Hazardous Waste Generator Inspection Report

SITE INFORMATION	
Facility Name:	Johnson & Johnston Assoc
EPA Identification Number:	NHD980909451
Street:	130 Route 111
City:	Hampstead County: Hillsborough
Zip code:	03841
Generator status:	☒Active ☐Inactive
Primary NAIC:	332999 Secondary NAIC:

CONTACT INFORMATION	
Owners name:	Gould Electronics
Street:	34929 Curtis Boulevard
City:	Eastlake, Ohio
Zip code:	44095
Phone Number:	440-953-5000

ADDRESS CORRESPONDENCE TO	
Street:	130 Route 111
City:	Hampstead
Zip code:	03841
Phone number:	603-329-5691

INDUSTRY REPRESENTATIVE	
Name(s):	Robert Bean, Plant Engineer, QA Mgr
Company President:	Bill Staib
Property Owner:	Dijohn Realty
Phone Number:	

Summary of Violations or Deficiencies:

Class	State Citation	Description	RCRA Info Code
2	Env-Wm 509.02(a)(2)	Training plan deficiencies	
1	Env-Wm 509.02(b)	No emergency posting	
2	Env-Wm 509.03(d)	Satellite storage container not closed	
2	Env-Wm 509.03(g)	Satellite storage container not labeled	
2	Env-Wm 1102.03(c)(1)	Universal waste lamp containers not closed	
2	Env-Wm 1112.03(a)	Universal waste lamps not stored in containers	
2	Env-Wm 1112.04	Universal waste lamp containers not labeled	

Past Ownership & Activity (years at site, name change, etc.):

Johnson & Johnston Associates, Inc. (JJA) has operated on-site since 1974. Gould Electronics acquired JJA in late 1999.

Number of years at facility as EH&S Coordinator:

Mr. Bean has been the QA Manager/Plant Engineer since 1993.

No. of Employees: 60 **No. of Shifts:** 3 **Shift Hours:** 7-3, 3-11, 11-7

Inspection Date: 5/20/03 **Reported Facility Type:** FQG(LQG) **Confirmed Facility Type:** FQG(LQG)

Prior Inspections:	2/22/94	Limited Permit Issued:	NA
Enf. Actions:	LOD 4/7/94	Other Permits:	Groundwater Management and Title V Air Permits
Waiver granted:			

Is the site within a wellhead protection area? No

Inspector's Initials: JC

NEW HAMPSHIRE DEPARTMENT OF Environmental Services

HAZARDOUS WASTE GENERATOR INSPECTION REPORT

DES Inspectors: J. Cajigas, R. Bishop

Lead Inspector's Signature: Jim Cajigas **Date:** 6/17/03

I. PRE-INSPECTION MEETING:

1. General Information:

Yes = 5, No = 1-4

a) Does the facility practice good general housekeeping? *(aisles clear, floors swept, etc)* — Yes | 5

b) Has the company made efforts within the past 5 years to reduce the toxicity or volume of its hazardous waste? — No | 2

c) Does the management conduct periodic facility-wide assessments to determine environmental compliance? — No | 3

d) Does the company have a written EMS? — No

e) Is the company ISO 14,000 certified? — No

f) Does the facility receive any hazardous wastes from off-site? — No

g) Does the facility discharge to a sewer system? — No

If yes:

i. What POTW accepts the discharge?
NA

ii. What industrial wastes are discharged?
NA

h) Does the facility have any industrial discharges to a septic system or drywell? — No

i) Does the facility have floor drains? — No

If yes:

i. Where do they discharge to?
No

2. Process Description/Waste Summary:

JJA converts rolls of aluminum into cut sheet panels. Aluminum stock rolls are pulled through an uncoiling machine and a vapor degreaser. In the degreaser, the aluminum is pulled down into trichloroethylene (TCE) vapors and then pulled up through cotton wipers ("corners"). Degreaser bottoms (TCE) are stored in 55-gallon containers and shipped off-site for recycle as a hazardous waste using waste codes F001, D040, and D001. Waste corners and other solid debris contaminated with TCE (paper towels, rags, gloves) are stored in a cubic yard box and shipped off-site for disposal as a hazardous waste using waste codes F001 and D040.

Following the degreaser, the aluminum is pulled through a leveler to straighten the roll out. The aluminum is mechanically cleaned and glue is laid down along the edges. Thin copper sheets are then adhered to the aluminum. Holes are punched though the aluminum and copper and then an inkjet printer is used to mark the aluminum with customer specifications. The copper-coated aluminum is then cut into the appropriately sized sheets. The final step is a quality control inspection. The process is capable of coating aluminum with copper on either one or two sides.

At the time of the inspection, JJA was operating two process lines. One line utilizes the vapor degreaser and the copper coating unit described above. The second line does not contain the copper coating unit and produces only cut aluminum sheets.

