler's Cove, the general public and first responders. The Court finds that injunctive relief promotes the public interest by ensuring compliance with safety standards intended to protect the health, safety and well-being of the occupants and the general public.

For these reasons, the Motion for a temporary and preliminary injunction is **ALLOWED**. All use of the Properties must cease until the necessary permits and approvals are obtained and compliance is achieved.

ORDER FOR TEMPORARY AND PRELIMINARY INJUNCTIONS

Pending further order of this Court, the Defendants are hereby temporarily and preliminarily enjoined and **ORDERED** as follows:

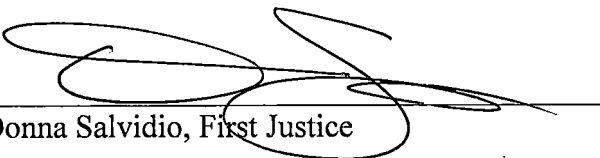
1. The Defendants are, individually and collectively, enjoined and restrained from conducting any business at the Properties effective immediately.
2. The Properties shall be boarded up immediately and entrance prohibited to all employees, other persons and the public except for the purpose of remediating the safety violations issued by the Plaintiff.
3. The Defendants shall safely and lawfully dispose of all hazardous materials stored on the Properties.
4. The Defendants shall remediate all building, electrical, fire safety and sprinkler deficiencies present on the Properties.
5. The Defendants shall apply for and obtain all necessary permits, including a permit to operate a hazardous waste processing facility, and shall diligently complete all necessary repairs.
6. Until the fire protection and sprinkler systems are operational and monitored, the Defendants shall maintain a 24-hour fire watch at both Properties. The fire watch shall be operated in three (3) shifts of eight (8) hours each, with one (1) uniformed person (two (2) persons in total) stationed in each of #12 and #19 at all times. The persons conducting the fire watch shall at all times be physically present, awake, alert and actively patrolling the interior of each building.

7. The Defendants shall provide the Plaintiff's health, fire, plumbing, electrical, building and safety inspectors with reasonable access to the Properties for purposes of completing reasonably necessary inspections of the Properties.
8. All parties were verbally informed of the general terms of this ORDER in open court; copies of this written ORDER shall be obtained by counsel through the MassCourts system. The requirement that service be obtained on the Defendants shall be dispensed with.

For good cause shown, the Court orders pursuant to Mass.R.Civ.P. 65(c) that no security be given by Plaintiff for the issuance of this temporary and preliminary injunction.

SO ORDERED.

November 29, 2024



Donna Salvidio, First Justice

cc: Owen J. Murphy, Esq.
Christopher T. Saunders, Esq.

B



Commonwealth of Massachusetts
HOUSING COURT DEPARTMENT OF THE TRIAL COURT
Southeast Division
Plymouth/Bristol/Barnstable/Nantucket/Dukes, ss

Docket #: 24CV255NB

City of New Bedford

PLAINTIFF

-v.-

Carlton Neves, Carlton Neves As Trustee on Behalf of Trusty of K Seven Realty Trust, Southcoast Plating Inc

DEFENDANT

The above entitled action came before the Court, First Justice, Donna T. Salvidio presiding, this 5th day of May, 2025
A hearing was conducted regarding the Plaintiff's / Defendant's request for the following:

Status Hearing

The Court having duly heard:

- Both Parties in the Case
- Plaintiff Only [*Defendant failed to appear*]
- Defendant Only [*Plaintiff failed to appear*],

and the Court being satisfied that proper notice of said hearing was served on the *Plaintiff / Defendant* (Certificate of service filed), it is hereby ORDERED and ADJUDGED:

1. By the close of business on May 19, 2025 the Defendants shall provide copies of the following documents to the City Solicitor's office on behalf of the Plaintiff:

1. Receipt(s) for all hazardous materials disposed of the Defendants pursuant to paragraph 3 of the court's November 29, 2024 order for temporary and preliminary injunction ("Order").

2. A copy of Defendant's contract with PT Fabrication and the structural engineering report pursuant to paragraph 4 of the order.

3. A further status hearing shall be held virtually on June 23, 2025 at 2PM (Zoom License 8). Clerk to send notice.

Your failure to comply with this order and/or to re-appear before the Court as indicated may result in an initial or further contempt proceeding; with Court ordered sanctions, and/or a Capias for your Civil arrest may also issue.

May 5, 2025

Date



First Justice

C

Tier II Emergency and Hazardous Chemical Inventory

Facility Name: Southcoast Plating, Inc. (formerly Plating Technology, Inc. d.b.a. Star Plating Company) Facility ID: 2570

Reporting Period From January 1, 2024 to December 31, 2024

Annual Update Revised Facility Information has changed from the last submission

Facility Identification				Owner/Operator Details																		
Facility ID:	2570		Name:	Carlton Neves																		
Facility Name:	Southcoast Plating, Inc. (formerly Plating Technology, Inc. d.b.a. Star Plating Company)		Address:	41 Coffin Avenue New Bedford, MA 02746, United States																		
Maximum Occupants:	7		Phone:	508-996-9712 Email: carltonneves@gmail.com																		
Physical Location:	41 Coffin Avenue, 42 Coffin Avenue, New Bedford, MA 02746		Parent Company Details																			
Nature of Business:	Electroplating, Plating, Polishing, Anodizing, and Coloring		Name:	Southcoast Plating																		
County:	Bristol County	NAICS Code:	332813																			
Fire Department:			Dun and Brad No:	41 Coffin Avenue New Bedford, MA 02746, United States																		
Phone:	508-996-9712	SIC Code:	001021245																			
<input checked="" type="checkbox"/> Manned <input type="checkbox"/> Unmanned			Dun and Brad No:	001021245																		
Email:	FTE: 5		EIN ID(Tax Number):																			
Subject to EPCRA Section 312 (Annual Inventory)?				<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No																		
Subject to Emergency Planning under Section 302 of EPCRA (40 CFR part 355)?				<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No																		
Subject to Section 112r of Clean Air Act (CAA)?				<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No																		
RMP Facility ID:																						
Subject to EPCRA Section 313 (Toxic Release Inventory - TRI)?				<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No																		
TRI Facility ID: 02746PLTNG41COF																						
Mailing Address				Facility Emergency Planning Coordinator																		
Company Name: Southcoast Plating				Name: Jack Coutinho																		
Attention:				Title: Plating Supervisor																		
Street Address 1: 41 Coffin Avenue				Phone: 508-996-9712 24 Hr.Phone: 508-996-9712																		
Street Address 2:				Email: carltonneves@gmail.com																		
City: New Bedford		State: MA																				
Zip: 02746		Phone: 508-996-9712																				
Country: United States																						
Emergency Contacts																						
<table border="1" style="width:100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 25%;">Name</th> <th style="width: 25%;">Title</th> <th style="width: 25%;">Phone</th> <th style="width: 25%;">24 Hr.Phone</th> <th style="width: 25%;">Email</th> </tr> </thead> <tbody> <tr> <td>Jack Coutinho</td> <td>Plating Supervisor</td> <td>508-996-9712</td> <td>508-996-9712</td> <td>carltonneves@gmail.com</td> </tr> <tr> <td>Carlton Neves</td> <td>President</td> <td>508-996-9712</td> <td>774-451-5917</td> <td>carltonneves@gmail.com</td> </tr> </tbody> </table>								Name	Title	Phone	24 Hr.Phone	Email	Jack Coutinho	Plating Supervisor	508-996-9712	508-996-9712	carltonneves@gmail.com	Carlton Neves	President	508-996-9712	774-451-5917	carltonneves@gmail.com
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Carlton Neves	President	508-996-9712	774-451-5917	carltonneves@gmail.com																		
Certification: I certify under penalty of law that I have personally examined and am familiar with the information submitted in pages one through 5, and that based on my inquiry of those individuals responsible for obtaining the information, I believe that the submitted information is true, accurate and complete.							Optional Attachments <input checked="" type="checkbox"/> Site Plan <input type="checkbox"/> Site Coordinate Abbreviations <input type="checkbox"/> Other Safeguard measures <input type="checkbox"/> Facility Emergency Response Plan															
Carlton Neves, President		2/27/2025 11:47:05 AM		508-996-9712		Carlton Neves																
Name and official title of owner/operator or authorized representative		Date Signed		Telephone Number		Signature																

Tier II Emergency and Hazardous Chemical Inventory

Facility Name: Southcoast Plating, Inc. (formerly Plating Technology, Inc. d.b.a. Star Plating Company) Facility ID: 2570
 Reporting Period From January 1, 2024 to December 31, 2024

