EPA United States Environmental Protection Agency
RCRA Compliance Branch
INSPECTION REPORT

Inspection Date(s):	3/27/2024	Inspection Announced: No
Facility or Site Name:	Tunnel Barrel and Drum Company	
Facility/Site Physical Location:	85 Triangle Boulevard, Carlstadt, NJ 07072	
(city, state, zip code)	Carlstadt, New Jersey 07072	
Mailing address (if different from above):	Same as above.	
(city, state, zip code)		
Facility/Site Contact:	James Urcioli	Production Manager
	james@tunnelbarrel.com	
	(201)-933-1444	
RCRA ID Number:	NJD001601152	
Facility/Site Personnel Participating in Inspection:		
James Urcioli	Production Manager	james@tunnelbarrel.com
Lillivette Hernandez	Env. Affairs Officer	lhernandez@tunnelbarrel.com
Abedallah Elaiwah	Supervisor	--
Inspector(s):		
Brook McKeown (ERG [EPA Contractor])	Brook McKeown Digitally signed by Brook McKeown Date: 2024.09.17 12:39:58 -04'00'	
EPA Supervisor		
Derval Thomas (EPA Region 2)	DERVAL THOMAS Digitally signed by DERVAL THOMAS Date: 2024.09.18 21:12:55 -04'00'	
Inspection Report Authors: Brook McKeown		

SECTION I – INTRODUCTION

Purpose of the Inspection Objective

EPA Region 2 identified Tunnel Barrel and Drum Company ("TB&D") as a target 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 Brook McKeown (ERG).

Opening Conference

The inspector arrived at TB&D at approximately 10:00 am on March 27th, 2024, for an unannounced RCRA inspection. Inspector McKeown first met with James Urcioli (Production Manager) and Lillivette Hernandez (Env. Affairs Officer). Brook McKeown presented their RCRA inspector credentials to Mr. Urcioli and Ms. Hernandez and informed them that this was an EPA RCRA CEI that covered all RCRA regulations. Inspector McKeown inquired about any permitting requirements for the use of equipment that is not intrinsically safe in the process area and explained TB&D's right to claim confidential business information (CBI). TB&D indicated that no information included in this report was claimed as CBI. The inspection report and attachments present the results of the CEI.

Facility/Site Description

TB&D reconditions or recycles steel drums, poly drums, poly totes and fiber drums. Mr. Urcioli stated that the facility will only accept RCRA-empty containers, and primarily those that were previously used to store chemical and pharmaceutical products. The containers are expected to arrive with no pourable material present. If a container received on-site is not RCRA empty, the facility will reportedly alert the customer to pick up the container. There is no specific list of materials for residuals in containers that cannot be received by TB&D. Facility personnel could only remember two occasions recently where they had to send containers that were not RCRA-empty back to customers.

The reconditioning process begins with the reception and unloading of containers from customers. Steel drums, fiber drums, poly drums and poly totes are segregated. Next, facility personnel will determine if each container is RCRA empty. Containers that are not RCRA empty are identified qualitatively by facility personnel (e.g., if the container is heavy or by visual inspection of the contents) and returned to customers. RCRA-empty containers are inspected for dents, rust, or other defects to determine if facility personnel can recondition them. Steel drums will be reconditioned if they are in an appropriate condition, otherwise they will be cleaned, crushed and sent off-site as scrap metal. All poly containers are shredded, and this material is sent off-site for recycling. Fiber drums are gently rinsed for reconditioning or sent-off site for disposal with Waste Management.

Steel drums that are accepted for reconditioning are sent to be washed on a conveyor line. TB&D maintains a series of wash baths with water at various temperatures. One of the baths contains tri-sodium phosphate as a cleaning agent and another contains sodium nitrate, which is an anti-rusting agent. Wash baths are changed every 1-3 days depending on the stage in the process (e.g. earlier washes are changed more frequently). Spent wash water is sent to the wastewater treatment plant. Following washing, the drums are staged at a natural gas-fired drying station. Any labels that may be affixed are ground off at this stage of the process.

Steel drums receive surface finishing in a shotblast unit that utilizes a steel shot media. Facility personnel stated that the shot blast unit had been down for several years, and just became operational again in February 2024. Therefore, they have not sent off spent shot blast media in some time and they are in the process of developing a waste profile for this waste stream. Following blasting, the drums are coated with oil-based paint at the facility paint booth. The facility has two paint booths, one of which is the primary booth. After the coating has dried, the drums are loaded into different shipping containers and trailers and delivered to customers. The facility uses n-methyl-2-pyrrolidone as a paint solvent, gun cleaner and for wipe down. The facility also reportedly uses ethanol or mineral spirits for drum and equipment wipe-down. The facility generates paint waste, which is comprised of paint filters, dry paint waste and wet paint waste, including off-spec or expired paint. This waste stream is managed as ignitable hazardous waste. Solvent waste, primarily consisting of solvent rags, is sent off-site as a separate ignitable hazardous waste stream.