The inkjet units described above are routinely removed from the line for maintenance. The units are brought to the maintenance room where waste ink is removed and stored in a plastic 30-gallon container located in a flammable cabinet just outside the maintenance room. Waste ink is shipped off-site for disposal as a hazardous waste using waste codes D035, F005, and D001.

Universal waste lamps and batteries are generated on-site. Waste lamps were stored in a room above the maintenance room. No waste batteries were stored on-site at the time of the inspection. Waste batteries are sent to Battery Shop of New England.

Used hydraulic oil is generated from machine maintenance and is shipped off-site for disposal as a hazardous waste using the waste codes NH01 and MA01. Compressor Air Systems North services the facility's air compressors, removing and disposing of the waste synthetic oil.

Waste Stream Summary			
Waste Stream Name	Adequate Waste Det. Conducted?	Determination Method	Status of Waste Stream
Waste TCE	☒ Yes ☐ No	☐ Analysis ☒ Gen. knowledge	☒ Regular ☐ Intermittent
Solid TCE (corners)	☒ Yes ☐ No	☐ Analysis ☒ Gen. knowledge	☒ Regular ☐ Intermittent
MEK, Ink	☒ Yes ☐ No	☐ Analysis ☒ Gen. knowledge	☒ Regular ☐ Intermittent
Antifreeze, Water, TCE	☒ Yes ☐ No	☐ Analysis ☒ Gen. knowledge	☒ One-time
Hydraulic Oil (NH01)	☒ Yes ☐ No	☐ Analysis ☒ Gen. knowledge	☐ Regular ☒ Intermittent

HAZARDOUS WASTE GENERATOR INSPECTION REPORT

3. Storage Practices:

a) How many main hazardous waste storage areas are on site? **One**

b) How many satellite storage areas are on site? **Two**

c) How many tanks are used to store hazardous waste? **NA**

4. Recycling:

a) Is the generator recycling any hazardous waste on-site? **No**

b) Is the generator recycling any hazardous waste off-site? **Yes**

c) What is the hazardous waste that is being recycled?
Waste TCE

d) How is the hazardous waste being recycled?
Burned for energy recovery

e) Is the hazardous waste being managed on-site as a valuable product? **No**

5. Used Oil:

a) Is the facility a used oil generator? **Yes**

b) Is the facility a used oil marketer? **No**

Definition:

i. Sends oil directly to burner;
ii. Receives oil from a generator and produces, processes or blends oil fuel from the used oil received, including persons sending blended or processed used oil to brokers or other intermediaries;
iii. Persons, including transporters, who take ownership of the oil they collect, who distribute, but do not process or blend used oil.

c) Is the facility a used oil burner? **No**

6. Universal Waste:

a) Does the facility generate Universal Waste (lamps, batteries, CRT's, antifreeze, Hg Devices, Pesticides)? **Yes**

b) Does the facility accept any Universal Waste from off-site? **No**

Comment: Universal waste lamps and batteries are generated on-site. At the time of the inspection there were five boxes and one bundle of universal waste lamps stored on-site.

7. **Notification Requirements:**

a) Has the generator obtained an EPA ID# prior to conducting hazardous waste activities? **Yes**

b) Is the generator status for the facility correct? **Yes**

c) Does the facility need to file a Subsequent Notification Form? **No**

d) Has the generator submitted the quarterly activity report and/or the required payment? **Yes**

8. **Limited Permits:**

a) If the facility is an FQG and treats hazardous waste, do they have a limited permit? **NA**

b) If the facility is an FQG and has a process that generates hazardous waste sludge, do they have a limited permit? **NA**

9. **Inspection Modules:**

Inspection Modules:			
1. SQG Extended Storage	☐	7. Tanks: ☐ All ☐ Existing ☐ New	
2. FQG Requirements	☒	8. Used Oil: ☐ Generator ☐ Marketer ☐ Burner	
3. FQG Records Review Module	☒	9. Trip Summary	☒
4. Contingency Plan (FQG only)	☒		
5. Limited Permit (FQG only)	☐		
6. Universal Waste	☒		

II. FACILITY TOUR:

1. **Photographs:**

a) Were any photographs taken? **No**

b) If so, which camera was used? **NA**

c) Photographer? **NA**

d)

PHOTO #	DESCRIPTION
NA	

2. Manifest Review:

a) Are all the appropriate and correct waste codes or descriptions of wastes identified on all manifests? **Yes**

b) Are all required documents held for three years? **Yes**

c) Is the Monthly Summary of Hazardous Waste Generator Activity correct according to the inspector? **Yes**

