EPA United States Environmental Protection Agency

RCRA Compliance Branch

INSPECTION REPORT

Inspection Date(s):	03/02/2023	**Inspection Announced:** No
Facility or Site Name:	Thorlabs	
Facility/Site Physical Location:	280 Spring Street	
(city, state, zip code)	Newton, NJ 07860	
Mailing address (if different from above):		
(city, state, zip code)		
Facility/Site Contact:	Maritsa Barosi	Environmental, Health, and Safety Manager
	MBarosi@thorlabs.com	
	(908) 645-2986	
RCRA ID Number:	NJR000080788	
Facility/Site Personnel Participating in Inspection:		
Maritsa Barosi	Above	Above
Scott Shadas	N/A	N/A
Inspector(s):		
William Chernes		
Supervisor:		
Derval Thomas	DERVAL THOMAS Digitally signed by DERVAL THOMAS Date: 2023.03.30 16:54:37 -04'00'	

SECTION I – INTRODUCTION

Purpose of the Inspection Objective

The purpose of the inspection was to determine the facility's compliance with the Resource Conservation and Recovery Act. The inspection was conducted by EPA RCRA inspector William Chernes.

Opening Conference

EPA Region 2 RCRA inspector William Chernes arrived at the Thorlabs Finishing facility on March 02, 2023, for an unannounced inspection. I met with Mr. Scott Shadas, Building Manager and Ms. Maritsa Barosi, Environmental, Health and Safety Manager, at the opening conference of the inspection. I presented my credentials to Ms. Barosi and Mr. Shadas and informed them that this was an EPA inspection to determine the facility's compliance with RCRA. The scope of the inspection was a compliance evaluation inspection (CEI).

Facility/Site Description

The Thorlabs finishing facility is used to tumble and anodize aluminum products. The facility utilizes a fully automated anodization line that employs several tanks in series. Hazardous waste is primarily generated from the anodization tank clean-outs and the waste is stored in 275-gallon totes for approximately 2-3 weeks. A wastewater treatment process is also employed at the facility, the wastewater is treated using elementary neutralization and is tested before discharge. The facility was determined to be a large quantity generator at the time of the inspection.

SECTION II – OBSERVATIONS

Tumbling Area

The tumbling area is used to dull the sheen off parts; this process is done with a centrifuge. There was no hazardous waste present in this area at the time of the inspection.

New Chemical Storage Area

The new chemical storage area stores all wastes, hazardous and non-hazardous, within secondary containment. There was one 55-gallon drum of laboratory hazardous waste that was not labeled or dated in this area at the time of the inspection. In the facility's 03/14/2023 follow-up response to the inspection, this drum was properly labeled and dated and was removed off-site.

Anodization Area

The anodization area contains all the production tanks as well as the wastewater treatment area. The area does not regularly generate hazardous waste, hazardous waste is generated on a scheduled basis depending on when the production tanks need to be cleaned out. The clean-outs are collected in 275-gallon totes and are stored for approximately 2-3 weeks before waste pick-

up. There was no hazardous waste present in this area at the time of the inspection; no hazardous waste tote storage.

Record Review

- Manifests and Land Disposal Restrictions

There were no discrepancies to report.

- Training Records

All required training and records were available for review and sent from the facility follow-up email on 03/14/2023, there were no concerns.

- Contingency Plan

The contingency and quick reference guide were available for review, there were no discrepancies to report.

- Weekly Container Storage Area Inspections

There were no discrepancies to report.

- Arrangements with the Local Authorities

The facility did not have any arrangement made with local authorities. In the facility's follow-up response on 03/14/2023, the arrangements were sent out via certified mail on 03/06/2023.

SECTION III – AREAS OF CONCERN

Regulatory Concerns

1. Pursuant to 40 C.F.R. § 262.256, as incorporated by N.J.A.C 7:26G-6.1, The large quantity generator must attempt to make arrangements with the local police department, fire department, other emergency response teams, emergency response contractors, equipment suppliers, and local hospitals, taking into account the types and quantities of hazardous wastes handled at the facility. Arrangements may be made with the Local Emergency Planning Committee, if it is determined to be the appropriate organization with which to make arrangements.

The facility did not have any arrangement made with local authorities. In the facility's follow-up response on 03/14/2023, the arrangements were sent out via certified mail on 03/06/2023.

2. Pursuant to 40 C.F.R § 262.34(a)(2), as incorporated by N.J.A.C 7:26G-6.1, the generator must mark or label its containers with the following: … the date upon which each period of accumulation begins is clearly marked and visible for inspection on each container.

At the time of the inception, in the new chemical storage area there was one 55-gallon drum of laboratory hazardous waste that was not dated.

3. Pursuant to 40 C.F.R § 262.17(5)(i)(A), as incorporated by N.J.A.C 7:26G-6.1, ***Containers.*** A large quantity generator must mark or label its containers with the following: (A) The words "Hazardous Waste"

At the time of the inspection, in the new chemical storage area there was one 55-gallon drum of laboratory hazardous waste that was not labeled hazardous waste.

Closing Conference

Inspector Chernes went over the compliance evaluation inspection that had just been conducted at the facility and discussed the areas of concern that were observed as well as the required follow-up information that had been requested. Ms. Barosi immediately remedied the concerns and documented the repairs in the 03/14/2023 follow-up email correspondence.