Wash water, once it can no longer be used, is sent to the wastewater treatment plant, where it undergoes physical separation and reverse osmosis filtration. The process generates a rotary screen waste, which contains solids and liquids from the wastewater treatment that have been collected. The rotary screen waste is managed as a characteristically hazardous waste for selenium. Used oil generated from maintenance operations is collected in a plastic tote and sent off-site infrequently. Facility personnel stated that fluorescent bulbs at the facility were most recently changed in approximately 2017, and information on how the bulbs were managed was not available.

The site is currently operating as a Large Quantity Generator (LQG) of hazardous waste. Paint waste is managed as ignitable hazardous waste, solvent rags are managed as ignitable hazardous waste, and rotary screen waste is managed as a characteristically hazardous waste for selenium. All hazardous wastes are stored in 55-gallon steel drums and transferred by ACV Environmental Services, Inc. (NJD003812047) to Cycle Chem, Inc (NJD002200046) at their Elizabeth, NJ facility. Post-treatment wastewater is discharged to the city sewer. Lorco reportedly collects used oil generated at the facility. Waste Management collects general trash, including waste fiber drums. The facility has one central accumulation area (CAA) and three satellite accumulation areas (SAAs).

TB&D operates under a NJDEP air minor source permit and an NPDES permit. The facility is listed on NJDEP's Site Remediation Program for a leaking underground storage tank that was identified in 1994 and held gasoline at that time. NJDEP's data indicate that there are benzene, methyl tert-butyl ether, tert-butyl alcohol and vinyl chloride impacts to the groundwater at the site. The facility is reportedly in the process of completing remedial action and a well-restriction area has been established.

TB&D operates 24 hours a day, five days a week.

SECTION II – OBSERVATIONS

The inspection team arrived at the TB&D facility in Newark on the morning of February 29th, 2024. Following the opening conference and a discussion of the facility processes, the inspection team conducted a walkthrough starting at approximately 11:00 am. The inspection team observed the container unloading and staging area, central accumulation area, painting area, maintenance shop, and wastewater treatment area. The inspection team ended the walkthrough at 12:25 pm.

All photographs taken during the walkthrough are provided in Attachment 1. The photograph numbers in this report correspond to the numbers in Attachment 1. Further details regarding each of the areas observed during the walkthrough are discussed in the sections below.

Container Unloading and Staging Area

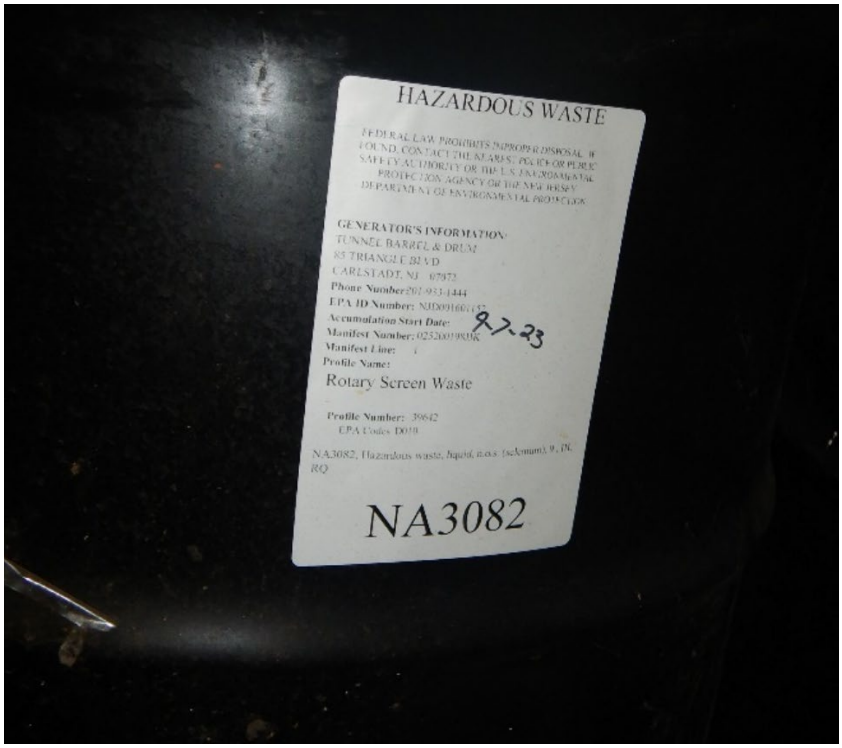
The inspection team observed the container unloading area, where a shipment of poly drums was being unloaded off of a trailer. The containers were inspected by personnel to ensure that they were RCRA-empty. Inspector McKeown observed the interior of several of the drums and did not identify any free liquids in the containers. The poly drums were then overturned in a washing area, where pressurized water was used to wash the inside of the drums. The wash water was then collected in a subgrade pit. A large number of containers were stored in this area, stacked several drums high and a tight area to walk through the stacks drums was available.

