EPA United States Environmental Protection Agency
RCRA Compliance Branch
INSPECTION REPORT

Inspection Date(s):	2/1/2024	Inspection Announced: No
Facility or Site Name:	Jersey Cooperage Co. Inc.	
Facility/Site Physical Location:	20 River Road	
(city, state, zip code)	Sayreville, NJ 08872	
Mailing address (if different from above):	Same as above.	
(city, state, zip code)		
Facility/Site Contact:	Michael Foglia	Owner
	mfoglia@williamsportsteelcontainer.com	
	(732) 299 - 7086	
RCRA ID Number:	NJD063175111	
Facility/Site Personnel Participating in Inspection:		
Michael Foglia	Owner	mfoglia@williamsportsteelcontainer.com
Waldo Vega	Plant Manager	N/A
Carlos Pilco	Operator	N/A
Inspector(s):		
Brook McKeown (ERG [EPA Contractor])	Brook McKeown Digitally signed by Brook McKeown Date: 2024.09.17 12:35:50 -04'00'	
EPA Supervisor		
Derval Thomas (EPA Region 2)	DERVAL THOMAS Digitally signed by DERVAL THOMAS Date: 2024.09.18 21:14:52 -04'00'	
Inspection Report Authors: Brook McKeown		

SECTION I – INTRODUCTION

Purpose of the Inspection Objective

EPA Region 2 identified Jersey Cooperage Co. Inc. ("Jersey Cooperage") as a target for a compliance evaluation inspection (CEI). The purpose of the inspection was to determine the facility's compliance with the Resource Conservation and Recovery Act (RCRA). The inspection was conducted by Brook McKeown (ERG).

Opening Conference

The inspector arrived at Jersey Cooperage at approximately 10:15 am on February 1st, 2024, for an unannounced RCRA inspection. Inspector McKeown first met with Carlos Pilco (Operator) and presented their RCRA inspector credentials to Mr. Pilco and informed him that this was an EPA RCRA CEI that covered all RCRA regulations. Mr. Pilco informed Inspector McKeown that the Plant Manager and Owner were not on site that day, and attempted to reach them by phone, however, they were not immediately available. Mr. Pilco provided a tour of the facility and answered some basic questions about the operations. Inspector McKeown held an interview with Michael Foglia (Owner) and Waldo Vega (Plant Manager) at 1:30 pm on February 2, 2024, to discuss the facility's operations in greater detail and request documentation. On that call, Inspector McKeown explained Jersey Cooperage's right to claim confidential business information (CBI). Jersey Cooperage indicated that no information included in this report was claimed as CBI. The inspection report and attachments present the results of the CEI.

Facility/Site Description

Jersey Cooperage reconditions and sells steel drums. Mr. Foglia stated that the facility will only accept RCRA-empty containers, and primarily those that were previously used to store flavors, fragrances, alcohols, and oil-based products. If a container received on site is not RCRA empty, the facility will alert the customer to pick up the container.

The reconditioning process begins with the reception and unloading of containers from customers. This stage will include the determination if the container is RCRA empty. Containers are then turned over on a conveyor and sent through a natural gas-fired incinerator to burn off any residual material present in the drums. Any residual materials present in the drums processed on site when it is turned over is collected beneath the incinerator line in a pit that also collects ash. The exhaust from the combustion chamber is further treated with a thermal oxidizer (afterburner) and the ash is captured with a dust collector. Ash generated from the incineration is collected in 55-gallon drums, which are subsequently transferred to roll-off containers. Periodically, the ash that collects in pits beneath the incinerators is also emptied and placed into roll-off containers. Each roll-off container is sampled prior to shipment off-site and is generally managed as non-hazardous waste.

Steel drums receive surface finishing in a shotblast unit that utilizes a steel shot media. Fines and spent blast media are collected in 55-gallon drums, transferred, and combined with incinerator ash in roll-off containers and managed as non-hazardous waste. If the drum does not pass leak detection testing or quality checks, the facility recycles the container as scrap metal. Otherwise, the drums and drum lids are then sent to their own spray paint booth and finally a drying oven. After the coating has dried, the drums are loaded into different shipping containers and trailers and delivered to customers. Paint filters for the paint booths are changed daily and sent through the incinerator to be destroyed.

