



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

Inspection Date 11-30-00

Time Start 1030

Time Finish 1315

HAZARDOUS WASTE INSPECTION REPORT
 GENERATOR S Q GENERATOR

37-00050-02
030-05980

Company name Safety Light Corp. I.D. Number PAD987327750
Site Address 4150A Old Berwick Rd., Bloumsburg, PA
County Columbia Municipality _____ Zip 17815
Name of Inspector PAT Brennan
Name & Title of Responsible Official Larry Harman, Plant Manager
Person Interviewed Norm Fritz & Larry Harman Telephone (570) 764-4344
Mailing Address (if different from above) same
Amount of Hazardous Waste Generated per Month: 4,030 Pounds 1,831 Kgs
August, 2000

1. Site Characterization:

STORAGE: Container Tanks Containment Bldg. Drip Pad Other _____
PBR: Neutralization/WWTP Reclaim Other _____
GENERATOR TREATMENT Containers Tanks Containment Bldg. Drip Pad

2. Universal Waste: Large Quantity Handler Small Quantity Handler

Universal Waste Types Fluorescent Bulbs

3. Hazardous Waste Transporters:

Transporter Name Safety Kleen Systems Inc. License Number PA-AH0271
Transporter Name _____ License Number _____
Transporter Name _____ License Number _____

4. Types of hazardous waste generated and destination facility (location & type).

Waste Code	Waste Description	Destination Facility
D001	Waste Flammable liquids,	Safety Kleen
	Waste Xlenes, Toluene	Liquid Ind.
F003, D005, D001	Waste Paint Related Material	" "

TO MARIE MILLEX
5 PAGES

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INSPECTION REPORT COMMENTS

Date of Inspection: November 30, 2000

Identification Number: PAD987387750

Company/Facility/Site Name: Safety Light Corp.

On November 30, 2000, I along with Howard Scher and Andy Gardosik, both of the Bureau of Radiation Protection, conducted a hazardous waste inspection at the above referenced facility. Norm Fritz, Radiation Protection Officer for the facility, was present during the inspection and gave his consent to conduct the inspection. Larry Harmon, Plant Manager was interviewed prior to the conclusion of the inspection. Safety Light Corporation manufactures self-illuminating exit signs and uses tritium as a light source. Hazardous waste in the form of waste solvent is generated from the painting operation. The following observations were made during the inspection:

1. The painting and screening operation is conducted in the Butler Building. A small amount of liquid waste solvent is generated in routine cleaning operations of equipment and/or parts used in the process. The waste is stored in a 55-gallon container, which is stored in appropriate containment in the shed that has been constructed over the area where the silos were located. A label with the appropriate information was on the container.

Waste paper towels and filters are also generated in the cleaning of paint spray guns and the cleaning of paint off screens used to paint the exit signs. Dolly Griffin, paint operator, indicated the spray guns are cleaned by adding solvent (Randolf Product Co. T112 Solvent Thinners and Durachem Reducer # 415 solvent blend) to the spray guns and spraying the solvent directly into filters (two) located in the paint booth. She indicated that this is accomplished at the end of the day or as needed, example: if changing the paint color. She also indicated that the filters are changed daily. Paint screens are cleaned by placing the screens over paper towels and applying a solvent (VT # 3) to the screen to remove the paint. She mentioned that the solvent does go through the screen onto the rags under the screens and rags are used to clean the screens. After the majority of the paint is removed, a less volatile solvent is used (Pico) to complete the cleaning process. Review of the MSDS for solvents used in the cleaning processes displays that some of the solvents used are considered an "F" listed hazardous waste.

MSDS for the solvents used in the cleaning processes display the following information:

- Durachem Reducer # 415, displayed this product contains 50% of toluene.
- T112 Solvent Thinner, displayed that this product contains 40-50 % toluene and 1-10% MEK.
- VT # 3, Textile Chemical Co., displayed that this product contains Acetone at 35 % by volume and Toluene at 60% by volume.
- Pico Chem Corp indicates the product contains no hazardous ingredients.

November 30, 2000

The filters and paper rags are placed into one of three open top containers situated in the paint shop and eventually discarded in a dumpster located at the loading dock for the main building. Mr. Fritz indicated that this is accomplished on a daily basis and the solvent "flashes" off the rags/filters. This waste is disposed of with the plant trash.

The above condition constitutes a violation of § 6018.403(a) of the Solid Waste Management Act which states: "It shall be unlawful for any person or municipality who generates, transports or stores hazardous waste to transfer such waste unless such person or municipality complies with the rules and regulations of the department and the terms or conditions of any applicable permit or license and any applicable order issued by the department."

The waste streams above are considered listed hazardous waste. It is recommended that the facility immediately cease disposing of this waste with the plant trash and make the appropriate arrangements to store and properly dispose of this waste at a permitted facility.

2. On November 1, 2000, the facility disposed of 275 gallons of D001 Waste Flammable Liquids, 55 gallons of D001 Waste Xylenes, 165 gallons of D001 Waste Toluene and 70 pounds of D001 Waste Flammable Liquids. This information was displayed on a Maryland Hazardous Waste Manifest (MDC 0833269). Mr. Fritz indicated that this waste was generated on August 10, 2000, when they cleaned out the lacquer storage building. Based on the amount of hazardous waste displayed on the manifest, the facility became a LQG when the waste was generated and they failed to submit a subsequent notification to the Department or EPA indicating the change of generator status.

