



RCRA COMPLIANCE EVALUATION INSPECTION

Lindeblad Piano Restoration LLC
158 West Clinton Street
Dover, New Jersey

NJR986659209

June 7, 2023

Report Prepared by:

**ROBERT
MORRELL**

Digitally signed by ROBERT
MORRELL
Date: 2023.07.13 14:42:46 -04'00'

Robert Morrell, Geologist
Monitoring Operations Section

Date: _____

Report Approved by:

PHILIP COCUZZA

Digitally signed by PHILIP
COCUZZA
Date: 2023.07.13 15:00:01 -04'00'

Philip Cocuzza, Supervisor
Monitoring Operations Section

Date: _____

Objective

A RCRA Compliance Evaluation Inspection (CEI) was conducted at Lindeblad Piano Restoration LLC on June 7, 2023. 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

Lindeblad Piano Restoration LLC

Chad Tomlin, Director of Operations and Purchasing
chad@lindebladpiano.com, 888-5874266

U.S. Environmental Protection Agency

Robert Morrell, Geologist
morrell.robert@epa.gov, 732-906-6804

Facility Description

Lindeblad Piano Restoration is located at 158 West Clinton Street in Dover, New Jersey. The company started the piano restoration business in Brooklyn, New York, in 1920. The business moved to New Jersey in the 1950's and has been at the present location in Dover, New Jersey, for approximately 10 years. All piano restoration activities are conducted at a 25,000 square foot facility in Dover. There are 23 full time employees working eight hours per day, Monday through Friday.

The restoration process involves rebuilding, refinishing, and tuning the piano to its original specifications. Lindeblad Piano Restoration restores approximately 300 pianos per year. Depending on the complexity of the job, the restoration process can take from 3 weeks to 6 months. After the initial consultation, the piano is picked up and delivered to the restoration studio. After the inspection and evaluation, a proposal is developed, and the restoration process begins. All the parts can be restored or replaced, including the soundboard, pinblock, harp, strings, dampers, pedals, keys, and cabinet.

In the Finishing Department, the cabinet is restored by refinishing the original wood. A chemical stripper is used to remove the varnish. After sanding, a stain is applied by hand or paint is applied by spraying. A clear coat lacquer or polyurethane is then applied by spraying.

In the Action Room, the piano is reassembled with the finished parts. The piano is tuned and prepared for delivery to the customer. After delivery, the piano is fine-tuned, and a final inspection is performed.

Water and Wastewater

Water for the building is supplied by the City of Dover. There is no process water used in the piano restoration activities. Sanitary wastewater is discharged to the local POTW.

Solid and Hazardous Waste Management

Waste chemical stripper is generated during removal of the original varnish or paint in the Finishing Department. The waste stripper is placed in a 55-gallon drum in the Chemical Stripper Room.

There are two spray booths in the Finishing Department. One spray booth is used for colored paints and varnishes. The other spray booth is used for clear coat lacquers. Waste paint thinner is generated during cleaning of the spray guns in the spray booths. The waste paint thinner is placed in a 55-gallon drum in the Chemical Stripper Room.

Used rags are generated during refinishing operations. The used rags are placed in a 5-gallon metal container in the Chemical Stripper Room.

The paint filters in the spray booths are replaced weekly. The spent filters are placed in a solid waste container.

The facility generates approximately one 55-gallon drum of waste solvent per month and is a small quantity generator of hazardous waste. The drums are stored in the Chemical Stripper Room. A review of the hazardous waste manifests indicate that 3 or 4 drums of waste flammable liquids are shipped every quarter to Veolia Environmental in Flanders, New Jersey. The waste codes on the manifests are F003, F005, D001, and D035.

