



RCRA COMPLIANCE EVALUATION INSPECTION

Salerno Packaging Inc.
14 Gus Lapham Lane
Plattsburgh, New York

NYR000058404

July 18, 2024

Report Prepared by:

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Robert Morrell, Geologist
Monitoring Operations Section

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Monitoring Operations Section

Date: _____

Objective

A RCRA Compliance Evaluation Inspection (CEI) was conducted at Salerno Packaging on July 18, 2024. The purpose of the inspection was to obtain information on the facility's hazardous waste management program. This information will be used to determine compliance with regulations pertaining to the Resource Conservation and Recovery Act (RCRA).

Survey Participants

Salerno Packaging Incorporated

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Facility Description

Salerno Packaging, an Inteplast Group company, is located at 14 Gus Lapham Lane in Plattsburgh, New York. The facility is a manufacturer of plastic bags for a variety of industries. The 8-acre site consists of two buildings with 220,000 square feet of space. There are 138 employees, and the plant operates two 12-hour shifts, 24 hours per day, 7 days per week.

The manufacturing process begins in the Extrusion Department. Low density polyethylene pellets are stored in silos. Vacuum tubes transport the pellets to the blenders, where they are mixed with ultraviolet inhibitors and color dyes. The mixture is heated to 420°F and is extruded through a die. The mixture cools as it rises. The finished product, which may consist of 3 layers of molten plastic, is conveyed to a dolly with rollers. The dolly is transferred to the Printing Department, where solvent-based inks are applied to the plastic with the printing presses. The final product may consist of a roll or cut bags. Hard plastic handles are attached to some bags. The final product is then packaged for shipping.

Water and Wastewater

Water for the facility is provided by the Town of Plattsburgh. Sanitary wastewater is discharged to the local POTW. There is no process wastewater discharged from the facility.

Solid and Hazardous Waste Management

Hazardous waste is generated when the printing presses are cleaned. Cloth rags and alcohol are used to clean the presses. The spent alcohol is placed in a 55-gallon drum in the Ink Room. A flammable liquid label is affixed to the drum with a label that describes the contents as “dirty alcohol”. Used rags and gloves are placed in a satellite container near the point of generation. The satellite containers are 5-gallon pails or 55-gallon drums. When the containers are full, they are transferred to the rag “Packmaster”, where the used rags and gloves are compacted in a 55-gallon drum. When the drum is approximately 250 pounds, it is transferred to the Hazardous Waste Staging Area. A flammable liquid label is affixed to the drum.

Used oil from machinery is collected in 55-gallon drums and stored in the Ink Room as non-hazardous used oil.

All solid and hazardous waste management of containers is provided by US Ecology Burlington of Williston, Vermont. Every two months, a container pickup is scheduled. US Ecology personnel prepare the hazardous waste labels, DOT shipping labels, and hazardous waste manifests for the container shipment. The containers of spent alcohol are shipped as waste alcohols with a hazardous waste code of D001 (ignitable). The containers of used rags and gloves are shipped as waste solids containing flammable liquid with a hazardous waste code of D001 (ignitable). The containers are shipped to the US Ecology treatment, storage, and disposal facility (TSDF) in Williston, Vermont.

Observations

A review of the hazardous waste manifests indicates that Salerno Packaging is a large quantity generator of hazardous waste. In the last 12 months, the facility generated 2494 pounds of hazardous waste per month. The most recent shipment of hazardous waste was on May 14, 2024.

On the day of the inspection, there were two 55-gallon drums of hazardous waste being stored in the Ink Room. One drum was full with a flammable liquid label attached to the container. There was also a label indicating the contents of the drum as “dirty alcohol only”. A second drum was half-full with a flammable liquid label attached to the container. There was a label indicating the contents of the drum as “dirty”. There were no hazardous waste labels on the drums.

At the Hazardous Waste Staging Area, there was one 55-gallon drum of hazardous waste being stored on a pallet. The drum was full of used rags and gloves. There was a flammable liquid label and a label indicating the weight of the drum. There was no hazardous waste label on the drum.

There was a 55-gallon satellite container located just outside the new printing press. The container was full of used gloves and rags. There was a flammable liquid label attached to the container and the container was marked "Used Gloves and Rags". There was no hazardous waste label on the drum.

There was a 5-gallon satellite container located near one of the printing presses. The container contained used gloves. There were no labels on the container.

Hazardous materials safety training is provided annually to employees that handle hazardous waste. Department of Transportation (DOT) shipping certification is provided for employees that sign hazardous waste manifests.

Findings

There are two container storage areas for hazardous waste: the Ink Room and the Hazardous Waste Staging Area. Containers of waste alcohols are stored in the Ink Room. Containers of used rags and gloves are stored in the Hazardous Waste Staging Area. There were two 55-gallon drums of waste alcohols being stored in the Ink Room. There was one 55-gallon drum of used rags and gloves being stored in the Hazardous Waste Staging Area. None of the three drums were labeled "Hazardous Waste". Containers of hazardous waste must be marked clearly with the words "Hazardous Waste" and the accumulation start date, as specified in 40 CFR Section 262.34(a)(2) and 262.34(a)(3).

There was a 55-gallon satellite container of used rags and gloves near the new printing press. There was a 5-gallon satellite container of used gloves near another printing press. Neither satellite container was marked with the words "Hazardous Waste". The 55-gallon container was marked with the words "Used Gloves and Rags". Containers in satellite accumulation areas must be marked with the words "Hazardous Waste" or other words that identify the contents, as specified in 40 CFR Section 262.34(c)(1)(ii).

