

**HAZARDOUS WASTE SECTION - COMPLIANCE BRANCH  
FILE TRANSMITTAL & DATA ENTRY FORM**

**Your Name:** Jeff Menzel

**Facility ID Number:** NCR000004135

**Facility Name:** Plastic Packaging Forest City

**Document Group:** Inspection/Investigation (I) **Document Type:** G - Compliance Assistance Visit (CAV)

**Description for File (for CARA):** Compliance assistance for solvent recovery system

**Date of Document:** 6/15/2015

**Author(s) of Document:** Jeff Menzel

**Inspector ID #:** NC014

**Suborganization:** Western Region

**Comments for RCRAInfo:** Compliance assistance for solvent recovery system

**County (if not on report):** Rutherford



**NORTH CAROLINA DEPARTMENT OF ENVIRONMENTAL QUALITY  
DIVISION OF WASTE MANAGEMENT  
HAZARDOUS WASTE SECTION (HWS) / COMPLIANCE BRANCH**

**RCRA INSPECTION REPORT**

1. **Facility Information:** Plastic Packaging, Inc.  
681 Piney Ridge Road  
Forest City, NC 28043  
**NCR 000 004 135**
  
- Mailing Address:** P.O. Box 2029  
Hickory, NC 28603
  
2. **Facility Contact:** Mr. Ed Sievers, Plastic Packaging-Director of Compliance  
Phone: 828.381.2350 Email: [esievers@ppi-hky.com](mailto:esievers@ppi-hky.com)
  
3. **Inspector(s):** Mr. Jeff Menzel, HWS-Environmental Senior Specialist  
Mr. Sean Morris, HWS-Environmental Senior Specialist
  
4. **Survey Participants:** Mr. Ed Sievers, Plastic Packaging-Compliance Manager  
Mr. Kent Jones
  
5. **Date/Time of Inspection:** March 11, 2016 / Arrived: 10:30am Departed: 4:00pm
  
- Date of Report:** June 15, 2016– Prepared By: Jeff Menzel
  
6. **Purpose of Inspection:** To determine compliance with NC Hazardous Waste Rules & Regulations
  
7. **Report:**

On March 11, 2016, Mr. Sean Morris and I conducted a Compliance Assistance Visit (CAV) at Plastic Packaging, Inc. located in Forest City, NC. This visit was conducted to provide follow-up compliance assistance with a CAV that was performed on October 21, 2015, at the request of Mr. Ed Sievers. Specifically, this CAV was conducted to review container management procedures and the facility's spent solvent recycling system for compliance with NC Hazardous Waste Management Rules/Regulations. The facility operates as a large quantity generator of hazardous waste. A summary of the areas inspected are as follow:

Spent Solvent Recycling Operations:

Plastic Packaging, Inc. generates spent solvents/inks from cleaning operations associated with the facility's flexible packaging printing process. A new distillation unit was installed at the facility, which changed the manner in which spent solvents are conveyed & stored onsite. The facility's new distillation unit is an automated, continuous feed, system that operates on a 10-hour distillation cycle. Facility personnel explained that each distillation cycle can produce 200-250 gallons of recycled solvent. The recycling system is interconnected, via fixed piping, to one printing press, one 250-gallon solvent distillation unit, one 2000-gallon above ground recycled solvent tank, one 4000-gallon above ground spent solvent tank and one 4000-gallon above ground distillation still bottom waste collection tank. Solvent is circulated through the system using a series of pneumatic, vacuum & diaphragm pumps. The system is utilized by press operators, as needed, to flush-out/clean the printing press, using a blend of propanol & ethyl acetate solvent.

The recycling process is a loop system where clean/recycled solvent is pumped through the printing press for cleaning and is then pumped to the spent solvent tank for storage until entering the distillation unit. After distillation, clean solvent is transferred to the clean solvent tank for storage until being re-circulated back to the printing press. The solvent distillation process generates distillation still bottoms, which are pumped to the distillation still bottom waste tank for storage until being collected for off-site disposal as a D001 hazardous waste.

The new system was designed with a solvent sink and vacuum hand pump interconnected to the system piping, which when operated in this manner causes the system to not qualify under the Closed Loop Recycling exemption provided at 40 CFR 261.4 (a)(8). On March 16, 2016 Mr. Sievers confirmed that the system would not be modified to meet the Closed Loop Recycling system exemption. The following comments were provided regarding the proper management of the facility's solvent recycling system:

- \* The solvent recycling system's still bottom waste tank, used solvent tank and associated piping/conveyance equipment is subject to all applicable hazardous waste tank & air emission regulations found at 40 CFR Part 265, Subparts J, BB & CC. The recycling system must be brought into compliance within 30-days from the date this report is received.**

Hazardous Waste Satellite Accumulation & Storage Areas:

During the visit, the facility's satellite accumulation areas and hazardous waste container storage area were visually inspected. The following comments were provided regarding the proper management of hazardous waste containers:

- It is strongly recommended that all SAA containers being used for the accumulation of used solvent wipes be inventoried so that their location within the facility is known at all times. The lids on each container should be inspected for integrity to confirm that the lids can close securely. The containers should also be evaluated for proper labeling as a hazardous waste SAA. The facility should develop a used rag management plan and include this in the annual RCRA training.
  - Facility personnel should inspect all hazardous waste container lids and funnel lids, if applicable, to ensure that each lid creates a proper tight seal to the container. Additionally, funnels used with hazardous waste containers must be equipped with a gasket that is in good condition and lids must not be bent or damaged.
  - Facility personnel should move the satellite accumulation container from the Distillation Room to the press area so that the container is considered at or near the point of generation and under the control of the operator generating the waste. Facility personnel must either designate a satellite accumulation area, or accumulate waste in a storage area. It is also a reminder that accumulation start dates must be marked on hazardous waste storage containers but are not required on containers that meet the classification of a hazardous waste satellite accumulation area.
- \* All containers being used to manage hazardous waste must be brought into compliance within 30-days from the date this report is received.**



06/15/2016

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**JEFF MENZEL, / DATE  
NC HWS-COMPLIANCE BRANCH**

**SENT BY EMAIL  
ED SIEVERS**

CC:  
Central Office Files  
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