

RCRA Compliance Branch INSPECTION REPORT

Inspection Date(s):	September 6, 2023	Inspection Announced: No	
Facility or Site Name:	Nitto Inc.		
Facility/Site Physical Location:	1990 Rutgers University Blvd.		
(city, state, zip code)	Lakewood, NJ 08701		
Mailing address (if different from above):			
(city, state, zip code)			
Facility/Site Contact:	Gayle Gollogly EH&S Manager	gayle.gollogly@nitto.com (848) 245-4042	
RCRA ID Number:	NJD986579969		
Facility/Site Personnel Participating in Inspection:			
Gayle Gollogly	EH&S Manager	gayle.gollogly@nitto.com (848) 245-4042	
Vihangi Bhavin Trivedi	Environmental Engineer	vihangi.trivedi@nitto.com (313) 502-6675	
{name}	{title}	{email/phone no.}	
Inspector(s):			
John D, Wilk (USEPA) (lead inspector name)	{Signature} JOHN WILK	Digitally signed by JOHN WILK Date: 2023.11.06 12:32:29 -05'00'	{date}
William Chernes (USEPA)			
Derval Thomas {Supervisor name}	{Signature} DERVAL THOMAS	Digitally signed by DERVAL THOMAS Date: 2023.11.06 13:52:51 -05'00'	{date}

SECTION I – INTRODUCTION

Purpose of the Inspection/Objective

The purpose of the inspection was to perform a RCRA comprehensive evaluation inspection (CEI) at this facility. This inspection was performed pursuant to the RCRA Air Emissions National Compliance Initiative (NCI) and was selected from an EPA headquarters developed target list.

Opening Conference

EPA Region 2 RCRA inspectors John Wilk and William Chernes arrived at the Nitto Inc., facility located at 1990 Rutgers University Blvd., Lakewood, NJ 08701 about 11:00 AM on September 6, 2023.

EPA inspectors met with the above referenced company representatives and conducted an opening conference for the inspection. Both William Chernes and I presented our credentials to the company representatives noted above and informed them this was an EPA inspection to determine the facility's compliance with RCRA. The scope of the inspection was a RCRA compliance evaluation inspection (CEI) which is a general comprehensive inspection to determine overall compliance with the requirements of RCRA including RCRA air emissions (40 CFR Part 265 Subparts AA, BB and CC.)

Facility/Site Description

The facility manufactures adhesive backed industrial strength tapes and insulation foam which are used in automobile manufacturing. The company is Japanese owned.

The facility is a large quantity generator (LQG) of hazardous waste (LQG's generate 1,000 kilograms per month or more of hazardous waste or more than one kilogram per month of acutely hazardous waste). It's most recent Subtitle C Site ID Handler Form (EPA Form 8700-12) was received by EPA on or about February 21, 2022, which acknowledged the facility's current status as a RCRA LQG and also conveyed the facility's biennial hazardous waste report.

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 and Training records (two years);
- (5) Contingency Plan;
- (6) Universal waste management;
- (7) Satellite collection areas;
- (8) 90- day hazardous waste container storage areas
- (9) Weekly 90-day container storage area log (2 years);
- (11) Whether facility is subject to 40 C.F.R. Part 265, Subpart BB regarding organic air emission monitoring.

SECTION II – OBSERVATIONS

The facility's main hazardous wastes is a mixture of spent organic solvents (including toluene, ethyl benzene, MEK, xylene) in both a liquid and solid form which is generated from the tape manufacturing process. According to the facility representatives, the facility's insulation foam process generates no hazardous waste

The facility has no hazardous waste tank storage and manages all its hazardous waste in containers. Consequently, the facility has no equipment (pumps, valves, etc) subject to the RCRA Subpart BB is therefore, accordingly, not subject to the 40 C.F.R. Part 265, Subpart BB air emissions requirements.

As of the date of this inspection, one main inside 90-day hazardous waste container storage area was identified at the facility. During this inspection the EPA inspectors conducted a physical walk through of the facility's main 90-day hazardous waste container storage area and observed fifteen (15) metal 55-gallon plastic drums (12 drums contained liquid hazardous waste (EPA Hazardous Waste Numbers: D001, D035, F002, F003, F005) and 3 contained solid material (EPA Hazardous Waste Numbers: D001, D035, F003, F005). All fifteen hazardous waste containers were properly sealed and properly marked "Hazardous Waste" and had their respective accumulation start dates (all within the 90-day accumulation time limit) marked on

them. The EPA inspectors noted no indications of releases (odors, staining, etc.) at or around the facility's 90-day accumulation area.

In addition, three (3) satellite containers (all 55-gallon metal drums) were observed near the 90-day storage area which contained spent solvent hazardous waste (one contained liquid hazardous waste and two contained solid hazardous). All three (3) satellite containers were marked with the words "Hazardous Waste" however one drum containing liquid hazardous waste had a funnel attached to it which had no rim gasket thus failing to meet the definition of a RCRA closed container pursuant to 40 C.F.R. § 265.173(a) (2015) as referenced by 40 CFR § 262.34(a)(1)(i) (2015). See photo below.



As of the date of this inspection, the most recent manifested hazardous waste shipment occurred from the facility on June 29, 2023, (Manifest # 017736075FLE) under which six (6) metal 55-gallon drums containing spent solvent liquid (EPA WASTE CODES D001, D035, F002, F003, F005), and four (4) metal 55-gallon drums containing spent solvent solid (EPA WASTE CODES D001, D035, F003, F005) were shipped to RCRA TSDF REPUBLIC ENVIRONMENTAL SYSTEMS (PA) LLC (EPA Id. #: PAD085690592) in Hatfield, Pennsylvania.

Overall, the facility representatives were cooperative, responsive and appeared forthright while the facility appeared to be generally well managed environmentally.

SECTION III – AREAS OF CONCERN

Regulatory Concerns-

The following regulatory areas of concern were noted:

- (1) One satellite drum containing liquid hazardous waste had a funnel attached to it which had no rim gasket thus failing to meet the definition of a RCRA closed container pursuant to 40 C.F.R. § 265.173(a) (2015) as referenced by 40 CFR § 262.34(a)(1)(i) (2015);

- (2) The facility's list of emergency coordinators in its Contingency Plan is outdated and needs to be revised to reflect current emergency coordinator(s) pursuant to 40 C.F.R. § 265.52(d) (2015) as referenced by 40 CFR § 262.34(a)(4) (2015);
- (3) The facility's Contingency Plan needs to be revised to include a list of all emergency equipment at the facility pursuant to 40 C.F.R. § 265.52(e) (2015) as referenced by 40 CFR § 262.34(a)(4) (2015).

General Concerns-

None.

Closing Conference

The EPA inspectors conducted a closing conference at the close of the September 6, 2023, RCRA inspection with the facility representative noted above. At the closing conference, the EPA inspectors discussed the above noted regulatory concerns with the facility representatives who then agreed to address/remediate those compliance concerns. The facility was also informed that it would be imminently receiving an inspection report from the USEPA documenting its inspection findings.