There were no weekly inspection logs of the two container storage areas. Container storage areas must be inspected weekly, as specified in 40 CFR Section 265.174.

The facility representatives were informed of the above findings on the day of the inspection. Hazardous Waste labels were immediately affixed to the drums in the container storage areas and the containers in the satellite accumulation areas. Weekly inspections of the container storage areas have been implemented and are being recorded in the weekly inspection logs.

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Inspection Date: July 18, 2024

Attachments

Photographs (#1 - #10)

Photo #1: A 55-gallon drum of waste alcohols in the Ink Room with no hazardous waste label.



Photo #2: The above drum in the Ink Room after a hazardous waste label was affixed.



Photo #3: A second drum of waste alcohols in the Ink Room with no hazardous waste label.



Photo #4: The above drum in the Ink Room after a hazardous waste label was affixed.



Photo #5: A drum of used rags and gloves in the Hazardous Waste Staging Area (no HW label).

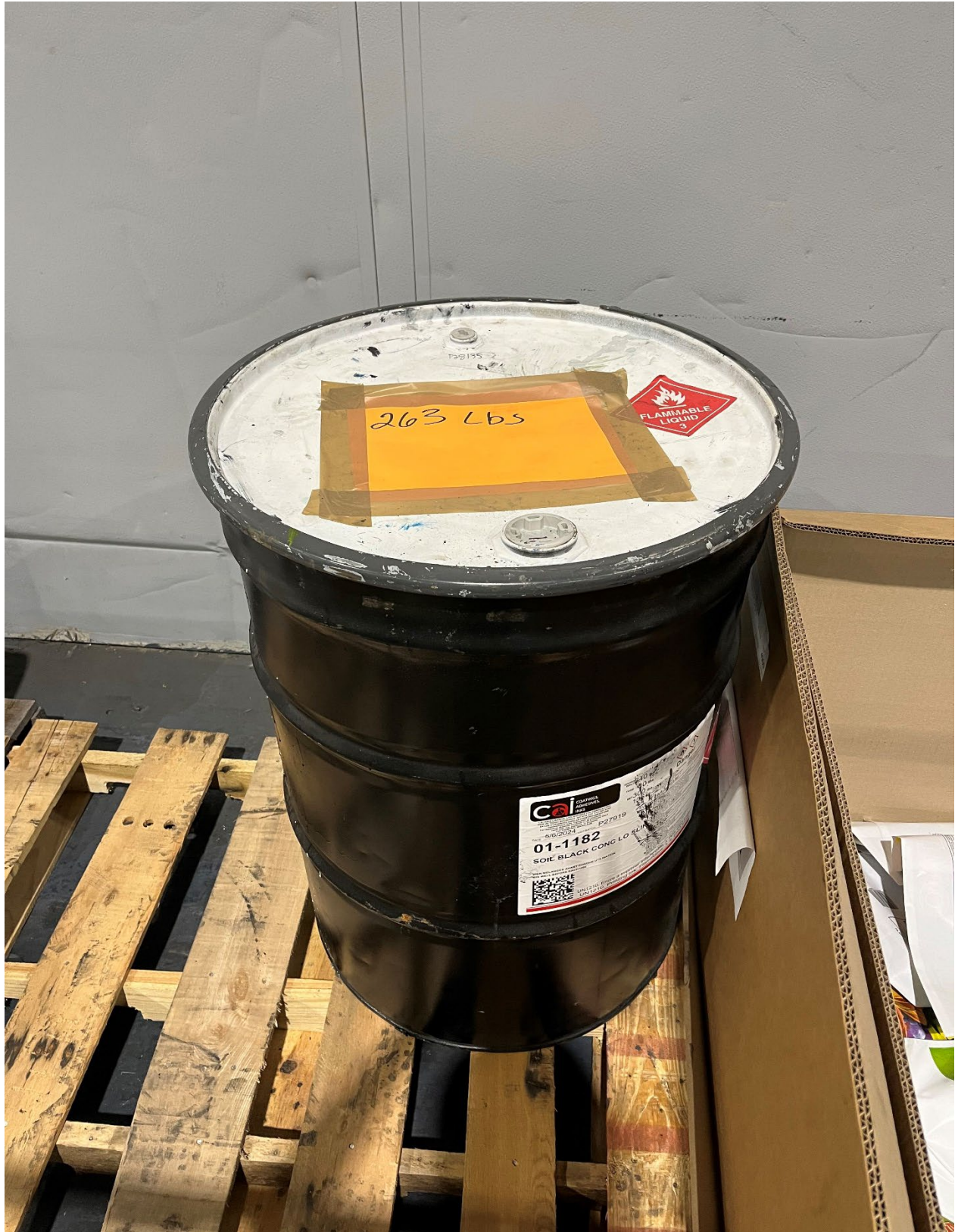


Photo #6: The above drum after a hazardous waste label was affixed.



Photo #7: A 55-gallon satellite container of used rags and gloves (no hazardous waste label).



Photo #8: The above drum after a hazardous waste label was affixed.



Photo #9: A 5-gallon satellite container of used gloves (no hazardous waste label).



Photo #10: The above container after a hazardous waste label was affixed.