Findings

Lindeblad Piano Restoration is a small quantity generator of hazardous waste. On the day of the inspection, there were two 55-gallon drums of hazardous waste being stored in the Chemical Stripper Room. One drum was full with the cap on and no hazardous waste label. The other drum was half full with the cap off, a funnel on the opening, and no hazardous waste label. Containers holding hazardous waste must be kept closed during storage, except when adding or removing waste, as specified in 40 CFR Section 265.173(a). Containers must be marked clearly with the words "Hazardous Waste" and the accumulation start date, as specified in 40 CFR Section 262.34(a). The facility representative was informed of these requirements and both deficiencies were rectified within 48 hours (see attached photos provided by the facility representative).

The hazardous waste codes on the manifests are representative of the waste paint thinner generated at the spray booths. However, the waste chemical stripper, containing approximately 85 percent methylene chloride, is also placed in the hazardous waste drums. Spent solvent waste containing more than 10 percent methylene chloride should have a hazardous waste code of F002 on the manifests and the hazardous waste labels.

Safety training, including hazardous materials, is provided to the employees twice per year. Full face respirators with cartridges are worn by employees during finishing operations.

Attachments

Photographs (#1 - #4)
Hazardous Waste Manifest

Photo #1: View of the 5-gallon metal container where used rags are stored.



Photo #2: View of the two 55-gallon drums with no labels. One drum is open with a funnel.



Photo #3: Sent by the facility representative showing hazardous waste label on full drum.

