EPA United States Environmental Protection Agency

Region 6 - Enforcement & Compliance Assurance Division

INSPECTION REPORT

Inspection Date(s):	03/05/2026	
Media Program:	RCRA	
Regulatory Program(s)	Generator	
Company Name:	**Image Set**	
Facility Name:	**Image Set**	
Facility Physical Location:	6611 Portwest Dr.	
(city, state, zip code)	Houston, TX, 77024	
Mailing address:	Same	
(city, state, zip code)	Same	
County/Parish:	Harris	
Facility Phone Number	(713) 869-7700	
Facility Contact:	Rachel Shepherd	Title: COO
	Email: rshepherd@imageset.com	
FRS Number:	None	
Identification/Permit Number:	TXR000085239	
Media Identifier Number:	None	
NAICS:	None	
SIC:	None	

Personnel participating in inspection:		
Bill Mansfield	US EPA Region 6	Inspector
Rachel Shepherd	Image Set	COO
Jared Sande	Image Set	Operations Manager

EPA Lead Inspector Signature/Date	WILLIAM MANSFIELD Digitally signed by WILLIAM MANSFIELD Date: 2026.04.16 08:04:30 -05'00'	
	Bill Mansfield	Date
Supervisor Signature/Date	DEBRA PANDAK Digitally signed by DEBRA PANDAK Date: 2026.04.16 08:14:21 -05'00'	
	Debra Pandak	Date

Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

I, Bill Mansfield, EPA Region 6 inspector arrived at Image Set at 9:04AM on 03/05/2026 for an announced inspection. I met with Rachel Shepherd the Corporate Operations Officer (COO) and Jared Sande the Operations Manager. I presented my credentials to Rachel and Jared, and informed them that this was an EPA inspection to determine the facility's compliance with the Resource Conservation and Recovery Act (RCRA). The scope of the inspection is a Compliance Evaluation Inspection (CEI) and includes evaluation of the facility's hazardous waste management activities.

FACILITY DESCRIPTION

Image Set's 6611 Portwest Dr location is a digital and commercial printing facility. The EPA ID TXR000085239 associated with the address of 6611 Portwest Dr was assigned to the facility by EPA in February of 2020 and indicates that Image Set is operating as a Very Small Quantity Generator (VSQG).

Section II - OBSERVATIONS

During the opening conference I requested hazardous waste determinations and the processes at the facility. The processes that generate waste are printing processes and come from the operation of two large commercial printing machines.

Waste Imaging Oil Storage Area:

In the waste imaging oil storage area, I observed three 55-gallon drums used for storing waste imaging oil (Appendix 1, Photo 1). Jared said they ship out the waste once or twice a year. I also observed an imaging oil washing station that is used to wash ink reservoirs used in the printing machine and, containers of partially used imaging oil that can still be used in the printing process (Appendix 1, Photos 2 and 3).

Production Area:

Walking in the first room of the production area I observed a large commercial HP printer. The printer uses imaging oil that is the main contributor to the facility's waste generated. Entering a second room in the production area, I observed a large commercial printing machine that applies a UV coating on prints. The excess UV material is discarded into five-gallon containers and accounts for the remaining waste generated at the facility (Appendix 1, Photo 4).

Documents provided:

The facility provided the following documents:

1) Waste management procedures
2) SDS for UV coating
3) SDS for Imaging Oil

Section III – AREAS OF CONCERN

The closing meeting was attended by me, Bill Mansfield (EPA Inspector), Rachel Shepherd (COO) and Jared Sande (Operations Manager). During the closing conference, I fielded questions from facility personnel and provided information about the next steps in the inspection process.

No areas of concern were observed during the inspection.

Section IV – FOLLOW UP

EPA is waiting for the following information requested from the facility.

1. Hazardous waste determinations for the two waste streams.

Section V – LIST OF APPENDICES

Appendix 1 – Photograph Log – 4 photos taken 03/05/2026

Appendix 2 - Documents provided on-site 03/05/2026

Appendix 1

Photograph Log

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 1

Facility/Location:	Image Set 6611 Portwest Dr.						
City:	Houston	County:	Harris	State:	TX	Direction:	W
Filename:	TWC_0871.JPG	Photo Date:	03/05/2026	Time:	10:10:32		
Photographer:	Bill Mansfield			Witness Name:	NA		

Description:	Waste imagining oil storage areas. Three oil waste collection drums.		
Latitude:	N/A	Longitude:	N/A

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 2

Facility/Location:	Image Set 6611 Portwest Dr.						
City:	Houston	County:	Harris	State:	TX	Direction:	S
Filename:	TWC_0872.JPG	Photo Date:	03/05/2026		Time:	10:10:40	
Photographer:	Bill Mansfield			Witness Name:	NA		