Chemical Description	Physical Hazards	Health Hazards
Chemical ID: 268777 Check if Chemical Information is changed from the last submission: <input checked="" type="checkbox"/> CAS #: 7664-93-9 Trade Secret: <input type="checkbox"/> Chemical Name: DILUTE SULFURIC ACID EHS: <input checked="" type="checkbox"/> Contains EHS: <input type="checkbox"/> Exceeds TPQ: <input type="checkbox"/> EHS Name: Sulfuric acid <input checked="" type="checkbox"/> Pure <input type="checkbox"/> Mix <input type="checkbox"/> Solid <input checked="" type="checkbox"/> Liquid <input type="checkbox"/> Gas Chemical Added On: Check if the chemical is below reporting threshold: <input type="checkbox"/>	<input type="checkbox"/> Combustible dust <input checked="" type="checkbox"/> Corrosive to metal <input type="checkbox"/> Explosive <input type="checkbox"/> Flammable (gases, aerosols, liquids, or solids) <input type="checkbox"/> Gas under pressure <input type="checkbox"/> Hazard Not Otherwise Classified (HNOC) <input type="checkbox"/> In contact with water emits flammable gas <input type="checkbox"/> Organic peroxide <input type="checkbox"/> Oxidizer (liquid, solid or gas) <input type="checkbox"/> Pyrophoric (liquid or solid) <input type="checkbox"/> Pyrophoric gas <input type="checkbox"/> Self-heating <input type="checkbox"/> Self-reactive	<input checked="" type="checkbox"/> Acute toxicity (any route of exposure) <input type="checkbox"/> Aspiration hazard <input type="checkbox"/> Carcinogenicity <input type="checkbox"/> Germ cell mutagenicity <input type="checkbox"/> Hazard Not Otherwise Classified (HNOC) <input type="checkbox"/> Reproductive toxicity <input type="checkbox"/> Respiratory or skin sensitization <input checked="" type="checkbox"/> Serious eye damage or eye irritation <input type="checkbox"/> Simple asphyxiant <input checked="" type="checkbox"/> Skin corrosion or irritation <input type="checkbox"/> Specific target organ toxicity (single or repeated exposure)

Inventory	Storage Codes & Location					
Max Daily Amt (lbs): 750 Max Daily Amt Code: 03 Avg Daily Amt (lbs): 750 Avg Daily Amt Code: 03 Max Amt in Largest Container (lbs): 750 No of days onsite: 365	Container Type	Pressure	Temperature	Storage Location	Description	Max Amt At Location(lbs)
	[E]Plastic or nonmetallic drum	[1]Ambient pressure	[4]Ambient temperature	Wastewater treatment area in North Plant (41 Coffin Avenue)	Wastewater Treatment - North Plant (41 Coffin Avenue)	375
	[E]Plastic or nonmetallic drum	[1]Ambient pressure	[4]Ambient temperature	Wastewater treatment area in South Plant (42 Coffin Avenue)	Wastewater Treatment - South Plant (42 Coffin Avenue)	375

SHIPMENT DETAILS					
Mode of Shipment: Trucks	Maximum Capacity Per Vessel: 750	Carrier: Astro Chemical			
Shipment Frequency Count: 10	Maximum Shipment Quantity at One Time: 750	Carrier Address: 126 Memorial Drive, Springfield, MA 01104-			
Shipment Frequency Period: Year	Average Annual Shipment Quantity: 750	Carrier Phone: 413-781-7240			
Physical State In Transit: Liquid	Routes of Travel: I90, I495, I140, I195	Carrier 24 Hr Phone: 413-531-0360			

Tier II Emergency and Hazardous Chemical Inventory

Facility Name: Southcoast Plating, Inc. (formerly Plating Technology, Inc. d.b.a. Star Plating Company)
 Reporting Period From January 1, 2024 to December 31, 2024

Facility ID: 2570

Chemical Description	Physical Hazards	Health Hazards
Chemical ID: 268776 Check if Chemical Information is changed from the last submission: <input checked="" type="checkbox"/> CAS #: 7697-37-2 Trade Secret: <input type="checkbox"/> Chemical Name: NITRIC ACID EHS: <input checked="" type="checkbox"/> Contains EHS: <input type="checkbox"/> Exceeds TPQ: <input type="checkbox"/> EHS Name: Nitric acid <input checked="" type="checkbox"/> Pure <input type="checkbox"/> Mix <input type="checkbox"/> Solid <input checked="" type="checkbox"/> Liquid <input type="checkbox"/> Gas Chemical Added On: Check if the chemical is below reporting threshold: <input type="checkbox"/>	<input type="checkbox"/> Combustible dust <input checked="" type="checkbox"/> Corrosive to metal <input type="checkbox"/> Explosive <input type="checkbox"/> Flammable (gases, aerosols, liquids, or solids) <input type="checkbox"/> Gas under pressure <input type="checkbox"/> Hazard Not Otherwise Classified (HNOC) <input type="checkbox"/> In contact with water emits flammable gas <input type="checkbox"/> Organic peroxide <input type="checkbox"/> Oxidizer (liquid, solid or gas) <input type="checkbox"/> Pyrophoric (liquid or solid) <input type="checkbox"/> Pyrophoric gas <input type="checkbox"/> Self-heating <input type="checkbox"/> Self-reactive	<input checked="" type="checkbox"/> Acute toxicity (any route of exposure) <input type="checkbox"/> Aspiration hazard <input type="checkbox"/> Carcinogenicity <input type="checkbox"/> Germ cell mutagenicity <input type="checkbox"/> Hazard Not Otherwise Classified (HNOC) <input type="checkbox"/> Reproductive toxicity <input type="checkbox"/> Respiratory or skin sensitization <input checked="" type="checkbox"/> Serious eye damage or eye irritation <input type="checkbox"/> Simple asphyxiant <input checked="" type="checkbox"/> Skin corrosion or irritation <input type="checkbox"/> Specific target organ toxicity (single or repeated exposure)

Inventory	Storage Codes & Location
-----------	--------------------------

Max Daily Amt (lbs): 800 Max Daily Amt Code: 03 Avg Daily Amt (lbs): 600 Avg Daily Amt Code: 03 Max Amt in Largest Container (lbs): 600 No of days onsite: 365	<table border="1"> <thead> <tr> <th>Container Type</th> <th>Pressure</th> <th>Temperature</th> <th>Storage Location</th> <th>Description</th> <th>Max Amt At Location(lbs)</th> </tr> </thead> <tbody> <tr> <td>[C]Tank inside building</td> <td>[1]Ambient pressure</td> <td>[4]Ambient temperature</td> <td>Diluted in 20 gallon plastic tanks on zinc plating lines in South Plant (42 Coffin Avenue)</td> <td>Zinc plating lines in South Plant (42 Coffin Avenue)</td> <td>100</td> </tr> <tr> <td>[C]Tank inside building</td> <td>[1]Ambient pressure</td> <td>[4]Ambient temperature</td> <td>In one passivation tank in South Plant (42 Coffin Avenue)</td> <td>In one passivation tank in South Plant (42 Coffin Avenue)</td> <td>520</td> </tr> <tr> <td>[D]Steel drum</td> <td>[1]Ambient pressure</td> <td>[4]Ambient temperature</td> <td>In chemical storage area in South Plant (42 Coffin Avenue)</td> <td>Chemical Storage in South Plant (42 Coffin Avenue)</td> <td>100</td> </tr> </tbody> </table>	Container Type	Pressure	Temperature	Storage Location	Description	Max Amt At Location(lbs)	[C]Tank inside building	[1]Ambient pressure	[4]Ambient temperature	Diluted in 20 gallon plastic tanks on zinc plating lines in South Plant (42 Coffin Avenue)	Zinc plating lines in South Plant (42 Coffin Avenue)	100	[C]Tank inside building	[1]Ambient pressure	[4]Ambient temperature	In one passivation tank in South Plant (42 Coffin Avenue)	In one passivation tank in South Plant (42 Coffin Avenue)	520	[D]Steel drum	[1]Ambient pressure	[4]Ambient temperature	In chemical storage area in South Plant (42 Coffin Avenue)	Chemical Storage in South Plant (42 Coffin Avenue)	100
Container Type	Pressure	Temperature	Storage Location	Description	Max Amt At Location(lbs)																				
[C]Tank inside building	[1]Ambient pressure	[4]Ambient temperature	Diluted in 20 gallon plastic tanks on zinc plating lines in South Plant (42 Coffin Avenue)	Zinc plating lines in South Plant (42 Coffin Avenue)	100																				
[C]Tank inside building	[1]Ambient pressure	[4]Ambient temperature	In one passivation tank in South Plant (42 Coffin Avenue)	In one passivation tank in South Plant (42 Coffin Avenue)	520																				
[D]Steel drum	[1]Ambient pressure	[4]Ambient temperature	In chemical storage area in South Plant (42 Coffin Avenue)	Chemical Storage in South Plant (42 Coffin Avenue)	100																				

Tier II Emergency and Hazardous Chemical Inventory

Facility Name: Southcoast Plating, Inc. (formerly Plating Technology, Inc. d.b.a. Star Plating Company) Facility ID: 2570
 Reporting Period From January 1, 2024 to December 31, 2024

SHIPMENT DETAILS

Mode of Shipment: Trucks	Maximum Capacity Per Vessel: 600	Carrier: Hubberd Hall Chemical
Shipment Frequency Count: 6	Maximum Shipment Quantity at One Time: 600	Carrier Address: 563 S. Leonard Street, Waterbury, CT 06708-
Shipment Frequency Period: Year	Average Annual Shipment: 600	Carrier Phone: 203-756-5521
Physical State In Transit: Liquid	Quantity: Routes of Travel: 184, Ct Rte 9, I95, I195	Carrier 24 Hr Phone: 203-756-5521

