

Hazardous Waste Section
File Room Document Transmittal Sheet

Your Name: Spring Allen (061)
EPA ID: N C R 0 0 0 1 3 6 2 4 2
Facility Name: UPM Raflatac
Document Group: Inspection/Investigation (I)
Document Type: Compliance Evaluation Inspection (CEI)
Description: routine lqg cei
Date of Doc: 1/8/2013
Author of Doc: Spring Allen

File Room Use Only

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Date Recieved by File Room:

Month	Day	Year

Date Scanned:

Scanner's Initials:

Hazardous Waste Compliance Data Entry Form – Side A

EPA ID Number: NCR 000 136 242

Facility Name: UPM Raflatac

Street: 400 Broadpointe Drive

Phone: 828-651-4796

City: MILLS RIVER Zip: 28759

County: Henderson

EVALUATION DATA New: XX Change: ___ Delete: ___

Date: 01 / 08 / 2013 Evaluation Type: CEI

Date: Evaluation Type:

Inspector ID #: 061 Reason: ___

Evaluation Comments:

SNC DETERMINATION: If this evaluation resulted in a SNC determination, fill in this block. (NOTE: SNC determinations are SNY/SNN evaluations. The SNY/SNN evaluation can also be submitted later on a separate form.)

Facility is (Check one)

- a SNC (SNY evaluation) Docket #
 or
 no longer a SNC (SNN evaluation)

YES / NO CSE ONLY

Waste Involved	Volume	Exposure Media (a, gw, sw, s)	Distance to Residences	Number of People involved	Distance to On-site wells	Distance to Off-site wells

RCRA INSPECTION REPORT

x= VIOLATION NOTED NA= NOT APPLICABLE

Facility Name: UPM Raflatac
Location: 400 Broadpointe Drive, Fletcher, NC 28732
Mailing Address: 400 Broadpointe Drive, Fletcher, NC 28732
EPA ID#: NCR 000 136 242 **Phone Number:** 828-651-4796
Contact/ Title: Laura Cummings **Inspection Date:** January 8, 2013
Last Inspection: February 8, 2012 **Status:** Large Quantity Generator
Type of Inspection: CEI **Inspector(s):** Spring Allen
Present at Inspection: James Horton, Matt Heafey, Bob Reavis, Spring Allen

Type of Business: UPM Raflatac is a 250,000 square foot manufacturing facility located on 16.25 acres. The facility supports 285 employees and operates under NAICS # 32222. They manufacture pressure sensitive laminate for printing peel-off pressure applied labels. Processes include silicone coating followed by heat treating, adhesive coating followed by heat treating, application of face paper. Then the product is cut, stacked, and packaged. Hazardous waste is generated when equipment is cleaned with mineral spirits. The facility operates an automated warehouse, materials supply and packaging & delivery system. There are no wells on site and the closest residential structure is more than 1/2 mile away. The facility is located in an industrial park.

Wastes Generated: hazardous or regulated waste streams generated on-site:
D001/F003 Solids – containing liquid ethyl acetate/ mineral spirits
D001/F003 liquid ethyl acetate/ mineral spirits D009 HW solid
D001/ F003 di-limonene/ ethyl acetate D003 Solid polysiloxane
Universal waste lamps, batteries E-Waste
Used oils Oily waste silicon debris non-HW glue water
Manifests indicate that U-Waste Lamps are regularly manifested off-site for recycling..

Manifests: Approved Transporters? yes Approved TSDF? yes
Filled out correctly? yes Signed Copies? yes LDR Notification Attached? yes
Comments - Manifests are in very good order. They are kept in a labeled binder. LDR certification is kept in the Manifest binder along with the waste profiles.