III. POST INSPECTION MEETING:

13. Exit debriefing:

a) Was an exit debriefing completed? **Yes**

Persons present: JJA: Bob Bean
DES: J. Cajigas, R. Bishop

Hazardous Waste Compliance Section
Hazardous Waste Generator Inspection Report

Inspector's Initials: JK

NEW HAMPSHIRE DEPARTMENT OF Environmental Services

CONTINGENCY PLAN MODULE

EPA Identification Number: NHD980909451 DBA Name: Johnson & Johnston Assoc Inspection Date: 5/20/03

Contingency Plan Review

1. General Information

a) Does the facility have a contingency plan? Yes

b) What is the date of the contingency plan? 7/30/02

c) Is a plan maintained at the facility? Yes

2. Contents of Contingency Plan

a) Is up-to-date information on all persons qualified to act as emergency coordinator maintained in the plan, including:

i. Names, noting the primary emergency coordinator? Yes

ii. Home and office phone numbers? Yes

iii. Home and office addresses? Yes

b) Does information on emergency equipment, documented in the plan, include:

i. The location of equipment? Yes

ii. A physical description of each item? and Yes

iii. A brief outline of equipment capability? Yes

c) Does the evacuation plan, documented in the plan, include:

i. Description of signal(s) used to begin evacuation? Yes

ii. Describe/ show evacuation routes? and Yes

iii. Alternate evacuation routes? Yes

d) Are arrangements with local authorities described? Yes

e) Have copies of the plan been submitted to local authorities (police, fire, hospitals, contractors, and state and local emergency response teams)? Yes

CONTINGENCY PLAN MODULE

EPA Identification Number: NHD980909451 DBA Name: Johnson & Johnston Assoc Inspection Date: 5/20/03

3. Responsibilities of Emergency Coordinator

a) Is the emergency coordinator familiar with all aspects of the plan, facility, operations and wastes? **Yes**

b) Does the emergency coordinator have the authority to commit the resources necessary to carry out the plan? **Yes**

c) Are provisions made in the contingency plan that, in the event of an emergency, the emergency coordinator will:

i. Activate internal facility alarms? **Yes**

ii. Notify appropriate state or local authorities if their help is needed? **Yes**

iii. Immediately identify the character, exact source, amount, and a real extent of any released materials? **Yes**

iv. Assess possible hazards to human health or the environment as a result of the emergency situation? **Yes**

v. Notify local authorities if an evacuation is needed? **Yes**

vi. Immediately notify the division at (603) 271-3899 (during working hours 8:00^{am} - 4:00^{pm}) or the New Hampshire Department of Safety Hazmat Unit at (800) 346-4009 (24 hrs./day) if human health or the environment is threatened? **Yes**

vii. Immediately notify either the local fire chief or the National Response Center at (800) 424-8802? **Yes**

viii. Address in the above notifications all vital information including:

a. Name and telephone number of reporter? **Yes**

b. Name and address of facility? **Yes**

c. Time and type of incident? **Yes**

d. Name and quantity of material(s) involved? **Yes**

e. Extent of injuries? and **Yes**

f. Possible hazards to human health or the environment, outside the facility? **Yes**

ix. Take all reasonable measures to ensure that fires, or releases of hazardous waste will not spread *(by halting operations, etc.)?* **Yes**

x. Monitor equipment if there is a work stoppage? **Yes**

CONTINGENCY PLAN MODULE

EPA Identification Number: NHD980909451 DBA Name: Johnson & Johnston Assoc Inspection Date: 5/20/03

xi. Provide for the treatment, storage or disposal of hazardous waste resulting from the emergency? **Yes**

xii. Ensure that a waste that is incompatible with the released material is not treated, stored or disposed of until cleanup procedures are completed? **Yes**

xiii. Provide that all equipment has been cleaned and is fit before resumption of operations? **Yes**

xiv. Notify state and local authorities that the facility is in compliance with 40 CFR 265.56(h)(1) & (2) before resumption of activities? **Yes**

xv. Submit a written report to the Waste Management Division within 15 days that addresses all details of the incident including:

a. Name, address and telephone number of the owner or operator? **Yes**

b. Name, address and telephone number of the facility? **Yes**

c. Date, time and type of incident? **Yes**

d. Name and quantity of material(s) involved? **Yes**

e. Extent of injuries? **Yes**

f. An assessment of actual or potential hazards to human health or the environment? and **Yes**

g. Estimated quantity and disposition of recovered material that resulted from the incident? **Yes**

Hazardous Waste Compliance Section
Hazardous Waste Generator Inspection Report

Inspector's Initials: JC

NEW HAMPSHIRE DEPARTMENT OF Environmental Services

FULL QUANTITY GENERATOR (FQG) MODULE

EPA Identification Number: NHD980909451 DBA Name: Johnson & Johnston Assoc Inspection Date: 5/20/03