Chemical Description	Physical Hazards	Health Hazards
Chemical ID: 268778 Check if Chemical Information is changed from the last submission: <input checked="" type="checkbox"/> CAS #: 7447-40-7 Trade Secret: <input type="checkbox"/> Chemical Name: Potassium Chloride EHS: <input type="checkbox"/> Contains EHS: <input type="checkbox"/> Exceeds TPQ: <input type="checkbox"/> EHS Name: <input checked="" type="checkbox"/> Pure <input type="checkbox"/> Mix <input checked="" type="checkbox"/> Solid <input type="checkbox"/> Liquid <input type="checkbox"/> Gas Chemical Added On: Check if the chemical is below reporting threshold: <input checked="" type="checkbox"/>	<input type="checkbox"/> Combustible dust <input type="checkbox"/> Corrosive to metal <input type="checkbox"/> Explosive <input type="checkbox"/> Flammable (gases, aerosols, liquids, or solids) <input type="checkbox"/> Gas under pressure <input checked="" type="checkbox"/> Hazard Not Otherwise Classified (HNOC) <input type="checkbox"/> In contact with water emits flammable gas <input type="checkbox"/> Organic peroxide <input type="checkbox"/> Oxidizer (liquid, solid or gas) <input type="checkbox"/> Pyrophoric (liquid or solid) <input type="checkbox"/> Pyrophoric gas <input type="checkbox"/> Self-heating <input type="checkbox"/> Self-reactive	<input type="checkbox"/> Acute toxicity (any route of exposure) <input type="checkbox"/> Aspiration hazard <input type="checkbox"/> Carcinogenicity <input type="checkbox"/> Germ cell mutagenicity <input checked="" type="checkbox"/> Hazard Not Otherwise Classified (HNOC) <input type="checkbox"/> Reproductive toxicity <input type="checkbox"/> Respiratory or skin sensitization <input type="checkbox"/> Serious eye damage or eye irritation <input type="checkbox"/> Simple asphyxiant <input checked="" type="checkbox"/> Skin corrosion or irritation <input type="checkbox"/> Specific target organ toxicity (single or repeated exposure)

Inventory	Storage Codes & Location					
Max Daily Amt (lbs): 7550 Max Daily Amt Code: 05 Avg Daily Amt (lbs): 3080 Avg Daily Amt Code: 04 Max Amt in Largest Container (lbs): 1080 No of days onsite: 365	Container Type	Pressure	Temperature	Storage Location	Description	Max Amt At Location(lbs)
	[C]Tank inside building	[1]Ambient pressure	[4]Ambient temperature	In solution in zinc plating tanks in South Plant (42 Coffin Avenue)		3080
	[J]Bag	[1]Ambient pressure	[4]Ambient temperature	On skid in chemical storage area in South Plant (42 Coffin Avenue)	Chemical Storage in South Plant (42 Coffin Avenue)	1540

Tier II Emergency and Hazardous Chemical Inventory

Facility Name: Southcoast Plating, Inc. (formerly Plating Technology, Inc. d.b.a. Star Plating Company) Facility ID: 2570
 Reporting Period From January 1, 2024 to December 31, 2024

SHIPMENT DETAILS

Mode of Shipment:	Trucks	Maximum Capacity Per Vessel:	3080	Carrier:	Astro Chemical
Shipment Frequency Count:	1	Maximum Shipment Quantity at One Time:	3080	Carrier Address:	126 Memorial Drive
Shipment Frequency Period:	Month	Average Annual Shipment Quantity:	3080		Springfield, Springfield, MA
Physical State In Transit:	Solid	Routes of Travel:	I90, I495, I140, I95	Carrier Phone:	01104
				Carrier 24 Hr Phone:	413-781-7240
					413-531-0360

Chemical Amount Range Code & Description

#	Code	Amount Range
1	01	[01] 0-99
2	02	[02] 100-499
3	03	[03] 500-999
4	04	[04] 1,000-4,999
5	05	[05] 5,000-9,999
6	06	[06] 10,000-24,999
7	07	[07] 25,000-49,999
8	08	[08] 50,000-74,999
9	09	[09] 75,000-99,999
10	10	[10] 100,000-499,999
11	11	[11] 500,000-999,999
12	12	[12] 1,000,000-9,999,999
13	13	[13] 10,000,000- Greater than 10 million



IC Environmental Management, Inc.

25 Tia Place
Franklin, MA 02038

Phone: 508-498-8236
Fax: 508-541-7443

INVOICE

Customer: Southcoast Plating, Inc.
41 Coffin Avenue
New Bedford, MA 02746
Attn: Carlton Neves

Invoice Date: 2/28/2025
Project Number: 2504
PO Number: Verbal
Terms: Upon Receipt

Date	Description	Cost
	Provide service to prepare and electronically submit the 2024 Tier II Reporting package for the above referenced facility. The report was submitted to MEMA, the New Bedford Fire Chief, and New Bedford EM Director.	
2/27/25	2024 Tier II Report Package	\$ 850.00
	Invoice Total:	\$ 850.00

Please Remit to:

IC Environmental Management, Inc.
25 Tia Place
Franklin, MA 02038



THE COMMONWEALTH OF MASSACHUSETTS
EXECUTIVE OFFICE OF LABOR AND WORKFORCE DEVELOPMENT
DEPARTMENT OF LABOR STANDARDS

MAURA HEALY
GOVERNOR

KIM DRISCOLL
LIEUTENANT GOVERNOR

LAUREN E. JONES
SECRETARY

MICHAEL FLANAGAN
DIRECTOR

February 22, 2024

Mr. Carlton Neves
President
South Coast Plating, Inc.
41 Coffin Avenue
New Bedford, MA 02746

Dear Mr. Neves,

Thank you for sending us your description of the actions that you have taken to correct serious hazards identified in the OSHA safety consultation report dated January 11, 2024. We have reviewed your written response and are pleased to inform you that your actions have corrected the corresponding hazards.

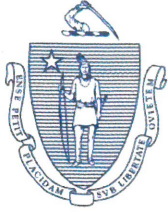
Through voluntary compliance with assistance from the consultation program you are meeting the basic intent of the Occupational Safety and Health Act: "To assure safe and healthful working conditions for working men and women of America."

A Consultation Questionnaire was enclosed in your report which provides valuable feedback on the Consultation Program. For your convenience this questionnaire is also available at <https://www.surveymonkey.com/s/86KRP7W>

It has been a pleasure to work with you. Due to periodic changes in the OSHA regulations and their interpretations, it is important for you to review your operations on a regular basis. We encourage you to visit the OSHA web site www.osha.gov. If you have any question or require additional information or assistance, please feel free to contact us.

Sincerely,

Michael Monfredo
Safety Consultant



THE COMMONWEALTH OF MASSACHUSETTS
EXECUTIVE OFFICE OF LABOR AND WORKFORCE DEVELOPMENT
DEPARTMENT OF LABOR STANDARDS

MAURA HEALY
GOVERNOR

KIM DRISCOLL
LIEUTENANT GOVERNOR

LAUREN E. JONES
SECRETARY

MICHAEL FLANAGAN
DIRECTOR

April 19, 2024

Mr. Carlton Neves, President
Southcoast Plating DBA Star Plating
41 Coffin Avenue
New Bedford, MA 02746

Dear Mr. Neves,

We congratulate you on the successful completion of your health consultation with us for Southcoast Plating DBA Star Plating in New Bedford. Through voluntary compliance with assistance from Onsite Consultation, you are meeting the basic intent and stated purpose of the Occupational Safety and Health Act: "To assure safe and healthful working conditions for working men and women of America."

Due to periodic changes in the OSHA Regulations and their interpretations, it is important for you to review your operations regularly with respect to voluntary OSHA compliance. If you have any questions or require additional information or assistance, please feel free to contact us.

It's been a pleasure working with you, and we look forward to assisting you in the future.

Please feel free to fill out our survey monkey questionnaire concerning this process
[Http://www.surveymonkey.com/s/86KRP7W](http://www.surveymonkey.com/s/86KRP7W).

Sincerely,

A handwritten signature in cursive script that reads "Deborah M. Russell".

Deborah Russell
Industrial Hygiene Consultant

NITRIC ACID 42 DEGREE

Revised: 12/6/22

1 IDENTIFICATION

Product Name: NITRIC ACID 42 DEGREE

Product Code :4041001

Recommended use of the chemical and restrictions on use:Industrial applications

Hubbard-Hall Inc.

563 South Leonard Street
Waterbury, CT 06708

Telephone: 203-756-5521

Fax number: 203-756-9017

Emergency Phone Number

CHEMTREC: 1 (800) 424-9300

International: 1 (703) 527-3887

2 HAZARDS IDENTIFICATION



Signal Word: DANGER

Hazard Category: Acute Toxicity-Oral Hazard Category 3

Acute Toxicity-Inhalation Hazard Category 1

Corrosive to Metals Hazard Category 1

Skin Corrosion/Irritation Hazard Category 1A

Eye Damage/Irritation Hazard Category 1

Oxidizing Liquids Hazard Category 3

Specific Target Organ Toxicity (Single Exposure) Hazard Category 2

Hazard Statements: Toxic if swallowed.

Fatal if inhaled.

Causes severe skin burns and eye damage.

May be corrosive to metals.

Causes serious eye damage.

May intensify fire, oxidizer

May cause damage to lungs and teeth through inhalation.

Prevention: Wash skin thoroughly after handling.

Do not eat, drink or smoke when using this product.

Do not breathe dust, fumes, gas, mist, vapors or spray.

Use only outdoors or in well ventilated area.

In case of inadequate ventilation wear respiratory protection.

Wear protective gloves, chemical protective clothing, eye protective goggles and face shield for face protection.
 Keep away from heat.
 Keep/Store away from clothing and other combustible material.
 Take any precaution to avoid mixing with combustibles.
 Keep only in original container.

Response: If exposed or concerned: Get medical advice/attention.
 If swallowed: Immediately call poison center or doctor.
 If swallowed: Rinse mouth. Do NOT induce vomiting.
 If on skin (or hair): Take off immediately all contaminated clothing. Rinse skin with water/shower.
 Wash contaminated clothing before reuse.
 If inhaled: Remove person to fresh air and keep comfortable for breathing.
 Immediately call poison center or doctor and explain the type of exposure to the chemical(s) and provide the name of the chemical(s).
 Specific treatment - refer to poison center or doctor for advice.
 If in eyes: Rinse cautiously with water for several minutes. Remove contact lenses, if present and easy to do. Continue rinsing.
 In case of fire: Use water, foam, chemical extinguisher or carbon dioxide.
 Absorb spillage to prevent material damage.

