

RCRA Compliance Branch INSPECTION REPORT

Inspection Date(s):	3/30/2023	Inspection Announced: No
Facility or Site Name:	Corbion Caravan	
Facility/Site Physical Location:	100 Adams Drive	
(City, state, zip code)	Totowa, NJ 07512	
Mailing address (if different from above):	N/A	
Facility/Site Contact:	Paxton Tsang	EHS Specialist
	Paxton.Tsang@corbion.com	
	(800) 526- 5261	
RCRA ID Number:	NJR986637403	
Facility/Site Personnel Participating in Inspection:		
Paxton Tsang	See above	See above
Gayle Goldberg	EHS Manager	Gayle.Goldberg@corbion.com
Inspector(s):		
William Chernes		
Areeba Khan	AREEBA KHAN	 Digitally signed by AREEBA KHAN Date: 2023.05.19 14:42:15 -04'00'
Supervisor:		
Derval Thomas	DERVAL THOMAS	 Digitally signed by Derval THOMAS Date: 2023.05.19 12:11:30 -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 inspectors William Chernes and Areeba Khan.

Opening Conference

EPA Region 2 RCRA inspectors William Chernes and Areeba Khan arrived at Corbion Caravan on March 30, 2023, for an unannounced inspection. We met with Paxton Tsang, EHS Specialist

and Gayle Goldberg at the entrance of the facility. We presented our credentials to Mr. Tsang and Mrs. Goldberg and informed them that this was an EPA inspection to determine the facility's compliance with RCRA. The scope of the inspection was compliance evaluation inspection (CEI).

Facility/Site Description

Corbion Caravan is a global food preservation manufacturing facility based in Amsterdam, Netherlands. Corbion started off as Central Sugar Company (CSM) in the Netherlands in 1919 and merged with Caravan, a US based company, then rebranded itself as Corbion in 2012. The company manufactures wet and dry food preservatives to use in their bread and bakery products. The facility we inspected was one of their branches in Totowa, NJ. This location ships and receives materials from other branches to manufacture their products (food additives). The raw materials received by the facility are nonhazardous. Mr. Tsang stated there are few hazardous materials received, lactic acid and glycolic acid, which are used as part of their production to create preservatives. The hazardous waste is generated in the facility quality control and quality analysis lab. The lab generates the following hazardous wastes: solvent waste and nitrate waste. The facility is a small quantity handler of universal waste. All the waste generated is picked up by Veolia every 3 months. Mr. Tsang stated that the facility employs 225 people. The facility runs 24 hours a day, 5 days a week, in 3 shifts. After review of the statements made by Mr. Tsang, the facility was determined to be a Small Quantity Generator (SQG) of hazardous waste at the time of the inspection.

SECTION II – OBSERVATIONS

Mr. Tsang and Mrs. Goyle guided us around the facility. We were also joined by Brian Boator the Quality Control Technician.

Quality Control (QC) Lab

The facility representatives explained the hazardous waste generated in this lab are from: chloroform; acetone, methanol used in testing the quality of the preservatives and silver chloride used during salt analysis. The following hazardous waste containers were in the lab:

- One 55-kg drum of hazardous waste being filled that was labeled.
- One 5-gallon container of hazardous waste that was labeled, dated and closed

Quality Analysis (QA) Lab

The facility representatives stated the hazardous waste generated in this lab are from: the HPLC machines, and lab procedures using acetic acid and chloroform. The following hazardous waste containers were in the lab:

- A 1-gallon container of methanol/acetonitrile that was empty and labeled
- Two 1-gallon containers of non-halogenated waste attached to HPLC machines. The facility representatives stated that they are closed at night. The inspectors recommended that the facility should get something to fully close the container even while under the control of the operator.
- There was a drainage pipe that the facility representative stated is for their wastewater

Central Storage Area

The Central Storage Area is a closed room that was clearly labeled with the words hazardous waste and maintained a list of Emergency contacts on the front of the door. The Central Storage Area contained:

- Four empty 55-gallon drums
- Two 55-gallon drums of hazardous waste full, labeled, dated, and closed
- One gallon container of hazardous waste that was labeled, dated, and closed
- Spill kit
- Fire extinguisher around the corner
- Weekly inspection log that was up to date

Universal Waste

- One box of circular fluorescent bulbs that was closed with no label and no date.
- Two 4 ½ foot boxes of straight fluorescent bulbs that was closed with no labels and no dates.
- One box of 3 lead acid batteries and 1 lithium battery that was closed with no label and no date.

Records Review

Mr. Tsang informed us that Maria Ericson (NJDEP) was there 2 weeks ago. Upon her visit she requested documents from the facility and did the records review. Therefore, the inspectors did not review records to mitigate further redundancy.

SECTION III – AREAS OF CONCERN

Regulatory Concerns

1. Pursuant to 40 C.F.R § 273.14(e), each lamp or a container or package in which such lamps are contained must be labeled or marked clearly with one of the following phrases: “Universal Waste-Lamp(s),” or “Waste Lamp(s),” or “Used Lamp(s)”.
 - a. At the time of the inspection the universal waste room located on the first floor had three boxes of fluorescent bulbs that were not labeled.

On March 30, 2022, Mr. Tsang followed up in an email regarding the area of concerns. Mr. Tsang stated: “Thank you for your visit today, attached are pictures of the Universal waste labels adhered to the containers.”



Figure 1: Each box shows the Universal Waste Sign, labeled with bulbs or batteries, and dated.

2. Pursuant to 40 C.F.R § 273.14(a), Universal waste batteries (*i.e.*, each battery), or a container in which the batteries are contained, must be labeled or marked clearly with any one of the following phrases: “Universal Waste - Battery(ies),” or “Waste Battery(ies),” or “Used Battery(ies);”
 - a. At the time of the inspection the universal waste storage area had 1 box of batteries that had no date.

On March 30, 2022, Mr. Tsang followed up in an email regarding the area of concerns. Mr. Tsang stated: “Thank you for your visit today, attached are pictures of the Universal

waste labels adhered to the containers.” The picture shown in figure 1 also shows the label of the box with the batteries.

3. Pursuant to 40 C.F.R § 273.15(c), a small quantity handler of universal waste who accumulates universal waste must be able to demonstrate the length of time that the universal waste has been accumulated from the date it becomes a waste or is received.
 - a. At the time of the inspection the waste room located on the first floor had three boxes of bulbs and 1 box of batteries that had no date.

On March 30, 2022, Mr. Tsang followed up in an email regarding the area of concerns. Mr. Tsang stated: “Thank you for your visit today, attached are pictures of the Universal waste labels adhered to the containers.” The picture shown in figure 1 also shows the date of each box.

General concern:

During the inspection the 1-gallon HPLC containers was not fully closed. We recommended to the facility to get a gasket that would seal the container completely.

Closing Conference

The closing conference was conducted by inspectors William Chernes, Areeba Khan and the facility representatives: Paxton Tsang, and Gayle Goldberg. During the closing conference USEPA Inspector Areeba Khan and Inspector Chernes explained to the facility representative the areas of concerns observed. Mr. Tsang, and Mrs. Goldberg stated that they will follow up and tend to the areas of concern immediately.