FQG Training Requirements

1. Personnel Training Records

a) Can the facility document that all hazardous waste employees have received the required training? **Yes**

b) Has the instructor received training in hazardous waste management? **Yes**

c) Can the facility document that the primary and alternate emergency coordinators have received annual hazardous waste management training over the past five years? **Yes**

0 out of 4 non-compliance for past 2 years

0 out of 10 non-compliance for past 5 years

d) Are facility personnel trained within six (6) months of employment or assignment to a new position? **Yes**

e) Are facility personnel not permitted to work in unsupervised positions until trained? **Yes**

f) Does the training program ensure that facility personnel can effectively respond to emergencies? **Yes**

g) Are annual reviews conducted for personnel handling hazardous waste? **Yes**

Training Records		Dates of Training				
Employee Name	Job Title/ Haz. Waste Duties	11/6/97	8/5/99	1/19/01	4/3/02	4/2/03
Robert Bean	Plant Engineer / Emergency Coordinator	Y	Y	Y	Y	Y
John Feoli	Maintenance Supervisor / Emergency Coordinator	Y	Y	Y	Y	Y
Donald Arsenault	Maintenance Tech / signed manifests	--	Y	Y	Y	--
William Studebaker	Maintenance Tech	--	--	Y	Y	Y
George P. Lloyd	Maintenance Tech	--	--	Y	Y	Y
33 CAC operators	These operators may handle, but not routinely, satellites for waste corners and waste ink	These employees were trained on 5/22/03 following the inspection, because it was realized that although it is the responsibility of maintenance personnel to handle the satellites, these employees may assist in the handling of waste corners and waste ink.				

FULL QUANTITY GENERATOR (FQG) MODULE

EPA Identification Number: NHD980909451 DBA Name: Johnson & Johnston Assoc Inspection Date: 5/20/03

2. Personnel Training Program

a) Is there a Personnel Training program available for review? **Yes**

b) Is the following documentation maintained:

i. The job title for each position at the facility related to hazardous waste management, and the name of the employee filling each job? **NO**

ii. A written job description, including requisite skills, education and duties, for positions with hazardous waste management duties? **NO**

iii. A written description of the type and amount of both introductory and continuing training that will be given to each person filling a position with hazardous waste management duties? **NO**

iv. Documentation that training has been completed? **Yes**

c) Are records kept at the facility until closure for current employees and for 3 years from date of last employment for past employees? **Yes**

FQG Preparedness and Prevention

1. Preparedness and Prevention

a) Has the owner/operator attempted to make (e.g. letter) arrangements to familiarize local authorities with the:

i. Facility layout? **Yes**

ii. Properties of hazardous waste? **Yes**

b) Has the owner/operator attempted to make arrangements (e.g. letter) with emergency response personnel? **Yes**

c) Has the owner/operator attempted to make arrangements (e.g. letter) to familiarize the local hospital with the properties of hazardous waste handled at the facility? **Yes**

FQG Satellite Storage

1. Personnel Training

a) Have all process operators been trained (initial and every three years thereafter)? **Yes**

Hazardous Waste Compliance Section
Hazardous Waste Generator Inspection Report

Inspector's Initials: JC

NEW HAMPSHIRE DEPARTMENT OF Environmental Services

FQG RECORDS REVIEW MODULE

EPA Identification Number: NHD980909451 DBA Name: Johnson & Johnston Assoc Inspection Date: 5/20/03

Records (Inspection Logs and land ban)

1. Container Inspection Requirements:

a) Are weekly inspections of the main hazardous waste storage area(s) being conducted? **Yes**

0 out of 26 non-compliance for past 6 months

0 out of 156 non-compliance for past 3 years

b) If required (>10 gallons), are monthly inspections of the satellite storage area(s) being conducted? **Yes**

c) Is there a written inspection schedule? **Yes**

d) Is there a log or checklist used to record inspections? **Yes**

e) Does the inspection log include:

i. Frequency of inspections? *(containers- weekly)* **Yes**

ii. Notation for observing leaks? **Yes**

iii. Notation for observing deterioration due to corrosion or other factors? **Yes**

iv. Date and time of inspection? **Yes**

v. Name of the inspector? **Yes**

vi. Notation of observations? **Yes**

vii. Date & nature of repairs or remedial actions? **Yes**

2. Land Ban:

a) Has the generator met the requirements under land disposal restrictions? **Yes**

Main Storage Area(s) Container Inventory

EPA ID NO.: NHD980909451
FACILITY NAME: Johnson and Johnston, Assoc., Inc. (JJA)
STORAGE AREA LOCATION: Main Storage Area DATE OF INSPECTION: 5/20/03
TOTAL NUMBER OF CONTAINERS: 2