Storage: Store locked up.
 Store in a corrosive resistant stainless steel container.
 Store in well ventilated place. Keep container tightly closed.

Disposal: Dispose of contents/container in accordance with local, regional, national, or international regulations.

3 COMPOSITION INFORMATION

Chemical Name	Common Name And Synonyms	CAS No. and other Unique identifiers	Concentration %
Nitric Acid	Aqua Fortis	7697-37-2	50-70%

4 FIRST AID

After Inhalation:

Get medical attention immediately. Call a poison control center or physician. If suspected that fumes are still present, the rescuer should wear an appropriate mask or self-contained breathing apparatus. If product vapor or mists cause respiratory irritation or distress, move the exposed person to fresh air immediately. If breathing is difficult or irregular, administer oxygen; if respiratory arrest occurs, start artificial respiration by trained personnel. Do not use the mouth to mouth method if the victim inhaled the substance; give artificial respiration with aid of a pocket mask equipped with a one-way valve or other proper respiratory device. If unconscious, maintain an open airway. Loosen tight clothing such as a collar, tie, belt or waistband.

After Skin Contact:

Immediately remove contaminated clothing under a safety shower. Flush all affected areas with large amounts of water for 15 minutes. DO NOT attempt to neutralize with chemical agents. Obtain medical advice.

After Eye Contact:

Immediately flush the eyes with large quantities of running water for 15 minutes. Hold the eyelids apart during the flushing to ensure rinsing of the entire surface of the eyelids with water. DO NOT attempt to neutralize with chemical agents. Obtain medical attention as soon as possible. Oils or ointments should not be used. Continue rinsing for an additional 15 minutes if the physician is not available.

After Ingestion:

If swallowed: Rinse mouth. Do NOT induce vomiting.

Immediately call poison center or doctor and explain the type of exposure to the chemical(s) and provide the name of the chemical(s).

Most Important Symptoms/Effects

Inhalation:

Effects may be delayed. Causes chemical burns to the respiratory tract. Inhalation may be fatal as a result of a spasm, inflammation, edema of the larynx and bronchi, chemical pneumonitis and pulmonary edema. Aspiration may lead to pulmonary edema. May cause systemic effects. May cause acute pulmonary edema, asphyxia, chemical pneumonitis and upper airway obstruction caused by edema. Depending on the conditions, the vapors of fumes of nitric acid may actually be a mixture of nitric acid and various oxides of nitrogen. The composition may vary with temperature, humidity, and contact with other organic materials.

Eye:

Causes serious eye damage. Material is extremely destructive to the tissue and mucous membranes of the eye. Causes redness, pain, burning sensation and tearing. Direct contact with liquid may cause blindness or permanent eye damage.

Skin:

Causes severe skin burns. Causes irritation, pain, redness and blisters. May cause deep penetrating ulcers of the skin. Concentrated Nitric Acid turns human skin yellow on contact.

Ingestion:

May cause severe and permanent damage to the digestive tract. Causes severe burns to the gastrointestinal tract. May cause perforation of the digestive tract. May cause systemic effects. Causes severe mouth, throat, and abdominal pain upon ingestion.

5 FIRE FIGHTING MEASURES

Suitable and Unsuitable extinguishing media:

Will not burn or support combustion. Use extinguishing media appropriate for surrounding fire, such as water spray, dry chemical, foam or carbon dioxide.

Specific hazards arising from the chemical:

Closed containers of Nitric Acid may explode (due to pressure build-up) when exposed to extreme heat. During emergency conditions overexposure to decomposition products may cause a health hazard. Hazardous decomposition products include nitrogen oxides, ammonia and amines. Symptoms may not be immediately apparent. Obtain medical attention.

Special protective equipment and precautions for firefighter

Fire fighters should enter area only if they are protected from all contact with the material. Full protective clothing, including self-contained breathing apparatus, coat, pants, gloves, boots and bands around legs, arms, and waist, should be worn. No skin surfaces should be exposed.

6 ACCIDENTAL RELEASE MEASURES

Personal Precautions, Protective Equipment, & Emergency Proc

Wear appropriate chemical protection equipment such as gloves, face-shield, goggles and suitable body protection to prevent contamination of skin, eyes and personal clothing.

Methods and Materials for containment & cleaning up:

If trained in accordance 29 CFR 1910.120, leaks should be stopped. Spills should be contained and cleaned immediately. Persons performing clean up work should wear adequate personal protective equipment and clothing. Spills and releases should be reported, if required, to the appropriate local, state and federal regulatory agencies.

Cover drains. Approach the release from upwind. Contain spill. Cover with large quantities of non-combustible, inert absorbent (eg sand, dry earth, vermiculite, diatomaceous earth) and place in container for proper disposal. Contaminated absorbant may pose the same hazard as the spilt product.

7 HANDLING AND STORAGE

Precautions for safe handling:

Use ventilation sufficient to keep personal exposure below the OSHA Permissible Exposure Limits (PEL) and or the ACGIH Threshold Limit Value (TLV) Time Weighted Average (TWA) exposure limits.

Do not get in eyes, or on skin, or on clothing.

Avoid breathing dust, fumes, gas, mist, vapors and sprays.

Wear rubber protective gloves, chemical protective clothing, eye protective goggles and face shield for face protection.

Keep container tightly closed.

Keep only in original container .

**Conditions for safe storage,
inc any incompatibilities:**

Store in well ventilated place. Keep container tightly closed.

Store locked up and away from incompatible chemicals.

Container that have been opened must be carefully resealed and kept upright to prevent leakage.

8 EXPOSURE CONTROLS / PERSONAL PROTECTION

Name	Std.	TWA-8hrs	STEL - 15 min.
Nitric Acid	ACGIH	2 ppm	4 ppm

ACGIH - American Control of Governmental Hygenists
OSHA - Occupational Safety and Health Administration

Ventilation: Use local exhaust to keep personal exposures below the OSHA Permissible Exposure Limit(s) (PEL) or the ACGIH threshold Limit Values (TLV)Time Weight Average (TWA).

Respiratory Protection: A respiratory protection program that meets OSHA 29 CFR 1910.134 and ANSI 788.2 or applicable federal requirements must be followed whenever work place conditions warrant respirator use. NIOSH's Respirator Decision Logic" may be useful in determining the suitability of various types of respirators.

Protective Gloves: Acid resistant rubber.

Eye Protection: Wear chemical safety goggles with face shield .

Other Protective Equipment: Wear chemical resistant boots.

Wear chemical resistant clothing.

9 PHYSICAL AND CHEMICAL PROPERTIES

Appearance: Clear colorless to pale yellow or brown liquid

Odor: Acrid pungent

Odor Threshold: 0.75 - 2.5 ppm

PH: <1

Melting Point/Freezing Point: -20 to -31.7 °C

Initial Boiling Point and Boiling Range: 117-120 °C

Flash Point: N/A

Evaporation Rate: N/A

Flammability (solid, gas): N/A

Upper/Lower flammability or explosive limits: N/A

Vapor Pressure: 9-10 mm Hg @ 25 °C

Vapor Density: >1 (Air=1)

Relative Density: 1.3551 - 1.4078 g/ml

Solubility (ies): Complete in water

Partition Coefficient; n-octanol/water:	Log Pow = -2.3
Auto-ignition Temperature:	N/A
Decomposition Temperature:	N/A
Viscosity:	N/A

10 STABILITY AND REACTIVITY

Reactivity:	Nitric Acid is a strong oxidizer. It attacks many metals producing extremely flammable hydrogen gas which can form explosive mixtures with air. Reactive or incompatible with alkali and metals. Violent reactions possible with combustible material, organic solvents, oxidizable substances, alcohols, ketones, aldehydes, acid anhydrides, amines, anilines, nitriles, organic nitro compounds, hydrazine, acetylidenes, metal alloys, metal oxides, alkali metals alkaline earth metals, ammonia, acids, hydrides, halogens, nonmetallic oxides, nitrides, hydrogen peroxide, charcoal, turpene and many other substances.
Chemical Stability:	Stable under recommended storage conditions. Decomposes in the presence of air, light or organic matter. Yellow/brown color is due to the release of nitrogen dioxide upon exposure to light.
Conditions to Avoid:	Extreme temperatures. Contact with incompatible material. Light. Moisture.
Incompatible Materials:	Nitric Acid reacts or is incompatible with over 150 chemical combinations. Refer to NFPA protection guide for specifics. Metals, powders, reducing agents, strong bases, acetic acid, alcohols, acetone, aniline, hydrogen sulfide, carbides, anhydrides, organic solvents, combustible materials, chromic acid, flammable liquids, cyanides, sulfides. Incompatible with many other substances. DO NOT add water to the acid. ALWAYS add the acid to water while stirring to prevent the release of heat, steam, fumes.

11 TOXICOLOGICAL INFORMATION

Oral Administration:	Nitric Acid -LD50->= 90 mg/kg (rat)
Inhalation:	Nitric Acid-LC50-30 min, -260 mg/m ³ (rat), LD50, 4 h-1302 mg/m ³ (rat); LD50, 4 h-67 ppm NO ₂ (rat)
Delayed effects:	Severe irritation or burns to skin, eyes and respiratory system
Short term exposure:	Severe irritation or burns to skin, eyes and respiratory system
Cancer Hazard:	Not listed by IARC, NTP, OSHA, ACGIH
Routes of Exposure	Eyes, Skin, Inhalation, Ingestion

12 ECOLOGICAL INFORMATION

Abiotic degradability:	No data available
Bioaccumulation potential:	low
Soil/Sediment Result:	No data available

13 DISPOSAL CONSIDERATION

Dispose of in accordance with local, state and federal regulations.

