RCRA COMPLIANCE EVALUATION INSPECTION

Golden Artist Colors Inc.
188 Bell Road
New Berlin, New York

NY0000097253

September 18, 2024

Report Prepared by:

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Objective

A RCRA Compliance Evaluation Inspection (CEI) was conducted at Golden Artist Colors on September 18, 2024. The purpose of the inspection was to obtain information on the facility's hazardous waste management program. This information will be used to determine compliance with regulations pertaining to the Resource Conservation and Recovery Act (RCRA).

Survey Participants

Golden Artist Colors Inc.
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Facility Description

Golden Artist Colors is located at 188 Bell Road in New Berlin, New York. The facility is a manufacturer of custom paints for professional and aspiring artists. Its products are sold online and at retail locations throughout the world. The 100,000 square foot facility began operations at this location in 1980. There are 240 employees, and the plant operates two 10-hour shifts, 20 hours per day, 4 days per week (Monday through Thursday).

Most of the paint products that are manufactured are acrylic paints, which comprise 83 percent of final product line. Watercolor paints account for 5 percent of the final product line. Oil paints account for 12 percent of the final product line. Acrylic paints and watercolors are water-based paints.

Raw materials come into the facility and are stored in the Pigment Room. Acrylic paints are manufactured in 50-gallon batches. Water, surfactants, stabilizers, and pigments are combined in a dispersion cell. The resultant slurry is conveyed to a mill, where acrylic is added to the mixture. After dispersion and mixing, the final product is available for dispensing into 5-gallon containers. For tubes and small jars, the final product is dispensed using automated machinery in the filling area.

Oil-based paints are also manufactured as a batch. Linseed oil, pigments, calcium carbonate, beeswax, and other additives are combined in a mixing cell. After mixing, the final product is dispensed into containers of various sizes.

The final paint products are packaged for shipping and transported to the product distribution center in Norwich, New York.

Water and Wastewater

Process water and sanitary water for the facility is provided by three on-site groundwater wells. The sanitary water is disinfected with sodium hypochlorite. The process water is not chlorinated. Process wastewater is generated when manufacturing equipment and tanks are cleaned between batch operations. The process wastewater flows to the on-site wastewater treatment plant (WWTP), where acrylic and pigments are removed with flocculation and filtration using diatomaceous earth. The wastewater is conveyed to a reverse osmosis (RO) system, which recovers approximately 70 percent of the wastewater for reuse in the cleaning operations. The concentrated effluent is transported by tank truck to the Norwich WWTP for further treatment and is regulated by its industrial user permit. The sludge is dewatered using a plate and frame press. The filtrate from the press is conveyed to the RO system. The sludge is transported to the local landfill for disposal.

Solid and Hazardous Waste Management

One of the products is a mineral spirit acrylic (MSA) varnish that is flammable and contains xylene and toluene. Personal protective equipment (PPE) such as disposable gloves and wipes are generated during cleaning of equipment. The liquid MSA waste is placed in a 55-gallon satellite container. This container has a hazardous waste label and a flammable label. The PPE waste is placed in a small container and transferred to a large plastic carboy in the Hazardous Waste Storage Location. The carboy is labelled as hazardous waste containing MSA PPE with an accumulation start date. The liquid MSA waste is shipped as a waste flammable liquid (xylene, toluene) with hazardous waste codes D001, F003, and F005. The plastic carboy of MSA PPE is shipped as a waste flammable solid, organic (xylene, toluene), with hazardous waste codes D001, D035, F003, and F005.

The pigments used in the various paint products can be organic-based or metal-based. The paints containing pigments with cadmium, chromium, or lead are handled as hazardous materials. During cleaning operations, used disposable gloves are generated and placed in a small container. The used gloves are transferred to a large plastic carboy in the Hazardous Waste Storage Location. The carboy is labelled as hazardous waste containing cadmium/lead PPE with an accumulation start date. The plastic carboy is shipped as waste toxic solids, inorganics (cadmium, lead), with hazardous waste codes D006, D007, and D008.

There are two 20-gallon aqueous parts cleaners on-site that are used for cleaning equipment. The parts cleaner liquid is replaced approximately 3 times per year. The aqueous parts cleaner is shipped as a hazardous waste liquid with hazardous waste codes D006 and D008.

Most of the hazardous waste generated on site is shipped to Solvents and Petroleum Service in Syracuse, New York. The parts cleaner waste is shipped to Safety Kleen Systems in Dolton, Illinois.

Observations

A review of the hazardous waste manifests indicates that Golden Artist Colors is a small quantity generator of hazardous waste. In the last 12 months, the facility generated 6,282 pounds of hazardous waste, mostly PPE waste containing disposable gloves. The most recent shipment of hazardous waste was on September 10, 2024.

On the day of the inspection, there were two large plastic carboys of PPE waste being stored in the Hazardous Waste Storage Location. Both containers were labelled as hazardous waste containing contaminated PPE, with accumulation start dates marked on the containers.

Hazardous materials safety training is provided annually to employees that handle hazardous waste. Department of Transportation (DOT) hazardous materials training is provided for employees that ship hazardous waste.

The facility maintains weekly inspection logs of the Chemical Storage Area and the Satellite Accumulation Room.

The facility maintains a Contingency Plan for the site.

Findings

There were no violations or compliance issues found on the day of the inspection.

Attachments

Photographs (#1 - #4)

Photo #1: View of the satellite accumulation container for the liquid MSA waste.

Photo #2: View of one of the aqueous parts cleaners.

Photo #3: View of the container of MSA PPE waste in the Hazardous Waste Storage Area.

Photo #4: View of the container of lead PPE waste in the Hazardous Waste Storage Area.