

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

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Facility ID Number: NCR000004135

Facility Name: Plastic Packaging, Inc. - Plant 2

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**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-Compliance Manager
Phone: 828.381.2350 Email: 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

5. **Date/Time of Inspection:** October 21, 2015 / Arrived: 10:20am Departed: 4:00pm

- Date of Report:** February 29, 2016– Prepared By: Sean Morris

6. **Purpose of Inspection:** To Determine Compliance & Provide Compliance Assistance with NC Hazardous Waste Rules & Regulations

7. **Facility Description:**

On October 21, 2015 Mr. Jeff Menzel and I conducted a Compliance Assistance Visit (CAV) at Plastic Packaging, Inc. located in Forest City, NC. Mr. Ed Sievers requested the CAV as he has transitioned to the facility's primary hazardous waste contact/manager.

Plastic Packaging, Inc. operates a flexographic printing process for packaging of such items as packaged foods, tobacco products, specialty products and other consumer goods. The facility has been at the current location since 1957 and is located on a 15-acre tract with one main production building that is 75,000 square feet in size. The facility currently has approximately 20-employees and operates 4 shifts 6 days a week. The facility borders a residential area, approximately 500-feet from the east portion of the property, and there are no known water supply wells onsite. The facility is connected to the Town of Spindale's POTW for water and sewer services and does not operate a wastewater pretreatment system. The last RCRA inspection conducted at this facility was on September 30, 2014.

Plastic Packaging, Inc. generates hazardous waste from spent solvents/inks and adhesives used in the flexible packaging printing process. The facility has five printing presses but only one of the presses was in operation at the time of the inspection. The facility can utilize 10 different colors for printing. The operating printing press is hard piped to a solvent distillation system. The recycling unit generates hazardous waste distillation bottoms on a routine basis and hazardous waste is also generated from spent solvents, inks and adhesives that can't be recycled. Hazardous waste is accumulated in containers and in one tank connected to the recycling system. The recycling system is further detailed in this report. The facility also generates used oil and universal waste and generates used solvent wipes, which are laundered and returned to the facility for reuse by Coyne Textile Services. Plastic Packaging is currently managing used solvent wipes as excluded solvent-contaminated wipes once free liquids are drained from the wipes. The facility was listed & operating as a LQG.

8. Hazardous Waste Type(s):

- D001, waste flammable liquid (n-propanol, ethyl alcohol) "Distillation Still Bottoms"
- D001/F003, waste flammable liquid (propanol, ethyl acetate) "Waste Adhesives, Inks & Solvent"
- D001, waste flammable liquid (n-propanol, isopropanol) "Used Mop Water"
- D002 corrosive liquid (NaOH)

9. Areas of Inspection:Manifests:

Hazardous waste manifests were reviewed from September 2014 to present. The manifests reviewed were in good order and documented approved transporters and TSD facilities. Land Disposal Restriction forms accompanied the manifests.

Transporters: Freehold Cartage – NJD 054 126 164
 Superior Transport Logistics – INR 000 104 224
 Univar USA, Inc. – GAD 980 845 077
 Dupree Transport – LAR 000 045 963
 Environmental Options – VAO 000 122 994

TSDs: Giant Cement Company - SCD 003 351 699
 Giant Resource Recovery – SCD 036 275 626
 Reclaimed Energy – IND 000 780 403

Waste Minimization:

The facility maintains a written waste minimization plan onsite. The plan is reviewed on a biannual basis and is maintained as part of the facility's "Sustainable Green Printing Program". The most recent version of this plan was dated March 2012.

Weekly Inspections:

The facility conducts and documents daily inspections for the hazardous waste tank & recycling system and weekly inspections for the facility's hazardous waste container storage areas and satellite accumulation areas.

Emergency Preparedness:

The facility is equipped with a P/A system, fire alarm pull stations and security system monitored by an outside contractor. The facility is also equipped with fire extinguishers, spill control materials and a sprinkler system. Facility personnel routinely participate in emergency response drills/evacuations and the facility has a designated spill response team. Emergency arrangement agreement request letters were last submitted to local emergency response agencies and contractors in February 2013 by certified mail. The facility's primary emergency coordinator is currently listed as Mr. Ed Sievers and facility personnel confirmed that there have not been any incidents involving spills, releases, fires or explosions from management of hazardous waste since the time of last inspection.

Training:

The facility has a hazardous waste training program in place. A written description of the topics reviewed during each training course was available for review. Mr. Ed Sievers presents annual and initial RCRA training to employees through verbal review of the facility's RCRA training outline. The training outline includes a brief overview of hazardous waste management and handling procedures. The review includes several site specific hazardous waste management topics and specific contingency plan implementation topics. Mr. Sievers explained that there are approximately 33-employees which are required to receive annual RCRA training for job functions such as signing manifests, handling containers, acting as facility emergency coordinator and conducting weekly inspections. Mr. Ed Sievers presented

RCRA training to 33-employees on April 2015. The training was documented with attendance sheets and a post training written quiz completed by employees. RCRA job titles and job descriptions were available for employees involved in the management of hazardous waste. Mr. Sievers has been assigned as the facility's hazardous waste contact and he will be involved with providing RCRA training and other RCRA management duties. Mr. Ed Sievers attended NC HWS LQG Workshop in May 2015.

