

Case Study: Aladdin Packaging LLC

Presenters:

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Facility Information/ Background

- ▶ Facility located at 115 Engineers Road, Hauppauge, New York 11788
- ▶ Aladdin Packaging LLC is a flexible printing company. The facility prints packaging for many different industries, some of their products include packaging for the food industry and textile industry.
- ▶ The hazardous waste that is generated at the facility is mostly organic solvents from the printing presses and distillation bottoms from the recycling of solvents.
- ▶ Facility employs a distillation unit for the on-site recycling of spent solvents.
- ▶ Facility is a large quantity generator of hazardous waste.



Subpart BB - Recap

- ▶ Applies to TSDFs and LQGs
- ▶ Applies to equipment containing/contacting hazardous waste with 10 % or more organics for greater than 300 hours
- ▶ Compliance is demonstrated through maintenance of records
- ▶ Regulated equipment pertaining to site:
 - ▶ Valves
 - ▶ Pumps

Investigative Activities

- ▶ Facility was inspected on November 30, 2017
- ▶ I observed some safe harbor violations including:
 - ▶ Container Storage Area Requirements
 - ▶ Closure/ Labeling Container Requirements
 - ▶ Recordkeeping
- ▶ Concerns arose when I observed three two-chambered tanks used for reclaiming spent solvent



Two-Chambered Tank

- ▶ The biggest issue regarding this case was a two-chambered tank, and how to determine where the hazardous waste is generated, and what is regulated under Subpart BB.
- ▶ The large chamber of the tank was used to cycle solvent through the printing heads until the solvent was deemed spent; spent after 2 cycles
- ▶ The smaller chamber was then used to temporarily store waste solvent to a specific volume; then the waste was pumped to a 55-gallon hazardous waste drum.





Two-Chambered Tank

Close-Up of Waste Accumulation Drum





Waste Pumped to Distillation Unit for Recycling

Cited Violations

- ▶ **Failure to maintain recordkeeping requirements regarding:**
 - ▶ equipment identification numbers & hazardous waste management unit identification
 - ▶ approximate locations of equipment within the facility;
 - ▶ the type of equipment (*i.e.* , valve or pump);
 - ▶ the percentage by weight and total organics in the waste stream
 - ▶ equipment coming in contact with the organic waste stream < 300 hours per year
- ▶ **Failure to Conduct Required Monitoring of Pumps in Light Liquid Service**
- ▶ **Failure to Conduct Required Monitoring of valves in Light Liquid Service**

Exclusions and Exemptions Claimed by Facility



The facility tried to claim three exclusions to Subpart BB:

Closed-Loop Recycling Exclusion
Manufacturing Process Unit Exemption
Satellite Accumulation Area Exclusion



All of these exclusions and exemptions were refuted, however we made sure to get affirmation and clarity from headquarters



Discussion of Refuted Closed-Loop Recycling Exclusion

EPA's Evaluation of Satellite Accumulation Area Exclusion

