RCRA COMPLIANCE EVALUATION INSPECTION

Kerry Bio-Science
158 State Highway 320
Norwich, New York

NYD986895852

September 17, 2024

Report Prepared by:

ROBERT MORRELL
Digitally signed by ROBERT MORRELL
Date: 2024.11.14 10:16:36 -05'00'

Robert Morrell, Geologist
Monitoring Operations Section

Date: _____

Report Approved by:

PHILIP COCUZZA
Digitally signed by PHILIP COCUZZA
Date: 2024.11.14 17:47:29 -05'00'

Philip Cocuzza, Supervisor
Monitoring Operations Section

Date: _____

Objective

A RCRA Compliance Evaluation Inspection (CEI) was conducted at Kerry Bio-Science on September 17, 2024. 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

Kerry Bio-Science
Jamie Anderson, Environmental Health and Safety Specialist
Jamie.anderson@kerry.com, 315-802-5938
Frank Crawford, Manufacturing Director
Frank.crawford@kerry.com, 607-244-9868

U.S. Environmental Protection Agency
Robert Morrell, Geologist
morrell.robert@epa.gov, 732-906-6804

Facility Description

Kerry Bio-Science is located at 158 State Highway 320 in Norwich, New York. The facility is a manufacturer of ingredients for the food and pharmaceutical industries. The 100-year-old facility was acquired by Kerry in 2004. There are 100 employees, and the Proteins Department operates two 12-hour shifts, 24 hours per day, 7 days per week. Most of the other departments operate 8 hours per day, 5 days per week.

In the Proteins Department, hydrolyzed protein powders are manufactured in batches. Incoming meat passes through a meat grinder. The resultant slurry is conveyed to a process tank, where ingredients are added. One of the ingredients is toluene, which acts as a bacteriostat. The mixture is conveyed to product tanks, where the hydrolyzed proteins are formed during digestion. The batch product is then dewatered with filter presses. The dewatered product passes through a dryer to remove any remaining moisture. The final product is a hydrolyzed protein powder that is packaged for shipping.

In the Coatings Department, coatings for pharmaceutical tablets are manufactured in batches. Using three different blenders, ingredients are added and mixed to produce the final product coatings. The final product is then packaged for shipping.

Water and Wastewater

Process water for the facility is provided by three on-site groundwater wells. The well water is treated with water softeners and a reverse osmosis system. Process wastewater is generated during cleaning in place (CIP) operations for process tanks. The process wastewater and sanitary wastewater flow to the on-site wastewater treatment plant (WWTP), which is an activated sludge plant with a capacity of 250,000 gallons per day (gpd). The treated effluent is discharged through a NPDES-permitted outfall (Outfall 01A) to the Chenango River.

Solid and Hazardous Waste Management

In the Proteins Department, the filtrate liquid is conveyed to a toluene recovery system. The recovered toluene is placed in 55-gallon drums and transferred to the Chemical Storage Area, where large containers of hazardous waste are stored. The containers of waste toluene are labeled as hazardous waste with the respective accumulation start dates. Every 90 days, the containers are shipped as RCRA F005 hazardous waste to Safety Kleen Systems in Smithfield, Kentucky.

Small containers of hazardous waste, ranging in size from 1 quart to 5 gallons, are generated at satellite accumulation areas in the Proteins Department Laboratory and the Quality Analytical Laboratory. Laboratory hazardous waste consists of formaldehyde, organic peroxides, flammable liquids, and acids. The satellite containers are labelled as hazardous waste. When a container becomes full, it is transferred to the Satellite Accumulation Room and the accumulation start date is placed on the hazardous waste label. The satellite containers in the Satellite Accumulation Room are placed in separate bins according to their hazard class, such as oxidizers, corrosives, or flammables. Every 90 days, the containers are shipped as RCRA hazardous waste (mostly D001 and D002) to Clean Harbors in Reidsville, North Carolina.

Observations

A review of the hazardous waste manifests indicates that Kerry Bio-Science is a large quantity generator of hazardous waste. In the last 12 months, the facility generated 35,100 pounds of waste toluene (F005) from the toluene recovery system and 1,379 pounds of laboratory waste (mostly D001 and D002) from the laboratories. The most recent shipment of hazardous waste was on July 16, 2024.

On the day of the inspection, there were twenty 55-gallon metal drums of waste toluene, two 55-gallon drums of waste acids, and seven 5-gallon containers of waste organic peroxides being stored in the Chemical Storage Area. All containers were labelled as hazardous waste with EPA waste codes and accumulation start dates.

In the Satellite Accumulation Room, there were four 1-gallon containers of formaldehyde waste being stored in secondary containment bins. Three of the four containers had hazardous waste labels with accumulation start dates. One of the containers had a hazardous waste label with no accumulation start date. Flammable hazard labels were attached to the bins.

Hazardous materials safety training is provided annually to employees that handle hazardous waste. Department of Transportation (DOT) and International Air Transport Association (IATA) shipping certification is provided for employees that ship, receive, or order hazardous materials.

The facility maintains weekly inspection logs of the Chemical Storage Area and the Satellite Accumulation Room.

The facility maintains a Spill Prevention Control and Countermeasures (SPCC) Plan and Contingency Plan for the site.

Findings

One of the 1-gallon containers of formaldehyde waste in the Satellite Accumulation Room did not have an accumulation start date on the hazardous waste label, as required in 40 CFR Section 262.34(a)(2). The facility representative was informed of this requirement and the accumulation start date (9/17/24) was immediately placed on the label. The facility representative explained that the container had recently been transferred to the Satellite Accumulation Room on the morning of the inspection. There were no other violations or compliance issues found on the day of the inspection.

Attachments

Photographs (#1 - #5)

Photo #1: View of a satellite accumulation area in the Quality Analytical Lab.

Photo #2: View of the Chemical Storage Area.

Photo #3: View of three containers of formaldehyde waste in the Satellite Accumulation Room.

Photo #4: View of the container of formaldehyde waste with no accumulation start date.

Photo #5: View of the container of formaldehyde waste marked with the accumulation start date.