14 TRANSPORT INFORMATION

UN Number:	2031
UN Proper Shipping Name:	NITRIC ACID (OTHER THAN RED FUMING, WITH NOT MORE THAN 70% NITRIC ACID),
Transport Hazard Class (es):	5.1, (8)
Packing Group:	II
ERG:	157

15 REGULATORY INFORMATION

HMIS: Health: 3 Flammability: 0 Reactivity: 1

Cercla RQ-1000 lbs

Sara Hazard Classification Nitric Acid-SARA 313 listed

Sara Hazard Classification SARA 302 - Extremely Hazardous Substances; Nitric Acid

Proposition 65 No Proposition 65 listed components in this formula

TSCA Inventory Status All components of this product are on the TSCA inventory or are exempt from TSCA inventory requirements .

16 OTHER INFORMATION

Disclaimer: The information is based on our knowledge to date but does not constitute an assurance of product properties and does not imply a legal contractual relationship.

Date Prepared: 9/22/14

APPENDIX XIV OF
HAZARDOUS WASTE MANAGEMENT
MANUAL

HAZARDOUS WASTE INCIDENT CONTINGENCY PLAN

SOUTHCOAST PLATING, INC. D.B.A.
STAR PLATING COMPANY
41 COFFIN AVENUE
NEW BEDFORD, MASSACHUSETTS 02746

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EXHIBITS:

1. Southcoast Plating Hazardous Waste Training Program
2. Sample Hazardous Waste Training Record Form
3. Emergency Call List
4. Site Plan and Layout
5. Emergency Response Equipment List
6. Reportable Quantity Limit List
7. Master Chemical List
8. Contingency Plan Distribution List
9. Hazmat Transporter's Security Plan (Freehold Cartage, Inc.)

A. INTRODUCTION

1. General

SOUTHCOAST PLATING, INC. d.b.a. STAR PLATING COMPANY is a privately held Corporation located at 41 Coffin Avenue in New Bedford, Massachusetts, which employs ~20 employees, including platers, maintenance people, truck drivers, inspectors, and office staff. STAR PLATING specializes in barrel electroplating of customer's hardware which is usually steel material. The plating applied includes zinc and tin finishes. The operation consists of (3-5) automatic plating machines with oblique barrels and (6) hand lines with horizontal barrels and overhead hoists.

STAR PLATING plates on both (North and South) sides of Coffin Avenue. The office and maintenance area are located on the second floor above the North Plant. The central wastewater treatment system is located in the basement and to the rear of the North Plant.

STAR PLATING is considered a "large quantity generator" of hazardous waste and has been issued EPA ID number MAD001021245. STAR PLATING utilizes a trench system for collection and delivery of all rinse water containing drag out of chemicals and metals from the North and South plating operations to STAR PLATING'S wastewater treatment system. A sump collects the wastewater from the South Plant and transfers the water under Coffin Avenue through double wall piping to a sump in the basement of the North Plant for treatment. All wastewater is pretreated in accordance with the Commonwealth of Massachusetts Sewer Permit No. 107675/ S98CI008A and City of New Bedford Industrial Discharge Permit L-016 prior to discharge to the City of New Bedford's Fort Rodman Treatment Plant. F006 hazardous waste sludge is generated from the wastewater pre-treatment operation and is properly manifested and transported dried in a 30 yard roll-off four times per year to Envirote Corporation in York, PA, for stabilization and secure land fill.

Chemicals that are used at STAR PLATING are kept in segregated storage areas as required for safety purposes and are purchased in weekly use quantities to minimize inventory on site. Complete sets of Material Safety Data Sheets (MSDS) are located as follows: General Managers office, and in the hallway outside the second floor office.

2. Purpose and Scope

This plan has been prepared in accordance with the US Department of Labor, Occupational Safety and Health Administration (OSHA) standards for Hazardous Waste Operation and Emergency Response (29 CFR 1910.120) and Massachusetts Hazardous Waste regulations. (310 CMR 30.500-30.524).

This plan describes the actions that facility personnel must take in response to fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water at the facility.

3. Strategy

STAR PLATING is organized at the "First Responder Awareness Level" as set forth by 29 CFR 1910.120. In the event of a major fire or significant release, the fire department and/or an outside environmental clean up contractor(s) will be utilized as responders.

Small localized fires or incidental spills may be addressed by maintenance or production workers at the discretion of and under the supervision of the Emergency Coordinator.

- d. Is authorized to carry out the contingency plan in an emergency situation and to expend the necessary resources.
- e. Duties during an emergency as required:
 - Emergency evacuation of personnel
 - Obtaining outside emergency assistance as required and follow up coordination
 - Supervising the extinguishing of minor fires and clean up of incidental spills
 - Shutting down of the facility as required
 - Notification of the appropriate authorities during an emergency
 - Notify and assist General Manager with the follow up measures through resumption of normal operations
- f. Regularly inspect emergency response equipment of monthly basis and correct any deficiencies found.

3. President/ General Manager

The General Manager has the following responsibilities:

- a. Maintenance and interpretation of the Hazardous Waste Manual, including the Contingency Plan.
- b. Assisting the emergency coordinators as soon as possible during an emergency to verify that all necessary responses are being taken up to resumption of normal operation.
- c. Serve as a company spokesman with the media and provide follow up communications and reporting to regulatory agencies.

4. Safety and Training Manager

The Safety and Training Manager has the following responsibilities:

- a. Make sure that all STAR PLATING personnel are properly trained in accordance with the Contingency Plan.
- b. Provide technical support during an emergency.

C. TRAINING

1. Program

All company personnel receive training as depicted in the “Plating Technology Hazardous Waste Training Program” shown in Exhibit 1.

2. Training Records

A file of training records is maintained in the upstairs office. Sample training record forms are shown in Exhibit 2.

3. Training Schedule

New employees are given a briefing on “Right To Know” and “Hazardous Waste” by their

supervisor prior to starting work. All employees receive formal training annually. (See Exhibit 1 and Exhibit 2).

D. EMERGENCY CALL LIST

See Exhibit 3. Note that Emergency Call Lists are posted by all “outside” telephones.

E. FACILITY SITE PLAN

A facility site plan and layout which diagrams the first floor of the North and South Plant is shown in Exhibit 4. Included in the site plan layout is the location of the following:

- First floor exits
- Fire department alarms (mounted on outside wall of building)
- First floor extinguishers
- Plating lines
- Wastewater Treatment
- Chemical storage areas

- Safety showers and emergency eye wash stations
- First aid kits
- Alternate evacuation routes

F. EMERGENCY RESPONSE EQUIPMENT

See list in Exhibit 5. Note: Sprinkler system and fire extinguishers are inspected and serviced by outside contractors on an annual and 3-month frequency, respectively.

G. EVACUATION PLAN

All employees will evacuate the facility if they hear the fire alarm siren or if they hear an evacuation announcement over the intercom page system. Evacuation will take place using the nearest exit which is unobstructed by the emergency. All employees will gather in front of 41 Coffin Avenue (office building) entrance for a head count unless directed elsewhere by the Emergency Coordinator or local authorities.

If more widespread evacuation appears necessary, the emergency coordinator will notify the New Bedford Police and Fire Department. See Emergency Call List in Exhibit 3.

H. FACILITY SHUTDOWN PROCEDURES

During an emergency, shutdown of utilities may be required to control the emergency. Shutdown procedures for electrical, water main, automatic sprinkler, and gas service are described below.

1. Electrical Service

The main electrical switch for the South Plant is located on the inside wall facing Coffin Avenue and to the right of the overhead door. The main electrical switch for the North Plant (office building) is in the Maintenance Department on the back wall. To disconnect all electrical service, turn the main switches from “ON” to “OFF”.

2. Water Main Service

For the North Plant, close the valve in the basement of the North Plant (office building) near

the floor on the Coffin Avenue side of the building. For the South Plant, close the valve in the cage along the Coffin Avenue wall next to the men's room. If the emergency prevents access to the inside water shutoff valves, the water main on the street may be used to shutdown water service.

3. Automatic Sprinklers

The South Plant sprinkler shutoff valve is located below floor level (under the trap door) in the north-east corner of the plant. The North Plant shutoff valve is located in the basement behind the air compressors along the north wall.

4. Gas Service

The STAR PLATING South Plant has a gas line which runs throughout the plant. See Call List in Exhibit 3 to have gas service shut off if necessary.

