

Hazardous Waste Section  
File Room Document Transmittal Sheet

Your Name: Spring Allen  
EPA ID: NCR000136242  
Facility Name: UPM Raflatac, Inc.  
Document Group: Inspection/Investigation (I)  
Document Type: Compliance Evaluation Inspection (CEI)  
Description:  
Date of Doc: 2/2/2011  
Author of Doc: Spring Allen

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**File Room Use Only**

NCR000136242

Date Recieved by File Room:

Month	Day	Year

Scanner's Initials:

Date Scanned:

## Hazardous Waste Section File Room Document Transmittal Sheet

**I. Identification:**

*Fill out form completely and accurately before sending it to File Room*

<b>Your Name</b>	Spring Allen (061) <small>Print Your Name Above (Last, First)</small>
<b>EPA ID #</b>	N C R 0 0 0 1 3 6 2 4 2
<b>Facility Name</b>	UPM Raflatac, Inc. <small>Facility's Name as it appears in RCRAInfo</small>

**II. Document Type:**

*Highlight, check or Circle*

**Document Type below**

<p><b>General (G)</b></p> <input type="checkbox"/> Compliance Assistance Visit (CAV) <input type="checkbox"/> Fees/Invoices (F) <input type="checkbox"/> Hazardous Waste Report (HWR) <input type="checkbox"/> Notification 8700 (8700) <input type="checkbox"/> Technical Assistance (TA) <input type="checkbox"/> Correspondence (C) <input type="checkbox"/> Other (O)	<p><b>Permit (P)</b></p> <input type="checkbox"/> Alternative to Post-Closure Permit (APC) <input type="checkbox"/> Emergency Permit (EMP) <input type="checkbox"/> Modification (MOD) <input type="checkbox"/> Notice of Deficiency (NOD) <input type="checkbox"/> Part A Application (PA) <input type="checkbox"/> Part B Application (PB) <input type="checkbox"/> Permitting Information (PI) <input type="checkbox"/> Correspondence (C) <input type="checkbox"/> Other (O)	<p><b>Corrective Action (CA)</b></p> <input type="checkbox"/> Confirmatory Sampling (CS) <input type="checkbox"/> Corrective Action Information (CAI) <input type="checkbox"/> Corrective Measure Plan/Design (CMPD) <input type="checkbox"/> Corrective Measures Study (CMS) <input type="checkbox"/> Environmental Indicators (EI) <input type="checkbox"/> HSWA Remedy (HSWA) <input type="checkbox"/> Interim Measures Study/Plan/Implemented (IM) <input type="checkbox"/> Land Use Restriction, Institutional Controls (LUR) <input type="checkbox"/> RCRA Facility Assessment (RFA) <input type="checkbox"/> RCRA Facility Investigation (RFI) <input type="checkbox"/> Remediation System Effective Reports (RSER) <input type="checkbox"/> Correspondence (C) <input type="checkbox"/> Other (O)
<p><b>Closure (C)</b></p> <input type="checkbox"/> Closure Information (CI) <input type="checkbox"/> Closure Plan (CP) <input type="checkbox"/> Closure Report/Certification (CR) <input type="checkbox"/> Correspondence (C) <input type="checkbox"/> Other (O)	<p><b>Groundwater (GW)</b></p> <input type="checkbox"/> Comprehensive Monitoring Event (CME) <input type="checkbox"/> Groundwater Monitoring Report (GMR) <input type="checkbox"/> Correspondence (C) <input type="checkbox"/> Other (O)	<p><b>Enforcement (E)</b></p> <input type="checkbox"/> Administrative Order on Consent (AOC) <input type="checkbox"/> Compliance Order (CO) <input type="checkbox"/> Enforcement Package (EP) <input type="checkbox"/> Immediate Action Notice of Violation (IANOV) <input type="checkbox"/> Notice of Violation (NOV) <input type="checkbox"/> Settlement Agreement (SA) <input checked="" type="checkbox"/> Ticket Notice of Violation (TNOV) <input type="checkbox"/> Correspondence (C) <input type="checkbox"/> Other (O)
<p><b>Inspection/Investigation (I)</b></p> <input type="checkbox"/> Case Development Inspections (CDI) <input type="checkbox"/> Complaint Investigation (CMP) <input checked="" type="checkbox"/> Compliance Evaluation Inspection (CEI) <input type="checkbox"/> Compliance Schedule Evaluation (CSE) <input type="checkbox"/> Emergency Response (EMR) <input type="checkbox"/> Focused Compliance Inspection (FCI) <input type="checkbox"/> Sampling Event (SPL) <input type="checkbox"/> Correspondence (C) <input type="checkbox"/> Other (O)	<p><b>Financial (F)</b></p> <input type="checkbox"/> Balance sheets (BS) <input type="checkbox"/> Financial record review (FRR) <input type="checkbox"/> Financial statements (FS) <input type="checkbox"/> Insurances (I) <input type="checkbox"/> Mechanisms and instruments (MI) <input type="checkbox"/> Tax returns (TR) <input type="checkbox"/> Correspondence (C) <input type="checkbox"/> Other (O)	

**III. Description:**

*Use up to 256 characters to describe the document. Every word below can be used as a searchable index to locate the document*

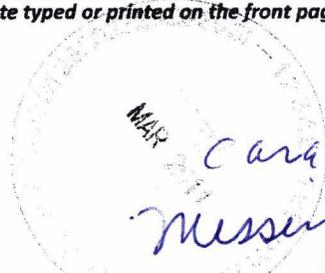
UPM Raflatac, Inc. LQG cei w/ nov docket # 2011-46

