

## RCRA Compliance Branch INSPECTION REPORT

|                                                             |                                                                          |                                                                          |
|-------------------------------------------------------------|--------------------------------------------------------------------------|--------------------------------------------------------------------------|
| <b>Inspection Date(s):</b>                                  | 8/25/2023                                                                | <b>Inspection Announced:</b> No                                          |
| <b>Facility or Site Name:</b>                               | Electro Ceramic Industries                                               |                                                                          |
| <b>Facility/Site Physical Location:</b>                     | 75 Kennedy Street                                                        |                                                                          |
| <b>(City, state, zip code)</b>                              | Hackensack, NJ 07601                                                     |                                                                          |
| <b>Mailing address (if different from above):</b>           |                                                                          |                                                                          |
| <b>Facility/Site Contact:</b>                               | Nilesh Patel                                                             | Vice President                                                           |
|                                                             | <a href="mailto:Npatel@electroceramic.com">Npatel@electroceramic.com</a> |                                                                          |
|                                                             | (201) 675 – 5472                                                         |                                                                          |
| <b>RCRA ID Number:</b>                                      | NJD081898850                                                             |                                                                          |
| <b>Facility/Site Personnel Participating in Inspection:</b> |                                                                          |                                                                          |
| Nilesh Patel                                                | See above                                                                | See above                                                                |
| Deborah Trusz                                               | Purchasing and Record Management                                         | <a href="mailto:DTrusz@electroceramic.com">DTrusz@electroceramic.com</a> |
| <b>Inspector:</b>                                           |                                                                          |                                                                          |
| Areeba Khan                                                 | AREEBA KHAN                                                              | Digitally signed by AREEBA KHAN<br>Date: 2023.10.30 11:19:35 -04'00'     |
| <b>Supervisor:</b>                                          |                                                                          |                                                                          |
| Derval Thomas                                               | DERVAL THOMAS                                                            | Digitally signed by Derval THOMAS<br>Date: 2023.10.30 10:01:47 -04'00'   |

### SECTION I – INTRODUCTION

#### Purpose of the Inspection Objective

The purpose of the inspection was to perform a Resource Conservation and Recovery Act (RCRA) comprehensive evaluation inspection (CEI) at this facility. The inspection was conducted by EPA RCRA inspector Areeba Khan.

#### Opening Conference

EPA Region 2 RCRA inspector Areeba Khan arrived at Electro Ceramic Industries on August 25, 2023, for an unannounced inspection. I was greeted by Deborah Trusz in the lobby. Mrs. Trusz directed me to Nilesh Patel, vice president. I presented my credentials to Mrs. Trusz and

Mr. Patel 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**

Electro Ceramic Industries is a metal plating facility located in Hackensack, NJ. Electro Ceramic Industries produces a variety of metalized ceramics, metal components and specialty plating services to its customers in various industries. The facility is comprised of a house (used as an office space), the main building and two outdoor storage areas. Mr. Patel stated that the house, located on 326 Taylor Ave, Hackensack, NJ 07601, is allocated for office/ administrative place. The house is next door to the main building. The facility's main building is used to produce its products. Mr. Patel stated that one outdoor storage area is used to store their product chemicals and the other outdoor storage area is used as their central storage area. The facility also has one satellite accumulation area and two furnaces. The facility generates hazardous waste and metal waste. The hazardous waste is generated from the cleaning of the metal plating. The hazardous waste is sent to Safety Kleen and the metal waste goes to Colt in Marninck, New Hampshire for refinery reclamation. The facility uses LA Associates as a consultant for managing its hazardous waste. The facility does not generate any universal waste.

After review of the manifest information and statements made by Mr. Patel, the facility was determined to be a Small Quantity Generator (SQG) of hazardous waste at the time of the inspection. The hours of operation are Monday through Friday 8 am to 4 pm. At this location, there are 39 employees.

## **SECTION II – OBSERVATIONS**

Mr. Patel showed me around the facility. Mrs. Trusz did not accompany us during the walkthrough as she had an injury.

