

RCRA Compliance Branch INSPECTION REPORT

Inspection Date(s):	September 5, 2023	Inspection Announced: No
Facility or Site Name:	Precision Escalator Products (former Precision Elevator)	
Facility/Site Physical Location:	147 N. Michigan Avenue	
(city, state, zip code)	Kenilworth, New Jersey 07033	
Mailing address (if different from above):		
(city, state, zip code)		
Facility/Site Contact:	David Singh Vice President	(908) 259-9009 dave@precisionescalator.com
RCRA ID Number:	NJR0000028720	
Facility/Site Personnel Participating in Inspection:		
David Singh	Vice President	(908) 259-9009 dave@precisionescalator.com
{name}	{title}	{email/phone no.}
Inspector(s):		
John D, Wilk (USEPA) (lead inspector name)	<i>{Signature}</i>  JOHN WILK Digitally signed by JOHN WILK Date: 2023.11.06 15:16:18 -05'00'	{date}
Derval Thomas {Supervisor name}	<i>{Signature}</i>  DERVAL THOMAS Digitally signed by DERVAL THOMAS Date: 2023.11.06 15:32:03 -05'00'	{date}

SECTION I – INTRODUCTION

Purpose of the Inspection/Objective

The purpose of the inspection was to perform a comprehensive 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 Precision Escalator Products, Inc. (called Precision Elevator in EPA's RCRAInfo database), facility located at 147 N. Michigan Avenue, Kenilworth, New Jersey 07033 at or about 12:00 P.M. on September 5, 2023.

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 the RCRA.

Facility/Site Description

The facility manufactures and sells escalator parts. The facility's main hazardous wastes are (1) spent 2, 4 dinitrotoluene (used as a parts degreaser) which is classified by the facility as EPA Hazardous Waste Codes: D001 (ignitable)/D030; and (2) spent cleaning solution (containing phosphoric acid used as a polishing agent) which is classified by the facility as EPA Hazardous Waste Codes: D008/D018.

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 April 16, 1999 but under the different facility name of *Precision Elevator*.

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: (1) two (2) metal 55-gallon drums (one containing rags and the other containing liquid waste) containing spent solvent (2, 4 dinitrotoluene); EPA Hazardous Waste Codes D001/D030). Both hazardous waste containers were effectively closed, marked with (1) the words "Hazardous Waste" however neither container had grounding wires attached; and (2) two 55-gallon plastic drums containing spent phosphoric acid (EPA Hazardous Waste Code: D008/D018). While both drums had labels marked "Hazardous Waste" neither container were marked with their respective accumulation start dates.

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 August 21, 2023, under Hazardous Waste Manifest # 016095793FLE which contained: nine (9) metal 55-gallon containers of hazardous waste liquid categorized as EPA Hazardous Waste Code: D001/D030; two (2) plastic 55-gallon containers of hazardous waste (rags) categorized as EPA Hazardous Waste Code: D001/D030; two (2) metal 55-gallon containers of hazardous waste (toluene/acetone) categorized as EPA Hazardous Waste Codes: D001, F003, F005; all weighing a total

of 7200 pounds. The August 21, 2023, manifested shipment was sent to RCRA permitted TSDf REPUBLIC ENV SYS INC. (EPA Id. #: PAD085690592) located in Hatfield, Pennsylvania.

The manifested hazardous waste shipment made from the facility immediately prior to the August 21, 2023, shipment occurred on June 19, 2023, under which 3150 pounds of hazardous waste was shipped off-site again to RCRA permitted TSDf REPUBLIC ENV SYS INC. (EPA Id. #: PAD085690592) located in Hatfield, Pennsylvania.

Overall, the facility representative was cooperative and appeared forthright while the facility appeared to be well managed environmentally.

SECTION III – AREAS OF CONCERN

Regulatory Concerns-

The EPA inspector noted as a result of this inspection the following regulatory concerns: (1) The facility has undergone a name change since its last EPA 8700-12 Notification on April 16, 1999, from Precision Elevator to Precision Escalator Products. The facility should provide an update for this name change to the USEPA by submitting a revised Notification of RCRA Subtitle C Activities (8700-12) reflecting these changes pursuant to 40 C.F.R. 262.12 (2015); (2) The EPA inspector observed two 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); and (3) Assuming all hazardous waste was shipped off the facility's site at or about June 19, 2023, it generated approximately 7200 pounds of hazardous waste from June 19, 2023, to August 21, 2023. This equates to a monthly amount of 2400 pounds or 1090 kilograms. Since this amount would categorize the facility as a large quantity generator (LQG) of hazardous waste (LQG's generate 1000 kilograms or more non-acute hazardous waste per month) and subject it to more regulatory requirements, it is recommended that the facility reevaluate its hazardous waste generator category status.

General Concerns-

The facility did not provide electrical grounding on two metal hazardous waste containers holding ignitable hazardous waste in its 180-day storage area. Grounding active in-use ignitable metal drums is standard industrial practice which helps prevent flash explosions and fires.

Closing Conference

The EPA inspector conducted a closing conference at the close of the September 5, 2023, RCRA inspection. At the closing conference, the EPA inspector conveyed to the facility representative

that several compliance concerns were identified during the inspection 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.