**IV. Date of Document:** *Date when the document generated, the date typed or printed on the front page of document*

<b>Date on Document</b>	02	02	2011
	<small>Month</small>	<small>Day</small>	<small>Year</small>

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 CARA FILE  
 MISSING  
 Waste Minimization info  
 P2

## Hazardous Waste Compliance Data Entry Form – Side A

EPA ID Number: NC <sup>B</sup> 000 136 242

Facility Name: UPM Raflatac  
 Street: 400 Broadpointe Drive  
 City: Fletcher Zip: 28732  
 County: Henderson

EVALUATION DATA      New: XX      Change: \_\_\_\_\_      Delete: \_\_\_\_\_

Date: 02/02/2011      Evaluation Type: CEI  
 Date: \_\_\_\_\_      Evaluation Type: \_\_\_\_\_

Inspector ID #: 061      Reason: \_\_\_\_\_

Evaluation Comments: ticket nov docket # 2011- 46

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

Date Determined: 02/02/2011  
 Branch: 01      Person: 061

Return to Compliance: 03/02/2011      02/04/2011  
    Scheduled      Actual

Regulation Description: 40 CFR 262.34(d) – 265.173(a) open containers

Comment: The violation was corrected at the time of inspection.

# 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:** February 2, 2011  
**Last Inspection:** November 16, 2009 **Status:** Large Quantity Generator  
**Type of Inspection:** CEI **Inspector(s):** Spring Allen  
**Present at Inspection:** Laura Cummings, Spring Allen

**Type of Business:** UPM Raflatac is a 250,000 square foot manufacturing facility on acres. 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.

**Distance to Neighbors:** < 1/2 mile **Number of Employees:** 250  
**Wells on-site / off-site?** NA / unk **NAICS #** 32222

**Wastes Generated:** hazardous or regulated waste streams generated on-site:

D001 mineral spirits D001/ F003 dlimonene/ ethyl acetate

D001 Solids – containing liquid ethyl acetate/ mineral spirits

Universal waste lamps Universal Waste Batteries

Used oils non-HW Electronics

Oily waste silicon debris non-HW adhesive waste

non-HW varnish waste non-HW floor cleaner

Manifests indicate that Universal Waste Lamps are manifested off-site for recycling on a regular basis.

**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  
Garco, Inc. U-Waste NCR 000 135 384  
NEO Corporation non-HW NCR 000 009 423

**TSDF's:** Giant Resource Recovery SCD 036 275 626  
VLS Piedmont, LLC SCR 000 762 468  
Garco U-Waste NCR 000 135 384  
JBR (Spartanburg) non-HW

**Waste Minimization:**

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 as energy recovery. They have minimized solvent use by increasing training improving housekeeping. Solid Waste, Hazardous Waste, Solvent Usage, Electricity and Water Usage are tracked on a corporate computer model. Additionally, the facility has installed an inline recycling filter unit for reuse of delimonene. Previous generation was about one 55-gallon container per month. They will generate less than one per year since installing this unit.

**Inspection Records:** Weekly inspections have been conducted and recorded as required. A note to the file indicates the directive of inspecting each seven days. Evidence that inspections are conducted: The facility is neat, clean and orderly

**Contingency Plan:** On-Site? yes Any Changes to facility/ processes or Emergency Coordinators since last review? no 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 December 29, 2010 in response to an on-site facility tour with the Mills River FD. The primary emergency coordinator, Randy Hart has been deployed to Afghanistan. During his absence Robert Revels has been named as primary emergency coordinator. Emergency responders have been notified of this change. The alternates are Mark McClintic, Laura Cummings, Olli Viljanmaa, and Eric Petit. The plan includes home addresses for ECs. Evacuation, emergency equipment, and description of arrangements with emergency responders are included.

**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. New Employees Since Last Inspection? no  
Evidence of Improper/ Inadequate Training? no

**Biennial Report Submitted:** submitted electronically on 2-22-2010  
LQG questionnaire was submitted on 9-17-2010. A copy is on site.

**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: Each was labeled and closed as required.

1. Lubricants (segregated to improve recycling)
2. & 7. D001 Solvent mixture
3. & 6. D001 Silicone & mineral spirits – Each is considered open as the small drum bung is open.
4. D001 Wipes contaminated with mineral spirits (may contain free liquids) are accumulated in multiple areas. Each is labeled and closed as required.

Closed? no 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 six (6) containers were in storage. Each was labeled, dated, and closed as required. Additionally, there were two (2) containers accumulating D001 adhesive rags. Neither was dated. Facility personnel stated that they would move the accumulation containers to an area near the point of generation. Personnel carry cellular phones for communication.

Containers closed? no Aisle Space? yes 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.

#### **Site Deficiencies:**

**40 CFR 262.34(d) / 265.173(a)** A container holding hazardous waste must always be closed during storage, except when it is necessary to add or remove waste. Rafalac is in violation of 40 CFR 265.173(a) in that two containers holding F003/ D001 waste silicone and mineral spirits were open at the time of inspection.

#### **Recommendations:**

The Following Recommendations are offered as part of the Compliance Evaluation Inspection conducted on February 2, 2011.

1. Continue to update arrangements with emergency responders with personal contact each three years at minimum and expand the description of emergency equipment in the contingency plan as discussed.
2. Continue inspections of funnel gaskets and containment pallets at each container change and assure accumulation container funnels are kept closed / latched unless adding waste.

Spring Denise Allen      2-2-2011  
Inspector                      (Date)

by mail  
Facility Contact              (Date)