



RCRA COMPLIANCE EVALUATION INSPECTION

Beiersdorf Inc.
6 Vreeland Road
Florham Park, New Jersey

NJR000083717

April 8, 2025

Report Prepared by:

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MORRELL**

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Date: 2025.04.15 07:55:15
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Robert Morrell, Geologist
Monitoring Operations Section

Date: _____

Report Approved by:

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Philip Cocuzza, Supervisor
Monitoring Operations Section

Date: _____

Beiersdorf Inc.
NJR000083717

Inspection Date: April 8, 2025

Objective

A RCRA Compliance Evaluation Inspection (CEI) was conducted at Beiersdorf Incorporated on April 8, 2025. 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

Beiersdorf Inc.

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Eric Bradley, Facility Manager

U.S. Environmental Protection Agency

Robert Morrell, Geologist

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Facility Description

Beiersdorf Incorporated is located at 6 Vreeland Road in Florham Park, New Jersey. The Florham Park location is a research and development facility for Beiersdorf. The facility develops skin care products such as sunscreens, lotions, creams, and cosmetics. The facility began research and development operations at this location in 2020. There are 50 employees, and the facility is open 8 hours per day, 5 days per week (Monday through Friday).

The raw materials for the research and development operations come into the warehouse. The raw material products are conveyed to the laboratories as needed. There are four laboratories: the GMP (good manufacturing process) Pilot Laboratory, the Packaging Laboratory, the Formulations Laboratory, and the Analytical Laboratory. The GMP Pilot Laboratory is focused on developing good manufacturing processes for products in the developmental stage. The Packaging Laboratory provides physical testing of packaging materials and containers for future products. The Formulations Laboratory develops formulations for lotions, sprays, and formulas. The Analytical Laboratory provides analytical testing of ingredients and raw materials used in product development.

Water and Wastewater

Water for the facility is provided by the Borough of Florham Park. A deionization unit is used to produce deionized water for the laboratories. Acidic and caustic wastewaters are conveyed from

laboratory sinks to a 500-gallon waste neutralization unit. The pH of the wastewater in the tank is monitored continuously. Caustic soda and sulfuric acid are used to maintain the pH between 7 and 8. The treated wastewater from the elementary waste neutralization unit is discharged to the local publicly owned treatment works (POTW). Sanitary wastewater is discharged separately to the POTW.

Solid and Hazardous Waste Management

Most of the hazardous waste is generated in the Analytical Laboratory. Solvents are used for extractions in the high-performance liquid chromatography (HPLC) machines. Waste flammable liquids, containing methanol and acetonitrile, drain into a 2-gallon satellite waste accumulation container. The satellite container has a hazardous waste label and a flammable liquid label. When the satellite container is full, the full date is marked on the label, and it is transferred to the Central Accumulation Area.

Glass vials from the HPLC machines are placed in a 20-gallon satellite container, which has a hazardous waste label and a flammable liquid label. Each vial contains a waste flammable liquid, consisting of isopropyl alcohol and acetonitrile. When the satellite container becomes full, the full date is marked on the label, and it is transferred to the Central Accumulation Area.

Leftover corrosive solutions from analytical testing are placed in a 5-gallon satellite container, which has a hazardous waste label. When the satellite container becomes full, the full date is marked on the label, and it is transferred to the Central Accumulation Area. Expired chemicals are also transferred to the Central Accumulation Area.

Non-hazardous waste is generated in the Formulations Laboratory, the Packaging Laboratory, and the GMP Pilot Laboratory. Waste lotions, creams, and product formulas are placed in a 55-gallon drum. When full, the 55-gallon drum of non-hazardous waste is transferred to the Central Accumulation Area.

Universal waste, consisting of aerosol cans, used mercury devices, and used lamps, is placed in separate 5-gallon containers with universal waste labels. The containers are stored in the Central Accumulation Area.

Every one to two months, the containers of hazardous waste are shipped to Veolia ES Technical Solutions in Flanders, New Jersey. Most of the containers are shipped as waste flammable liquids containing methanol and acetonitrile (D001, F003). The corrosive solutions are shipped as waste corrosive liquids (D002).

Observations

A review of the hazardous waste manifests indicates that Beiersdorf Incorporated is a small quantity generator (SQG) of hazardous waste. In the last 12 months, the facility generated 6152 pounds of hazardous waste, with the RCRA hazardous waste codes D001, D002, and F003. The most recent shipment of hazardous waste was on March 4, 2025.