Description:	Imaging oil wash station.		
Latitude:	N/A	Longitude:	N/A

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 3

Facility/Location:	Image Set 6611 Portwest Dr.						
City:	Houston	County:	Harris	State:	TX	Direction:	E
Filename:	TWC_0873.JPG	Photo Date:	03/05/2026		Time:	10:11:21	
Photographer:	Bill Mansfield			Witness Name:		NA	

Description:	Imaging oil that can still be used.		
Latitude:	N/A	Longitude:	N/A

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 4

Facility/Location:	Image Set 6611 Portwest Dr.						
City:	Houston	County:	Harris	State:	TX	Direction:	S
Filename:	TWC_0874.JPG	Photo Date:	03/05/2026			Time:	10:15:09
Photographer:	Bill Mansfield			Witness Name:		NA	

Description:	UV waste containers in Production Area.		
Latitude:	N/A	Longitude:	N/A

Appendix 2

Documents provided on-site

P332 + P313 If skin irritation occurs: Get medical advice/ attention.
P337 + P313 If eye irritation persists: Get medical advice/ attention.
P362 Take off contaminated clothing and wash before reuse.

Other hazards

The following percentage of the mixture consists of ingredient(s) with unknown acute toxicity: 65 %

SECTION 3. COMPOSITION/INFORMATION ON INGREDIENTS

Hazardous components

Component	CAS-No.	Concentration (%)
Oligomer Acrylate		>= 10 - < 30

SECTION 4. FIRST AID MEASURES

General advice : Get medical attention immediately if symptoms occur.
Treat symptomatically.

If inhaled : If inhaled, remove to fresh air.
If breathing is difficult, give oxygen.
If not breathing, give artificial respiration.

In case of skin contact : Remove contaminated clothing. Wash thoroughly with soap and water for at least 20 min. or until material is removed.
Wash contaminated clothing before re-use.
Get medical attention if irritation develops and persists.

In case of eye contact : If easy to do, remove contact lens, if worn.
Rinse immediately with plenty of water, also under the eyelids, for at least 15 minutes.
Seek medical advice.

If swallowed : Do NOT induce vomiting.
Gently wipe or rinse the inside of the mouth with water.
Obtain medical attention.

SECTION 5. FIREFIGHTING MEASURES

Suitable extinguishing media : ABC powder
Carbon dioxide (CO2)

Unsuitable extinguishing media : Water

Specific hazards during firefighting	:	Do not use a solid water stream as it may scatter and spread fire.
Further information	:	Use water spray to cool unopened containers.
Special protective equipment for firefighters	:	In the event of fire, wear self-contained breathing apparatus. Use personal protective equipment.

SECTION 6. ACCIDENTAL RELEASE MEASURES

Personal precautions, protective equipment and emergency procedures	:	Ensure adequate ventilation. Use personal protective equipment.
Environmental precautions	:	Prevent spilled material from entering the ground, water and/or air by using appropriate containment methods.
Methods and materials for containment and cleaning up	:	Soak up with inert absorbent material.

SECTION 7. HANDLING AND STORAGE

Advice on safe handling	:	Use only in accordance with our recommendations.
Conditions for safe storage	:	Keep container tightly closed in a dry and well-ventilated place.
Materials to avoid	:	Keep away from oxidising agents and strongly acid or alkaline materials.

SECTION 8. EXPOSURE CONTROLS/PERSONAL PROTECTION

Components with workplace control parameters

Contains no substances with occupational exposure limit values.

Engineering measures	:	Handle only in a place equipped with local exhaust (or other appropriate exhaust).

Personal protective equipment

Hand protection

Material	:	Impervious gloves
Eye protection	:	Safety glasses with side-shields Safety goggles

SAFETY DATA SHEET

IMAGING OIL

Version #: 22
Issue date: 18-Jul-2014
Revision date: 23-Jun-2023
Supersedes date: 23-Jun-2023

SECTION 1: Identification of the substance/mixture and of the company/undertaking

Important information *** This Safety Data Sheet is only authorised for use by HP for HP Original products. Any unauthorised use of this Safety Data Sheet is strictly prohibited and may result in legal action being taken by HP. ***

1.1. Product identifier

Trade name or designation of the mixture HP Indigo Imaging Oil for use with HP Indigo Digital Press WS6000 series, W7200 series, 7000 series and 8000
Q4345A

Registration number -

UFI: 761E-FV5M-830J-0WFM

Synonyms Part Number Q4345A

1.2. Relevant identified uses of the substance or mixture and uses advised against

Identified uses HP product for use with HP Indigo Digital Presses WS6000 series, W7200 series, 7000 series and 8000.

Uses advised against None known.