I. EMERGENCY RESPONSE PROCEDURES

Whenever there is an imminent or actual emergency, the emergency coordinator must take immediate action to respond to the incident and notify appropriate authorities. The emergency coordinator must immediately identify the character, source, amount, and extent of released materials, and at the same time, he must assess the possible hazards to the public health, safety, or welfare, or the environment. Depending upon the type and magnitude of the emergency, the sequence of the response actions and notification may vary, but based upon his assessment, the emergency coordinator must then take action as follows:

1. Detailed Response Procedures

a. Fire or Explosion

In the event of a fire or explosion, the Emergency Coordinator will do the following:

- (1) Determine the character, source, amount and extent of fire, and assess the risk to personnel safety, public health, and the environment.
- (2) If the fire is minor in nature, use portable fire extinguishers to attempt to control and douse the flames.
- (3) If the fire is not minor, sound the fire alarm and evacuate the facility immediately by means of nearest exit. The emergency coordinator will see to it that all personnel in fact evacuated by taking a headcount.
- (4) Attend to injured employees, if applicable. Call hospital as required, if injury or illness is involved.
- (5) If necessary and safe to do so, shutdown electricity and water supply. Call to have gas service (Revere Sink) shut off if necessary.
- (6) The Emergency Coordinator will notify the appropriate authorities as described in section I.2 below.

b. Groundwater Contamination/Spill

All spills will be promptly reported to the emergency coordinator. For major spills or release of hazardous materials which poses a threat to the environment, or that cannot

be readily contained inside the facility, or which creates an unsafe work or clean-up environment, the following procedures will be followed:

- (1) The emergency coordinator will determine the character, source, amount and extent of spill, and assess the risk to personnel safety, public health, and the environment.
- (2) If necessary, sound the alarm and evacuate the building. Verify that all personnel are evacuated by taking a headcount.
- (3) Attend to injured employees if applicable and/or call for hospital assistance, if needed.
- (4) Contact Franklin Environmental, Inc. at (508)384-6151 or, as alternate, Clean Harbors, Inc. at (508)778-2341 and request emergency clean up assistance.
- (5) Contact the appropriate authorities as described in Section I.2 below.
- (6) If safety conditions permit, dress in appropriate safety equipment and attempt the following when applicable, pending arrival of the outside emergency clean-up crew:
 - Attempt to contain or absorb the spill
 - Halt production
 - Remove or isolate hazardous waste containers
 - Shutdown utilities
- (7) Coordinate with outside emergency clean-up crew by providing all of the necessary information for clean-up.

c. Container Leaks

For incidental leaks which, in the judgment of the Emergency Coordinator, can safely be cleaned up by maintenance or production workers, the following applies:

- (1) Dress in appropriate safety equipment.
- (2) Stop the leak using mechanical means, repositioning the container, or transferring the material.
- (3) If applicable, some of the following techniques can be employed:
 - Dike the leak using absorbent material (FLORCO-X Absorbent)
 - Absorb the spill by gradually adding absorbent material and neutralize the spill as follows:

<u>Chemical Type</u>	<u>Neutralizer</u>
Acid	Caustic
Alkali	N/A
Oil	N/

- Dilute and flush the spill into the trench system
- (4) If applicable, shovel the contaminated absorbent into a clean, empty drum and seal and label the drum pending proper disposal.

2. Authority Notification and Reporting Requirements

If the emergency incident is of a nature that required local emergency response assistance (i.e., fire department, ambulance service), the emergency coordinator shall contact the appropriate agency. He shall then undertake the following actions:

- a. Notify the Commonwealth of Massachusetts Response Team in the event of a hazardous waste release or spill of any type at (617)292-5887.
- b. If there is a spill or release outside the facility, and the quantity of released hazardous substance(s) exceeds its "Reportable Quantity Limit" (RQ), the Coast Guard's National Response Center must be notified immediately at 1-800-424-8802. See Exhibit 6 for RQ limits. The following information must be included:
 - (1) Name and telephone of reporter
 - (2) Name and address of facility
 - (3) Time and type of incident (e.g., release, fire);
 - (4) Name and quantity of material(s) involved, to the extent known;
 - (5) The extent of injuries, if any; and
 - (6) The possible hazardous to human health, or the environment, outside the facility.
- c. If any chemical spill is suspected to have been released to the sewer, the emergency coordinator should immediately notify the Commissioner of the City of New Bedford, Department of Public Works, Sewer Division. Specific reporting requirements will be included in Star's wastewater discharge permit.
- d. Written Report to DEQE

Within (15) fifteen days of an incident requiring implementation of the contingency plan, the General Manager will submit a written report to DEP, including the following information:

- (1) The name, address, telephone number of the owner or operator;
- (2) The name, address, and telephone number of the facility;
- (3) The date, time, and type of incident (e.g., fire, explosion);
- (4) The name and quantity of material (s) involved;
- (5) The extent of injuries, if any;
- (6) An assessment of actual or potential hazards to public health safety, welfare, or the environment, when this is applicable;
- (7) The estimated quantity and the disposition of recovered material that resulted from the incident;
- (8) All differences between the emergency response activities actually taken and those prescribed in the contingency plan and the reason for each such difference; and

(9) Proposed measures to prevent similar incidents in the future.

Copies of these emergency incident reports will be kept in a file in the upstairs office.

3. Resuming Operations

If the facility stops operation in response to an emergency incident, operation will not resume until the General Manger contacts the Massachusetts Department of Environmental Protection (DEP), and appropriate local authorities, and informs them that:

- a. Clean-up procedures are completed; and
- b. All emergency equipment listed in the Contingency Plan is cleaned and fit for its intended use.

Operation will not resume until DEP determines in writing that a threat to public health, safety, or welfare, or the environment no longer exists.

4. Natural Emergencies

The hazardous waste regulations require that provisions be taken in order to ensure that there would not be a release of hazardous waste to the environment in the event of flooding of natural waters.

Investigation of the statistical one hundred year flood plain map for the City of New Bedford indicates that STAR PLATING is not within the flood plain zone.

J. MEDICAL EXAMINATIONS

Due to the "First Responder Awareness Level" organization, medical exams for employees involved in emergency incidents will be provided only if exposure is indicated.

K. SECURITY PLAN

This integrated security plan is designed to meet the requirements of OSHA, DOT (HM-232), and other regulatory agencies.

1. Risk Assessment

a. Terrorists

Star Plating Company, a small family owned business, would not be at any significant risk from international or domestic terrorists for any logical reason. Star Plating Company has an excellent local environmental record and reputation and maintains a low profile so that the company would not be a target for extreme environmental groups.

b. Employee or Spouse Violence

Star Plating Company has never had any incidents of workplace violence in the past, however, as part of our security training , each employee and supervisor is requested to report any noticeable behavioral changes, threats of any kind, or work or personal situations that they may know of which may lead to build-up of tension in an employee or

spouse. The general Manager will take whatever steps that are necessary to defuse any potentially dangerous situation including disciplinary action or notifying outside authorities.

2. Background Checks

Star Plating Company will employ background checks for new hires, at the discretion of the general manager, depending on the position and the exposure to the company. Production workers are brought in initially on a “temporary basis” and are screened by the employment firm.

3. Perimeter Security

The plating supervisors and the wastewater and maintenance manager have been instructed to lock the gate on the south property at the end of the day shift and to keep the outside doors locked from the outside during the night shift and when possible during the day shift. When necessary for ventilation, doors can be left open providing that there are at least two employees working in near-by proximity to monitor the doorways. As part of the security training, each employee and supervisor is requested to challenge any stranger that enters the facility and either put them in contact with the appropriate member of management or escort them out of the facility. The supervisors are hereby instructed to call the New Bedford Police Department for assistance should any threatening situation develop with Star Plating Company employees or outsiders.

4. Hazardous material shipments and storage

Star Plating Company had a limited number of hazardous material shipments which are properly manifested and implemented using licensed Hazmat Shipping Companies. Normally, there are only (4) quarterly shipments of (F006) metal hydroxide sludge in a 30 yard roll-off. This material looks like dry, rust colored soil with a pH of about 9.0 and a 20% zinc metal content. The accumulating (F006) material is stored outside in an enclosed, locked shed. The Hazmat Shipping Companies are responsible for over the road security.

Star Plating Company also receives weekly usage quantities of plating chemicals such as acids, caustics, cleaners, salts, and chromates which are received in totes, 55 gallon drums, and five gallon pails. These materials are brought to inside storage areas promptly upon receipt. None of these chemicals in these quantities pose any significant danger or threat to our employees or the neighborhood and would not be a likely target for any outside group or organization.

5. Training

Star Plating Company provides annual security training to our employees as outlined in Star Plating Company’s Training Schedule and Training Log.

L. CONTINGENCY PLAN DISTRIBUTION

This contingency plan has been submitted to the Commonwealth of Massachusetts Department of Environmental Protection, Southeast Region at Lakeville Hospital, Main Street, Lakeville, MA 02347, and to each agency listed in Exhibit 8.

EXHIBIT 3 (Emergency Call List)

EMERGENCY
PHONE NUMBERS

FIRE DEPARTMENT..... 911 or 508-991-6100
 POLICE DEPARTMENT..... 911 or 508-991-6352
 AMBULANCE..... 911 or 508-991-6340

EMERGENCY COORDINATORS CELL FACILITY # HOME #

- | | | | | |
|----|---------------|--------------|----------|----------------|
| 1. | CarltonNeves | 774-451-5917 | PAGE ON | (774) 451-5917 |
| 2. | Jack Coutinho | 774-365-1127 | INTERCOM | (508) 995-2219 |

DEP - 24 HOURS..... 1-617-556-1133
 1-888-304-1133

DEP LAKEVILLE REGIONAL OFFICE..... 1-508-946-2700
 1-508-946-2850

OR STATE POLICE IF DEP CANNOT BE REACHED..... 1-508-820-2300

NATIONAL RESPONSE CENTER (Fire, Explosion or Spill)..... 1-800-424-8802
 STATE POLLUTION CONTROL AGENCY..... 1-508-946-2700
 CHEMTREC - Information to help with large spills..... 1-800-424-9300
 POISON CONTROL INFORMATION.....1-800-682-9211
 GAS SUPPLY COMPANY (NSTAR Gas Co.).....1-800-592-2000 EXT 1
 EQ NORTHEAST ENVIRONMENTAL SERVICE, INC.....1-508-384-6151
 CLEAN HARBORS ENVIRONMENTAL SERVICES, INC..... 1-800-645-8265

EXHIBIT 5

EMERGENCY RESPONSE EQUIPMENT LIST

A. FIRE PROTECTION

1. Equipment Type: Fire Alarm
Physical Description: Alarm pull box
Capabilities: Sound audio alarm throughout building and signal local fire department.
Location: Outside production area and office area. (see facility diagram)
2. Equipment Type: Sprinkler System (water system).
Physical Description: Standard overhead sprinkler heads.
Capabilities: Automatic activation upon heat detection
Location: Ceilings throughout building.
3. Equipment Type: Portable Fire Extinguishers type A and type ABC
Physical Description: Portable self contained, pressurized vessel. Red or silver canister with black hose and nozzle, with silver handle, mounted on wall.
Capabilities: Type A - General refuse fires, wood fires. NOT for electrical or chemical fires.
Type ABC - All fires. Sufficient capacity to extinguish a single barrel of burning waste, but probably not large volumes.
Location: Throughout building. (See facility diagram.)