Central Accumulation Area

The inspection team observed the CAA, located adjacent to the wastewater treatment area on the western side of the building, where drums are received from the SAAs. Sixteen hazardous waste containers were observed in this area, stored on two rows of pallets and stacked two to three high. Thirteen of these drums were not labeled as hazardous waste, with an indication of their hazards, or with an accumulation start date. There was not adequate aisle space on either side of the row of hazardous waste drums (Photographs 5 -7 and 9, Attachment 1).

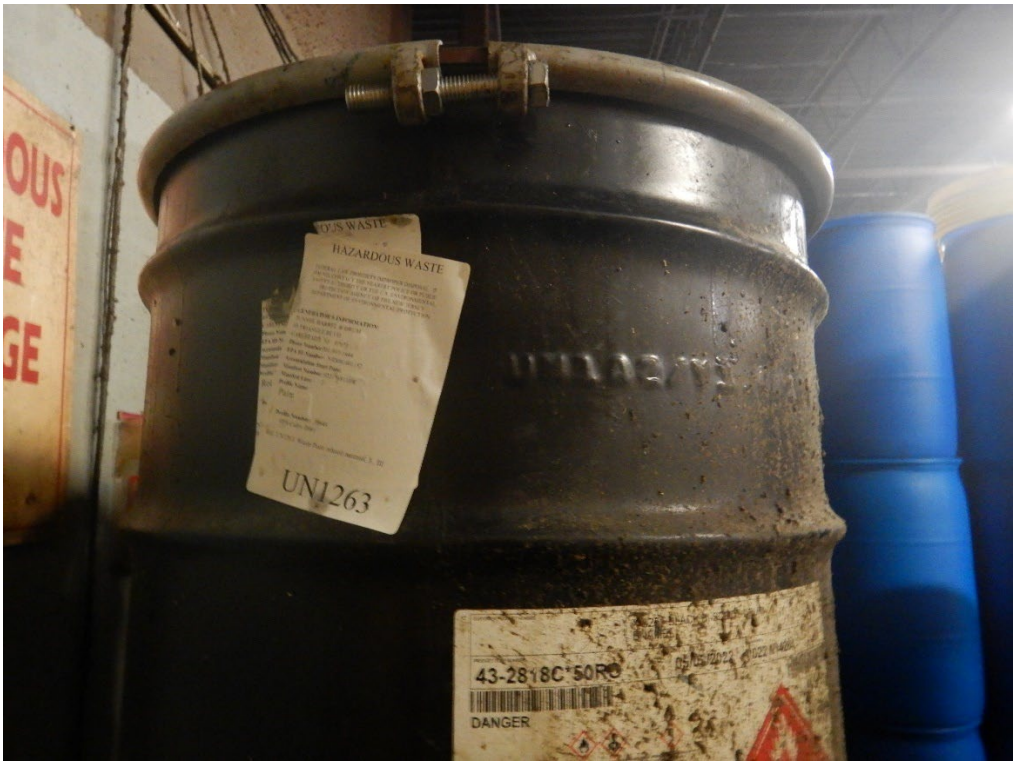
Overall view of the CAA. Ten drums of hazardous waste are stored on the first row of pallets seen here, none of which are labeled as hazardous waste, with an indication of their hazards, or with an accumulation start date. Six more drums are stored on the row behind this front row that but cannot be seen in this photo. Additionally, there is not adequate aisle space on either side of the drums. {Photograph 5, Attachment 1}

One 55-gallon steel drum in the back row of containers stored in the CAA was labeled as hazardous “rotary screen waste” with an accumulation date of 9/7/2023, indicating that the drum had been stored on-site for 202 days on the day of the inspection (Photograph 2, Attachment 1). This is in exceedance of the 90-day storage limit for hazardous waste containers at an LQG. The label also includes a manifest number 025200198JJK, which corresponds to a shipment that was shipped from TB&D on 8/11/2023.