On the day of the inspection, there were 8 containers of hazardous waste being stored in the Central Accumulation Area: one 55-gallon drum of waste flammable liquids and seven 2-gallon containers of waste flammable liquids. All the containers were labelled as hazardous waste with accumulation start dates and flammable labels.

There were three containers of universal waste being stored in the Central Accumulation Area. The containers had universal waste labels and were marked with the contents and accumulation start dates.

Hazardous materials safety training is provided annually to employees that handle hazardous waste. Department of Transportation (DOT) hazardous materials training is provided for employees that sign hazardous waste manifests.

The facility maintains weekly inspection checklists for the Central Accumulation Area.

Findings

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

Attachments

Photographs (#1 - #6)

Photo #1: A satellite container that collects waste flammable liquids from the HPLC machines.

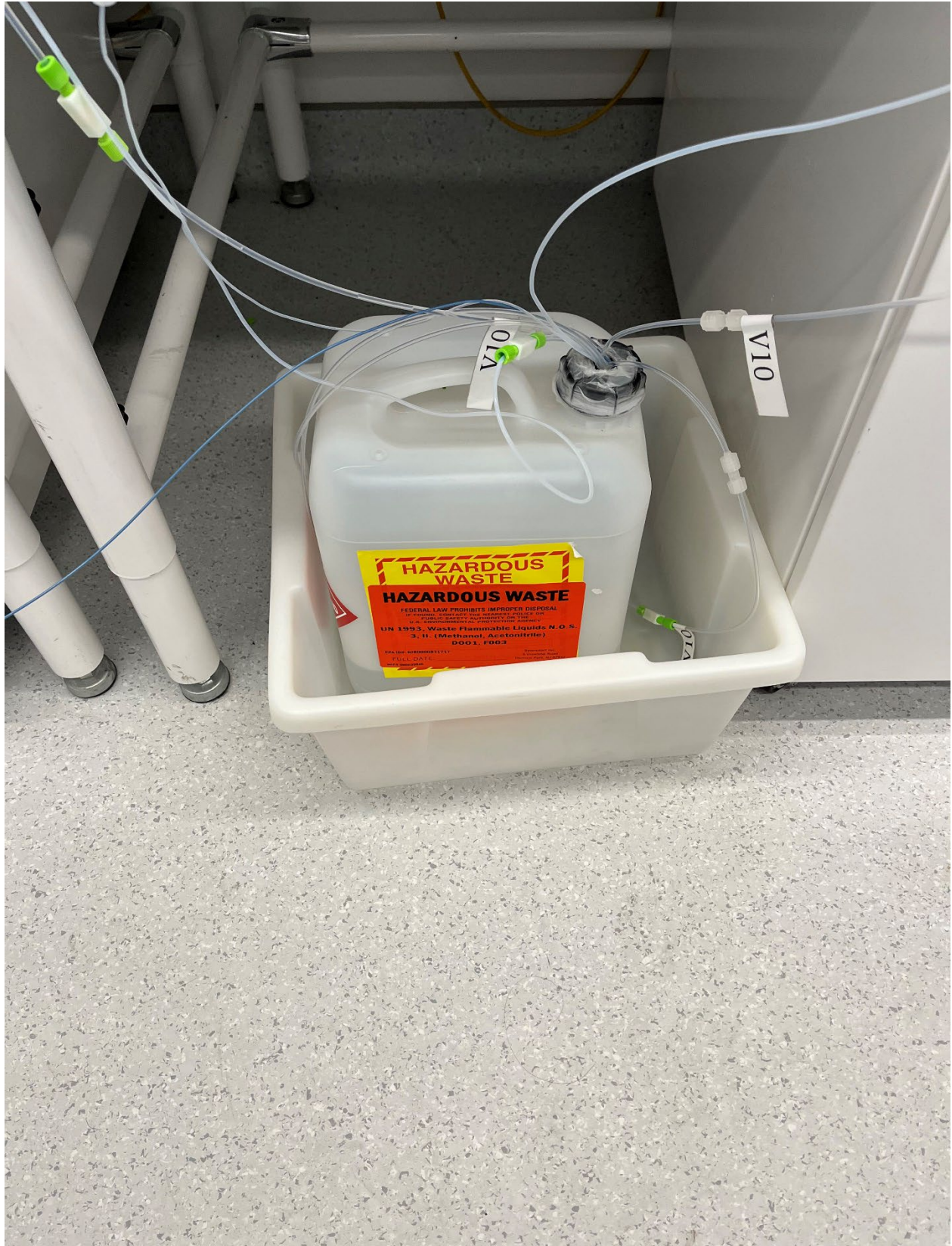


Photo #2: A satellite container for the glass vials containing waste flammable liquids.

