

RCRA Compliance Branch INSPECTION REPORT

Inspection Date(s):	February 22, 2024	Inspection Announced: No
Facility or Site Name:	Coining Manufacturing L.L.C.	
Facility/Site Physical Location:	35 Monhegan Street	
(city, state, zip code)	Clifton, New Jersey 07013	
Mailing address (if different from above):		
(city, state, zip code)		
Facility/Site Contact:	Christian Bolcar Director of Advanced Manufacturing & CI	(201) 953-2716 christianb@coining.com
RCRA ID Number:	NJD001324474	
Facility/Site Personnel Participating in Inspection:		
Christian Bolcar	Director of Advanced Manufacturing & CI	(201) 953-2716 christianb@coining.com
{name}	{title}	{email/phone no.}
Inspector(s):		
John D, Wilk (USEPA) (lead inspector name)	JOHN WILK Digitally signed by JOHN WILK Date: 2024.04.23 08:25:20 -04'00'	{date}
Derval Thomas {Supervisor name}	DERVAL THOMAS Digitally signed by DERVAL THOMAS Date: 2024.04.22 15:00:57 -04'00'	{date}

SECTION I – INTRODUCTION

Purpose of the Inspection/Objective

The purpose of the inspection was to perform a compliance evaluation inspection (CEI) under the Resource Conservation and Recovery Act. The RCRA contains federal regulations pertaining to the management and disposal of hazardous waste.

Opening Conference

EPA Region 2 RCRA inspector John Wilk arrived at the Coining Manufacturing L.L.C. facility located at 35 Monhegan Street, Clifton, New Jersey 07013 at or about 10:30 A.M. on February 22, 2024.

The EPA inspector met with the above referenced company representative and immediately conducted an opening conference for the inspection. The EPA inspector presented his credentials to the company representative at the onset of the inspection and informed him this was an EPA inspection to determine the facility's compliance with Subtitle C of RCRA.

Facility/Site Description

The facility machines/stamps metal (mainly copper, nickle and stainless steel) parts for the aerospace, defense, and telecommunications industries. The facility's main declared hazardous waste is spent mineral spirits which is generated from the cleaning of the metal parts it manufactures and which is classified by the facility as EPA Hazardous Waste Codes: D001 (ignitable).

To facilitate further cleaning the facility washes manufactured parts in a water system which effluent is passed through an absorbent material called R10 after which the effluent is discharged to the sanitary sewer which feeds into the Passaic Valley Sewerage Authority (PVSA). The facility disposes spent R10 absorbent into its regular trash but provided no documentation regarding whether the material is a RCRA hazardous waste. However, the facility did indicate that this disposal practice has been an ongoing one passed down from past employees and was assumed to be legitimate.

At the time of the inspection, the facility identified itself as a RCRA small quantity generator (SQG) of hazardous waste (SQG's generate more than 100 kilograms and less than 1000 kilograms of non-acute hazardous waste per calendar month) which is reflected in the facility's most recent Notification of RCRA Subtitle C Activities (8700-12) to the USEPA which was filed by the facility on or about August 14, 2014.

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 training records (two years);
- (5) Contingency Plan (only for LQGs/TSDFs);
- (6) Universal waste management;
- (7) Satellite collection areas;
- (8) Observations of conditions of hazardous waste container storage area(s);
- (9) Weekly 90-day container storage area log (2 years) (for LQGs/TSDFs only);
- (10) Daily hazardous waste tank inspection log (2 years), only if applicable;

SECTION II – OBSERVATIONS

According to the facility representative, all hazardous waste accumulation occurs in containers. The facility utilizes no hazardous waste tanks and is not subject to any of the RCRA air emissions standards, i.e., 40 C.F.R. Subparts AA/BB/CC.

As of the date of this inspection, the facility was maintaining one inside 180-day hazardous waste container storage area which had the following hazardous waste containers in inventory: (3) three metal 55-gallon drums (2 full; one approximately 33% full) all reportedly containing spent mineral spirits (EPA Hazardous Waste Code D001. Only one of these three containers was marked with the words “Hazardous Waste”, and none were marked with their respective accumulation start dates. Two of these containers were properly sealed but one of these containers (the partially full container) had no cap while it was not in the process of being filled or emptied.

No indications (staining, etc.) of releases of hazardous waste were observed by the USEPA inspectors at or near the facility’s 180-day hazardous waste accumulation area.

The most recent hazardous waste shipment from this facility, prior to this inspection, occurred on January 31, 2023, under Hazardous Waste Manifest # 023453410 JJK which contained: six (6) metal 55-gallon containers of hazardous waste liquid categorized as EPA Hazardous Waste Code: D001 with a total weight of 2700 pounds. The January 31, 2023, manifested shipment was sent to RCRA permitted TSD Cycle Chem Inc., (EPA Id. #: NJD002200046) located in Elizabeth, New Jersey.

Overall, the facility representative was cooperative and appeared forthright.

SECTION III – AREAS OF CONCERN

Regulatory Concerns-

The EPA inspector noted the following regulatory concerns:

- (1) The EPA inspector observed three drums of hazardous waste in its 180-day storage area which were not marked with their respective accumulation start dates, as required by 40 C.F.R. 262.34(d)(4) (2015);
- (2) The EPA inspector observed three drums of hazardous waste in its 180-day storage area two of which were not marked with the words “Hazardous Waste”, as required by 40 C.F.R. 262.34(d)(4) (2015);
- (3) The EPA inspector observed three drums of hazardous waste in its 180-day storage area one of which was not closed, as required by 40 C.F.R. 265.173(a) (2015) as referenced at 40 C.F.R. 262.34(d)(2) (2015);
- (4) The facility did not provide the EPA inspector a hazardous waste determination for its spent R10 absorbent material as required under 40 C.F.R. 262.11 (2015).

General Concerns

No proof was provided to the EPA inspector regarding whether the Passaic Valley Sewerage Authority was notified and has acknowledged acceptance of the industrial wastewater discharge from your facility. The purpose of this notification/acknowledgement is to assure compliance with the sewer use ordinance established by the PVSA and is considered an Indirect User Permit pursuant to the New Jersey Pollution Discharge Elimination System (NJPDES) when complied with. The NJPDES is authorized by the EPA to conduct a wastewater program under the federal Clean Water Act.

Closing Conference

The EPA inspector conducted a closing conference at the close of the February 22, 2024, RCRA inspection. At the closing conference, the EPA inspector conveyed to the facility representative that several compliance concerns were identified and that these concerns would be transmitted to the facility in the form of an inspection report which EPA would issue within 70 days. During the closing conference, the facility representative agreed the facility would carefully consider and address all concerns raised by EPA in its forthcoming report.