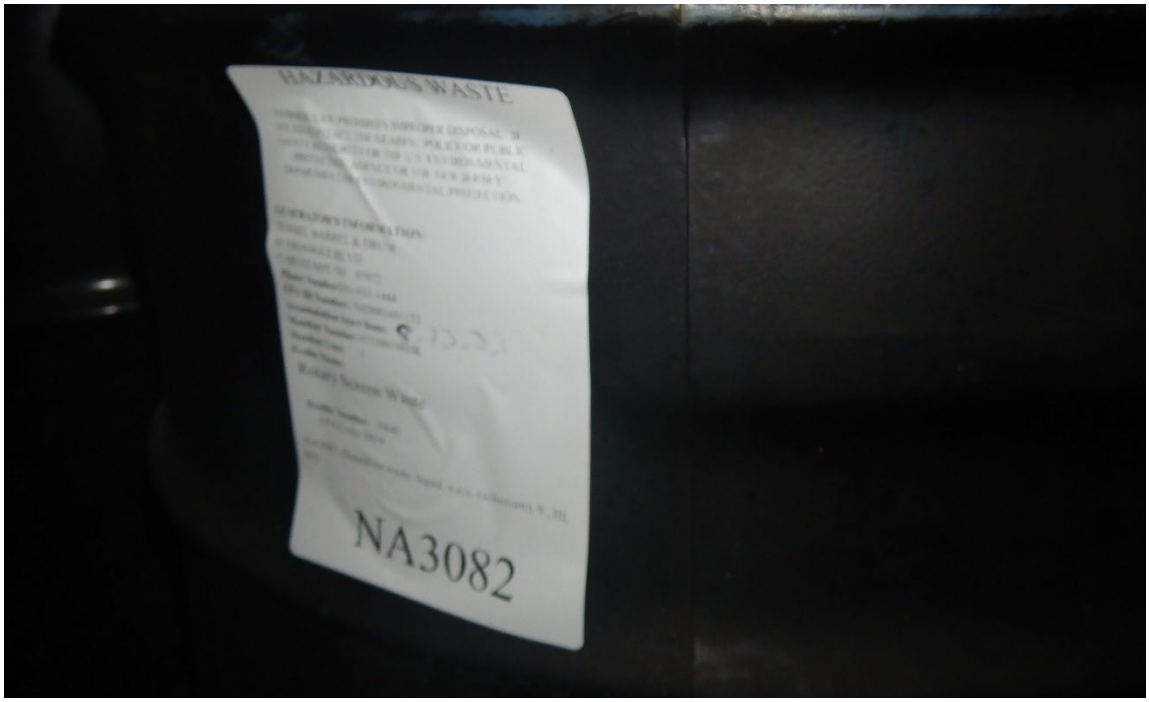
Close-up view of the label on one of the rotary screen hazardous waste drums observed in the CAA. The accumulation date is listed as 9/7/2023.
{Photograph 2, Attachment 1}

Another 55-gallon steel drum in the back row of containers stored in the CAA was labeled as hazardous “Paint” with no accumulation date listed (Photograph 3, Attachment 1). The label lists a manifest number, but it is not legible in the photograph.



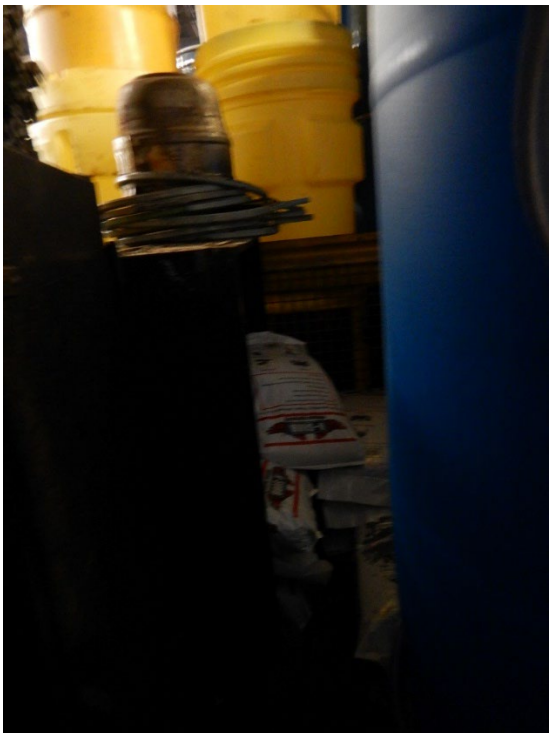
View of the hazardous paint waste drum observed in the CAA. No accumulation date is listed on the drum.
{Photograph 3, Attachment 1}

A third 55-gallon drum was observed in the CAA with a hazardous waste label. The drum was observed in the back row of containers stored in the CAA was labeled as hazardous “rotary screen waste” with an accumulation date of 8/13/2023, indicating that the drum had been stored on-site for 227 days on the day of the inspection (Photograph 4, Attachment 1). This is in exceedance of the 90-day storage limit for hazardous waste containers at an LQG.