	SQG			SQG Ext.			FQG		
Preparedness and Prevention (items within 100' of storage area)	YES	NO	N/A	YES	NO	N/A	YES	NO	N/A
a. Portable fire control equipment?	☐	☐		☐	☐		☒	☐	
b. Spill control/decon equipment?	☐	☐		☐	☐		☒	☐	
c. Testing and maintenance of equipment?			☒	☐	☐		☒	☐	
d. Alarm/internal communication?			☒	☐	☐		☒	☐	
e. Telephone/2-way communication?			☒	☐	☐		☒	☐	
f. Adequate water for fire control?			☒	☐	☐		☒	☐	
g. No smoking signs posted?	☐	☐	☐	☐	☐	☐	☒	☐	☐
h. Incompatible wastes separated?			☒	☐	☐		☒	☐	
i. Does the facility have emergency measures posted at the telephone nearest to its main hazardous waste storage area?* (1 out of 1 Non-compliance)			☒	☐	☐		☐	☒	
j. Emergency measures complete (EC's name/tel. #)?			☒	☐	☐		☐	☒	
k. Emergency measures complete (fire/police/hospital/ERT tel. #)?			☒	☐	☐		☐	☒	
l. Emergency measures complete (fire ext/spill control/alarm location)?			☒	☐	☐		☐	☒	

FQG Outdoor Storage Area	YES	NO	N/A	YES	NO	N/A	YES	NO	N/A
a. Barrier			☒			☒	☐	☐	☒
b. Entry Control			☒			☒	☐	☐	☒
c. "Authorized personnel" only			☒			☒	☐	☐	☒

* *Emergency measures includes home and office phone number(s) of emergency coordinators, phone numbers of fire, police, hospital and response personnel, and location of fire extinguisher, spill control materials and alarms.*

			Labeling Requirements					Prepare/ Prevent	Condition			Storage					
SEQ #	TYPE	SIZE	"HAZ WASTE" ON LABEL?	WST CODE	ACCUM. DATE?	VISIBLE?	WORDS?	2' AISLE SPACE?	COMPATIBLE	CLOSED?	NO LEAKS/ PRESS?	MEETS 90 DAYS?	IMP. SUR?	NO FLR. DRAINS?	2ºCONT?	OUT COV'D?	50' FROM H_2O
1 & 2	DM	55 gal	☒Yes ☐No	☒Yes ☐No *Code:* D040, F001	☒Yes ☐No *Date:* 5/9/03	☒Yes ☐No	☒Yes ☐No	☒Yes ☐No	☒Yes ☐No	☒Yes ☐No	☒Yes ☐No	☒Yes ☐No	☒Yes ☐No	☒Yes ☐No	☒Yes ☐No ☐N/A	☐Yes ☐No ☒N/A	☐Yes ☐No ☒N/A

CONTENTS: Degreaser Bottoms (Trichloroethylene and oil) **COMMENTS:**

0 out of 2 Non-compliance for "Haz Waste". 0 out of 2 Non-compliance for Closed and/or Good Condition.

Satellite Storage Area(s) Container Inventory

EPA ID NO.: NHD980909451
FACILITY NAME: Johnson and Johnston Assoc., Inc. (JJA)
STORAGE AREA LOCATION: Raw Goods DATE OF INSPECTION: 5/20/03
TOTAL NUMBER OF CONTAINERS: 1

Preparedness and Prevention	FQG Satellite YES	FQG Satellite NO
a. Area meets "at or near"?	☒	☐
b. Area meets "under control of operator"?	☒	☐
c. Area contains less than 55 gallons of hazardous waste or 1 qt. of acutely hazardous waste?	☒	☐
d. Incompatible wastes separated?	☒	☐

			Labeling Requirements					Prepare/ Prevent	Condition			Storage			
SEQ #	TYPE	SIZE	"HAZ WASTE" ON LABEL?	WST CODE (WHEN FULL)	EXCESS ACCUM. DATE?	VISIBLE?	WORDS?	2' AISLE SPACE?	COMPATIBLE	CLOSED?	NO LEAKS/ PRESS?	3 DAYS TO MAIN STORAGE? (WHEN FULL)	IMP. SUR?	NO FLR DRAINS	2° CONT?
1	CF	Cubic Yard	☒Yes ☐No	☐Yes ☐No ☒N/A Code:	☐Yes ☐No ☒N/A Date:	☒Yes ☐No	☒Yes ☐No	☒Yes ☐No	☒Yes ☐No	☒Yes ☐No	☒Yes ☐No	☐Yes ☐No ☒N/A	☒Yes ☐No	☒Yes ☐No	☐Yes ☐No ☒N/A

CONTENTS: Trichoroethylene-contaminated corners and other solids **COMMENTS:**

0 out of 1 Non-compliance for "Haz Waste". 0 out of 1 Non-compliance for Closed and/or Good Condition.