1.3. Details of the supplier of the safety data sheet

HP Belgium BVBA
Hermeslaan 1B, Floor B1
Diegem
Belgium 1831

Telephone +32 2 620 1600

HP Inc. health effects line
(Toll-free within the US) 1-800-457-4209
(Direct) 1-760-710-0048

HP Inc. Customer Care Line
(Toll-free within the US) 1-800-474-6836
(Direct) 1-208-323-2551

Email: sustainability@hp.com

1.4 Emergency telephone number +32 070 245 245

SECTION 2: Hazards identification

2.1. Classification of the substance or mixture

Classification according to Regulation (EC) No 1272/2008 as amended

Health hazards		
Aspiration hazard	Category 1	H304 - May be fatal if swallowed and enters airways.

2.2. Label elements

Label according to Regulation (EC) No. 1272/2008 as amended

Contains: Alkanes C11-15 iso, White Mineral Oil

Hazard pictograms

Signal word Danger

Hazard statements

H304	May be fatal if swallowed and enters airways.

Precautionary statements

Prevention

P210	Keep away from heat/sparks/open flames/hot surfaces. - No smoking.
P280	Wear personal protective equipment/face protection.

Response

P301 + P330 + P331	If swallowed: Rinse mouth. Do NOT induce vomiting.
P301 + P310	If swallowed: Immediately call a poison center/doctor.

Storage

P405	Store locked up.

Disposal

P501	Dispose of contents/container in accordance with local/regional/national/international regulations.

Supplemental label information EUH066 - Repeated exposure may cause skin dryness or cracking.

2.3. Other hazards Endocrine disrupting properties (Toxicity/Ecotoxicity): This mixture does not contain substances considered to have endocrine disrupting properties according to REACH Article 57(f) or Commission Delegated regulation (EU) 2017/2100 or Commission Regulation (EU) 2018/605 at levels of 0.1% or higher.

SECTION 3: Composition/information on ingredients

3.2. Mixtures

General information

Chemical name	%	CAS-No. / EC No.	REACH Registration No.	Index No.	Notes
Alkanes C11-15 iso	<100	90622-58-5 920-901-0	01-2119456810-40-XXXX	-	
Classification: Asp. Tox. 1;H304 **Supplemental Hazard Statement(s):** EUH066					
White Mineral Oil	<1	8042-47-5 232-455-8	-	-	
Classification: Asp. Tox. 1;H304					

SECTION 4: First aid measures

General information Not available.

4.1. Description of first aid measures

Inhalation If overcome by vapor, remove person from exposure to fresh air. If breathing is difficult, give oxygen. If symptoms persist, get medical attention.

Skin contact Wash affected areas thoroughly with mild soap and water.
Immediately take off all contaminated clothing. Wash clothing separately before reuse.
Get medical attention if irritation develops or persists.

Eye contact Do not rub eyes. Immediately flush with large amounts of clean, warm water (low pressure) for at least 15 minutes or until particles are removed. If irritation persists get medical attention.
Do not apply neutralizing agents.

Ingestion Do not induce vomiting. Never give anything by mouth to an unconscious person.
If ingestion of a large amount does occur, seek medical attention.

4.2. Most important symptoms and effects, both acute and delayed Not available.

4.3. Indication of any immediate medical attention and special treatment needed Not available.

SECTION 5: Firefighting measures

General fire hazards Not available.

5.1. Extinguishing media

Suitable extinguishing media Suitable extinguishing media: Dry chemical, CO2, water spray or regular foam.

Unsuitable extinguishing media None known.

5.2. Special hazards arising from the substance or mixture	None known.
5.3. Advice for firefighters	
Special protective equipment for firefighters	Not available.
Special fire fighting procedures	Move containers from fire area if you can do it without risk. Evacuate area and fight fire from a safe distance.

SECTION 6: Accidental release measures

6.1. Personal precautions, protective equipment and emergency procedures

For non-emergency personnel	Wear appropriate personal protective equipment.
For emergency responders	Not available.
6.2. Environmental precautions	Do not let product enter drains. Do not flush into surface water or sanitary sewer system.
6.3. Methods and material for containment and cleaning up	Not available.
6.4. Reference to other sections	See Section 8 of the SDS for Personal Protective Equipment.

SECTION 7: Handling and storage

7.1. Precautions for safe handling	Avoid prolonged or repeated skin contact with this material. Avoid contact with skin, eyes and clothing. Keep away from open flames, hot surfaces and sources of ignition. Do not reuse the empty container. Take precautionary measures against static discharges.
7.2. Conditions for safe storage, including any incompatibilities	Keep away from excessive heat or cold. Store in a cool and shaded area. Do not store in direct sunlight.
7.3. Specific end use(s)	Not available.

SECTION 8: Exposure controls/personal protection

8.1. Control parameters

Occupational exposure limits	No exposure limits noted for ingredient(s).
Biological limit values	No biological exposure limits noted for the ingredient(s).
Recommended monitoring procedures	Not available.
Derived no effect levels (DNELs)	Not available.
Predicted no effect concentrations (PNECs)	Not available.
Exposure guidelines	Manufacturer recommended exposure limit based on petroleum hydrocarbon at > 95%. TWA = 171ppm (1200 mg/m3).