Close-up view of the label on one of the rotary screen hazardous waste drums observed in the CAA. The accumulation date is listed as 8/13/2023.
{Photograph 4, Attachment 1}

Facility personnel acknowledged that a waste pick-up had not been scheduled for a few months at the time of the inspection. They stated that they did not separately track or have a means to identify the accumulation dates on the drums that were not labeled. To determine what the contents of the drums were, they would need to open the containers and make visual observations. Additionally, a black storage cabinet was located adjacent to the CAA which contained sorbent materials. A number of poly drums were stored in front of the cabinet, making it difficult to access the spill response equipment (Photograph 19, Attachment 1).



View of the spill absorbent stored in a black cabinet adjacent to the CAA. The spill equipment was not readily accessible, due to drums blocking access.
{Photograph 19, Attachment 1}

Painting Area

The inspection team observed the paint booth area, where washed and blasted drums are coated prior to shipment to customers. The facility has two paint booths, one that has automated spray guns and the another where paint is applied manually with a spray gun. Paint booth filters, which become paint waste were observed in the booths. There were pails in the vicinity of the paint booths use to capture paint waste, which also reportedly would be transferred to the paint waste drum. At the time of the inspection, a satellite drum used to collect paint waste was not observed in the area. Adjacent to the paint area, near the drum conveyor line, the satellite accumulation area for the spent solvent rags was observed. One 55-gallon drum was present (Photograph 17, Attachment 1). The container was not labeled as hazardous waste or with an indication of its hazards. The drum was covered with a lid, but the lid was not secured and the bung openings on the drum lid were not closed.

View of satellite accumulation drum of solvent rags, which was not properly closed and was not labeled as hazardous waste or with an indication of its hazards.
{Photograph 17, Attachment 1}

Maintenance Shop

The inspection team observed the maintenance shop, where minor repairs and fabrication of process equipment is performed. Mobile equipment is reportedly serviced (e.g. oil changes, etc.) by an outside contractor that comes on-site and manages the waste for them. One poly tote of used oil was observed in the maintenance area (Photograph 12, Attachment 1). Facility personnel indicated that used oil is generated very infrequently, so it takes a significant amount of time to fill the tote and send the used oil off-site. A heating oil aboveground storage tank was observed adjacent to the used oil tote.

Wastewater Treatment Area

The inspection team observed the wastewater treatment area for the site, where spent wash water from the process is treated through physical separation and reverse osmosis. Coming out of the separation tank, piping discharges into a 55-gallon drum, which collects the rotary screen

waste. This area serves as a satellite accumulation area for the rotary screen waste. Two drums of rotary screen waste were observed in the area, one which was still accumulating rotary screen waste, and the other drum was full (Photograph 18, Attachment 1). Neither of the drums were labeled as hazardous waste or with an indication of their hazards. Additionally, the SAA was storing more than 55-gallons of hazardous waste based on the two containers that were present.

Rotary screen waste satellite accumulation area, adjacent to the wastewater treatment equipment. The two black drums contain rotary screen waste. Neither of the drums are labeled or closed.
{Photograph 18, Attachment 1}

Records Review
The inspection team reviewed the following compliance documents as part of the records review:

Contingency Plan and Quick Response Guide: TB&D provided a copy of its Emergency Response and Contingency Plan (dated December 12, 2022), as well as their Quick Reference Guide (undated). The Contingency Plan is provided as Attachment 2 and the Quick Reference Guide is included as Attachment 3.

The Contingency Plan provides a list of emergency telephone numbers and lists the emergency phone chain sequence; however, it does not identify who at the facility serves as Emergency Coordinator. The phone chain states that Anthony Urcioli should be contacted first, followed by Abedallah Elaiwah, James Ucioli and then Dariusz Ulicki in the event of an emergency. The title of Emergency Coordinator is referenced throughout the plan as having responsibilities during emergency procedures, but specific personnel are not assigned to this title. The Quick Response Plan states that Abedallah Elaiwah and James Urcioli are the site Emergency Coordinators. The Contingency Plan does not clearly identify who the Emergency Coordinators are for the facility.