Jersey Cooperage previously used kerosene for parts cleaning but does not currently use a parts washer. The paints used at the facility to coat drums are water-based, low-volatile organic compound (VOC) pre-mixed paints. The facility does not use any solvents for paint mixing or drum wipe-down. If any drums or equipment needs to be cleaned, facility staff reportedly use hot water and a rag.

The site is currently operating as a Very Small Quantity Generator (VSQG) of hazardous waste. In the past, waste ash reportedly could become hazardous due to the metals that were used in paints to coat the drums, but this has not happened in years. Incinerator ash, spent blast media, and residual material from drums that are cleaned out of the pit below the incinerator is combined in roll-off containers and managed off-site as a non-hazardous waste by Republic Environmental Systems (PAD085690592). A different division of Republic Environmental Systems is responsible for transportation (PAD982661381). Used oil generated from equipment maintenance is reportedly picked up by one of Jersey Cooperage's customers for recycling. The facility could not recall the last time fluorescent bulbs at the facility had been changed and how they had been managed.

Jersey Cooperage maintains a synthetic minor air permit with the New Jersey Department of Environmental Protection (NJDEP), with registration number 15418. The incinerator and blast units are permitted sources of air emissions.

The facility operates five days a week, with one shift running from 6:00 am to 3:30 pm.

SECTION II – OBSERVATIONS

The inspection team arrived at the Jersey Cooperage facility in Sayreville on the morning of February 1st, 2024. Following the opening conference and a brief discussion of the facility processes, the inspection team conducted a walkthrough starting at approximately 10:30 am. The inspection team observed the shot blast units, incinerator, waste storage area, paint storage room, the paint booths, and the shipping yard. The inspection team ended the walkthrough at 11:30 am. The inspection team conducted a closing conference the following day via phone.

All photographs taken during the walkthrough are provided in Attachment 1. The photographs numbers in this report correspond to the number inside of Attachment 1. Further details regarding each of the areas observed during the walkthrough are discussed in the sections below.

Shot Blast Units

The inspection team observed two shot blast units that are located inside the facility building and used to surface prep and remove any remaining paint or oxidized material on the drums prior to painting. The facility uses a steel shot blast media. Spent shot blast media and other fines generated from the process are collected via a baghouse system and emptied into an open top container or 55-gallon drums, as shown in Photograph 25 and 27. The spent shot blast media and other fines are combined in the incinerator ash roll-off container for off-site disposal as non-hazardous waste.

View of the baghouse system connected to the shot blast units, which are inside the building. Spent media and fines are collected in 55-gallon drums and other open-top containers. {Photograph 25, Attachment 1}

Incinerator

The inspection team observed the incinerator and drum loading area, where 55-gallon drums are received on site and placed on a conveyor into the incinerator. A 55-gallon drum was present at the point that containers are loaded onto the conveyor, which contained a liquid material and a ladle (see Photographs 2 and 3). Mr. Foglia and Mr. Vega explained that if any residual material is present in the drums received on-site, it will be drained into this drum. Additionally, if a drum is completely dry, a small amount of the collected material will be ladled into the drums prior to loading onto the conveyor, to improve the efficiency of the incineration operation. Mr. Vega stated that the facility does not accept drums that have more than one inch of residual material present. The EPA inspection team did not observe drums received at the facility for processing that had any readily observable residual material.

View inside the 55-gallon drum where residual material from drums received on-site is collected, and then ladled back into containers to improve incineration operations. Located adjacent to the conveyor line into the incinerator.
{Photograph 3, Attachment 1}

Under the conveyor and combustion chamber associated with the incinerator, the inspection team observed a pit where incinerator ash and residual materials from the drums could be collected (see Photographs 5 and 6). It appeared that the pits were concrete lined. The pits are

reportedly cleaned at a certain frequency, placed into 55-gallon drums and ultimately emptied into the incinerator ash roll-off container for off-site disposal as non-hazardous waste.

