

RCRA Compliance Branch INSPECTION REPORT

Inspection Date(s):	11/15/2022	Inspection Announced: No
Facility or Site Name: Metem AGE Power		
Facility/Site Physical Location: 700 Parsippany Road,		
(City, state, zip code) Parsippany, NJ 07054		
Mailing address (if different from above): N/A		
Facility/Site Contact:	Mark Schnobel	EHS Facility Leader
	Mark.Schnobel@Ge.com	
RCRA ID Number: NJD002139244		
Facility/Site Personnel Participating in Inspection:		
David	Former Plant Manager	
Mark Dicker	Plant Manager	Mark.Dicker@Ge.com
Mark Schnobel	EHS Facility Leader	Mark.Schnobel@Ge.com
Robin Callaghan	Former EHS Leader	Robin.Callaghan@Ge.com (513) 305-4631
Carly Lawrence	LEAN Leader	Carly.Lawrence@Ge.com
Inspector(s):		
William Chernes	WILLIAM CHERNES  Digitally signed by WILLIAM CHERNES Date: 2023.01.24 12:47:00 -05'00'	{date}
Areeba Khan		{date}
Inspector(s):		
Derval Thomas	DERVAL THOMAS  Digitally signed by DERVAL THOMAS Date: 2023.01.24 13:20:14 -05'00'	{date}

SECTION I – INTRODUCTION

Purpose of the Inspection Objective

EPA Region 2 conducted an inspection of Metem AGE Power 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 EPA RCRA inspectors William Chernes and Areeba Khan.

Opening Conference

EPA Region 2 RCRA inspectors William Chernes and Areeba Khan arrived at Metem AGE Power on November 15, 2022, for an unannounced inspection. We met with Carly Lawrence the LEAN Leader, Mark Dicker the new Plant Manager, David the former Plant Manager (still working at the facility in another position) in person and met with Robin Callaghan Former EHS Leader and Mark Schnobel the EHS Facility Leader through microsoft team call at the opening conference of the inspection. We presented our credentials to the facility representatives and informed them that this was an EPA inspection to determine the facility's compliance with RCRA regulations. The scope of the inspection was to conduct a compliance evaluation inspection (CEI).

Facility/Site Description

Metem AGE Power is a manufacturing company located in Parsippany, NJ. The facility manufactures and supplies parts of machinery equipment. The facility consists of two buildings, the main building generates hazardous waste, and the other building does not. The hazardous waste is stored in various outdoor and indoor locations throughout the facility. The hazardous waste is primarily generated from the acid drilling process used in manufacturing the machinery parts in the form of corrosive and chromium wastes. The facility does have a wastewater treatment plant on site to filter out the metals and neutralize the process effluent before sending it to the Parsippany Publicly Own Wastewater Treatment Facility. In their drilling process they also use electrical discharge machining (EDM) however, there is no hazardous waste formed. They also recycle excluded materials such as nickel, chromium, and cobalt from their process that go to their other facility in Pennsylvania. Filter cakes are also generated from cleanouts of tanks, the waste filter cakes are then put into drums and shipped out as hazardous waste. All their waste, hazardous and non-hazardous, is routinely picked up by Veolia every 2 weeks.

In 2021, the facility became an LQG because of a hurricane causing a roof collapse in their acid area. The facility representatives stated that they took the necessary measures to contain the area and are still in the process of fixing up the area; they have employed monitoring wells because of this incident. In 2022, another incident occurred in Mid-June where the facility saw that they had a leaking process line from the area. They put the spill from the leaking process line into a lab pack which was then tested and picked up by Veolia. The facility is still recovering from the incidents. There is a small stream present on the site. The state came to test the water and saw that the pH was lower; the state is continuing to monitor this area.

After review of the manifest information and statements made by the facility representatives, the facility was determined to be a Large Quantity Generator (LQG) of hazardous waste at the time of the inspection. The facility also generates universal wastes and used oil from normal upkeep. Metem AGE Power employs approximately 115 individuals, 30 salaried and 80 hourly workers and operates 24/6. Monday through Friday they have a 3-shift schedule from 6AM-2PM, 2PM-

10PM, and 10PM-6AM. The facility operates a 2-shift schedule on Saturdays and no shift on Sundays.

