

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

Your Name: Jeff Menzel

Facility ID Number: NCR 000 136 242

Facility Name: UPM Raflatac

Document Group: Inspection/Investigation (I)

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Inspector ID #: NC014

Suborganization: Western Region

County (if not on report):

Facility Name	<u>TSD Facilities:</u> EPA ID #
Giant Resource Recovery	SCD 036 275 626
VLS Piedmont, LLC	SCR 000 762 468
Tradebee Treatment & Recycling	TND 000 772 186
Holston Energy used oils	

Transporter Name	<u>Transporters:</u> EPA ID #
Univar USA, Inc.	GAD 980 845 077
Dupree Transport, Inc.	LAD 000 045 963

Document Review

- **262.12- EPA ID Numbers** ***Compliance Yes**
 (a) Generators must acquire an EPA ID Number before they offer hazardous waste for shipment or disposal
 (c) Generators must use approved TSD's and Transporters with valid EPA ID numbers.
- **262.20- Manifest** ***Compliance Yes**
 Manifests must be properly filled out for all hazardous waste shipments.
- **268.7 (a)(4)- LDR Certification** ***Compliance Yes**
 Land Disposal Restrictions must accompany all waste streams sent to TSDF.
- **262.34(a)(1)(i) ref 265.174- Weekly Inspections** ***Compliance Yes**
 Storage Areas must be inspected weekly for leaking containers and for deterioration of containers caused by corrosion.
- **15A NCAC 13A .0107(d) – Documented Weekly Inspections** ***Compliance Yes**
 The generator must keep records of the inspections and results of the inspections for at least three years from the date of the inspection.
Weekly inspection records were reviewed from September, 2014-present. Employees conduct these inspections for each SAA container as well as the less than 90 day hazardous waste storage area.
- **262.40- Recordkeeping** ***Compliance Yes**
 - a) Manifest must be kept for three years
 - b) Biennial Reports must be kept for three years. (does not apply to SGQ)
 - c) Waste analyses or test results must be kept for three years
 - d) If enforcement actions are taken these time periods are extended.
- **262.41- Biennial Report** **Submitted: 02/20/2015** ***Compliance Yes**
 Generators who ship hazardous waste in the US must prepare a Biennial Report by March 1 of each even numbered year.

Subpart C – Preparedness and Prevention

- **265.33- Testing and Maintenance of Equipment** ***Compliance Yes**
 All equipment listed in this section should be tested and maintained to assure operation in case of an emergency.
- **265.37- Arrangements with Local Authorities** ***Compliance Yes**
 - (A) Arrangement for services should be made with the following:
 - 1) Arrangements to familiarize **police, fire departments and emergency response teams** with the facility layout, properties of hazardous waste handled and associated hazards, places where people normally work, entrance roads and evacuation routes.
 - 2) Primary response agencies should be established with all emergency responders. All others will support.
 - 3) Arrangements with **state emergency response teams, contractors, and equipment suppliers.**
 - 4) Arrangements to familiarize **local hospitals** with the properties of hazardous waste handled and types of injuries or illnesses which could result from fires, explosions or releases at the facility.
 - (B) Documentation from any local authorities that decline any of the emergency arrangements

UPM Raflatac contacted local response entities to make arrangements for emergency response in October 2015.

Subpart D – Contingency Plan and Emergency Procedures

- **265.51- Contingency Plan** **Last Revised: September 2015** ***Compliance Yes**

- (a) Each owner or operator must have a contingency plan for their facility.
- (b) Plan must be carried out in the event of a fire, explosion, or release of hazardous waste that could threaten health or environment.

- **265.52- Content of the Contingency Plan** ***Compliance Yes**

- a) Plan must describe the actions personnel must take to respond to event including fire, explosion and spills.
- b) SPCC plan can be amended to include required content in this subpart.
- c) Plan must describe arrangements agreed to by local police, fire, hospitals, contractors, and state agencies.
- d) The plan must list names, addresses, and phone numbers (home and office) for all emergency coordinators. List must be kept up to date. Primary coordinator and secondary coordinators should be listed.
- e) Plan must include a list of all emergency equipment and alarms at the facility. List should show locations and physical descriptions, and capabilities of equipment. List must remain up to date.
- f) The plan must include an evacuation plan if evacuation may be required. The plan should describe signals, evacuation routes, and alternate evacuation routes.

The facility's Contingency Plan was most recently updated in September 2015, and UPM Raflatac contacted local responders to make arrangements emergency arrangements in October 2015.

- **265.53- Copies of the Contingency Plan** ***Compliance Yes**

Contingency plans and revisions must be:

- a) Maintained at the facility.
- b) Submitted to all local police, fire, hospitals, state agencies, and emergency response teams.

- **265.54- Amendment of the Contingency Plan** ***Compliance Yes**

Plan must be amended when:

- (a) Regulations are revised
- (b) Plan fails in an emergency
- (c) Facility changes
- (d) Emergency coordinators change
- (e) Emergency equipment changes

- **265.55- Emergency Coordinator** ***Compliance Yes**

An emergency coordinator should be on the premises or on call at all times. Must be able to respond in a short period of time. The coordinator must be familiar with all aspects of the contingency plan, operations, locations of haz-waste, record locations, and facility layout. Person must have the authority to commit resources needed to carry out contingency plan.

