

RCRA Compliance Branch INSPECTION REPORT

Inspection Date(s):	12/19/2024	Inspection Announced: No
Facility or Site Name:	Kinemotive Corporation	
Facility/Site Physical Location:	222 Central Avenue	
(City, state, zip code)	Farmingdale, NY 11735	
Mailing address (if different from above):		
Facility/Site Contact:	Steve Ledo	Vice President Product Quality Engineering
	sledo@kinemotive.com	
	T: (631) 249 -6440 ext 24	
RCRA ID Number:	NYD002054377	
Inspector:		
Areeba Khan	AREEBA KHAN  Digitally signed by AREEBA KHAN Date: 2025.02.05 16:21:25 -05'00'	
Supervisor:		
Derval Thomas		

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 inspector Areeba Khan.

Opening Conference

EPA Region 2 RCRA inspector Areeba Khan arrived at Kinemotive Corporation on December 19, 2024, for an unannounced inspection. I was greeted by the receptionist in the hall. The receptionist called Steve Ledo the Vice President Product Quality Engineering. I presented my

credentials to Mr. Ledo and informed him that this was an EPA inspection to determine the facility's compliance with RCRA regulations. The scope of the inspection was to conduct a compliance evaluation inspection (CEI).

Facility/Site Description

Kinemotive Corporation is an aerospace design and manufacturing company. The facility works on aerospace projects for commercial and military use. The hazardous waste generated from the facility are the following: waste amim liquid, waste aerosols, lab packs, epoxies, nitric acid, sodium hydroxide, rags, actain, and acetone. The facility determines the waste category using the information on the safety data sheets. The facility has three 400 gallon double walled tank. The waste is picked up every 80 days along with other waste by Innovative Recycling. The facility has a contract with Innovative Recycling as its transporter. The facility also has a contract with Rapid Intervention to conduct training once a year. Kinemotive Corporation also generates universal waste (bulbs, and batteries) and used oil from general maintenance.

After review of manifest information and statements made by the facility representative, the facility was determined to be a Large Quantity Generator (LQG) of hazardous waste at the time of the inspection. The hours of operation are Monday through Friday 6 am to 6 pm. The facility has 47 employees.

SECTION II – OBSERVATIONS

Satellite Storage Area

The facility representative stated this is the satellite storage area. At the time of the inspection the following was observed:

- One 30 gallon satellite accumulation container of hazardous waste (actain) that was labeled and closed.
- Three 55 gallon satellite accumulation containers of aluminum waste that were labeled and open. The facility representative stated it goes to a recycling company as scrap metal.
- Two 55 gallon satellite accumulation containers of mixed metal waste that were labeled and open. The facility representative stated it goes to a recycling company as scrap metal.

- One 4 foot tall universal waste container of fluorescent lamps that was dated 3/26/2019 labeled and closed.
- Four empty 1 Liter bottle of nitric acid (product). The facility representative stated the bottle is triple rinsed before being disposed of in the dumpster. The rinsed liquid from the bottle is put into a hazardous waste drum.

Etching Room

The facility representative stated this is the etching room. At the time of the inspection the following was observed:

- One 50 gallon of satellite accumulation tank of hazardous waste under the sink with no hazardous waste label attached to a 55 gallon satellite accumulation container of hazardous waste that was labeled and open. The facility representative closed the drum in front of me.

Tank Storage Area

The facility representative stated this is where all the hazardous waste tanks are located. The daily tank inspections reports were kept in a digital log. The daily inspections were conducted daily except on Sunday. At the time of the inspection the following were observed three 400 gallon double walled tanks of hazardous waste (caustic waste solution) that were dated (10/15/2024) and labeled.

Chemical Storage Area

The facility representative stated this is the main central storage area. At the entrance of the central storage area there was a hazardous waste sign posted on the door. There was a fire extinguisher present. The weekly inspections reports were kept in a digital log. At the time of the inspection the following were observed:

- One 55 gallon container of hazardous waste (acetone) that was dated (8/8/2024), labeled and closed. The facility representative stated they forgot to put the new label on the drum with the date on the drum for October and not August.

- One 55 gallon of hazardous waste (fluo-solve, glc waste) that was dated (4/25/2024), labeled and closed. The facility representative stated the drum was empty and the hazardous waste labeled was not removed.

Records Review

- Contingency Plan

At the time of the inspection, there was a contingency plan in place.

- Biannual Report

There were no issues.

- Manifests and Land Disposal Restrictions

At the time of the inspection, there were manifests record onsite.

- Personnel Training

At the time of the inspection, the training was sufficient.

- Arrangement with Local Authority

At the time of the inspection, the facility had made arrangement with the local authorities.

SECTION III – AREAS OF CONCERN

Regulatory Concerns

1. Pursuant to 6 NYCRR § 373-3.9(d)(1), A container holding hazardous waste must always be closed during storage, except when it is necessary to add or remove waste.