8.2. Exposure controls

Appropriate engineering controls	Use in a well ventilated area.

Individual protection measures, such as personal protective equipment

General information	Use personal protective equipment to minimize exposure to skin and eye.
Eye/face protection	Not available.
Skin protection	
- Hand protection	Wear Latex-free 100% nitrile, minimum 0.38 mm thick, powder free gloves.
- Other	Chemical resistant gloves.
Respiratory protection	Not available.
Thermal hazards	Not available.
Hygiene measures	Handle in accordance with good industrial hygiene and safety practice. Use personal protective equipment to minimize exposure to skin and eye.
Environmental exposure controls	Not available.

SECTION 9: Physical and chemical properties

9.1. Information on basic physical and chemical properties

Physical state	Liquid.

Form	Liquid.
Color	Colorless.
Odor	mild hydrocarbon-like
Melting point/freezing point	Not available.
Boiling point or initial boiling point and boiling range	370.4 °F (188 °C) (based on petroleum hydrocarbon)
Flammability	Not available.
Flash point	147.2 °F (64.0 °C) Pensky-Martens Closed Cup (based on Petroleum Hydrocarbon)
Auto-ignition temperature	Not available.
Decomposition temperature	Not available.
pH	Not available.
Kinematic viscosity	Not available.
Solubility	
Solubility (water)	Not soluble
Partition coefficient (n-octanol/water) (log value)	Not available.
Vapor pressure	Not available.
Density and/or relative density	
Density	0.77 g/cm3
Relative density	0.771 g/cm3
Relative vapor density	Not available.
Particle characteristics	Not available.
Explosive properties	Not available.
Oxidizing properties	Not applicable.
9.2. Other information	
9.2.1. Information with regard to physical hazard classes	No relevant additional information available.
9.2.2. Other safety characteristics	
Specific gravity	0.771
VOC	770 g/L (6.34 lbs/gal.US) (Calculated)
9.2. Other information	
Density	0.77 g/cm3

SECTION 10: Stability and reactivity

10.1. Reactivity	Not available.
10.2. Chemical stability	Stable under recommended storage conditions.
10.3. Possibility of hazardous reactions	Will not occur.
10.4. Conditions to avoid	Not available.
10.5. Incompatible materials	This product may react with strong oxidizing agents.
10.6. Hazardous decomposition products	Upon decomposition, this product emits carbon monoxide, carbon dioxide and/or low molecular weight hydrocarbons.

SECTION 11: Toxicological information

General information	Refer to Section 2 for potential health effects and Section 4 for first aid measures.
Information on likely routes of exposure	
Inhalation	Under normal conditions of intended use, this material is not expected to be an inhalation hazard.
Skin contact	Contact with skin may result in mild irritation.
Eye contact	Contact with eyes may result in mild irritation.
Ingestion	Health injuries are not known or expected under normal use. Ingestion is not a likely route of exposure.
Symptoms	Not available.

11.1. Information on hazard classes as defined in Regulation (EC) No 1272/2008

Acute toxicity	Harmful if swallowed.

Components	Species	Test Results
White Mineral Oil (CAS 8042-47-5)		
Acute		
Dermal		
LD50	Rat	>= 5000 mg/kg
Oral		
LD50	Rat	>= 5000 mg/kg

Skin corrosion/irritation	Not classified.
Serious eye damage/eye irritation	Not classified.
Respiratory sensitization	Not classified.
Skin sensitization	Mildly irritating to the skin with prolonged exposure.
Germ cell mutagenicity	Not classified.
Carcinogenicity	Not classified.
Reproductive toxicity	Not classified.
Specific target organ toxicity - single exposure	Not classified.
Specific target organ toxicity - repeated exposure	Not classified.
Aspiration hazard	May be harmful if swallowed and enters airways.
Mixture versus substance information	Not available.

11.2. Information on other hazards

Endocrine disrupting properties	(Toxicity): This mixture does not contain substances considered to have endocrine disrupting properties according to REACH Article 57(f) or Commission Delegated regulation (EU) 2017/2100 or Commission Regulation (EU) 2018/605 at levels of 0.1% or higher.
Other information	No data is available on the product itself.

SECTION 12: Ecological information

12.1. Toxicity	No toxicity data noted for the ingredient(s).
Aquatic toxicity	This product has not been tested for ecological effects.
12.2. Persistence and degradability	Not available.
12.3. Bioaccumulative potential	Not available.
Partition coefficient n-octanol/water (log Kow)	Not available.
Bioconcentration factor (BCF)	Not available.
12.4. Mobility in soil	Not available.
12.5. Results of PBT and vPvB assessment	Not a PBT or vPvB substance or mixture.
12.6. Endocrine disrupting properties	(Ecotoxicity): This mixture does not contain substances considered to have endocrine disrupting properties according to REACH Article 57(f) or Commission Delegated regulation (EU) 2017/2100 or Commission Regulation (EU) 2018/605 at levels of 0.1% or higher.
12.7. Other adverse effects	Not available.