B. PERSONNEL PROTECTION

1. Equipment Type: Emergency showers & eye wash basins.
Physical Description: Shower head with pull ring.
Capabilities: Provide water deluge for persons who have had direct contact with hazardous substances.
Location: Wastewater treatment (1), first floor of office building (2), production area (3).
(See facility diagram)
2. Equipment Type: Impervious protective clothing.
Physical Description: Rubber boots, aprons.
Capabilities: Splash protection from acids, caustics and solvents.
Location: Throughout facility & in safety cabinet at top of stairs. (North Plant)
3. Equipment Type: Protective face shield.
Physical Description: Plastic face shield with headband.
Capabilities: Splash protection, projectiles.
Location: Throughout facility & in safety cabinet at top of stairs. (North Plant)
4. Equipment Type: Protection gloves
Physical Description: Black Polyvinyl chloride coated gloves
Capabilities: Hand protection from acids, caustics
Location: Throughout facility & in safety cabinet at top of stairs. (North Plant)

EMERGENCY RESPONSE EQUIPMENT LIST
(continued)

5. Equipment Type: Protective gloves
Physical Description: Neoprene gloves
Capabilities: Hand protection from acids & caustics
Location: Throughout facility & in safety cabinet at top of stairs. (North Plant)
6. Equipment Type: Chemical splash goggles
Physical Description: Clear plastic goggles with head strap
Capabilities: Full protection from chemical splashes
Location: In safety cabinet at top of stairs. (North Plant)
7. Equipment Type: Safety glasses
Physical Description: Clear plastic glasses with side shields
Capabilities: Eye protection from chemical splash
Location: Throughout facility and in the main office

C. SPILL CONTROL AND DECONTAMINATION

1. Equipment Type: Absorbents (Flor con-X)
Physical Description: Mineral sponge granular absorbent
Capabilities: Contains & absorbs wet chemical spills
Location: Closest next to men's room, first floor (North Plant)
2. Equipment Type: Brooms
Physical Description: Wooden handle push brooms
Capabilities: Sweeping up absorbent, powders, etc.
Location: Throughout facility
3. Equipment Type: Shovels
Physical Description: Square mouth, long handled shovel
Capabilities: Manual movement of absorbent, powders, etc.
Location: Throughout facility

D. MEDICAL RESPONSE/FIRST AID

1. Equipment Type: First aid kits
Physical Description: Metal box, metal cabinets
Capabilities: Medical supplies for treatment of minor injuries
Location: Maintenance area and Supervisor's Office in South Plant.

EXHIBIT 6

REPORTABLE QUANTITY LIMIT LIST

1. Oil - any quantity to surface water or storm drains
2. Sodium Hydroxide - 50 pounds
3. Hydrochloric Acid - 100 pounds
4. Sulfuric Acid - 50 pounds
5. Chromic Acid - 5 pounds
6. Ammonium Chloride - 100 pounds
7. Potassium Permanganate - 10 pounds
8. Zinc Chloride - 50 pounds
9. Wastewater Treatment Sludge - 5 pound
10. Methanol - 100 pounds
11. Nitric Acid – 50 pounds

RQ's for process baths and chemicals may be calculated according to operating strength form the above list.

EXHIBIT 8.

CONTINGENCY PLAN DISTRIBUTION LIST
PREARRANGEMENTS FOR OUTSIDE EMERGENCY ASSISTANCE

AGENCY:	CONTACT PERSON:
A. New Bedford Fire Department 868 Pleasant Street New Bedford, MA 02740 (508) 991-6124	Chief Scott Kruger Hazardous Materials Team New Bedford Fire Department Station #5 New Bedford, MA
B. New Bedford Police Department N. Station #3 Ashley Blvd. New Bedford, MA 02740	Emergency Contingency Number (508) 991-6352 Secondary Emergency Number (508) 991-6360
C. New Bedford Board of Health 1213 Purchase Street New Bedford, MA 02740 (508)991-6199	Sandra manning (508) 991-6199
D. St. Lukes Hospital 101 Page Street New Bedford, MA 02740 (508)997-1515	Marik McGraw, Director Paramedics Service 508-991-6390
E. Civil Defense & Emergency Management Dept. 834 Kempton Street New Bedford, MA 02740 (508) 961-3060, Secondary: 508-991-6389	Brian Nobrega New Bedford Emergency Management 834 Kempton Street New Bedford, MA 02740
F. City of New Bedford, City Hall 133 William Street New Bedford, MA 02740 (508) 979-1400	Mr. John Mitchell Mayor (508) 979-1410

Star Plating

Hazardous Material Identification and Description

For identification of the applicable hazardous material related to the Application for Permit to Process Hazardous Materials at Star Plating, please find the following:

Hazardous Material: Nitric Acid 42 Degree, DOT Hazard Class 8 (Corrosive)

Usage: Nitric Acid 42 Degree is utilized in one (1) 250 gallon Passivation Tank in the South Plant at 42 Coffin Avenue. Nitric Acid makes up 15-20% of the tank contents or a maximum of 50 gallons. Passivation is a plating technique which protects materials from corrosion and deterioration



FP6 (rev. 3/00)

The Commonwealth of Massachusetts
Department of Fire Services - Office of the State Fire Marshal
P. O. Box 1025, State Road, Stow, MA 01775



APPLICATION FOR PERMIT

City or Town New Bedford

Date 4/10/2025

DIG SAFE NUMBER
N/A
Start Date: 4/10/2025

In accordance with the provisions of M.G.L. Chapter 148, as provided in Section application is hereby made
by Fire Systems, Inc.
(Full name of person, Firm or Corporation)

Address 955 Reed Road, Dartmouth, MA 02747
(Street or P.O. Box) (City or Town)

For permission to (state clearly purpose for which permit is requested) Replace Corroded 1-1/4" Branch Line
Above Plating Vats At North East Section Of Building To & Including (5) Sprinkler Heads

Name of competent operator (If Applicable) Pierre A. Lemieux Cert. No. SC-3022

Date Issued-rejected By
(Signature of Applicant)

Date of expiration Fee 50.00 \$ Paid \$50 Due



FP6 (rev. 3/00)

The Commonwealth of Massachusetts
Department of Fire Services - Office of the State Fire Marshal
P. O. Box 1025, State Road, Stow, MA 01775



PERMIT

City or Town New Bedford

Date 4/10/2025

Permit Number (if applicable)

DIG SAFE NUMBER
Start Date:

In accordance with the provisions of M.G.L. Chapter 148, as provided in Chapter 9 this permit is granted
to Fire Systems, Inc., 955 Reed Road, Dartmouth, MA 02747
(Full name of person, Firm or Corporation)

for Sprinkler Repair Work

Restrictions:
at
(Give location by street and no., or describe in such manner as to provide adequate identification of location)

Fee Paid \$ This Permit will expire on

Signature of Official Granting Permit Title

This permit must be conspicuously posted upon the premises

Training Schedule Notice for

3:00PM to 3:15PM in GM office (Supervisors & Maintenance)

Contingency Plan (Security)
Hazardous Waste
Lockout Tag-Out
Confined Space
Safety Meeting
Safety & Environmental Inspection

3:15PM to 4:00 PM in Lunch Room (Supervisors, Platers, & Maintenance)

Right to Know & Hazardous Waste (including GHS)
Contingency Plan (Security)
Personal Protective Equipment
Discrimination & Workplace and Sexual Harassment
Ergonomics
Fire Fighting
Fork Truck Safety

Carlton Neves

January 03, 2024

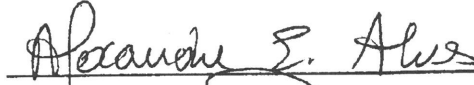
STAR PLATING COMPANY TRAINING LOG
PROGRAM TITLE: OSHA RIGHT TO KNOW
{GHS}, HAZMAT, PPE, DISCRIMINATION
POLICY ERGONOMICS, FIRE FIGHTING &
FORK TRUCK SAFETY

TRAINER: C. NEVES

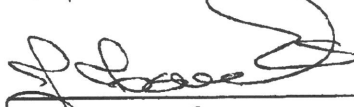
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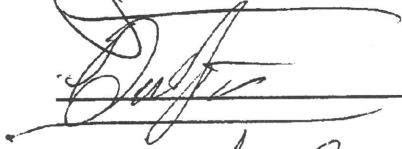
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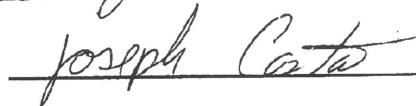
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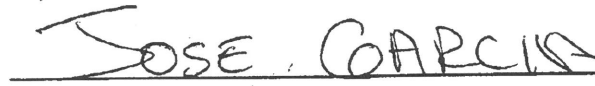
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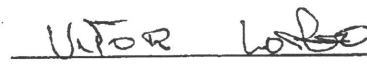
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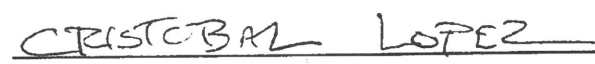
GARCIA, JOSE



LOBO, VICTOR



LOPEZ, CRISTOBAL



D

SOUTHEAST HOUSING COURT
COMMONWEALTH OF MASSACHUSETTS

The City of New Bedford

Plaintiff,

v.

