EPA United States Environmental Protection Agency

RCRA Compliance Branch

INSPECTION REPORT

Inspection Date(s):	10/25/2023	**Inspection Announced:** No
Facility or Site Name:	Knowles Corporation Trading as Johnson Manufacturing Corp	
Facility/Site Physical Location:	301 Rockaway Valley Rd	
(city, state, zip code)	Boonton Township, New Jersey 07005	
Mailing address (if different from above):		
(city, state, zip code)		
Facility/Site Contact:	Jeff Hope	Wastewater/ Lab Operator
	Jeff.hope@knowles.com	
	973-339-3699	
RCRA ID Number:	NJD002193001	
Facility/Site Personnel Participating in Inspection:		
Jeff Hope	Above	Above
Robert Centinaro		Robert.centinaro@knowles.com
Rob Pisapia		Rob.pisapia@knowles.com
Inspector(s):		
William Chernes	WILLIAM CHERNES Digitally signed by WILLIAM CHERNES Date: 2024.01.03 12:57:03 -05'00'	
Supervisor:		
Derval Thomas	DERVAL THOMAS Digitally signed by DERVAL THOMAS Date: 2024.01.03 12:13:02 -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 and inspector-in-training Kiran Jain.

Opening Conference

EPA Region 2 RCRA inspector William Chernes and inspector-in-training Kiran Jain arrived at the Knowles Corporation facility on October 25, 2023, for an unannounced inspection. I met with Mr. Jeff Hope, Wastewater Lab Operator, at the opening conference of the inspection. EPA presented its credentials to Mr. Hope and informed him 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

Knowles Corporation is a manufacturing facility located in Boonton Township, New Jersey. The facility manufactures capacitors and maintains a machine shop plating operation. Their main source of hazardous waste from operation is mixed acids from spent acid baths. Hazardous waste is also occasionally generated in the machine shop from parts washer, solvent changeouts. The facility reclaims gold and silver through ion exchangers. Wastewater treatment operation is also conducted by the facility for all the drummed waste from the chromate process. After review of the manifest information, and statements made by the facility representatives, the facility was determined to be a Large Quantity Generator at the time of inspection.

The facility employs approximately 23 individuals and operates Monday through Friday from 6am to 2:30pm.

SECTION II – OBSERVATIONS

Plating Department

This area is used for various plating operations. The area employs two automated plating lines and six plating lines, each line gets pumped to a different resin process to extract metals for reuse. After the metal extraction for resin, all tanks feed the same wastewater treatment process. There is a separate section for the chromium bright dip. Waste from this process goes to a 200-gallon tote for disposal. Rinse water gets neutralized.

Wastewater Treatment Area

This room contains waste in a 200-gallon tote for bright dip waste; the container was close, labeled, and dated. This area also contains virgin material and hazardous waste storage. There were five 55-gallon hazardous waste drums located in this area at the time of the inspection. All drums were closed, labeled, and dated.

Waste Neutralization Area

This area contains non-hazardous waste stored in waste tanks. ACV Environmental picks up material from the tanks when they reach a set volume.

Garage Storage Area

This room is used as the central storage area for the facility. The area had met the necessary health and safety requirement for a fire extinguisher but lacked an emergency coordinator list and spill kit. The area contained the following waste at the time of the inspection:

- Eight 55-gallon drums of hazardous waste, all closed, labeled, and dated.
- One 35-gallon container of hazardous waste IPA, closed, labeled, and dated.
- One 55-gallon drum of used oil, closed and labeled.

Machine Shop

The machine shop contained two 5-gallon parts washers that were in use at the time of the inspection. This material is determined hazardous waste at the time of waste pick-up.

Glass Area

This area is used for cutting glass for various applications. The area was storing two 55-gallon containers of lead-contaminated hazardous waste at the time of the inspection. This area is a 90-day storage area and did not contain a spill kit or emergency coordinator list, nor was there documented regular inspection. Two 55-gallon satellite waste containers were in the area at the time of inspection, but not labeled; one full 55-gallon satellite was removed and brought to the central storage area at the time of inspection. Additionally, the area contained one 28-gallon satellite accumulation container used for collecting hazardous waste lead-contaminated cutting water; the container was not labeled nor closed.

Record Review

- Manifests and land disposal restriction forms

  After review of the manifests and land disposal restriction forms, there were no discrepancies to report.

- Personnel training

  The personnel training was documented and recorded, there were no discrepancies to report.

- Weekly container storage area inspections

  Documented weekly inspections were not being conducted for the 90-day storage area located in the glass area.

- Contingency plan

  The contingency plan was properly documented and maintained, no concerns.

- Arrangements with local authorities

  The facility had not made arrangements with the required authorities, which includes the local fire department, police department, and hospital.

SECTION III – AREAS OF CONCERN

Regulatory Concerns

1. At the time of the inspection, the facility had three satellite accumulation containers that were not labeled. In the glass area, two 55-gallon satellite waste containers and one 28-gallon satellite accumulation container used for collecting hazardous waste lead-contaminated cutting water were not labeled.
2. At the time of the inspection, the facility had one 28-gallon satellite accumulation container located in the glass room that was not closed.
3. At the time of the inspection, the facility did not have spill kits in their garage central storage area and glass 90-day storage area.
4. At the time of the inspection, the facility was not conducting weekly container storage area inspections in the glass 90-day storage area.
5. At the time of the inspection, the facility had not made arrangements with the required authorities, which includes the local fire department, police department, and hospital.

Closing Conference

Inspector Chernes went over the compliance evaluation inspection that had just been conducted at the facility and discussed the areas of concern that were observed at the time of the inspection. Mr. Hope immediately remedied several of the concerns at the time of the inspection. The rest of the observed concerns were resolved and documented via email correspondence, dated 11/3/2023.