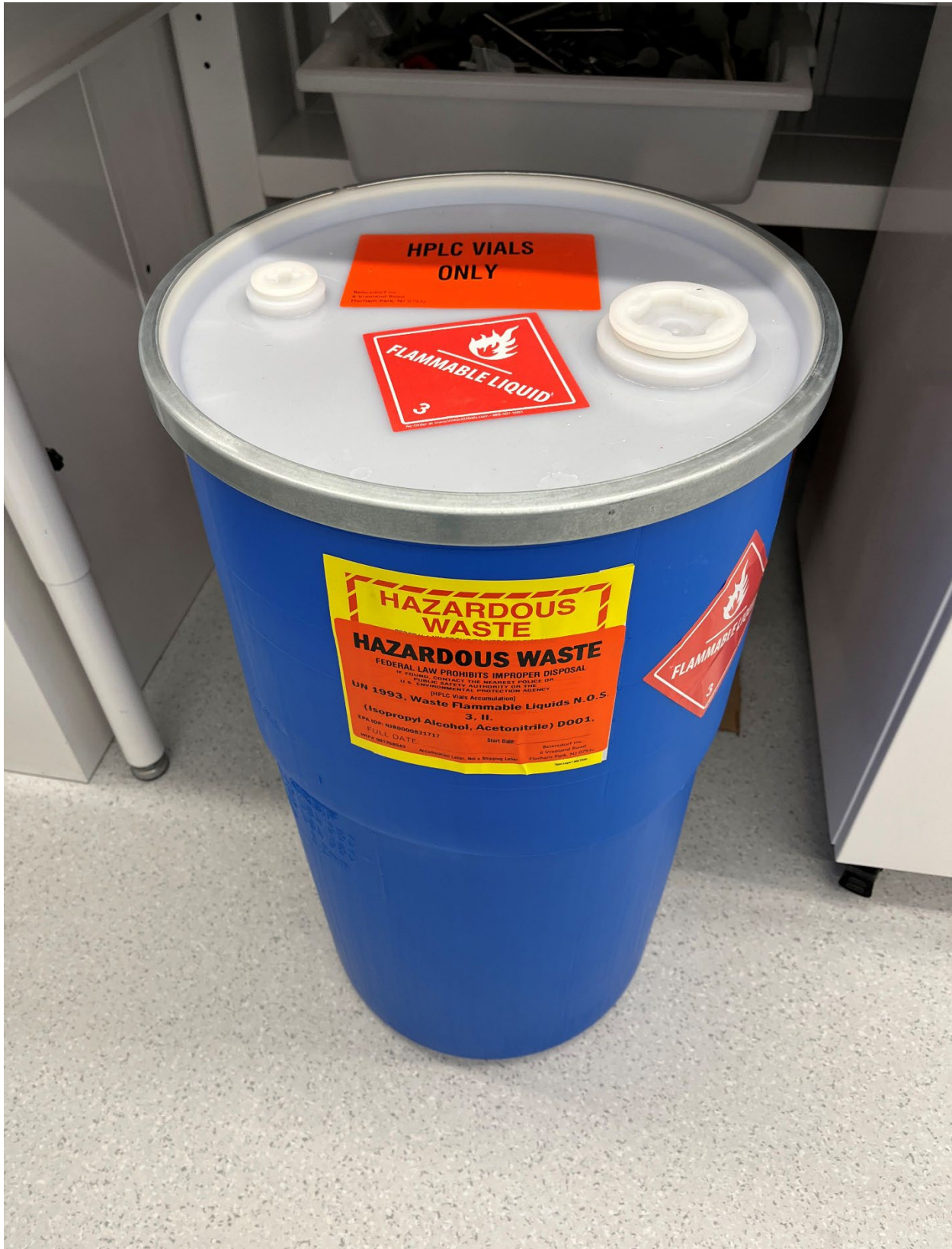


Photo #3: Containers of hazardous waste and universal waste in the Central Accumulation Area.