View of one of the pits located beneath the conveyor and combustion chamber of the incinerator. Ash and other residual material may drop into these pits and they are emptied at certain intervals.
{Photograph 6, Attachment 1}

Incinerator ash fines that are captured after the thermal oxidizer in a baghouse are collected in 55-gallon drums (see Photograph 7). The 55-gallon drums are then emptied into the incinerator ash roll-off container for off-site disposal as non-hazardous waste. A number of drums were observed in this area, some of which contained incinerator ash from the baghouse, and some that were generated from clean-outs of the pits beneath the incinerator. Mr. Pilco stated that the equipment they use to empty the drums into the roll-off container was currently broken, otherwise they would not have so many 55-gallon drums of the incinerator-related wastes stored at one time. None of the drums were labeled as to their contents.

View of one of the pits located beneath the conveyor and combustion chamber of the incinerator. Ash and other residual material may drop into these pits and they are emptied at certain intervals.
{Photograph 7, Attachment 1}

Waste Storage Area

The inspection team observed the roll-off container where incinerator ash collected from the baghouse, incinerator ash and residual from the incinerator pits, and spent shotblast media and fines are emptied. The roll-off is covered with a plastic tarp when material is not actively being added. Mr. Pilco pulled back the tarp on the roll-off so that the material could be observed. When the tarp was removed, a notable odor was observed by the inspection team.

Adjacent to the waste storage area, Inspector McKeown observed an unlabeled tan drum (see Photograph 15). Following the inspection, Mr. Foglia provided an update and indicated that the drum contained a boiler treatment chemical.

View inside the roll-off container that contains the incinerator ash and other mixed wastes. A noticeable odor was observed when the cover was removed.
{Photograph 12, Attachment 1}

Paint Storage Room
The inspection team observed the paint storage room, where paint drums are connected to equipment that delivers the correct coating to the adjacent paint booths and paint guns. No solvents were observed in the paint storage room.

Paint Booths
The inspection team observed the two paint booths used to coat the drum bodies and lids. Inspector McKeown inquired about the paint filters, and the Mr. Pilco stated that the filters are changed daily and sent through the incinerator for on-site management. The facility does not use solvents for gun cleaning or wipe down of equipment or drums. Water and rags are used if equipment needs to be wiped down. There is no other paint waste that is routinely generated.

Shipping Yard
The inspection team observed the shipping yard located to the south of the facility buildings. Approximately two dozen trailers were located throughout the yard, that were generally empty and could be used to store finished product if needed. Two unlabeled blue 55-gallon plastic drums were observed underneath one of the trailers (see Photographs 23 and 24). After the inspection, Mr. Foglia provided information that these drums contained diesel fuel for mobile equipment. Additionally, one of the trailers contained plastic containers of various sizes (see Photograph 28). These reportedly were empty plastic containers that were inadvertently sent to the facility. The containers will be returned back to the customers who sent them, as the site does not process plastic containers.

Records Review
The inspection team reviewed the following compliance documents as part of the records review:

Safety Data Sheets for Paints used at the facility: Jersey Cooperage provided SDS sheets of the following paints: L-15 Dark Brown Phenolic Epoxy, Blue W/R Drum Enamel, White W/R Drum Enamel, and Black W/R Drum Enamel. L-15 Dark Brown Phenolic Epoxy contains iso-butanol, an F-listed solvent, however it is part of the paint formulation. Three of the paints contain barium sulfate: Black W/R Drum Enamel, 8.00%; Blue W/R Drum Enamel, 2.00%; and, White W/R Drum Enamel, 2.00%. Barium is listed constituent for toxicity under 40 CFR 261.24, with any wastes with a toxicity. Safety data sheets are included as Attachment 2.

Waste Sampling and Profiles: Jersey Cooperage provided the April 2022-April 2023 and August 2023-August 2024 waste profiles for non-hazardous incinerator ash and three recent tests for individual incinerator ash shipments. Both waste profiles indicate that the waste stream is not ignitable and does not contain toxic constituents, however, this claim is based on generator knowledge and not analytical. The three tests provided are from November 2021, September 2022, and August 2023 shipments of the incinerator ash and other mixed wastes that are combined in the roll-off. The sample is reportedly collected after spent blast media, incinerator ash and pit clean-outs of ash, and other residual are combined in the roll-off container. The waste shipments were tested for pH, and ignitability. None of the results indicate that the waste stream meets the criteria of a hazardous waste based on these two parameters. However, specific toxic metals and organics were not tested, and the facility did not provide other analytical test results. The profiles and waste testing are provided as Attachment 3.

