

RCRA Compliance Branch INSPECTION REPORT

Inspection Date(s):	11/16/2023	Inspection Announced: No
Facility or Site Name:	Carestream	
Facility/Site Physical Location:	1049 W Ridge Road	
(city, state, zip code)	Rochester, NY 14615	
Mailing address (if different from above):		
(city, state, zip code)		
Facility/Site Contact:	Mick Snyder	EHS Manager
	Michael.snyder@carestream.com	
	(585) 500-1586	
RCRA ID Number:	NYR000145185	
Facility/Site Personnel Participating in Inspection:		
Mick Snyder	Above	Above
John Bartolotto	Facility Manager	
Inspector(s):		
William Chernes	Chernes, William  Digitally signed by Chernes, William Date: 2024.01.25 10:52:37 -05'00'	
Supervisor:		
Derval Thomas	DERVAL THOMAS  Digitally signed by Derval Thomas Date: 2024.01.24 16:38:11 -05'00'	

SECTION I – INTRODUCTION

Purpose of the Inspection Objective

The purpose of the inspection was to determine the facility's compliance with the Resource Conservation and Recovery Act. The inspection was conducted by EPA RCRA inspector William Chernes.

Opening Conference

EPA Region 2 RCRA inspector William Chernes arrived at the Carestream facility on November 16, 2023, for an unannounced inspection. I met with Mr. Mick Snyder and Mr. John Bartolotto at the opening conference of the inspection. I presented my credentials to Mr. Snyder and Mr. Bartolotto and informed them that this was an EPA inspection to determine the facility's compliance with RCRA. The scope of the inspection a compliance evaluation inspection (CEI).

Facility/Site Description

Carestream is an x-ray equipment assembly and research and development facility located in Rochester, New York. The facility generates hazardous waste during operation, the hazardous waste generated is typically from solvent containing wipes and spent epoxy injectors. The facility was determined to be a small quantity generator (SQG) at the time of the inspection.

SECTION II – OBSERVATIONS

NDT Assembly

The NDT assembly area contained one 5-gallon satellite accumulation container for spent epoxy injectors, the container was labeled but was not closed.

180-Day Storage Area

The 180-day storage area had the following hazardous waste and universal wastes present at the time of the inspection:

- One 55-gallon fiber drum of hazardous waste, the drum was closed, labeled, and dated.
- One 30-gallon fiber drum of spent epoxy injector hazardous waste, the drum was closed, labeled, and dated.
- One 55-gallon drum of universal waste – batteries, the drum was closed, labeled, and dated.
- Three 8-foot containers for universal waste – lamps, the boxes were closed, however two of the boxes were not labeled or dated. Additionally, one box was dated 08/31/2018, this is over the required one-year accumulation time for universal wastes.
- One 6-foot container of universal waste – lamps, the container was closed, but was not labeled or dated.

- Approximately 210 small spent lead-acid batteries were stored in this area at the time of the inspection. All the batteries were closed, contained, and stored on a pallet. The batteries were not labeled or dated.

IS and C Area

The IS and C area is the primary production area of the facility. Majority of the hazardous waste is stored in satellite accumulation containers throughout this area. Spent lead films are also stored in this area in a 275-gallon non-hazardous waste tote. The facility sent a follow-up email regarding this material on 01/03/2024 and determined that material will be going out for recycling and is non-hazardous waste. At the time of the inspection, the facility had a 30-gallon hazardous waste storage container that was being misused as a satellite accumulation container. The facility immediately remedied this concern and documented the change in an email dated 01/03/2024.

Record Review

After review of the facility's mandatory records required by RCRA, there were no discrepancies to report.

SECTION III – AREAS OF CONCERN

Regulatory Concerns

1. At the time of the inspection, one 5-gallon satellite accumulation container for spent epoxy injectors located in the NDT Assembly was not closed.
2. At the time of the inspection, the facility had a 30-gallon hazardous waste storage container that was being misused as a satellite accumulation container. The facility immediately remedied this concern and documented the change in an email dated 01/03/2024.
3. At the time of the inspection, two 8-foot containers for universal waste – lamps located in the 180-day storage area were not labeled or dated.
4. At the time of the inspection, one 8-foot container of universal waste – lamps located in the 180-day storage area was dated 08/31/2018, this is over the required one-year accumulation time for universal wastes.
5. At the time of the inspection, one 6-foot container of universal waste – lamps located in the 180-day storage area was not labeled or dated.
6. At the time of the inspection, approximately 210 small spent lead-acid batteries were stored in this area at the time of the inspection. All the batteries were closed, contained, and stored on a pallet. The batteries were not labeled or dated.

Closing Conference

Inspector Chernes went over the compliance evaluation inspection that had just been conducted at the facility and discussed the areas of concern identified at the time of the inspection. Mr. Snyder stated that the facility would immediately remedy the concerns. Mr. Snyder sent email

correspondence dated 01/03/2024, documenting all the repairs the facility had made to come into compliance. After review of the email correspondence, I no longer have any concerns.