

RCRA Compliance Branch INSPECTION REPORT

Inspection Date(s):	8/9/2023	Inspection Announced: No
Facility or Site Name:	Tiffany and Co.	
Facility/Site Physical Location:	15 Sylvan Way	
(City, state, zip code)	Parsippany-Troy Hills, NJ 07054	
Mailing address (if different from above):		
Facility/Site Contact:	Joe Lista	Foreman
	Joe.lista@tiffany.com	
	(973) 254 - 7421	
RCRA ID Number:	NJR000023408	
Inspector:		
Areeba Khan	AREEBA KHAN	 Digitally signed by AREEBA KHAN Date: 2023.10.12 16:25:43 -04'00'
Supervisor:		
Derval Thomas	DERVAL THOMAS	 Digitally signed by DERVAL THOMAS Date: 2023.10.12 11:21:28 -04'00'

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 Tiffany and Co on August 9, 2023, for an unannounced inspection. I was greeted by the receptionist in the front lobby. The receptionist called Joe Lista, foreman, to the lobby. I presented my credentials to Mr. Lista 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

Tiffany & Co is a global luxury jewelry and specialty design company based in New York City, New York. In 2021, LVMH Moët Hennessy Louis Vuitton acquired majority stake in Tiffany & Co. The company currently operates as an independent subsidiary. Tiffany & Co has three hundred retail stores globally. The location I went to is their distribution center located in Parsippany-Troy Hills, NJ. At this location, there are 300 employees, and their hours of operation are Monday through Friday 7:30 am to 8:30 pm. Tiffany & Co designs, manufacture and sells the following products: fine jewelry, sterling silver, watches, porcelain, crystal, stationery, fragrance, personal accessories, and leather goods. At this location the facility does not manufacture any products. The products come to this facility from Tiffany's manufacturing facilities (located off site) for quality analysis checks before being sent to its retail stores. The facility has two labs on site the quality analysis lab and the gem lab. At the facility's quality analysis lab, the lab tests to make sure all items received are up to standard. The facility generates ignitable (D001), corrosive (D002), lead (D008), and selenium (D010) hazardous wastes. The facility also generates universal waste such as: batteries, bulbs, and fluorescent lamps from general upkeep. The hazardous waste and universal waste are stored in their central storage area. The hazardous waste is picked up by Veolia every three months. After review of the manifest information and statements made by Mr. Vala, the facility was determined to be a Small Quantity Generator (SQG) of hazardous waste at the time of the inspection.

SECTION II – OBSERVATIONS

Central Storage Area

Mr. Lista stated that the facility has one central storage area that holds all their wastes (hazardous waste and universal waste). In the central storage area, there was a hazardous waste sign on the door. There was a fire extinguisher present, spill kit present, a list of phone numbers in case of an emergency and weekly inspections log is kept up to date. At the time of the inspection there was no hazardous waste inside the central storage area. The universal waste observed was the following:

- One 4 ft tall container that was empty.
- Two 4 ft tall container of fluorescent bulbs that was labeled, closed, and dated.
- One box containing ballast bulbs that was labeled, closed, and dated.

Quality Analysis Lab (SAA)

Mr. Lista stated that all hazardous wastes are generated by the quality analysis lab. The quality analysis lab generates hazardous waste from testing of the crystal, china and precious metals. The lab does not do lead testing. In the quality analysis lab, the following was observed:

- One 35-gallon drum of lead and magnesium oxide that was closed, labeled, and dated.
- One 55-gallon drum of hydrochloric acid and nitric acid that was labeled, dated but had a funnel with no gasket.
- Mr. Lista explained that there was a five-gallon container with product that is used in the lab. After the product is used the leftover residue is determined to be a hazardous waste (D002). The residue is then collected and disposed of by Veolia.

Reclamation Storage Area:

Mr. Lista stated that the products that are damaged during shipping are put in their reclamation storage area. The following was observed in the reclamation storage area:

- One 55-gallon non-hazardous waste drum of silver
- There were storage shelves that contained damaged goods from their shipping. Mr. Lista explained the facility determined the damaged goods to be a hazardous waste based on generator knowledge. Veolia comes and picks up the damaged goods as they are ignitable (D001).

Records Review

Mr. Lista stated that his supervisor Mr. Charles Ventre the assistant manager of building operations and services has all the records in his computer. At the time of the inspection, Mr. Ventre was not at the facility. Mr. Lista stated he will notify his supervisor about the inspection and about the records. On September 6, 2023, Mr. Ventre sent me an email regarding the following records:

- Basic Plan

After review of the emergency response plan, there were no discrepancies.

- Manifests and Land Disposal Restrictions

After review of the manifest and land disposal restriction documentation, there were no discrepancies.

- Personnel Training

After reviewing the statement from the facility representative there was sufficient personnel training determined.

- Arrangement with Local Authority

The facility representative stated that they are “in the process of revising our program which has not yet been completed and, therefore, not submitted to the local authorities.”

SECTION III – AREAS OF CONCERN

Regulatory Concerns

1. Pursuant to 40 C.F.R § 262.17(a)(1) (iv), as referenced by 262.34(a)(4) as incorporated by N.J.A.C 7:26G-6.1, A container holding hazardous waste must always be closed during accumulation, except when it is necessary to add or remove waste

At the time of the inspection, there were one 55-gallon drum containing D002 waste (hydrochloric acid and nitric acid) located in the quality control lab that had a funnel but there was no gasket, therefore it was not closed.

2. Pursuant to 40 C.F.R § 265.37(a)(1) and (4), as referenced by 40 C.F.R § 262.34(a)(4), as incorporated by N.J.A.C 7:26G-6.1, The owner or operator must attempt to make the following arrangements, as appropriate for the type of waste handled at his facility and the potential need for the services of these organizations: (1) Arrangements to familiarize police, fire departments, and emergency response teams with the layout of the facility, properties of hazardous waste handled at the facility and associated hazards, places where facility personnel would normally be working, entrances to roads inside the facility, and possible evacuation routes; ... (4) Arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the types of injuries or illnesses which could result from fires, explosions, or releases at the facility.

The facility could not present any documentation providing information or evidence of attempts to make arrangement with the local authorities. However, the facility stated it is in the process of making arrangement with local authorities.

General Concerns

There were no general concerns at the time of the inspection.

Closing Conference

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