Laura Cummings - primary, Joe Zavaglia - secondary

- **265.56- Emergency Procedures** ***Compliance Yes**

- a) During an emergency event the coordinator must immediately:
See regulations described at 40 CFR 265.56 if an event occurred causing the Contingency Plan to be implement

- 265.16- Personnel Training & Job Description** ***Compliance Yes**

- a) (1) Facility personnel must successfully complete a program of classroom instruction or on-the-job training that teaches them to perform their duties in a way to ensure compliance with these sections requirements.
- (2) Training must be conducted by a person trained in hazardous waste management procedures and training must include hazardous waste management training relevant to each employee's position (including contingency plan implementation).
- (3) Training should be designed to ensure that personnel can respond properly to emergencies.
- b) Personnel must complete the training within six months of their hire date or when they change job responsibilities.

- c) Personnel must take part in an annual review of the initial training.
- d) The following documents must be maintained at the facility:
 - (1) Job title and person filling position for each position related to hazardous waste management.
 - (2) A job description for each position listed above, including requisite skills, education, and qualifications. Position duties should also be recorded.
 - (3) A written description of the type and amount of initial and continuing training that will be given for each position.
 - (4) Records that document that the training or job experience have been completed by personnel.
- e) Training records on current personnel must be kept until closure of the facility. Training records on all former employees must be kept for at least three years from date of separation

Laura Cummings is the primary emergency coordinator. Alternate emergency coordinators are Joe Zataglia, and Olli Viljanmaa. 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.

Facility Walkthrough

- **262.30- Proper DOT Containers** ***Compliance Yes**
Waste must be packaged in accordance with applicable DOT regulations 49 CFR 173, 178, 179.
- **262.34 (a)- Accumulation Time** ***Compliance Yes**
A generator may accumulate hazardous waste on-site for 90 days or less without a permit.
- **262.34 (a)(1)(i)- Storage Container Spills/Releases** ***Compliance Yes**
Waste must be placed in containers.
- **262.34(a)(1)(i) ref 265.176- Waste Placement** ***Compliance Yes**
Ignitable or reactive waste must be stored at least 50 feet from the property line
- **262.34(a)(1)(i) ref 265.177- Incompatible Waste** ***Compliance Yes**
(a) Incompatible waste/materials must not be placed in the same container
(b) Hazardous waste must not be placed in an unwashed container that previously held an incompatible waste
(c) Incompatible waste must be separated while in storage
- **262.34 (a)(2)- Accumulation Start Dates** ***Compliance Yes**
Containers in storage must be dated when accumulation begins.
- **262.34 (a)(3)- Storage Container Labeling** ***Compliance Yes**
Containers in storage area must be labeled “Hazardous Waste”.
- **262.34(c)(1)- Satellite Container Spills/Releases** ***Compliance Yes**
No more than 55-gallons may be placed in containers at or near the point of generation under the control of the operator. No spills of hazardous waste on/around satellite accumulation containers.
- **262.34(c)(1)(i) ref 265.171- Container Condition** ***Compliance Yes**
Container in poor condition must be replaced.
- **262.34(c)(1)(i) ref 265.172- Container Compatibility** ***Compliance Yes**
Containers must be compatible with the waste they hold.
- **262.34(c) (1) (i) ref 265.173(a)- Container Management** ***Compliance Yes**
Containers must be maintained in a closed position unless adding or removing waste.
All satellite containers were properly closed.
- **262.34(c) (1) (ii) - Satellite Container Labeling** ***Compliance Yes**
Satellite containers must be marked with the words “Hazardous Waste” or other words to describe the contents.
All satellite containers were properly labeled.

- **265.31- Maintenance and Operation of Facility** ***Compliance Yes**
Facility must be operated to minimize the possibility of a fire or any unplanned sudden or non-sudden release of hazardous waste that threatens health or environment.
- **265.32- Required Equipment** ***Compliance Yes**
Facilities must have the following equipment unless not needed.
 - (a) Internal communications or alarm system that provides emergency instruction to personnel.
 - (b) A telephone or two-way radio must be available at the scene of operation to summon emergency assistance.
 - (c) Fire extinguishers and fire control equipment spill control, and decontamination equipment.
 - (d) Adequate water volume and pressure to supply fire hoses, automatic sprinklers, or water spray systems.
- **265.34- Access to Communications** ***Compliance Yes**
 - (a) Whenever hazardous waste is being handled, all personnel involved must have access to an alarm or communication device. Visual or voice contact is allowed.
 - (b) If there is just one person at the facility, while in operation, they must have immediate access to a telephone or two-way radio capable of summoning emergency assistance.
- **265.35- Required Aisle Space (15A NCAC 13A .0110 (c))** ***Compliance Yes**
Two feet of aisle space must be maintained to allow unobstructed movement of personnel or safety equipment.

Satellite Accumulation Area(s):

Used oil and other lubricants (segregated to improve recycling). Used oil is collected in a labeled tote.

D001/F003 Solvent mixture of Ethyl acetate and mineral spirits are accumulated in three (3) designated areas where they are generated at each laminator and in the finishing area. Each was labeled, dated, and closed as required.

D001/ F003 Wipes contaminated with Ethyl acetate and mineral spirits (may contain free liquids) are accumulated in five (5) 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.

Less Than 90-Day Hazardous Waste Storage Area(s):

The storage area is a 25' X 25' caged area located in the newly constructed flammable storage building in the rear of the facility. The area is equipped with a spill kit. Containers are stored on pallets. At the time of inspection there was one (1) container holding D001/ F003 solids/containing liquids was in storage. The container was labeled, dated, and closed as required. Additionally, there were one (1) container holding non-HW silicone absorbents in storage. Each was labeled, dated and closed as required. Required aisle space is provided. Personnel use the buddy system when entering the building as cellular phones carried by personnel are left outside the building.

Comments and Recommendations:

No violations of applicable regulations were observed during this inspection.



**JEFF MENZEL, 03/28/2016
NC HWS-COMPLIANCE BRANCH**

**SENT BY EMAIL
Laura Cummings**

cc:
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Central Office Files