It is a reminder to insure that all employees date annual hazardous waste training completion records.

Biennial Report:

The facility's 2013 Biennial Hazardous Waste Report was submitted on February 27, 2014. The report was available for review at the time of the inspection.

Contingency Plan:

The facility maintains a RCRA contingency plan on-site. The plan was last revised on February 18, 2015. The plan lists Mr. Ed Sievers as the facility's primary RCRA emergency coordinator. The plan includes the coordinator names and home addresses. The plan includes a facility diagram, which lists the type and location of emergency equipment. The plan also lists the emergency response procedures for the sites emergency coordinators. The plan describes the evacuation process, emergency alarms and subsequent alarm tones, basic emergency response procedures and includes a list of contingency plan revisions. The plan also includes a revision section. The revised plan has been submitted to all required local authorities (See Comment Section). The plan lists STAT, Inc. as the facility's environmental emergency contractor.

Excluded Solvent-Contaminated Wipe Management:

The facility has begun managing used solvent wipes as excluded solvent-contaminated wipes per 40 CFR Part 261.4 (a)(26), adopted by reference and implemented by NC in February 2014. The facility currently generates approximately (2-3) 55-gallon containers of used solvent wipes on a monthly basis. Used solvent wipes are currently sent to Coyne Textile Services for laundering and return to Plastic Packaging for reuse. Plastic Packaging, Inc. has developed procedures & guidelines to remove free liquids from soaked/wet used wipes. Facility records indicate that a Paint Filter Test was performed on a representative sample of solvent wipes on July 15, 2015. The sample was taken from used solvent wipes, which had been allowed to drain for eight hours, and the results confirmed that the sample passed the analysis and qualify for the exclusion (See Comment Section).

Used solvent wipes are primarily accumulated in containers with a capacity of ~20-gallons or less and are maintained in four locations throughout production areas of the plant. Used solvent wipes are then placed into 55-gallon drainage containers within the Ink Room. The drainage containers are equipped with a metal mesh screen positioned approximately 24-inches above the bottom of each container. The drainage containers are filled with solvent soaked used wipes, which are kept within the containers for approximately 8-hours to allow for gravity to drain liquid solvent from the wipes. Once the wipes are drained of liquid solvent, the used wipes are then placed into either ~100-gallon plastic bins or 55-gallon steel containers that are labeled & managed as excluded solvent-contaminated wipes until transport to the laundering facility.

Used solvent wipe accumulation containers and drainage containers are managed as hazardous waste containers. Used solvent that accumulates within the containers during the draining process are transferred, as needed, into another 55-gallon hazardous waste storage container within the area.

Hazardous Waste Satellite Accumulation Areas (SAAs):

The following SAAs were visited at the time of the inspection:

1. Press 50 SAA - There was one 5-gallon container being used to accumulate hazardous waste used solvent wipes in this area. The container was properly labeled and closed.

2. Press 47 SAA - There was one 5-gallon container being used to accumulate hazardous waste used solvent wipes in this area. The container was properly labeled and closed.
3. Spent Solvent Wipe SAAs – There are approximately three 55-gallon containers located at various locations within process areas, which are used to accumulate used solvent wipes. The facility manages used solvent wipes as hazardous waste because of free liquids that also can accumulate within the containers. Once full, the containers are moved to the Ink Room Hazardous Waste Storage Area where the wipes are placed into 55-gallon containers designed to allow solvent to drain from the wipes. Most of the containers are equipped with a self-closing lid but several recommendations were made regarding management of the containers (See Comment Section).
4. Used Mop Heads SAA – There was one 55-gallon open-top container observed within the Ink Room. The container held several used, wet mop heads with a few inches of solvent visible within the container. The container was closed but was not labeled (See Deficiency Section).
5. Aerosol Can SAA – There was one 55-gallon container being used to accumulate hazardous waste aerosol cans. The container was properly labeled and closed at the time of the inspection.
6. Ink Room Mix Station SAA - There was one 55-gallon container being used to accumulate hazardous waste and the container was properly labeled and closed at the time of the inspection. Additionally there was one 5-gallon container being used as a work bucket and a recommendation was made to label the container accordingly.
7. Ink Sludge Area SAA - There was one 55-gallon container of hazardous waste ink/solvent located within the Pump Room. The container was properly labeled and closed at the time of the inspection. The container was equipped with a closed funnel and is used for collection solid ink waste and sludges that are too heavy to be pumped into the system. A small amount of spills were noted on the outside of the container (See Comment Section).