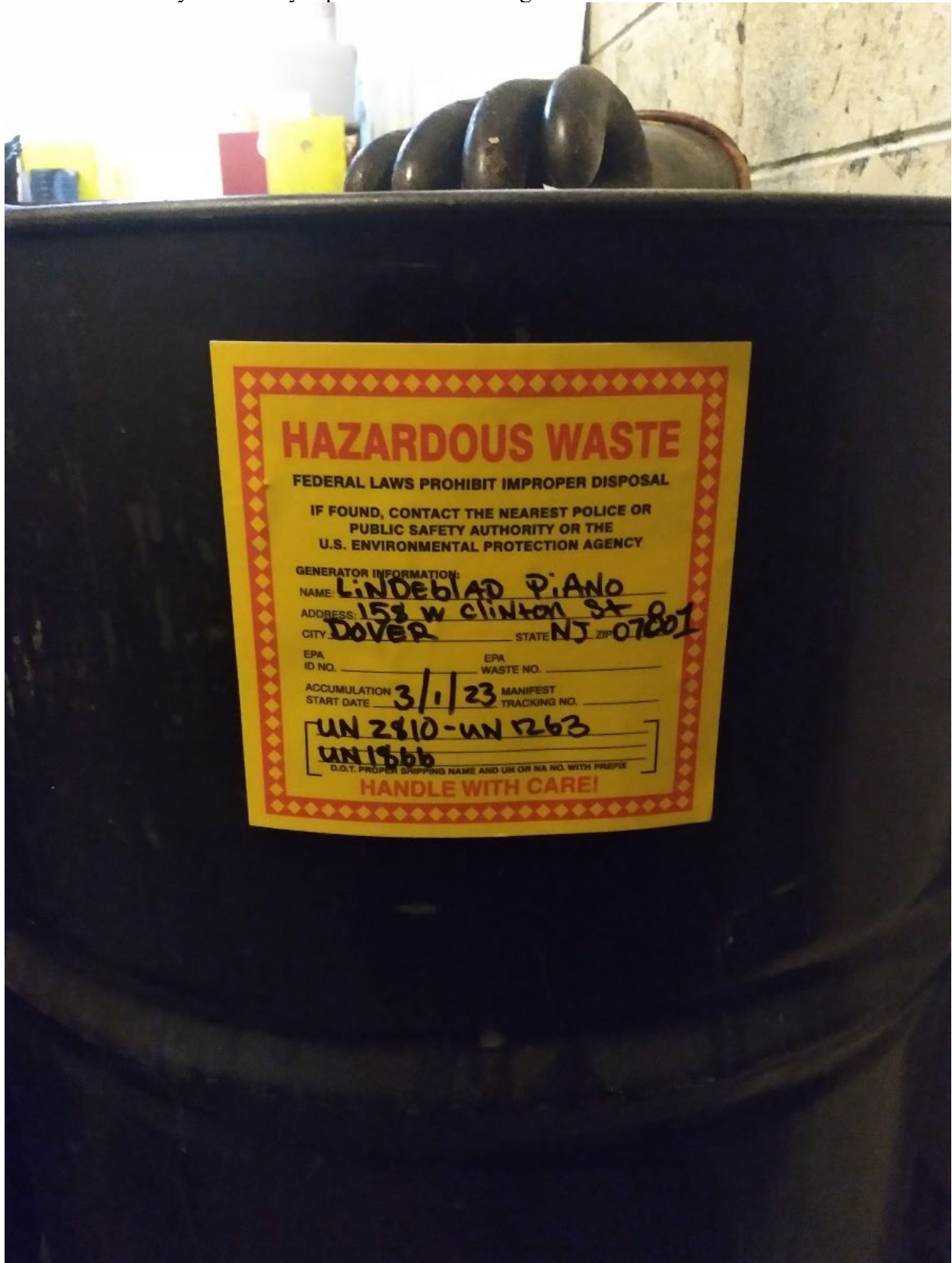


Photo #4: Sent by the facility representative showing closed funnel and hazardous waste label.





Please print or type.

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number N I E 9 8 6 6 5 9 2 0 9	2. Page 1 of 1	3. Emergency Response Phone (877) 812-0007	4. Manifest Tracking Number 002202751 VES			
5. Generator's Name and Mailing Address LINDEBLAD PIANO RESTORATION 158 W CLINTON ST UNIT M DOVER, NJ 07801-3491 Generator's Phone: 973-650-7122				Generator's Site Address (if different than mailing address) SAMB				
6. Transporter 1 Company Name VEOLIA ES TECHNICAL SOLUTIONS				U.S. EPA ID Number N I D 0 8 0 6 3 1 3 6 9				
7. Transporter 2 Company Name				U.S. EPA ID Number				
8. Designated Facility Name and Site Address VEOLIA ES TECHNICAL SOLUTIONS LLC. 1 EDEN LANE FLANDERS, NJ 07836 Facility's Phone: 973-347-7111				U.S. EPA ID Number N I D 9 8 0 5 3 6 5 9 3				
GENERATOR	9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers		11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes	
			No.	Type				
	X	UN1993, WASTE FLAMMABLE LIQUIDS, n.o.s., (TOLUENE, XYLENE), 3, H, RQ (D001)	3	D M	1200	P	F003	D001
							F005	D035
14. Special Handling Instructions and Additional Information HR Service Contracted by VESTS + Contract retained by generator confirm agency authority on initial transporter to add or substitute additional transporters on generator's behalf. + 1) W:303989 A:MARFS								
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.								
Generator's/Offoror's Printed/Typed Name X DAVE DONAVUCCIO				Signature 		Month Day Year 0 3 2 0 2 3		
INT'L	16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: _____ Date leaving U.S.: _____							
	17. Transporter Acknowledgment of Receipt of Materials							
TRANSPORTER	Transporter 1 Printed/Typed Name MICHAEL SMITH				Signature 		Month Day Year 0 3 2 0 2 3	
	Transporter 2 Printed/Typed Name				Signature		Month Day Year	
DESIGNATED FACILITY	18. Discrepancy							
	18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection							
	18b. Alternate Facility (or Generator) Manifest Reference Number: _____ U.S. EPA ID Number _____							
	18c. Signature of Alternate Facility (or Generator) _____ Month Day Year _____							
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)								
1. H141		2.		3.		4.		
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a								
Printed/Typed Name DEANNA TARNICE				Signature 		Month Day Year 0 3 2 9 2 3		