



RCRA COMPLIANCE EVALUATION INSPECTION

Custom Alloy Corporation
3 Washington Avenue
High Bridge, New Jersey

NJD981555600

December 20, 2023

Report Prepared by:

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Monitoring Operations Section

Date: _____

Objective

A RCRA Compliance Evaluation Inspection (CEI) was conducted at Custom Alloy Corporation on December 20, 2023. The purpose of the inspection was to obtain information on the facility's hazardous waste management program. This information will be used to determine compliance with regulations pertaining to the Resource Conservation and Recovery Act (RCRA).

Survey Participants

Custom Alloy Corporation

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Facility Description

Custom Alloy Corporation is located at 3 Washington Avenue in High Bridge, New Jersey. The facility is a manufacturer of seamless and welded pipe fittings, pipes, and forgings for the oil and gas industry. While gas transmission is Custom Alloy Corporation's largest market, its products are also used in the petrochemical, power, offshore drilling, defense, mining, and aerospace industries. The company was founded in 1968 and has been operating at the present location since 1986. The 15-acre facility was purchased by Trident Maritime Systems in July 2023. There are 132 employees, and the plant operates two 8-hour shifts from 7 am to 12 midnight, five days per week.

Stainless steel, carbon steel, and other metal alloys come into the receiving area as bars, pipes, or sheets. The material is cut, formed, and pressed according to specifications. The diameter of the pipes and pipe fittings can range from 0.75 inches to 42 inches. Some products are subjected to welding, and some are seamless. The product is then conveyed to a furnace, where it is heat-treated. After heat treatment, the product is dipped in a quench tank. A steel shot blasting machine is used to remove rust. The product is conveyed to the machine shop for further milling, cutting, and grinding. Some products are pickled in an acid bath, consisting of nitric acid and hydrofluoric acid. During the quality control inspection, an x-ray booth and liquid penetrating dyes are used to check welds and cracks. Some products are conveyed to a paint booth where paint is applied. After the final inspection, the product is sent to the shipping area for packaging.

Water and Wastewater

Water for the facility is provided by the Borough of High Bridge. Sanitary wastewater is discharged to the local POTW. Wastewater from the quench tanks is conveyed to an evaporator.

Solid and Hazardous Waste Management

Hazardous waste is generated at two locations: the pickling tank and the paint booth.

Acid bath salts are generated during episodic cleanouts of the pickling tank, which occur approximately once per year. The waste is placed in 55-gallon drums and stored in the central accumulation area, also known as the EPA Room. The RCRA hazardous waste codes for the acid bath salts are D004, D005, D007, D008, and K062.

Waste paint and waste paint related materials are generated at the paint booth. The waste is placed in 55-gallon drums and stored in the EPA Room. The RCRA hazardous waste codes are D001 and D035.

Paint filters are placed in a 55-gallon drum and stored in the EPA Room as a non-hazardous solid waste.

Used fluorescent bulbs are collected and stored in the EPA Room as universal waste.

Used oil from machinery is collected in 55-gallon drums and stored in the EPA Room as non-hazardous used oil.

Solids from the quench tanks are placed in 55-gallon drums and stored in the EPA Room as non-hazardous solid waste.

On the day of the inspection, there were no hazardous waste containers being stored in the EPA Room. There were containers of used oil and universal waste being stored.

All solid and hazardous waste management of containers is provided by Environmental Waste Minimization of Northampton, Pennsylvania. The containers of acid bath salts, used oil, and paint filters are shipped to EQ Detroit, a treatment, storage, and disposal facility (TSDF) in Detroit, Michigan. Waste paint, waste paint related materials, and quench tank solids are shipped to Cycle Chem, a TSDF in Lewisberry, Pennsylvania. Universal waste, consisting of used fluorescent bulbs, is shipped to AERC Recycling Solutions in Allentown, Pennsylvania.

Observations

A review of the hazardous waste manifests indicates that Custom Alloy Corporation is a small quantity generator of hazardous waste. In 2023, the facility generated 1350 pounds of waste paint and paint related materials, and 2500 pounds of acid bath salts.

The facility maintains weekly inspection logs of the EPA Room.

Hazardous materials safety training is provided once per year to employees that handle hazardous waste.

The facility maintains waste analysis profile forms for all solid and hazardous wastes generated on site.

Findings

There were no violations or compliance issues found on the day of the inspection.

Attachment

Photograph (#1)

Photo #1: The Central Accumulation Area, also known as the EPA Room.