The Quick Reference Guide includes a facility map and street map; however, due to their small size and low resolution, the maps are not legible. The Quick Reference Guide also lists the hazardous wastes that are generated at the site, however, it does not describe the hazards associated with the wastes. For example, the Guide lists “Rotary Screen” as a hazardous waste but does not identify what properties make the waste hazardous (e.g., toxic or Selenium-containing).

The inspection team requested documentation that the latest versions of the Contingency Plan and Quick Reference Guide have been submitted to local emergency responders. TB&D stated that they did not have records of the Contingency Plan or Quick Reference Guide being submitted to local emergency responders (Attachment 10).

Training Records: TB&D provided the sign-in sheets for the RCRA hazardous waste training conducted on April 4, 2024, December 20, 2022 and July 11, 2019. Hazardous waste training was not conducted in 2020, 2021 and 2023. It is noted that the April 2024 and December 2022 sign-in sheets are not legible for all attendees; therefore, it was not possible to identify everyone who received training. The training sign-in sheets are provided as Attachment 4.

Safety Data Sheets: TB&D provided SDS sheets for eight paints used in its paint booths to coat drums and one SDS for the solvent. Several paints contain toluene, which is an F-listed solvent. However, the toluene is part of the paint formulation and not part of a solvent mixture. Several of the paints are listed as ignitable based on their SDSs. The solvent used at the facility, n-methyl-2-pyrrolidone, is ignitable. Safety data sheets are included as Attachment 5.

Waste Profiles: TB&D provided the waste profiles for the “Solvent Rags” dated April 4, 2024, “Paint” waste dated April 3, 2024 and “Rotary Screens” which was undated. The Solvent Rags profile indicates that hazardous waste code D001 (ignitability) is applicable, based on generator knowledge. The profile also states that the waste is comprised of 5% isopropyl alcohol and 90% rags. The Paint waste profile indicates that hazardous waste code D001 (ignitability) is applicable, based on generator knowledge. The Rotary Screens profile indicates that hazardous waste code D010 (selenium) is applicable. The waste profile does not indicate whether the determination is based on laboratory testing, generator knowledge, or some other method. The

profile states that the total concentration of selenium in the waste stream is a maximum of 5 parts per million (ppm). Waste profiles are provided at Attachment 6.

Waste Analytical: The inspection team requested waste testing information for the waste paint and rotary screen waste that were used to develop the waste profiles. Facility personnel stated that this information was not available. Internal testing conducted by the TB&D's waste vendor for 2022 and 2023 was provided, which screens for some general parameters such as pH, ignitability, and reactivity. These records do not include any testing for toxic metal compounds or any documentation of the selenium or chromium concentrations in the waste streams.

Based on the 2019 Biannual Report submitted by TB&D, the facility previously sent out the rotary screen waste under waste codes D004 (arsenic), D005 (barium), D006 (cadmium), D007 (chromium), D008 (lead), and D010 (selenium). Facility personnel could not provide documentation as to why the waste code designation for the waste stream had changed and all the metals except selenium were removed from the profile. The facility could not provide documentation to support the current concentrations of selenium reported on their waste profile either.

Analytical testing for waste streams is included as Attachment 7.

Manifests: The inspection team reviewed hazardous waste manifests provided by TB&D and viewed on RCRAInfo. The paint waste, solvent rags and rotary screen waste are transferred by ACV Environmental Services, Inc. (NJD003812047) to Cycle Chem, Inc (NJD002200046) at their Elizabeth, NJ facility. Example manifests are provided in Attachment 8.

Weekly CAA Inspections: During the inspection, facility personnel stated that weekly CAA inspections were being completed, but that field notes had not been transferred to their CAA form and therefore records could not be viewed on-site. The inspection team requested copies of weekly inspection records from January 2023-March 2024. Facility personnel stated that no weekly inspection records were available during that time. It is not known when the most recent weekly inspection was conducted.

Empty Container Certification: TB&D provided the "Empty Container Certification Form" that all customers sign and certify stating that all containers delivered are "empty" as defined by 40 CFR 261.7 and have properly been prepared for transportation under 49 CFR 173.29. Containers that previously held P-listed, acutely hazardous materials are accepted at the site, provided that the container has been triple rinsed. A copy of the customer certification is provided as Attachment 9.

SECTION III – AREAS OF CONCERN

The presentation of areas of concern does not constitute a formal compliance determination or violation.