SECTION 13: Disposal considerations

13.1. Waste treatment methods

Residual waste	Not available.
Contaminated packaging	Do not re-use empty containers. Empty containers should be taken to an approved waste handling site for recycling or disposal.
EU waste code	08 03 13 - waste ink other than those mentioned in 08 03 12
Disposal methods/information	Do not dispose of together with general office waste. Do not allow this material to drain into sewers/water supplies. Dispose of waste material according to Local, State, Federal, and Provincial Environmental Regulations. Ensure collection and disposal with an appropriately licensed waste contractor.

SECTION 14: Transport information

ADR

14.1. UN number	Not regulated as dangerous goods.
14.2. UN proper shipping name	Not Regulated.
14.3. Transport hazard class(es)	
Class	Not assigned.
Subsidiary risk	-
Hazard No. (ADR)	Not assigned.
Tunnel restriction code	Not assigned.
14.4. Packing group	Not assigned.
14.5. Environmental hazards	No.
14.6. Special precautions for user	Not assigned.

IATA

14.1. UN number	Not regulated as dangerous goods.
14.2. UN proper shipping name	Not Regulated.
14.3. Transport hazard class(es)	
Class	Not assigned.
Subsidiary risk	-
14.4. Packing group	Not assigned.
14.5. Environmental hazards	No.
14.6. Special precautions for user	Not assigned.

IMDG

14.1. UN number	Not regulated as dangerous goods.
14.2. UN proper shipping name	Not Regulated.
14.3. Transport hazard class(es)	
Class	Not assigned.
Subsidiary risk	-
14.4. Packing group	Not assigned.
14.5. Environmental hazards	
Marine pollutant	No.
EmS	Not assigned.
14.6. Special precautions for user	Not assigned.

14.7. Maritime transport in bulk according to IMO instruments	Not available.
Further information	Transport in bulk according to Annex II of MARPOL73/78 and the IBC code: Not applicable. Not a dangerous good under DOT, IATA, ADR, IMDG, or RID.

SECTION 15: Regulatory information

15.1. Safety, health and environmental regulations/legislation specific for the substance or mixture

EU regulations

Regulation (EC) No. 1005/2009 on substances that deplete the ozone layer, Annex I and II, as amended

Not listed.

Regulation (EU) 2019/1021 On persistent organic pollutants (recast), as amended

Not listed.

Regulation (EU) No. 649/2012 concerning the export and import of dangerous chemicals, Annex I, Part 1 as amended

Not listed.

Regulation (EU) No. 649/2012 concerning the export and import of dangerous chemicals, Annex I, Part 2 as amended

Not listed.

Regulation (EU) No. 649/2012 concerning the export and import of dangerous chemicals, Annex I, Part 3 as amended

Not listed.

Regulation (EU) No. 649/2012 concerning the export and import of dangerous chemicals, Annex V as amended

Not listed.

Regulation (EC) No. 166/2006 Annex II Pollutant Release and Transfer Registry, as amended

Not listed.

Regulation (EC) No. 1907/2006, REACH Article 59(10) Candidate List as currently published by ECHA

Not listed.

Authorizations

Regulation (EC) No. 1907/2006, REACH Annex XIV Substances subject to authorization, as amended

Not listed.

Restrictions on use

Regulation (EC) No. 1907/2006, REACH Annex XVII Substances subject to restriction on marketing and use as amended

Not listed.

Directive 2004/37/EC: on the protection of workers from the risks related to exposure to carcinogens and mutagens at work, as amended

Not listed.

Other EU regulations

Directive 2012/18/EU on major accident hazards involving dangerous substances, as amended

Not listed.

Other regulations	HP complies with chemical regulatory requirements in chemical substance notification laws, where applicable. All chemical substances are notified or exempt from notification or listed in the inventory as existing substances in the following countries: US (TSCA), Canada (DSL/NDSL), Australia (AICIS), Japan (ISHL, ENCS), Philippines (PICCS), New Zealand (NZIoC) and China (IECSC). For guidance on importation and/or additional requirements for registration schemes such as EAEU, EU, South Korea, Turkey, UK, India and Taiwan, please contact the Sustainability and Compliance Center (sustainability@hp.com).
Other information	This Safety Data Sheet complies with the requirements of Regulation (EU) 2015/830. Classification according to Regulation (EC) No 1272/2008 as amended.
National regulations	Not available.
15.2. Chemical safety assessment	See attached SUMI or GEIS document, if applicable.