SECTION II – OBSERVATIONS

Inside the Main Building

- Universal Waste Area
 - The universal waste storage area was located in the main building. The universal waste observed is as follows:
 - Two containers of fluorescent and balast that were labeled, dated, and closed. There was 1 balast outside of the container. The facility representative put the balast back into container in front of us and closed it.
 - One container of lead acid battery that was labeled, dated, and closed.
 - One container of nickel cadmium batteries that was labeled, dated, and closed.
 - One container of alkaline batteries that was labeled, dated, and closed.
 - One container of cadmium batteries that was labeled, dated, and closed.
 - One 4-foot container of fluorescent lamps that was labeled, dated, and closed.
 - One 8-foot container of fluorescent lamps that was labeled, dated but was not closed.
- Evaporator Area
 - The Evaporator Area was located just outside the universal waste storage area, it contained the following:
 - One 55- gallon drum of oil filters that was determined to be non-hazardous that was closed, labeled, and dated.
 - One 55- gallon drum of water from the parts washer that was determined to be non-hazardous that was closed, labeled, and dated.
 - One 55-gallon drum of oil filter from the drum sediment that had no organics and just consisted of dirt from their process and was determined to be nonhazardous that was closed, labeled, and dated.
- Wastewater Treatment Area
 - The Wastewater Treatment Area was located in the main building next to the evaporator area. This area was where the J- press was located and the facility representatives stated that the plant acted as a secondary containment area, this contained the following:
 - Two collection troughs of hazardous waste that were not labeled or dated and still contained some hazardous waste, these troughs were currently not in use at the time of the inspection. One of the troughs was not in good condition as it seemed to be corroded, the EPA inspectors told the facility representatives that they need to reline this trough. They stated that they would immediately follow up in an email regarding the changes.

Outside of the main building

- Outside of the main building the facility representatives showed us where the location of the roof collapse happened. They also showed us where they put up recovery and monitoring wells to catch any of remaining residue from the incident as they are still in the process of cleaning up. There was a small stream nearby that was being tested by the state as there was a problem with the pH as it was extremely low. The facility representatives stated that it was not a part of the facility and came from another facility that was being monitored.
 - There were twelve 275-gallon totes of nonhazardous waste that was labeled, closed, and dated.
 - There were 3 empty drums near the river that was not apart of the facility. There were other people doing testing in the stream at the time of the inspection that may have brought the drums.

Parking Lot

- In the parking lot of the facility the facility representatives stated that because of the spill events and roof collapse they needed more space and located some of their waste here, so it is easier to be picked up.
 - There was one hazardous waste roll off trailer that was closed, lined, had no leaks, but did not have a hazardous waste label or a date.
 - There was one metal waste roll off trailer that was closed.
 - There was one roll off that was being used as general trash.

Outside of other building, container storage area

- The facility representatives stated that there was another contiguous building that is part of the facility, however, that building does not generate hazardous waste. There is only non-hazardous waste stored from the EDM process inside a secondary containment storage shed on the outside of the building.
 - There were four 275 -gallon totes of nonhazardous waste that were closed, labeled, and dated.

Acid Tanks Area

- Located outside of the main building, there was a raw material acid storage area. It contains the following:
 - The sulfuric acid tank was about 550- gallon tank and it was labeled and closed. It had a secondary containment.
 - The nitric acid tank was about 550- gallon tank and it was labeled and closed. It had a secondary containment.
- The facility representatives stated that there was a process acid tank inside of the main building where the roof collapsed, it is still under repair and being cleaned up. Mr. David stated the tank had a secondary containment and the building acted as a tertiary containment.

Storage Area

- Located on the outside of the facility there was a storage area. The outdoor storage sheds were all equipped with secondary containment and were vented. The outdoor storage sheds were marked for their hazards and had pictograms for the respective hazards. The hazardous wastes observed in each containment shed was as follows:
 - Containment Shed 1 contained used oil that needs to be sampled.
 - Containment Shed 2 contained non- hazardous waste
 - Containment Shed 3 contained hazardous waste that needed to be tested. Inside contained the following:
 - Three 55- gallon drums of hazardous waste that were closed, labeled, and dated.
 - Two 275 -gallon totes of hazardous waste that were closed, labeled, and dated.

Record Review

- Inspection Logs

The inspection logs were reviewed and up to date. There were no discrepancies to report.