The above condition constitutes a violation of 25 Pa Code §262a.12(b)(4) which states: "In addition to the requirements incorporated by reference, a generator shall submit a subsequent notification to the Department if the type of regulated activity that takes place at the generator facility changes.

It is recommended that the generator submit a subsequent notification to the Department indicating that they changed their generator status from a CESQG to a LQG.

3. It was brought to my attention that fluorescent light bulbs are disposed of with the plant trash. Be advised, that some fluorescent light bulbs may be characteristically hazardous for mercury.

The above condition constitutes a violation of 40 CFR §262.11, as incorporated by reference at 25 Pa Code §262a.10 which states in part: "A person who generates a solid waste, as defined in 40 CFR 261.2, must determine if the waste is a hazardous waste..."

It is recommended that the facility immediately cease disposing of the fluorescent light bulbs with the plant trash. A determination should be made if the bulbs are characteristically hazardous for mercury. If so, it is recommended that the bulbs be managed as such or as a universal waste.

4. 176 X 55-gallon containers and 26 X B25 boxes are located southeast of the tritium production area. This waste is a radioactive waste that was removed from two silos located south of the main building. The waste was removed from the silos by I.T. Corporation, beginning on January 5, 2000. Both Mr. Harmon and Mr. Fritz indicated that this waste may be a mixed waste but not all of it may be mixed. They indicated that they don't have the resources to make this determination on the contents in each container. They mentioned that they are receiving quotes from two companies (I.T. Corp., GTS Duratech) to make determinations on the waste but there is no scheduled time frame because of financial constraints. When questioned about making an accurate determination on the contents in the containers, Mr. Harmon indicated that it's not going to happen because of financial constraints and it's tied up with NRC. NRC has to release the money and it probably won't occur until next spring. Again, he mentioned that the company does not have the resources to do the waste profiling. When questioned about why the waste is being considered a mix waste, both men indicated that I.T. Corp. sampled the silos in three locations: top, middle and bottom. The analysis displayed elevated levels of lead and possibly VOC's. They are not sure if the samples were a true representative sample. Therefore, they are not prepared to make a waste determination on the contents in all of the containers.

The above condition constitutes a violation of 40 CFR §262.11, as incorporated by reference at 25 Pa Code §262a.10 which states in part: "A person who generates a solid waste, as defined in 40 CFR 261.2, must determine if the waste is a hazardous waste ...

It is recommended that the facility make an accurate hazardous waste determination on the contents within all of the containers mentioned in this section (4).

5. The above referenced solid waste is located in the floodplain of the Susquehanna River and is not being stored in secondary containment. There are no hazardous waste labels displaying the date the waste was generated or the type of waste being stored in the containers. The facility does not have a Source Reduction Strategy on the hazardous waste or a PPC plan. At the time the waste was generated, they failed to submit a subsequent notification to the Department or EPA indicating that their generator status has changed.

In addition, the above conditions constitute violations of 40 CFR, as incorporated by reference at 25 Pa Code which can be referenced in the following locations of the 40 CFR and 25 Pa Code:

1. 25 Pa Code §265a.173, regarding a proper containment and collection system in place.
2. 40 CFR §262.34, as incorporated by reference at 25 Pa Code §262a.10, regarding container management.
3. Solid Waste Management Plan §6018.403(b)(2), referencing containers labeled to accurately identify the contents.
4. 40 CFR §262.34(a), as incorporated by 25 Pa Code §262a.10, references the development of a PPC plan.
5. 25 Pa Code §261a.4, referencing source reduction strategy prepared and available for this solid waste.
6. 25 Pa Code §262a.12(b)(4) which states: "In addition to the requirements incorporated by reference, a generator shall submit a subsequent notification to the Department if the type of regulated activity that takes place at the generator facility changes.

- 7. 40 CFR §262.34(a)(3), as incorporated by 25 Pa Code §262a.10, regarding containers not labeled Hazardous Waste.
- 6. An estimate of between 15 and 20 55-gallon containers of solid waste was evident approximately 25 feet east of the tritium production building. Mr. Fritz indicated that the drums contained drilling core soil generated in 1990 in what he termed the Chem. Nuclear Project. The drums were covered with tarps making it difficult to obtain an accurate count. Mr. Fritz indicated that he thought there were 16 or 17 drums. He also mentioned that they intend to mix this waste in with the waste generated from the silos.

The above constitutes a violation of 40 CFR §262.11, as incorporated by reference at 25 Pa Code §262a.10 which states in part: "A person who generates a solid waste, as defined in 40 CFR 261.2, must determine if the waste is a hazardous waste...In addition, it is a violation of §6018.103, Definition for Storage, which states in part: "The containment of any waste on a temporary basis in such a manner as not to constitute disposal of such waste. It shall be presumed that the containment of any waste in excess of one year constitutes disposal..."

It is recommended that the facility make an accurate hazardous waste determination on the contents within these containers and make the appropriate arrangements for the disposal of this solid waste.

- 7. 6X55 containers of well drilling purge waste were located in the new shed located over the old silos. Five of the containers were situated in two plastic children's pools used for containment. The sixth container was sitting on the surface of the ground. Mr. Fritz indicated that the waste was generated from the DEP contractor when groundwater-monitoring wells were sampled during the past summer and the five containers, in containment, contained a liquid waste.

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

This report does not constitute an order or other appeasable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person Interviewed (signature) *Larry Harmon*

Date *12/14/00*

Inspector (signature) *Pat Berman*

Date *12/14/00*