SECTION 16: Other information

References	Regulation (EC) No. 1907/2006 of December 18, 2006 concerning the Registration, Evaluation, Authorization and Restriction of Chemicals (REACH) and establishing a European Chemicals Agency (REACH). Regulation (EC) No. 1272/2008 of December 16, 2008 on classification, labeling and packaging of substances and mixtures, and amendments (CLP). The information in this document is based on the present state of our knowledge, including but not limited to the data present in the registrations of the ingredients, it does not purport to be all-inclusive and shall be used only as a guide. This Safety Data Sheet is in compliance with Commission Regulation (EU) 2020/878 of 18 June 2020 amending REACH Annex II.
Information on evaluation method leading to the classification of mixture	The classification for health and environmental hazards is derived by a combination of calculation methods and test data, if available.
Full text of any statements, which are not written out in full under sections 2 to 15	H304 May be fatal if swallowed and enters airways.
Revision information	None.
Training information	Follow training instructions when handling this material.
Disclaimer	This Safety Data Sheet document is provided without charge to customers of HP. Data is the most current known to HP at the time of preparation of this document and is believed to be accurate. It should not be construed as guaranteeing specific properties of the products as described or suitability for a particular application. This document was prepared to the requirements of the jurisdiction specified in Section 1 above and may not meet regulatory requirements in other countries.

Explanation of abbreviations

ACGIH	American Conference of Governmental Industrial Hygienists
Acute Tox.	Acute toxicity
Aquatic Acute	Short-term (acute) aquatic hazard
Aquatic Chronic	Long-term (chronic) aquatic hazard
Asp. Tox.	Aspiration hazard
Carc.	Carcinogenicity
CAS	Chemical Abstracts Service
CERCLA	Comprehensive Environmental Response Compensation and Liability Act
CFR	Code of Federal Regulations
COC	Cleveland Open Cup
DOT	Department of Transportation
EPCRA	Emergency Planning and Community Right-to-Know Act (aka SARA)
Eye Dam.	Serious eye damage
Eye Irrit.	Eye Irritation
Flam. Liq.	Flammable liquids
Flam. Sol.	Flammable solids
Lact.	Effects on or via lactation
Muta.	Germ cell mutagenicity
IARC	International Agency for Research on Cancer
NIOSH	National Institute for Occupational Safety and Health
NTP	National Toxicology Program
OSHA	Occupational Safety and Health Administration
Ox. Liq.	Oxidising liquids
Ozone	Hazardous to the ozone layer
PEL	Permissible Exposure Limit
Press. Gas	Gases under pressure
RCRA	Resource Conservation and Recovery Act
REC	Recommended
REL	Recommended Exposure Limit
Repr.	Reproductive toxicity
Resp. Sens.	Respiratory sensitization
SARA	Superfund Amendments and Reauthorization Act of 1986
Skin Corr.	Skin corrosion
Skin Irrit.	Skin irritation
Skin Sens.	Skin sensitization
STEL	Short-Term Exposure Limit
STOT RE	Specific target organ toxicity - repeated exposure
STOT SE	Specific target organ toxicity - single exposure
TCLP	Toxicity Characteristics Leaching Procedure
TLV	Threshold Limit Value
TSCA	Toxic Substances Control Act

Waste Management Procedure ImageSet

Purpose

The procedures outlined in this document ensures that facility's waste is characterized, labeled and shipped according to State and Federal regulations.

Things You Should Know

Wastes that exhibit certain characteristics such as flammability, corrosivity, reactivity, or TCLP Toxicity are classified as hazardous.

Wastes that contain certain chemicals, some in specified concentrations, are classified as hazardous.

Web Connect .

Certain hazardous wastes such as batteries and mercury containing bulbs and thermostats that are reclaimed are classified as Universal Wastes and do not have to be handled and disposed as a Hazardous Waste.

Waste oil in the State of Texas is classified as non-hazardous waste.

Waste that is stored in containers (typically 55-gallon drums) are:
Imaging Oil

Typical Hazardous Wastes Generated	Codes
None	

Typical Nonhazardous Wastes Generated	Codes
Imaging Oil – Non-regulated liquid	No Code

Waste Characterization

Stage	Description	Responsibility
1	Determine the type of waste: EPA Hazardous Waste Texas Regulated Hazardous Waste Universal Waste Non-hazardous Waste	Executive Management

rshepherd@imageset.com

Waste Management Procedure ImageSet

2	To determine if the waste is hazardous refer to the list of typical hazardous wastes in the "Things You Should Know" section above. If the waste is not listed follow one of the following methods: Is it listed in the regulations (310 CMR 30.131) Does it exhibit a hazardous characteristic: Ignitable – Easily catches fire, flash point at or Below 140 F Corrosive – Very acidic or alkaline, pH below 2 or greater than 12.5 Reactive – Explosive, produces toxic gases When mixed with water or acid Toxic – Leaches toxic chemicals as determined by TCLP laboratory test For more information, refer to the attached Hazardous Waste Identification Flowchart	Executive Management
3	To determine if the waste is a Universal Waste, refer to the following list if Universal Wastes: Batteries Pesticides Mercury Thermostats (non-leaking) Mercury-containing devices (non-leaking) Mercury-containing lamps (non-leaking)	Executive Management
4	Wastes that do not meet the definition of Hazardous or Universal are not regulated. Refer to the list of typical non-hazardous wastes listed in the "Things You Should Know" section above.	Executive Management