Regulatory Concerns

1. 40 CFR 262.11 states that "a person who generates solid waste, as defined in 40 CFR 261.2 must make an accurate determination as to whether that waste is a hazardous waste in order to ensure wastes are properly managed according to applicable RCRA regulations". TB&D could not provide the basis for the D010 code for toxicity (selenium) currently listed on the waste profile and waste manifests for the rotary screen waste (Attachment 10). Previously, this waste stream also carried waste codes D004, D005, D006, D007 and D008. TB&D did not provide the basis or an explanation regarding why those waste codes were removed from the characterization (Attachment 10).
2. Pursuant to 40 CFR 262.34(c)(2), a generator who accumulates either hazardous waste or acutely hazardous waste listed in §261.31 or §261.33(e) in excess of the amounts listed in paragraph (c)(1) of this section at or near any point of generation must, with respect to that amount of excess waste, comply within three days with paragraph (a) of this section or other applicable provisions of this chapter. During the three day period the generator must continue to comply with paragraphs (c)(1)(i) and (ii) of this section. The generator must mark the container holding the excess accumulation of hazardous waste with the date the excess amount began accumulating. Two drums of rotary screen hazardous waste were observed in the rotary screen SAA (Photograph 19, Attachment 1), in exceedance of the 55 gallon limit. Neither of the containers were marked with an accumulation date to mark when the 55-gallon limit had been exceeded in the SAA.
3. Pursuant to 40 CFR 262.34(c)(1), a generator may accumulate as much as 55 gallons of hazardous waste or one quart of acutely hazardous waste listed in §261.31 or §261.33(e) in containers at or near any point of generation where wastes initially accumulate which is under the control of the operator of the process generating the waste, without a permit or interim status and without complying with paragraph (a) or (d) of this section provided he: (i) Complies with §§265.171, 265.172, and 265.173(a) of this chapter; and (ii) Marks his containers either with the words ''Hazardous Waste'' or with other words that identify the contents of the containers. Pursuant to 40 CFR 265.173(a) a container holding hazardous waste must always be closed during storage, except when it is necessary to add or remove waste. The inspection team observed one SAA container of hazardous solvent rags (Photograph 17, Attachment 1) and two SAA containers of hazardous rotary screen waste (Photograph 18, Attachment 1) which were open in violation of 40 CFR 262.34(c)(1)(i).
4. Pursuant to 40 CFR §262.34(a), a generator may accumulate hazardous waste on-site in containers without a permit or without having interim status, if certain requirements are met, intra alia, accumulation of hazardous waste on-site for 90 days or less. The inspection team observed two drums of rotary screen waste in the CAA with

accumulation dates that exceeded 90 days (Photographs 2 and 4, Attachment 1). One drum was labeled with an accumulation date of 9/7/2023 and another was labeled with an accumulation date of 8/13/2023. At the time of the inspection, these containers had been stored on site for 202 and 227 days from their accumulation dates, respectively.

5. Pursuant to 40 CFR 262.34(a)(3), while being accumulated on-site, each container and tank must be clearly labeled or marked with the words ‘‘Hazardous Waste”. Thirteen of sixteen hazardous waste containers observed in the CAA were not marked with the words “Hazardous Waste”.
6. Pursuant to 40 CFR 262.34(a)(2), the date upon which each period of accumulation begins is clearly marked and visible for inspection on each container; while being accumulated on-site. Thirteen of sixteen hazardous waste containers observed in the CAA were not marked with their respective accumulation start dates.
7. 40 CFR 265.174, as referenced by 40 CFR 262.34(a)(1)(i), states that “at least weekly, the owner or operator must inspect areas where (hazardous waste) containers are stored.” TB&D did not have documentation of weekly CAA inspections from January 2023-March 2024 (Attachment 10), which were requested by the inspection team. It is not known when the most recent documented CAA weekly inspection was completed.
8. 40 CFR 265.16(c), as referenced by 40 CFR 262.34(a)(4)2.17(a)(7)(iii), states that “Facility personnel must take part in an annual review of the initial training required in paragraph (a) of this section”. TB&D provided the sign-in sheets for the RCRA hazardous waste training conducted on April 4, 2024, December 20, 2022 and July 11, 2019 (Attachment 4). Hazardous waste training was not conducted in 2020, 2021 and 2023. The names on the April 2024 and December 2022 sign-in sheets are not legible for all attendees, therefore, it was not possible to identify everyone who received training on those dates.
9. 40 CFR 265.52(d), as referenced by 40 CFR 262.34(a)(4), states that “the [contingency] plan must list names and phone numbers (office and home) of all persons qualified to act as emergency coordinator and this list must be kept up to date. Where more than one person is listed, one must be named as primary emergency coordinator, and others must be listed in the order in which they will assume responsibility as alternates.” The TB&D’s contingency plan (Attachment 2) does not clearly indicate who the emergency coordinators are for the facility and who is the primary emergency coordinator. In addition, the emergency phone chain sequence presented in the Contingency Plan conflicts with the emergency coordinator information listed in the Quick Reference Guide (Attachment 3)
10. 40 CFR 265.53(b),) as referenced by 40 CFR 262.34(a)(4), states that “the large quantity generator must submit a copy of the contingency plan and all revisions to all local emergency responders”. TB&D does not have documentation that the Contingency Plan was submitted to local emergency responders (Attachment 10).