### **Brazing and Metalizing Furnace Area**

Mr. Patel showed me the facility's furnace area. In the furnace area, there were two furnaces. Mr. Patel stated one furnace is used for brazing the ceramics and the other is for metalizing. The brazing furnace takes in nitrogen and hydrogen and releases water vapor. The metalizing furnace does not release any exhaust. Mr. Patel stated they have a carbon monoxide detector nearby to detect any emissions. Nearby the two furnaces there was a machine that converts the hydrogen and nitrogen to ammonium. Mr. Patel stated the ammonium is used in the production lines and is a closed loop system, so there was no waste. There was no hazardous waste generated in this area.

### **Plating Area**

The plating area is where the facility plates ceramics and metals. The chemicals used for the plating are the following: nickel, gold, silver, copper, and tin that is lead free. The residual waste (“drag out”) from the cleaning of the plating area is put into a drum to be sent to reclamation. Acetone is used to clean the area and then put into a 55 gallon drum to be disposed of by Safety Kleen. At the time of the inspection, there was one 55 gallon hazardous satellite accumulation drum that was labeled, dated, the funnel was open and the opening of the drum was rusted. There was a fire extinguisher nearby, emergency phone number list and signage stating hazardous waste area.

### Central Storage Area

The central storage area was located behind the facility’s main building in an outdoor storage fenced area. At the time of the inspection, there was a fire extinguisher present. However, there was no signage, no emergency phone number list. There was one 55 gallon container of hazardous waste (acetone) that was labeled, dated, and closed.

### Records Review

- Basic Plan

At the time of the inspection, there was a plan in place.

- Manifests and Land Disposal Restrictions

At the time of the inspection, there were no discrepancies to report regarding the manifests.

- Personnel Training

At the time of the inspection, there was personal training done.

- Arrangement with Local Authority

At the time of the inspection, the facility only had an arrangement with the local fire department and not with the local police or local hospital. The facility representatives stated that they will follow up with the arrangements with local authority.

## **SECTION III – AREAS OF CONCERN**

### Regulatory Concerns

1. Pursuant to 40 C.F.R. § 262.15(a)(4)-(5), as referenced by 262.34(a)(3), as incorporated by reference in N.J.A.C. 7:26G-6. 1 (a) states that a SAA container must be closed and labeled with the words “Hazardous Waste” and “[a]n indication of the hazards of the contents”.

At the time of the inspection, there was one 55-gallon drum located in the plating area that had a funnel that was open.

2. Pursuant to 40 C.F.R § 262.34(d)(5)(ii)(A)(C), as incorporated by N.J.A.C 7:26G-6.1, the generator must post the following information next to telephones or in areas directly involved in the generation and accumulation of hazardous waste: (A) The name and telephone number of the emergency coordinator; (C) The telephone number of the fire department, unless the facility has a direct alarm.

At the time of the inspection, there was no name and telephone numbers of the emergency coordinator, and no telephone number of the fire department near central storage area.

3. Pursuant to 40 C.F.R § 265.37(a)(1) and (4), as referenced by 40 C.F.R § 262.34(a)(4), as incorporated by N.J.A.C 7:26G-6.1, The owner or operator must attempt to make the following arrangements, as appropriate for the type of waste handled at his facility and the potential need for the services of these organizations: (1) Arrangements to familiarize police, fire departments, and emergency response teams with the layout of the facility, properties of hazardous waste handled at the facility and associated hazards, places where facility personnel would normally be working, entrances to roads inside the facility, and possible evacuation routes; ... (4) Arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the types of injuries or illnesses which could result from fires, explosions, or releases at the facility.

At the time of the inspection, the facility only had an arrangement with the local fire department and not with the local police or local hospital. The facility representatives stated that they will follow up with the arrangements with local police or local hospital.

On August 29, 2023, Mr. Patel sent an email to inspector Khan stating “Attached please find scan copy of the community right to know letters send to three departments, certified mail receipts”. The email included documents demonstrating compliance with this concern.

#### General Concerns

1. The container located in the plating area showed signs of corrosion on the top of the drum.
2. In the central storage area, there was no sign indicating this was a hazardous waste storage area. On August 29, 2023, Mr. Patel sent an email to inspector Khan with a picture of the hazardous waste sign in the central storage area.

## **Closing Conference**

The closing conference was conducted by EPA inspector Areeba Khan and the facility representatives Deborah Trusz and Nilesch Patel. Inspector Khan explained to the facility representatives the areas of concerns. The facility representatives stated that they will follow up and tend to the areas of concern immediately.