EPA ID NO.: NHD980909451

FACILITY NAME: Johnson and Johnston Assoc., Inc. (JJA)

STORAGE AREA LOCATION: Main Storage Area DATE OF INSPECTION: 5/20/03

TOTAL NUMBER OF CONTAINERS: 1

Preparedness and Prevention	FQG Satellite YES	FQG Satellite NO
a. Area meets "at or near"?	☒	☐
b. Area meets "under control of operator"?	☒	☐
c. Area contains less than 55 gallons of hazardous waste or 1 qt. of acutely hazardous waste?	☒	☐
d. Incompatible wastes separated?	☒	☐

			Labeling Requirements					Prepare/ Prevent	Condition			Storage			
SEQ #	TYPE	SIZE	"HAZ WASTE" ON LABEL?	WST CODE (WHEN FULL)	EXCESS ACCUM. DATE?	VISIBLE?	WORDS?	2' AISLE SPACE?	COMPATIBLE	CLOSED?	NO LEAKS/ PRESS?	3 DAYS TO MAIN STORAGE? (WHEN FULL)	IMP. SUR?	NO FLR. DRAINS	2° CONT?
1	DF	30 gal	☐Yes ☒No	☐Yes ☐No ☒N/A Code:	☐Yes ☐No ☒N/A Date:	☐Yes ☒No	☐Yes ☒No	☒Yes ☐No	☒Yes ☐No	☐Yes ☒No	☒Yes ☐No	☐Yes ☐No ☒N/A	☒Yes ☐No	☒Yes ☐No	☒Yes ☐No ☐N/A

CONTENTS: Methyl ethyl ketone/ink waste **COMMENTS:** Container was open and not labeled. The container was closed and labeled prior to the end of the inspection.

1 out of 1 Non-compliance for "Haz Waste". 1 out of 1 Non-compliance for Closed and/or Good Condition.

Hazardous Waste Compliance Section
Hazardous Waste Generator Inspection Report

Inspector's Initials: JC

NEW HAMPSHIRE DEPARTMENT OF Environmental Services

UNIVERSAL WASTE MODULE

EPA Identification Number: NHD980909451 DBA Name: Johnson & Johnston Assoc Inspection Date: 5/20/03

1. General Requirements

a) Applicability:

i. What type of universal waste is being accumulated?
- ☒ Batteries;
- ☒ Lamps;
- ☐ Antifreeze;
- ☐ Cathode Ray Tubes;
- ☐ Mercury-containing Devices;
- ☐ Pesticides

b) What size handler is the facility? SQH

c) Do they handle pesticides? No

d) Is universal waste not disposed of on-site? Yes

e) Training:

i. For a SQH, are all employees thoroughly familiar with proper waste handling and emergency procedures relative to their responsibilities? Yes

ii. For a LQH, are all employees thoroughly familiar with proper waste handling and emergency procedures relative to their responsibilities? NA

iii. For a VLQH, are all employees thoroughly familiar with proper waste handling and emergency procedures relative to their responsibilities? NA

f) Off-Site Shipments:

i. Is universal waste sent or taken to another handler, destination facility or to a foreign destination? Yes

ii. If universal waste is exported to a foreign destination has the handler:

a. Complied with the requirements applicable to a primary exporter? NA

b. Exported such universal waste only upon consent of the receiving country and in conformance with the EPA Acknowledgement of Consent? NA

c. Provided a copy of the EPA Acknowledgement of Consent for the shipment to the transporter exporting the universal waste? NA

UNIVERSAL WASTE MODULE

EPA Identification Number: NHD980909451 DBA Name: Johnson & Johnston Assoc Inspection Date: 5/20/03

g) Accumulation Time Limits:

i. Can the handler demonstrate the length of time that the waste has been accumulated? **Yes**

ii. If the universal waste is accumulated on-site for longer than 1 year, can the handler document that the sole purpose of extended accumulation time is to facilitate proper recovery, treatment or disposal? **NA**

2. Large Quantity Handlers

Comment	This section was omitted because Johnson & Johnston Assoc (JJA) is a Small Quantity Handler of Universal Waste.

3. Very Large Quantity Handlers

Comment	This section was omitted because JJA is a Small Quantity Handler of Universal Waste.

4. Waste Specific Management Requirements

a) Batteries:

Comment	This section was omitted because there were no Universal Waste Batteries stored on-site at the time of the inspection.

b) Pesticides:

Comment	This section was omitted because JJA is not a Handler of Universal Waste Pesticides.

c) Mercury-Containing Devices:

Comment	This section was omitted because JJA is not a Handler of Universal Waste Mercury-Containing Devices.

d) Lamps:

i. If lamps are intentionally crushed or dismantled, has a permit been obtained from DES? **NA**

Comment	At the time of the inspection there were four boxes of 4-foot bulbs and one box of 8-foot bulbs stored on-site. There were also three bulbs that were not stored in a container. JJA does not crush universal waste lamps.

e) Cathode Ray Tubes (CRTs):

Comment	This section was omitted because JJA is not a Handler of Universal Waste CRTs.

