

RCRA Compliance Branch INSPECTION REPORT

Inspection Date(s):	August 11, 2023	Inspection Announced: No
Facility or Site Name:	GASFLO PRODUCTS	
Facility/Site Physical Location:	159 Dwight Place	
(city, state, zip code)	Fairfield, New Jersey 07004	
Mailing address (if different from above):		
(city, state, zip code)		
Facility/Site Contact:	Jeff Ballini, Process Engineer	(973) 276-9011 JBALLINI@GASFLO.COM
RCRA ID Number:	NJR000080275	
Facility/Site Personnel Participating in Inspection:		
Jeff Ballini	Process Engineer	(973) 276-9011 JBALLINI@GASFLO.COM
{name}	{title}	{email/phone no.}
Inspector(s):		
John D, Wilk (USEPA) (lead inspector name)	<i>{Signature}</i> JOHN WILK  Digitally signed by JOHN WILK Date: 2023.10.03 10:18:37 -04'00'	{date}
Derval Thomas {Supervisor name}	<i>{Signature}</i> DERVAL THOMAS  Digitally signed by Derval THOMAS Date: 2023.10.04 09:03:30 -04'00'	{date}

SECTION I – INTRODUCTION

Purpose of the Inspection/Objective

The purpose of the inspection was to perform a comprehensive evaluation inspection (CEI) under the Resource Conservation and Recovery Act. The RCRA contains federal regulations pertaining to the management and disposal of hazardous waste.

Opening Conference

EPA Region 2 RCRA inspector John Wilk arrived at the Gasflo Products facility located at 159 Dwight Place, Fairfield, New Jersey 07004 at or about 11.00 A.M. on August 11, 2023.

The EPA inspector met with the above referenced company representative and immediately conducted an opening conference for the inspection. The EPA inspector presented his credentials to the company representative at the onset of the inspection and informed him this was an EPA inspection to determine the facility's compliance with Subtitle C of the RCRA.

Facility/Site Description

The facility manufactures and assembles gas transmission products including connectors regulators and metering equipment. Some assembling occurs on-site using parts either manufactured (machined, stamped pressed) on-site or brought in from other Gasflo Products facilities or outside vendors.

At of the date of this inspection, the facility identified itself as a RCRA small quantity generator (SQG) of hazardous waste (SQG's generate more than 100 kilograms and less than 1000 kilograms of non-acute hazardous waste per calendar month) which is also reflected in the facility's most recent Notification of RCRA Subtitle C Activities (8700-12) to the USEPA which was filed by the facility on or about August 26, 2021.

SCOPE OF INSPECTION:

The following regulatory areas were reviewed during this inspection (any potential violations/concerns identified would be noted in SECTION III – AREAS OF CONCERN below):

- (1) Facility's RCRA regulatory category determination;
- (2) Hazardous waste determinations pursuant to 40 CFR 262.11;
- (3) Manifesting (e-manifest review only);
- (4) Personnel training records (two years);

- (5) Contingency Plan (only for LQGs/TSDFs);
- (6) Universal waste management;
- (7) Satellite collection areas;
- (8) Observations of conditions of hazardous waste container storage area(s);
- (9) Weekly 90-day container storage area log (2 years) (for LQGs/TSDFs only);
- (10) Daily hazardous waste tank inspection log (2 years), only if applicable;

SECTION II – OBSERVATIONS

The facility's main hazardous waste is spent acid solution (sulfuric/phosphoric mixture) which is derived from a metal polishing process in which acid is employed as a polishing agent. The spent acid solution is categorized by the facility as EPA Hazardous Waste Number: D002; which is characteristic for corrosivity (pH less than or equal to 2 or equal to or greater than 12.5).

According to the facility representative, all hazardous waste accumulation occurs in containers. The facility utilizes no hazardous waste tanks and is not subject to any of the RCRA air emissions standards, i.e., 40 C.F.R. Subparts AA/BB/CC.

As of the date of this inspection, the facility was maintaining one inside 180-day hazardous waste container storage area which had the following hazardous waste containers in inventory: (1) one (1) plastic 55-gallon drum (full) corrosive hazardous waste; (2) one (1) plastic 55-gallon drum (approximately 33% full) corrosive hazardous waste. Both hazardous containers were marked with the words "Hazardous Waste" but were not marked with their respective accumulation start dates pursuant to 40 C.F.R. 262.16(6)(C) (N.J.A.C. 7:26G-6.1). No indications (staining, etc.) of releases of hazardous waste were observed by the USEPA inspectors at or near the facility's 180-day hazardous waste accumulation area.

The most recent hazardous waste shipment from this facility, prior to this inspection, occurred on July 25, 2023, under Hazardous Waste Manifest # 002129831VES which contained: Two (2) plastic containers of hazardous waste categorized as EPA Hazardous Waste Code: D002 (corrosivity) weighing a total of 800 pounds. The July 25, 2023, manifested shipment was sent to RCRA permitted TSDF VEOLIA ES TECHNICAL SOLUTIONS (EPA Id. #: NJD980536593) located in Flanders, New Jersey.

Overall, the facility representative was cooperative and appeared forthright while the facility appeared to be well managed environmentally notwithstanding its failure to mark two hazardous waste storage containers with their accumulation start dates.

SECTION III – AREAS OF CONCERN

Regulatory Concerns-

Both hazardous containers at the facility's 180-day hazardous waste accumulation area were not marked with their respective accumulation start dates pursuant to 40 C.F.R. 262.16(6)(C) (N.J.A.C. 7:26G-6.1).

General Concerns-

None.

Closing Conference

The EPA inspector conducted a closing conference at the close of the August 11, 2023 RCRA inspection. At the closing conference, the EPA inspector provided the facility representative a verbal warning indicating that the only compliance concerns identified during this inspection were missing accumulation start date markings on both drums of hazardous waste in the facility's 180-day storage area. In response, the facility representative stated he would immediately assure both drums were marked with their respective accumulation start dates and that corrective action would be taken to assure the same compliance issue was not repeated in the future.

The facility representative was also apprised that the facility would be imminently receiving an inspection report from the USEPA documenting its inspection findings.