Hazardous Waste Storage Areas:

The facility maintains the following storage areas:

1. Central Container Storage Area - The storage area is a small designated area in the rear of the Product Storage Room. Hazardous waste is stored in a single row along the rear wall. There was no waste present at the time of inspection. Non-hazardous waste and dirty cleaning towels for the laundry are stored just inside the overhead door opening.
2. Distillation Bottoms Tank – The facility maintains one 4000-gallon tank system for storage of D001 hazardous waste, which is located outside of the facility. The tank is used for the collection of distillation bottoms and is equipped with secondary containment. The tank was properly labeled at the time of the inspection.

Solvent Distillation System:

The facility operates a continuous feed, 10-hour cycle distillation unit for recycling spent solvent. Mr. Sievers explained that a new distillation unit had recently been installed. Facility personnel indicated that each cycle results in 200-250 gallons per cycle. Still bottoms are pumped directly into a 4000-gallon double walled storage tank. Recovered solvent is stored in a 2000-gallon tank. All tanks are outside beside the still room. The recycling unit generates hazardous waste distillation bottoms on a routine basis.

The facility operates an automated solvent recycling system, which is connected via fixed piping to one printing press, one 250-gallon solvent distillation unit, one 2000-gallon above ground clean solvent tank, one 4000-gallon above ground spent solvent tank and one 4000-gallon distillation still bottom 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 press piping/equipment, using a blend of propanol & ethyl acetate solvent, between print jobs that use different color inks.

The recycling unit operates on a continuous feed, 10-hour distillation cycle, and each cycle recycles 200-250 gallons of solvent. Clean solvent is pumped to the press for cleaning and is then pumped to the spent solvent tank for storage until entering the distillation unit. The distillation unit is a batch process, controlled by a remote mounted control panel. Spent solvent is pumped from the 4,000-gallon spent solvent tank to the 250-gallon 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 distillation process generates distillation still bottoms that are pumped to the distillation still bottom tank for storage until being collected for off-site disposal as D001 hazardous waste.

The new system was designed with a solvent sink and vacuum hand pump interconnected to the system, 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). The system's distillation still bottom tank & used solvent tank would be subject to hazardous waste regulation. At the time of the inspection, the facility was managing only the distillation still bottom tank in accordance to hazardous waste regulations but was not managing the used solvent tank as a regulated hazardous waste tank (See Deficiency Section). The distillation still bottom tank appeared to be in compliance with 40 CFR 265, Subpart J, BB & CC regulation.

On October 28, 2015 Mr. Sievers supplied additional information regarding the operation of the solvent recycling system and explained that they were planning to remove the solvent sink and vacuum hand pump connections. Mr. Sievers confirmed that used solvent would not be able to be manually introduced into the system (See Comment Section). The equipment & piping, which is used to convey D001 distillation still bottoms, from the distillation unit to the 4,000-gallon hazardous waste distillation still bottoms tank will remain subject to all applicable regulations.

Used Oil and Universal Waste:

The facility generates universal waste lamps and batteries. At the time of inspection there were five boxes of used fluorescent lamps, one container of used batteries and one container of mercury containing devices in storage. There were also four boxes, holding an individual used HID lamps, in storage but each box was not properly labeled (See Deficiency Section). Universal waste is currently being managed through Mountain Environmental based out of Canton, NC. The last collection date was documented as November 25, 2014.

The facility generates a small amount of used oil from general machinery maintenance. Used oil containers were not observed during the inspection.

10. Comments:

- It is a reminder that information should be maintained to demonstrate revised hazardous waste contingency plans have been submitted & received by local authorities. The contingency plan must also include a section that describes emergency arrangements agreed upon (i.e. issuing of emergency arrangement request letters) and the plan must list the capabilities of all emergency equipment listed in the contingency plan.
- It is strongly recommended that the facility's waste profiles be reviewed and revised so that they remain up to date and accurately document waste streams. Facility personnel must also maintain all required documentation for the used solvent contaminated wipe exclusion as specified at 40 CFR 261.4(a)(26)(v)(C).

11. Site Deficiencies Noted During Compliance Assistance Visit:

- A.** Facility personnel must maintain documentation to demonstrate compliance with 40 CFR 265 Subpart J, BB & CC. In addition, information should be maintained to support the claim that the facility's recycling system qualifies for the RCRA's Closed Loop Recycling exemption 40 CFR 261.4 (a) (8).
- B.** Facility personnel must maintain all hazardous waste accumulation containers so that they are properly closed, labeled and free from spills on the outside of containers as required at 40 CFR 262.34 (c)(1).
- C.** Facility personnel must maintain all universal waste containers in compliance with all applicable 40 CFR 273 requirements.

***NOTE:** The deficiencies summarized above were noted during a Compliance Assistance Visit (CAV). After 30 days (from the date report is received) your facility is subject to an unannounced Compliance Evaluation Inspection (CEI). Any violations found during a subsequent CEI will be subject to enforcement.

**SEAN MORRIS / DATE
NC HWS-COMPLIANCE BRANCH**

**SENT BY EMAIL
FACILITY CONTACT**

CC:
Brent Burch, Compliance Branch Head
Central Office Files
Ed Sievers, Plastic Packaging, Inc.