Universal Waste Storage Area Container Inventory

EPA ID NO.: NHD980909451
FACILITY NAME: Johnson and Johnston, Assoc, Inc. (JJA)
STORAGE AREA LOCATION: Maintenance Storage Room DATE OF INSPECTION: 5/20/03
TOTAL NUMBER OF CONTAINERS: 5 boxes (and 3 lamps that were not in a container)

Preparedness and Prevention (items within 100' of storage area)	SQH/LQH			VLQH		Pesticides	
	YES	NO	N/A	YES	NO	YES	NO
a. Is appropriate fire control equipment present?			☒	☐	☐	☐	☐
b. Is spill control equipment present?			☒	☐	☐	☐	☐
c. Is decontamination equipment present?			☒	☐	☐	☐	☐
d. Is adequate aisle space maintained?			☒	☐	☐	☐	☐

Outdoor Storage Area Only	SQH/LQH			VLQH		Pesticides		
	YES	NO	N/A	YES	NO	YES	NO	N/A
a. Is there a barrier that prevents unauthorized or unknowing entry?			☒	☐	☐	☐	☐	
b. Is entry controlled at all times?			☒	☐	☐	☐	☐	
c. Is there a sign stating: "Danger- Unauthorized Personnel Keep Out"?			☒	☐	☐	☐	☐	
d. Is the storage area outside the 100 year flood plain?			☒	☐	☐			☒

			Container Requirements				Outside Storage Only	Pesticides Only					
SEQ #	TYPE	SIZE	Compatible	Closed	Free of damage and defects	Labeled	Are wastes covered?	Recalled	Unused	Original product label	Impervious storage surface	No floor drains	2ºCONT
1,2,3,4	CF	4 foot	☒Yes ☐ No	☐Yes ☒ No	☒Yes ☐ No	☒Yes ☐ No	☐Yes ☐ No ☒ N/A	☐Yes ☐ No ☒ N/A	☐Yes ☐ No ☒ N/A	☐Yes ☐ No ☒ N/A	☐Yes ☐ No ☒ N/A	☐Yes ☐ No ☒ N/A	☐Yes ☐ No ☒ N/A

Comments: The containers were closed prior to the end of the Inspection.

			Container Requirements				Outside Storage Only	Pesticides Only					
SEQ #	TYPE	SIZE	Compatible	Closed	Free of damage and defects	Labeled	Are wastes covered?	Recalled	Unused	Original product label	Impervious storage surface	No floor drains	2ºCONT
5	CF	8 foot	☒Yes ☐ No	☐Yes ☒ No	☒Yes ☐ No	☐Yes ☒ No	☐Yes ☐ No ☒ N/A	☐Yes ☐ No ☒ N/A	☐Yes ☐ No ☒ N/A	☐Yes ☐ No ☒ N/A	☐Yes ☐ No ☒ N/A	☐Yes ☐ No ☒ N/A	☐Yes ☐ No ☒ N/A

Comments: The box was closed and labeled prior to the end of the inspection.

			Container Requirements				Outside Storage Only	Pesticides Only					
SEQ #	TYPE	SIZE	Compatible	Closed	Free of damage and defects	Labeled	Are wastes covered?	Recalled	Unused	Original product label	Impervious storage surface	No floor drains	2ºCONT
6		8 foot	☐Yes ☐ No	☐Yes ☐ No	☐Yes ☐ No	☐Yes ☒ No	☐Yes ☐ No ☒ N/A	☐Yes ☐ No ☒ N/A	☐Yes ☐ No ☒ N/A	☐Yes ☐ No ☒ N/A	☐Yes ☐ No ☒ N/A	☐Yes ☐ No ☒ N/A	☐Yes ☐ No ☒ N/A

Comments: 3 Bulbs were not stored in containers; these bulbs were placed in a container and the container was labeled and closed prior to the end of the Inspection.

#10

JOHNSON & JOHNSTON ASSOCIATES, INC.

MAINTENANCE PROCEDURE

Department: **MAINTENANCE** Procedure: **HAZARDOUS WASTE MANAGEMENT**

1.0 SCOPE
This document defines the procedure to be used to Manage Hazardous Waste within JJA.

2.0 APPLICABLE EQUIPMENT
Any equipment or process that generates Hazardous Waste.

3.0 MATERIALS REQUIRED
None

4.0 PROCEDURE

4.1 Any hazardous waste must be collected in only approved storage containers.

4.2 When a container of hazardous waste is generated, Maintenance will arrange to move the container to the hazardous waste area. Containers of liquid waste must be on the containment skids.

4.3 Maintenance must notify Plant Engineering to obtain proper hazardous waste labels, and must fill out the accumulation start date on the label.