Carlton Neves,

Carlton Neves, Trustee of K Seven
Realty Trust, and

Southcoast Plating, Inc.

Defendants.

CIVIL ACTION NO:
24H83CV00255NB

AFFIDAVIT OF HAZARDOUS MATERIALS OFC. TRAVIS REBELLO

1. I am a fire fighter for the City of New Bedford Fire Department, serving as the Hazardous Materials Officer.
2. I am involved with the inspection and enforcement activities taking place at 12 Coffin and 19 Coffin Avenue, the “properties.”
3. On May 9, 2025, I flew a drone over the properties and saw that there were no vehicles and no activity, leading me to believe there was also no fire watch.
4. At about 11:00 am, I reported to the properties. I was driving a marked fire department vehicle.
5. I drove by and observed a U-Haul truck, which backed up to the loading door. Men were loading a pallet of boxes on to the truck.
6. I turned back to photograph the truck and investigate the activity.
7. Before I was able to park, the U-Haul truck drove off.

8. In the area where the U-Haul truck had been, I located a box that was like those being loaded. It contained a collection of metal parts.
9. Upon these observations, I formed the suspicion that the defendants are continuing to conduct business in violation of the court's order.
10. Neither property is boarded, in violation of the court order.
11. No fire watch was taking place.
12. On May 17, at about 6:00 pm, I reported to the properties. There were no vehicles present. I walked around the properties, looking for signs of a fire watch but could not find any.

Signed under the pains and penalties of perjury on this __ day of June, 2025.

Travis Rebello

Travis Rebello
New Bedford Fire Department

E

SOUTHEAST HOUSING COURT
COMMONWEALTH OF MASSACHUSETTS

The City of New Bedford

Plaintiff,

v.

Carlton Neves,

Carlton Neves, Trustee of K Seven
Realty Trust, and

Southcoast Plating, Inc.

Defendants.

CIVIL ACTION NO:
24H83CV00255NB

AFFIDAVIT OF CAPTAIN KURT HOUGHTON

1. I am a Captain for the City of New Bedford Fire Department.
2. I am involved with the inspection and enforcement activities taking place at 12 Coffin and 19 Coffin Avenue.
3. On May 9, 2025, at about 11:30 am, I was contacted by Hazardous Materials Officer Travis Rebello.
4. Rebello informed me that he had conducted drone surveillance at the properties, and that he believed the defendants were failing to conduct a fire watch.
5. I reported to the properties and confirmed that no one was present in the buildings and that no fire watch was being conducted.
6. The property was not boarded up.
7. I contacted Carlton Neves and informed him that there was no fire watch occurring.

8. Neves acknowledged that there was no fire watch and arranged for two individuals to report to the properties.
9. I remained at the properties until about 1:30 pm, at which time the two individuals arrived.
10. I explained to Neves that he would be receiving a citation and instructed him to provide me with a schedule of the fire watch, along with contact information of those conducting the fire watch.
11. I informed Neves that he would be cited again if he continued to fail to conduct a fire watch.
12. On May 17, 2025, Rebello once again found that no fire watch was occurring at the properties. Neves was issued a second citation.

Signed under the pains and penalties of perjury on this 2nd day of June, 2025.


Kurt Houghton
New Bedford Fire Department

F





MAX FILL LINE

MAY



Handwritten graffiti in blue ink on the corrugated metal wall, possibly reading "A95" or similar.



G

MASSACHUSETTS NON-CRIMINAL FIRE CODE VIOLATION NOTICE

(Issued pursuant to M.G.L. c. 148A and 527 CMR 1.00)

TICKET #
F051-71036

DATE ISSUED: 5-9-25 DEPARTMENT ISSUING NOTICE: NEW BEDFORD FIRE ISSUED BY: [] HEAD OF FIRE DEPARTMENT (OR DESIGNEE) [] STATE FIRE MARSHAL (OR DESIGNEE) FIRE CODE ENFORCEMENT OFFICER (PRINT NAME): CAPT. K. HOUGHTON OFFICER I.D. NUMBER: JNS 51

NAME OF OFFENDER (LAST): NEVES (FIRST): CARLTON MI: MI

ADDRESS: 12-42 COFFIN AVE City/Town: NEW BEDFORD STATE: MA ZIP CODE: 02746

DATE OF VIOLATION: 5-9-25 TIME: 1130 LOCATION OF VIOLATION (INCLUDE #, ST, CITY, TOWN): 12-42 COFFIN AVE STATE: MA ZIP CODE: 02746

VIOLATIONS(S): Fire Code, 527 CMR 1.00 (Code of Massachusetts Regulations Only) Check One:

- A. Warnings of violation(s) only
- B. Violation(s) 527 CMR 1.00 (1st offense = \$100 2nd offense = \$500 3rd offense = \$1000)
- C. No specific conditions to be corrected
- Continuing conditions to be corrected within 24 hours
- Conditions to be corrected within ___ days

Description	Assessment
Sec. 10.12.4 FAILURE OF BUILDING OWNER	\$ 100-
Sec. TO MAKE BUILDING SAFE AND SECURE	\$
Sec. AFTER BEING NOTIFIED BY THE AFD	\$
Sec. 1.7.9 IMMINENT DANGER	\$ 100-
Sec.	\$

Description of Condition:

NO FIRE WATCH ON SITE

Report Attached Yes No Total Amount Due: \$ 200.00

This is a 2nd or subsequent offense Date(s) of prior Offense(s) _____

OFFICER CERTIFICATION: I certify that I am authorized to issue this Massachusetts Fire Code Violation Notice in accordance with the provisions of M.G.L. c. 148A. I further certify that (check one):

- I have delivered a copy of this violation to the offender, or the offender's agent at the time and place of the violation
- Signature of offender or agent of the offender upon receipt:
Name: [Signature] Date: 5-9-25
- Check here if offender refused delivery (Note: Whoever upon the request of any local or state code enforcement officer refuses to state his/her name and address shall be punished by a fine of not more than \$200.00 (M.G.L. C.148A))

I have mailed a copy of this violation notice to the offender at the offender's last known address.

I have delivered a copy of this violation at the offender's last known address.

Address of mailing or delivery: _____

Officer Signature: [Signature]

D. MAKE PAYMENT OR REQUEST AN APPEAL TO:

ATTN: Steve Melo
Municipal Hearings Officer
133 William Street, Room 203
New Bedford, MA 02740
Payable To: City of New Bedford) OFFICE OF CITY SOLICITOR
CITY OF NEW BEDFORD

RECEIVED

MAY 16 2025

SEE REVERSE SIDE FOR IMPORTANT INSTRUCTIONS

Important Instructions

You have been issued a non-criminal notice of a fire code violation under the provisions of Massachusetts General Laws chapter 148 A. These instructions give you very important information about your responsibilities and rights regarding this violation notice.

- If the box A, “Warning of Violation(s) Only” has been checked, there is no need to pay any money or assessment. However, any stated corrections must be corrected within the time stated.
- If the box B, “Violation(s)” has been checked, you **must** within 21 days of the receipt of this Notice of Violation:
 - Check either **Box (1) below** indicating that you are paying the assessment, **OR**
 - Check **Box (2) below** indicating that you request a hearing **AND**,
 - **Sign** where indicated and mail this notice of violation to the address in **Box D**.
- If this notice is for more than 1 violation, you may request a hearing on any one or more of the violations. However, you may not pay the other violations until those violations for which a hearing has been requested have been resolved.
- You must also correct any conditions indicated in **Box C**.
- If you fail to return this citation within 21 days with either box (1) or box (2) checked
 - You will lose your right to a hearing;
 - You will be deemed responsible for the alleged violation(s) listed in this notice for the purposes of any future civil or criminal proceeding regarding this matter, and
 - If the condition which caused the notice of violation or warning to issue continues to exist you may be subject to the suspension or revocation of any license, permit or certificate for the subject building, structure or premises issued by the municipality, the State Fire Marshal or the Commissioner of Public Safety pending the correction of the condition.

To Pay or Request a Hearing, Check off Box 1 or 2 and Sign Below

(1) **I wish to pay the assessment(s) indicated.** I elect to pay the “Total Amount Due” as a final disposition of this matter and I’m waiving my right to a hearing regarding this matter. I understand that such payment is an admission of responsibility for all violations indicated on the violation notice.

To pay: Mail or deliver a check or money order for the total amount due **AND** this original Violation Notice to the addressee as indicated in Box D on the front of this Violation Notice. **Do Not send cash! The Check or money order shall be made out to the City, Town or State Agency indicated in Box D.**

(2) **I request a hearing on this matter :** I dispute the violation(s) listed on this Fire Code Violation Notice and request a hearing before the municipal hearing officer or the appropriate clerk magistrate as indicated in **Box D** on the front of this violation notice. I understand that I will be notified by mail of the date, time and place of the hearing. I am aware that if I fail to appear at the time and place of the hearing I will be deemed responsible for the listed violations.

After checking either Box (1) or (2), sign below:

Offender’s Signature: _____ Date: _____

Print Name: _____

Address: _____

H

