



RCRA COMPLIANCE EVALUATION INSPECTION

American Bilrite Inc.
105 Whittendale Drive
Moorestown, New Jersey

NJR000012849

March 13, 2025

Report Prepared by:

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MORRELL**

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Robert Morrell, Geologist
Monitoring Operations Section

Date: _____

Report Approved by:

Philip Cocuzza, Supervisor
Monitoring Operations Section

Date: _____

American Biltrite Inc.
NJR000012849

Inspection Date: March 13, 2025

Objective

A RCRA Compliance Evaluation Inspection (CEI) was conducted at American Biltrite Incorporated on March 13, 2025. 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

American Biltrite Inc.

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Facility Description

American Biltrite Incorporated is located at 105 Whittendale Drive in Moorestown, New Jersey. The Moorestown location is the world headquarters for the ABI Tape Division. The facility is a manufacturer of pressure sensitive tapes and protective films for a variety of industries, including automotive, appliances, shoe and leather goods, HVAC, and insulation. The 175,000 square foot facility began operations at this location in 1989. There are 125 employees, and the plant operates three 8-hour shifts, 24 hours per day, 5 days per week (Monday through Friday). During busy periods, the plant also operates on weekends.

There are six automated production lines used in the manufacturing process. Water-based adhesives are used on Lines 1, 2, 3, and 4. Solvent-based adhesives are used on Lines 7 and 8. The raw materials for the water-based adhesives are added to a tank and mixed on site. The solvent-based adhesives are manufactured off-site and delivered to the receiving warehouse premixed and ready for use. The roll stock for the production lines consists of paper or polyethylene film. During the manufacturing process, a release coat and an adhesive coat are applied to the substrate (paper or polyethylene film). The final products consist of pressure sensitive tapes and protective films that are cut to specifications and prepared for shipping.

Water and Wastewater

Water for the facility is provided by the Township of Moorestown. The water is used for the tank during mixing of ingredients for the water-based adhesives. Non-hazardous wastewater is generated during cleaning of the tank and is placed in a 225-gallon tote. Sanitary wastewater is discharged to the local POTW.

Solid and Hazardous Waste Management

Hazardous waste is generated at Lines 7 and 8 during a cleanup or upset in the manufacturing process. Waste flammable solids, consisting of gloves and rags contaminated with solvent adhesives, are placed in a 5-gallon satellite container. The satellite container has a hazardous waste label and a flammable solids label. When the satellite container is full, the contents are transferred to a 55-gallon drum in the Flammable Storage Room. Waste flammable liquids, consisting of contaminated solvent adhesives, are placed in a 55-gallon drum and transferred to the Flammable Storage Room. The accumulation start dates are added to the hazardous waste labels on the containers.

The hazardous waste generated on site is shipped as waste flammable solids or waste flammable liquids containing toluene (D001, F005). Every one to two months, the containers of hazardous waste are shipped to Fielding Environmental in Freedom, Pennsylvania. Compliance Management International of Landsdale, Pennsylvania, provides technical assistance with management and shipment of hazardous waste.

Observations

A review of the hazardous waste manifests indicates that American Biltrite is a large quantity generator (LQG) of hazardous waste. In the last 12 months, the facility generated 28,350 pounds of hazardous waste, with the RCRA hazardous waste codes D001 and F005. The most recent shipment of hazardous waste was on February 26, 2025.

On the day of the inspection, there were four containers of hazardous waste being stored in the Flammable Storage Room: one 55-gallon drum of waste flammable liquids, two 55-gallon drums of waste flammable solids, and one 1650-kilogram carboy of waste flammable liquids. All the containers were labelled as hazardous waste with accumulation start dates and flammable labels.

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 sign hazardous waste manifests.

The facility maintains weekly inspection logs of the Flammable Storage Room.

The facility maintains a Contingency Plan for the site.

Findings

On the day of the inspection, the 55-gallon drum of waste flammable liquids in the Flammable Storage Room was being stored with the screw cap removed. A container holding hazardous waste must always be closed during storage, except when it is necessary to add or remove waste, as specified in 40 CFR Section 265.173(a). The facility personnel were informed of this requirement and the container was immediately closed by affixing the screw cap.

Attachments

Photographs (#1 - #4)

Photo #1: View of the container of hazardous waste with the screw cap missing.



Photo #2: View of the container of hazardous waste after the screw cap was affixed.



Photo #3: A 55-gallon drum of waste flammable solids in the Flammable Storage Room.



Photo #4: View of a 5-gallon satellite container.