Manifests: The inspection team reviewed non-hazardous manifests for incinerator ash provided by Jersey Cooperage via email. The incinerator ash is transferred by Republic Environmental Systems (PAD982661381) to their facility in Hatfield, PA, which operates under EPA ID PAD0085690592. The facility sends off 20 cubic yards of incinerator waste approximately twice a year. Example manifests are provided in Attachment 4.

SECTION III – AREAS OF CONCERN

The presentation of areas of concern does not constitute a formal compliance determination or violation.

Regulatory Concerns

1. 40 CFR 262.11 states that "a person who generates solid waste, as defined in 40 CFR 261.2 must make an accurate determination as to whether that waste is a hazardous waste in order to ensure waste are properly managed according to applicable RCRA regulations". The inspection team reviewed SDSs for paints used at the facility. Three of the paints contain barium sulfate at concentrations ranging from two to eight percent by weight. Barium is a listed constituent for toxicity under 40 CFR 261.24(b). Paint filters from the paint booths, which contain paint materials from overspray, are replaced daily at the facility and treated in the on-site incinerator. The paint filters would be considered a waste stream at the point that they were removed from the paint booths, and a waste determination must be conducted at the point of generation. Jersey Cooperage has not conducted a hazardous waste determination on the paint booth filters.
2. 40 CFR 262.11 states that "a person who generates solid waste, as defined in 40 CFR 261.2 must make an accurate determination as to whether that waste is a hazardous waste in order to ensure waste are properly managed according to applicable RCRA regulations". The inspection team reviewed waste analytical records and waste profiles for the incinerator ash waste stream, that is mixed with spent shot blast media and residual material from drums processed on site. The analytical testing conducted for each waste shipment only includes ignitability and pH test methods, and additional testing results were not provided by Jersey Cooperage. Further, the waste profiles generated for this waste stream state that the basis for indicating that toxic metals and organics are not present in the waste stream above regulatory levels for hazardous waste is from generator knowledge. Since the facility processes paint filters that are known to contain barium, a listed RCRA toxic constituent, in the incinerator and the roll-off container is co-mingled with residual material from the processed drums, it is possible that toxic constituents may be present. Additionally, the sample is reportedly taken after several waste streams are combined together (i.e. spent shot blast media, post-thermal oxidizer incinerator ash, pit clean-outs containing residual materials and pre-thermal oxidizer incinerator ash. Without additional documentation of the basis of the generator's knowledge claim that the waste is non-hazardous or additional analytical testing at the point of generation for each waste stream, a proper hazardous waste determination has not been made.

Non-Regulatory Concerns

1. At the time of the inspection, several 55-gallon drums were observed throughout the facility without labels, including non-hazardous waste containers. The facility confirmed that none of these drums contained hazardous waste, however, Jersey Cooperage should consider, as a best management practice, marking or labeling its non-hazardous waste containers, as well, to avoid confusion regarding their contents.

Closing Conference

The closing conference took place on February 2, 2024, at approximately 1:30 pm via telephone call. Attending from the facility were Michael Foglia and Waldo Vega. Inspector McKeown was in attendance for the closing conference. Inspector McKeown reviewed the list of documents requested by the inspection team as follow-up to the inspection and informed the facility of their right to claim CBI. The closing meeting ended at approximately 2:15 pm on February 2, 2024.

List of Attachments

These attachments are referenced throughout this report:

- Attachment 1: Photographic Log
- Attachment 2: Safety Data Sheets
- Attachment 3: Incinerator Ash Testing and Waste Profiles
- Attachment 4: Incinerator Ash Manifests

Post-Inspection Facility Correspondence

Following the inspection, Jersey Cooperage provided documents requested at the inspection closing conference via emails received from February 5th, 2024, through February 14, 2024.
Attachment 01

Photographic Log

Attachment 02

Safety Data Sheets

Attachment 03

Incinerator Ash Testing and Waste Profiles

Attachment 04

Incinerator Ash Manifests