- Contingency Plan

The contingency plan was reviewed and was determined to be insufficient. The facility representatives stated that they would follow up on the plan.

- Manifest

After review of the manifest and land disposal restriction documentation, there were some discrepancies to report. There was no TSDf return copy on three manifest records dated: 3/8/21, 10/5/21, 10/15/21. The facility representatives were able to find the electronic copy from the TSDf and showed it to us.

- SPCC Plan

The SPCC Plan was reviewed and up to date. There were no discrepancies to report.

- Wastewater Treatment Plant Permit: Expires in 1/31/2024

The wastewater treatment plant permit was reviewed and was determined to be up to date. There were no discrepancies to report.

- Arrangement of Local Authorities

The facility contacted the local authorities and showed us emails and signatures showing they received an emergency action plan from them.

- Training Records

The facility had no training records on site to review.

SECTION III – AREAS OF CONCERN

Regulatory Concerns

1. 40 C.F.R. § 262.34(a)(3), as incorporated by reference in N.J.A.C. 7 :26G-6. 1 (a) states that a container must be labeled with the words “Hazardous Waste” and “[a]n indication of the hazards of the contents”.
 - a. At the time of the inspection, two troughs located in the wastewater treatment area were not labeled.
 - b. At the time of the inspection, one roll-off trailer located in the parking lot was not labeled.
2. 40 C.F.R § 262.34(a)(2) as incorporated by reference in N.J.A.C. 7 :26G-6. 1 clearly mark container with date when accumulation period begins or to make mark visible for inspection
 - a. At the time of the inspection, one roll-off trailer that contained hazardous waste located in the parking lot was not dated.
3. 40 C.F.R § 264.171 as incorporated by reference in N.J.A.C. 7 :26G-6. 1 If a container holding hazardous waste is not in good condition (e.g., severe rusting, apparent structural defects) or if it begins to leak, the owner or operator must transfer the hazardous waste from this container to a container that is in good condition or manage the waste in some other way that complies with the requirements of this part.
 - a. At the time of the inspection, one hazardous waste trough located in the wastewater treatment area had evidence of severe corrosion on the lining of the container.
4. Pursuant to 40 C.F.R § 262.17(a)(1) (iv), as referenced by 262.34(a)(4) as incorporated by N.J.A.C 7:26G-6.1, A container holding hazardous waste must always be closed during accumulation, except when it is necessary to add or remove waste.
 - a. At the time of the inspection, one trough was located in the wastewater treatment area had some hazardous waste left in the trough.
5. 40 C.F.R § 273.13(d)(1) as incorporated by reference in N.J.A.C. 7 :26G-6.1: a small quantity handler of universal waste must contain any lamp in containers or packages that are structurally sound, adequate to prevent breakage, and compatible with the contents of the lamps. Such containers and packages must remain closed and must lack evidence of leakage, spillage or damage that could cause leakage under reasonably foreseeable conditions.
 - a. At the time of the inspection, there was one balast outside of the container in the universal waste storage area. The facility representative put the balast back into container in front of us and closed it.
 - b. At the time of the inspection, one 8-foot container of fluorescent lamps was open in the universal waste storage area.
6. Pursuant to 40 C.F.R § 265.51 (a), as incorporated by N.J.A.C 7:26G-6.1, Each owner or operator must have a contingency plan for his facility. The contingency plan must be designed to minimize hazards to human health or the environment from fires, explosions,

or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water.

- a. The contingency plan was reviewed and was determined to be insufficient. The facility representatives stated that they would follow up on the plan, EPA never received follow-up regarding the contingency plan as requested.

General Concerns

There were no general concerns at the time of the inspection.

Closing Conference

A closing conference was conducted with USEPA Inspector William Chernes and Areeba Khan, and the facility representatives: Carly Lawrence the LEAN Leader, Mark Dicker the new Plant Manager, David the former Plant Manager in person and with Robin Callaghan Former EHS Leader and Mark Schnobel the EHS Facility Leader through microsoft team call. During the closing conference USEPA Inspector William Chernes and Areeba Khan stated the area of concerns to Mrs. Lawrence, Mr. Dicker, David, Mrs. Callaghan and Mr. Schnobel; the facility representatives stated that they would tend to the areas of concern immediately.