Non-Regulatory Concerns

The following non-regulatory concerns were identified:

- During the inspection, a 55-gallon drum of spent blast media and fines was observed. Facility personnel stated that they were in the process of profiling the waste stream, as the shot blasting operations had recently restarted after being down for several years. TB&D will need to properly profile the waste stream prior to disposal or off-site management.
- The following concerns related to EPA's 2016 Hazardous Waste Generator Improvement Rule were identified. The State of New Jersey has adopted these regulations but has not yet been authorized by EPA to implement them. TB&D should be aware the State of New Jersey may seek enforce the following requirements against it and which are currently unenforceable at the federal level for the aforementioned reason:
    - 40 CFR 262.15(a)(5) states that "[one of] the conditions for exemption for satellite accumulations [is]….a generator must mark or label its container with the following: i) the words "Hazardous Waste" and; ii) an indication of the hazards of the contents". One SAA container of hazardous solvent rags (Photograph 17, Attachment 1) and two SAA containers of hazardous rotary screen waste (Photograph 18, Attachment 1) were observed by the inspection team. None of these three containers were labeled as hazardous waste or with an indication of their hazards.
    - 40 CFR 262.262(b) states that "a large quantity generator that first becomes subject to these provisions after May 30, 2017, or a large quantity generator that is otherwise amending its contingency plan must at that time submit a quick reference guide of the contingency plan to the local emergency responders…". TB&D does not have documentation that the Quick Reference Guide was submitted to local emergency responders (Attachment 10).
    - 40 CFR 262.262(b)(1) states that "the quick reference guide must include types/names of hazardous wastes in layman's terms and the associated hazard associated with each hazardous waste present at any one time (e.g., toxic paint wastes, spent ignitable solvent, corrosive acid)". The Quick Reference Guide lists the hazardous wastes present at the facility but does not state the hazardous associated with each waste stream (Attachment 3).
    - 40 CFR 262.262(b)(4) and (5) states that "the quick reference guide must include 4) a map of the facility showing where hazardous wastes are generated, accumulated and treated and routes for accessing these wastes; and 5) A street map of the facility in relation to surrounding businesses, schools and residential areas to understand how best to get to the facility and also evacuate citizens and workers". The Quick Reference Guide provided by TB&D includes a facility map and a street map, however due to the small size and low resolution of the maps, they are not legible (Attachment 3).

Closing Conference

The closing conference took place on March 27, 2024, at approximately 12:30 pm. Attending from the facility were James Urcioli and Lillivette Hernandez. Inspector McKeown was in attendance for the closing conference. Inspector McKeown discussed preliminary areas of concern and reviewed the list of documents requested by the inspection team as follow-up to the inspection. The closing meeting ended at approximately 1:00 pm on February 29, 2024.

List of Attachments

These attachments are referenced throughout this report:

- Attachment 1: Photolog
- Attachment 2: Emergency Action Plan and Spill Prevention Plan
- Attachment 3: Quick Reference Guide
- Attachment 4: Training Records
- Attachment 5: Paint SDSs
- Attachment 6: Waste Profiles
- Attachment 7: Waste Testing
- Attachment 8: Waste Manifests
- Attachment 9: Empty Drum Certification
- Attachment 10: Post-inspection Correspondence

Post-Inspection Facility Correspondence

Following the inspection, ERG provided a file transfer protocol link to TB&D to allow them to upload pending documents requested during the inspection. Documents were uploaded by the facility, with the final documents uploaded on April 10, 2024. TB&D provided responses to requested documents, including statements when requested documentation was not available. Additionally, TB&D provided photos of the CAA and SAAs, documenting labeling, container closure, aisle space and secondary containment corrective actions. Labels were not visible for all containers. The post-inspection correspondence and documentation of corrective action is included as Attachment 10.

Attachment 01

Photographic Log

Attachment 02

Contingency Plan

Attachment 03

Quick Reference Guide

Attachment 04

Training Records

Attachment 05

Safety Data Sheets

Attachment 06

Waste Profiles

Attachment 07

Waste Testing

Attachment 08

Waste Manifests

Attachment 09

Empty Drum Certification

Attachment 10

Post -Inspection Correspondence