Drum and Container Selection

Stage	Description	Responsibility
1	Empty containers: Confirm empty per 310 CMR 30.010 (See Attached Definition) Empty drums are stored room in the waste storage room. Plastic Drums, if free from any residue, can be used as trash barrels.	Pressroom Supervisor
2	Drums and other containers used for waste accumulation are to be drawn from empty input material drums and containers.	Pressroom Supervisor
3	Verify that the container is empty, clean, and in good condition prior to using for waste storage.	Pressroom Supervisor

Waste Management Procedure ImageSet

4	Verify that the waste is compatible with the container's material of construction. Current wastes are all stored in metal containers but, as a rule, corrosive materials are stored in plastic containers.	Pressroom Supervisor
5	All containers used for waste storage must have lids that fit securely.	Pressroom Supervisor
6	Remove existing product labels and apply appropriate waste label (see below) provided by Safety-Kleen, the waste disposal company.	Pressroom Supervisor

Waste Container Labeling

Stage	Description	Responsibility
1	Containers should be labeled prior to accumulating any waste.	Pressroom Supervisor
2	Label non-hazardous wastes with an appropriate nonhazardous waste label. Label should be dated on the day that the waste is first added to the container.	Pressroom Supervisor
3	Drum labels are located in a plastic sleeve by the drums.	Pressroom Supervisor

Waste Container Storage

Stage	Description	Responsibility
1	Verify that container is sealed at all times during waste storage unless draining or filling.	Pressroom Supervisor
2	Verify that the top of the container is completely free of debris and waste materials.	Pressroom Supervisor
3	For liquid waste containers, verify that the top of the container has an absorbent pad to collect spilled waste material.	Pressroom Supervisor
4	Containers are to be inspected weekly according to the Facility Inspections SOP.	Pressroom Supervisor
5	Transport containers using proper container handling equipment.	Pressroom Supervisor
6	Send container off site for proper disposal using an approved disposal vendor (Safety-Kleen)	Pressroom Supervisor

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Manifesting

Stage	Description	Responsibility
1	All non-hazardous waste sent off-site must be accompanied by a manifest and signed by a member of Executive Management.	Executive Management
2	The Non-Hazardous Waste Manifest will be completed by Safety-Kleen and brought when picking up the waste.	Executive Management
3	The generator copy, and return copy of the manifest, and any other accompany forms from the disposal company (Safety-Kleen) must be kept on file in the Accounting Office.	Executive Management
4	Executive Management must receive the TSDF-returned copy of the manifest (Copy 1) from the disposal facility within 35 days. If the return copy is not received, the TSDF (disposal) facility must be contacted.	Executive Management

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Supporting Documents

Hazardous Waste Identification Flowchart

NOTE: ImageSet does not currently generate hazardous waste. This flowchart, along with the Safety Data Sheet of the product, can be used when assessing any new waste stream generated by the company.

Imaging Oil SDS

Waste Profile for Imaging Oil

Waste Management Procedure ImageSet

EMPTY CONTAINER DEFINITION

(a) A container or an inner liner removed from a lined container that has held any hazardous material or hazardous waste, except a waste that is a compressed gas or that is listed in 310 CMR 30.136, is empty if:

1. all wastes have been removed that can be removed using the practices commonly employed to remove materials from that type of container, e.g., pouring, pumping, and aspirating; and
2. no more than 2.5 centimeters (one inch) of residue remain on the bottom of the container or inner liner.

(b) A container that has held a hazardous material or hazardous waste that is a compressed gas is empty when the pressure in the container is substantially at atmospheric pressure.

(c) A container or inner liner removed from a lined container that has held a hazardous waste identified in 310 CMR 30.136 is empty if:

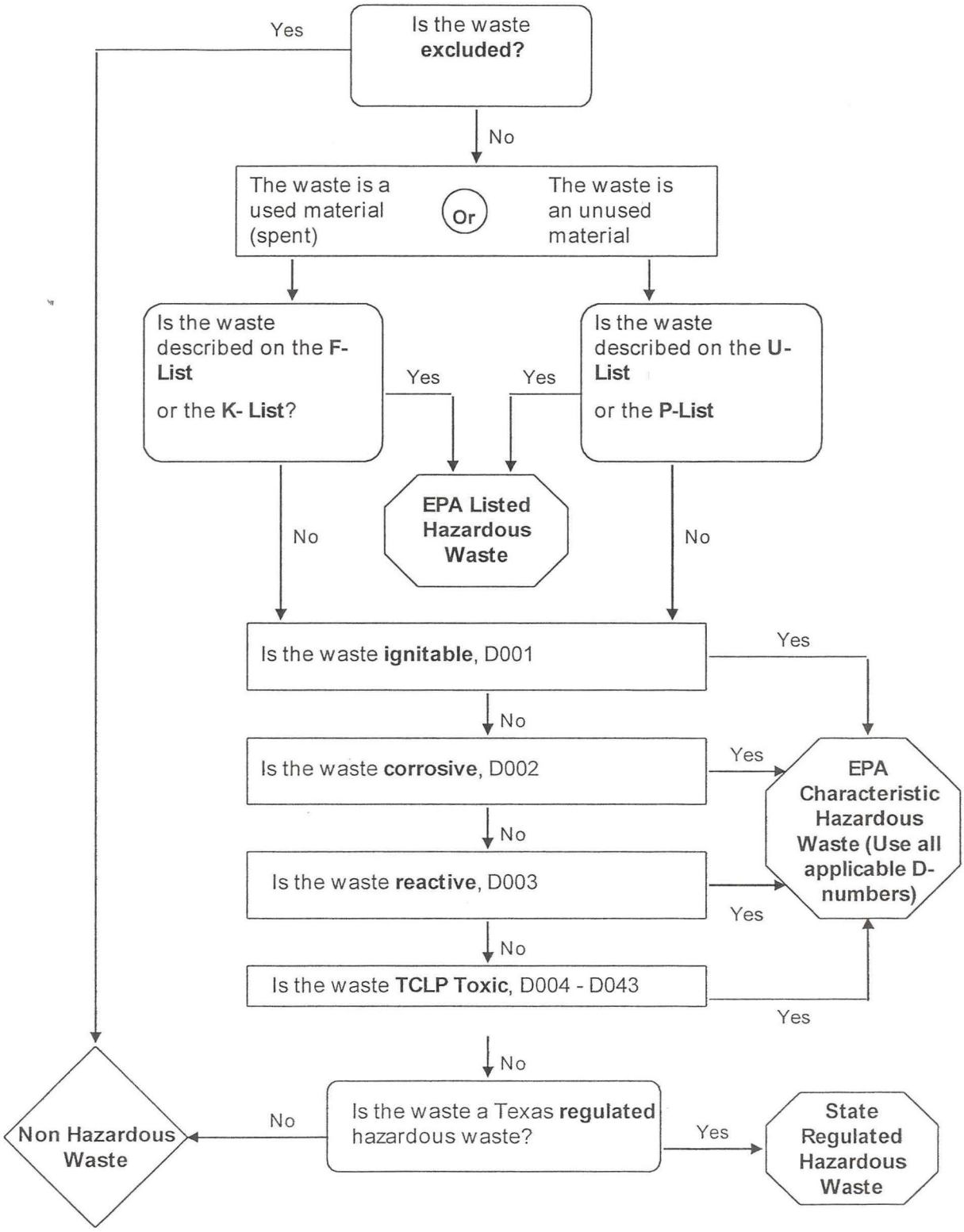
1. the container or inner liner has been triple rinsed using a solvent capable of removing the commercial chemical product or manufacturing intermediate; or
2. the container or inner liner has been cleaned by another method that has been shown in the scientific literature, or by tests conducted by the person doing the cleaning, to achieve equivalent removal; or,
3. in the case of a lined container, the liner that prevented contact of the commercial chemical product or manufacturing intermediate with the container has been removed.
4. in the case of a container having held acutely hazardous wastes, the container is labeled "safe for disposal", "triple rinsed", or "processed to meet the definition of empty," once the container is empty as defined within the definition of empty container.

(d) A paper bag which:

1. has contained a hazardous material or a hazardous waste, except for a waste listed in 310 CMR 30.136, is empty if all wastes have been removed that can be removed by shaking or using equivalent means to ensure that all wastes have been removed to the extent feasible.
2. has contained a hazardous material or a hazardous waste listed in 310 CMR 30.136 shall never be deemed an "empty container".

Waste Management Procedure ImageSet

Hazardous Waste Identification Procedure



Imaging Oil Waste

Safety-Kleen is the service that picks up imaging oil waste from our HP Indigo press.
Their number is **281-208-6500**
Our customer number is **IM12291**

All barrels that contain the imaging oil waste must have a green Non-Hazardous sticker affixed to them. It should be filled out with our company information and the contents of the barrel (imaging oil). The label should also include the date that we started filling the barrel.

When the barrels are picked up, the driver will leave a copy of the Non-Hazardous Waste Manifest completed by Safety-Kleen. The driver and an approved ImageSet employee will sign the manifest. Inspect the manifest to make sure there is a "no classification" code (NOS).

Rachel, Mitch and Daileon are approved to accept the manifest.

Later we will be mailed a copy of the manifest indicating that the waste has been properly disposed of. Accounting will store both copies of the manifest.

An inspection of the disposal containers should be made weekly by a press operator. A form is posted in the room where the barrels are stored.