Transporters: Univar USA, Inc. GAD 980 845 077
Dupree Transport, Inc. LAD 000 045 963
AR Paquette & Co. Inc. FLD 982 105 884
Heritage Transport IND 058b484 114
EQ Industrial Service MID 000 263 871
NEO Corporation non- HW

TSDF's: Giant Resource Recovery SCD 036 275 626
VLS Piedmont, LLC SCR 000 762 468
Heritage WTI, Inc. DBA WTI OHD 980 613 541
EQ Detroit MID 980 991 566
BR Spartanburg SDR000 004 358

Waste Minimization:

UPM Raflatac has a written plan and strong corporate support for WM efforts. They continue waste minimization efforts as follows. The facility has placed tanks holding specialized cleaning fluids in each department that are compatible with the type of products used there. Towels and uniforms are cleaned by Coyne Laundry. They are currently recycling paper for energy recovery. They continue to minimize solvent use by training to improve housekeeping. Solid Waste, Hazardous Waste, Solvent Usage, Electricity and Water Usage are tracked on a corporate computer model. The inline recycling filter unit for reuse of de-limonene has decreased the generation by more than 85%. They also concentrate on efforts to recycle cardboard, plastic trim, cores, pallets, scrap metal, and Aluminum can.

Inspection Records: Weekly inspections have been conducted and recorded as required. The facility is neat, clean and orderly.

Contingency Plan: On-Site? yes Any Changes to facility/ processes or Emergency Coordinators since last review? yes Are changes needed to the plan? no Has the plan been Implemented? no (If yes, comment about adequacy) The contingency plan was last updated on November 12, 2012 The emergency coordinator information was updated with Randy Hart's leaving the facility. Laura Cummings is the primary emergency coordinator. Alternate emergency coordinators are Joe Zataglia, Olli Viljanmaa, and Eric Petit, and Keith Moore. The plan includes home addresses for ECs, evacuation, and emergency equipment. Descriptions of arrangements with emergency responders are included in cover letters sent with plan copies.

Training Records: Certified Training Records Available?

Personnel training has been conducted according to the computerized training matrix. Training is conducted within the required time frames for individual personnel. 173 persons were trained on 12-12-2012. New personnel were trained on January 1-7- 2013. All emergency coordinators were trained as required. Job descriptions are under review due to personnel changes and changes in job requirements.

New Employees Since Last Inspection? yes

Evidence of Improper/ Inadequate Training? no

Biennial Report Submitted: submitted electronically on 2-18-2012

Emergency Preparedness:

Facility Maintained and Operated to Prevent Releases? yes

Internal Communications or Alarm Present? yes

Portable Fire Extinguishers and/ or Fire Control Equipment? yes, records of equipment inspection are available. Spill Control Equipment: yes

Adequate Water Volume, Foam Equipment or Sprinkler System? yes

All equipment / alarms tested/ maintained? yes

All Personnel Handling HW have access to Alarm/ Device? yes, cellular phones

Adequate Aisle Space in operation areas? yes

Satellite Accumulation Area(s):

Location(s) / Description of waste:

1. Used oil and other lubricants (segregated to improve recycling)
2. D001/F003 Solvent mixture of Ethyl acetate and mineral spirits are accumulated in designated areas where they are generated at each laminator and in the finishing area.. Each was labeled, dated, and closed as required.
3. D001/ F003 Wipes contaminated with Ethyl acetate and mineral spirits (may contain free liquids) are accumulated in five designated areas: at each laminator, on the slitting side of the facility, and in two designated areas in the tank farm area. Each is labeled and closed as required.

Closed? yes Labeled/ ID yes <55 gallons? yes waste in containers? yes

Storage Area(s): The storage area is a 20' X 25' flammable storage containment room located in the indoor tank farm in the rear of the building. The area is equipped with a spill kit. Containers are stored on pallets. At the time of inspection two (2) containers holding D001/ F003 solids/ containing liquids were in storage. Each was labeled, dated, and closed as required. Additionally, there were eight (8) containers holding D001/F003 silicone with mineral spirits in storage. Each was labeled, dated and closed as required. Required aisle space is provided. Personnel carry cellular phones for communication.

Containers closed? yes Aisle Space? no Labeled? yes
Evidence of Release? no <90 days? yes Good Condition? yes

Universal Wastes : Manifests indicate that lamps are manifested off-site on a regularly. At the time of inspection one box holding 4' lamps, one box holding 8' lamps, one box holding miscellaneous bulbs and one 30-gallon container holding batteries were in storage in the compressor room. Battery posts are taped prior to being placed into the container.

Site Deficiencies: none noted

Recommendations:

The Following Recommendations are offered as part of the Compliance Evaluation Inspection conducted on January 8, 2013.

1. Continue to update arrangements with emergency responders with personal contact each three years at minimum.

Spring Denise Allen 1-8-2013
Inspector (Date)

by mail

Facility Contact (Date)