Photo #4: A container of waste flammable liquids in the Central Accumulation Area.



Photo #5: A container of universal waste in the Central Accumulation Area.

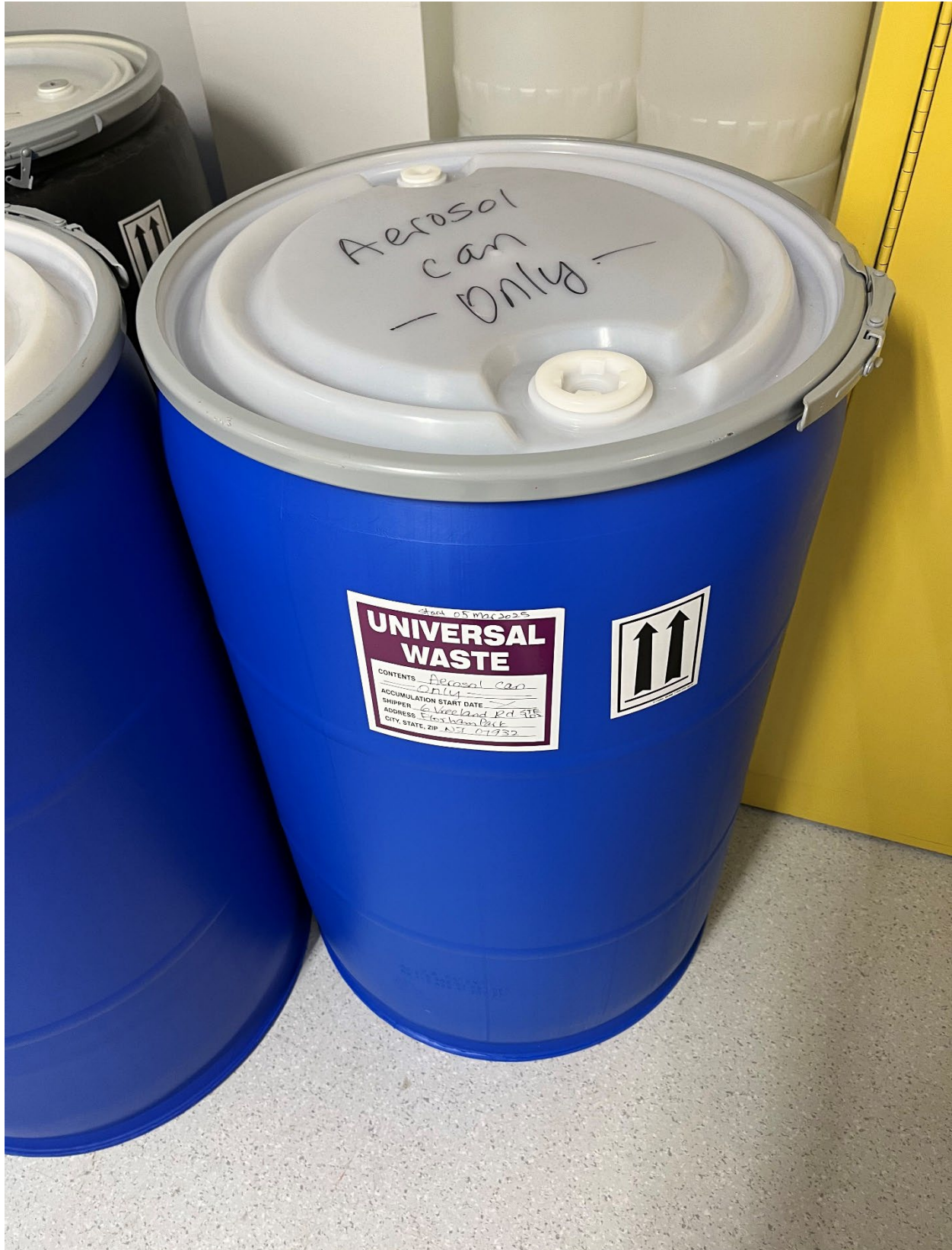


Photo #6: The entrance to the Central Accumulation Area.