4.4 Plant Engineering may obtain the labels from Laidlaw, after properly identifying each waste stream.

4.5 Within 90 days, Plant Engineering must arrange for Laidlaw to pick up the waste containers.

4.6 When Laidlaw picks up the hazardous waste, the shipping person (warehouse, or maintenance) must check the manifest carefully for accuracy, and sign as required. Laidlaw will separate all the copies for JJA. The shipper must forward all retained copies to Plant Engineering.

4.7 Plant Engineering will maintain a file of all manifest copies, stapling together the "Generator" and "Facility Mails to Generator" copies when recieved back from the facilty.
All records must be maintained for seven (7) years.

Approvals:

Plant Engineering	Maintenance	Operations	Document No.	Rev.
5/4/94		5/4/94	MP 1350	A

file: RPB\mp1350.doc

Hazardous Waste Inspection Exit Debriefing

Facility Name: Johnson & Johnston Assoc **EPA ID#:** NHD980909451

Location: 130 Route 111, Hampstead, NH 03841 **Inspection date:** 5/20/03

You have just received an inspection conducted to evaluate compliance with RSA 147-A and its implementing regulations, the New Hampshire Hazardous Waste Rules (codified as Env-Wm 100-1100). The following is intended to summarize some of the areas of concern noted during the inspection, and areas you should consider for follow-up action. Be advised that additional reports and correspondence may be forthcoming. Any omissions in this report shall not be construed as a determination of compliance with applicable laws and rules.

1. SUMMARY OF POTENTIAL VIOLATIONS:

State Citation	Description	State Citation	Description
☐ Env-Wm 502.01	Hazardous Waste Determination(s)	☐ Env-Wm 509.02(a)(5)	Contingency Plan
☐ Env-Wm 504.02	Generator Notification	☒ Env-Wm 509.02 (b)	Emergency Posting
☒ Env-Wm 507.01(a)(3)	Storage Requirements - Closed	☐ Env-Wm 807.06(b)(5)	Used Oil Containers - Closed
☐ Env-Wm 507.02 (a)	90-Day Storage Time Requirement	☐ Env-Wm 807.06(b)(4)	Label Used Oil Containers
☒ Env-Wm 507.03(a)(1)	Container Marking	☐ Env-Wm 807.06(b)(7)	Initial Used Oil Determination
☐ Env-Wm 508.02(b)	2 Feet of Aisle Space	☒ Env-Wm 1102.03(c)(1)	Universal Waste Containers - Closed
☐ Env-Wm 509.02(a)(1)	Inspection Requirements		
☒ Env-Wm 509.02 (a)(2)	Personnel Training		
☐ Env-Wm 509.02 (a)(3)	"No Smoking" Signs		

2. DOCUMENTS RECEIVED AT INSPECTION:

By State from Facility:	SQG	SQG Extended	FQG
MSDS	☐Yes ☐No	☐Yes ☐No	☐Yes ☐No
Hazardous Waste Determinations	☐Yes ☐No	☐Yes ☐No	☒Yes ☐No
Manifests	☐Yes ☐No	☐Yes ☐No	☒Yes ☐No
Inspection Records	N/A	☐Yes ☐No	☒Yes ☐No
Personnel Training Plan	N/A	☐Yes ☐No	☒Yes ☐No
Contingency Plan	N/A	N/A	☒Yes ☐No

By Facility from State:

☐ Hazardous Waste Generator Summary

Fact Sheets: ☐ Used Oil ☐ Universal Waste ☐ Other:

Vendor Lists: ☒ Fluorescent lamp and ballast recycling facilities ☐ Laboratories that test hazardous waste ☐ Laboratories that perform used oil analysis ☐ Other:

☐ Hazardous Waste Rules

☒ Other FQG module for training

3. REQUESTS FOR INFORMATION:

Information Requested By State From Facility:	Date Received
① Training Plan information - job titles, descriptions, types of training etc.	
② Add emergency coordinator office phone #s and the locations of fire control equip, spill control equipment, + fire alarms to emergency posting	

Information Requested By Facility From State:	Date Received

4. Has the generator been informed of enforcement procedures (NOF,NOPV, LOD, AO)? YES

Facility Representative: R. P. BEAN (Print) Date: 5/20/3 Facility Representative: R P Bean (Signature)

Inspector: Jessica Cajigas (Print) Date: 5/20/03 Inspector: Jessica Cajigas (Signature)

Written Response Requested: ☒ *Yes* ☐ *No.* *Within* 8 *days, please mail your response documenting compliance with the instructions above to your inspector at the New Hampshire Department of Environmental Services, Hazardous Waste Compliance Section, 6 Hazen Drive, Concord, NH 03301. Direct any questions to your inspector at (603) 271-2942. Thank you.*