At the time of the inspection there was one 55 gallon satellite accumulation container of hazardous waste located in the etching room that was open.

The facility representative closed the drum in front of me during the inspection.

2. Pursuant to 6 NYCRR § 372.2(a)(8)(i)(a)(2):....the generator marks the containers with the words “Hazardous Waste” and with other words that identify the contents of the containers.

At the time of the inspection there was one 50 gallon container of satellite accumulation tank of hazardous waste located in the etching room under the sink with no hazardous waste label.

On December 20, 2024, the facility representative emailed a picture of the hazardous waste label put on the tank (as shown in figure 1).



(Figure 1: Hazardous waste label put on tank located in the etching room)

3. Pursuant to 6 NYCRR § 373-3.10 (f)(1): The owner or operator must inspect, where present, at least once each operating day, data gathered from monitoring and leak detection equipment (e.g., pressure or temperature gauges, monitoring wells) to ensure that the tank system is being operated according to its design.

- a. At the time of the inspection, the daily tank inspections were kept in a digital log. The daily inspections were conducted daily except on Sunday.
4. Pursuant to 6 NYCRR § 372.2(a)(8)(ii), The date upon which each period of accumulation begins is clearly marked and visible for inspection on each container.
 - a. At the time of the inspection, there was one 55 gallon drum of hazardous waste (acetone) that the facility representative stated had the wrong date in the chemical storage area.

On December 20, 2024, the facility representative emailed a picture of the correct date on the 55 gallon hazardous waste drum located in the chemical storage area (as shown in figure 2).

HAZARDOUS WASTE

STATE AND FEDERAL LAW PROHIBITS IMPROPER DISPOSAL
IF FOUND, CONTACT THE NEAREST POLICE, OR PUBLIC SAFETY
AUTHORITY, OR THE U.S. ENVIRONMENTAL PROTECTION AGENCY

GENERATOR NAME KINEMOTIVE CORP
ADDRESS 222 CENTRAL AVE 24 HR. PHONE 631249-2440
CITY FARMINGDALE STATE NY ZIP 11735
EPA ID NO. NYD002054377 MANIFEST DOCUMENT NO. 10165124
EPA WASTE NO. ACETONE - WASTE ACCUMULATION START DATE 10/15/24
CONTENTS, COMPOSITION ACETONE - WASTE
PROPER DOT SHIPPING NAME
TECHNICAL NAME (S)
UNNA NO. WITH PREFIX

HANDLE WITH CARE!
CONTAINS HAZARDOUS OR TOXIC WASTES

(Figure 2: Date corrected on 55 gallon hazardous waste drum located in the chemical storage area)

- b. At the time of the inspection, there was one 55 gallon drum of hazardous waste located in the etching room that was not dated.

On December 20, 2024, the facility representative emailed a picture of the date put on the 55 gallon hazardous waste drum located in the etching room (as shown in figure 3).



(Figure 3: Date put on 55 gallon hazardous waste drum located in the etching room)

5. Pursuant to 6 NYCRR § 372.2(a)(8)(i)(a): A generator may accumulate as much as 55 gallons of non-acute hazardous waste, or as much as either one quart of liquid acute

hazardous waste listed in section 371.4(b) or (d)(5) of this Title, one quart of containerized gas acute hazardous waste listed in section 371.4(b) or (d)(5) of this Title, or one kilogram (2.2 lbs) of solid acute hazardous waste listed in section 371.4(b) or (d)(5) of this Title, 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 372.2(a) Page 8 of Part 372 without complying with subparagraphs (ii) or (iii) of this paragraph provided the generator:

At the time of the inspection, in the etching room, there was one 50 gallon of satellite accumulation tank of hazardous waste under the sink. The tank was attached to a 55 gallon satellite accumulation container of hazardous waste. The facility representative stated the hazardous waste is transferred through a tube from one container to another. It is not permissible to move one satellite accumulation containers to another satellite accumulation container.

During the inspection, I explained to the facility you can not move one satellite accumulation containers to another satellite accumulation container. The facility representative understood and explained they will designate the tank under the sink as a satellite accumulation area and the 55 gallon satellite accumulation container of hazardous waste drum as a 90-day storage container. On December 20, 2024, the facility emailed pictures demonstrating compliance as shown in figures 1 & 3.

General Concerns

The hazardous waste label should only be on the drum when there is waste inside the drum. During the inspection, there was one empty 55 gallon drum labeled with a hazardous waste label and date.

Closing Conference

The closing conference was conducted by EPA inspector Areeba Khan and the facility representative Steve Ledo. Inspector Khan explained to the facility representative the areas of concerns. Mr. Ledo stated that he will follow up and tend to the areas of concern immediately.