RCRA Inspection Report

1) Inspector and Author of Report

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RCRA Enforcement Section
Chemical Safety and Land Enforcement Branch
Enforcement and Compliance Assurance Division
U.S. Environmental Protection Agency, Region 4
61 Forsyth Street, S.W.
Atlanta, Georgia 30303

2) Facility Information

Graphic Packaging International, LLC–Stone Mountain
5853 E Ponce De Leon Ave
Stone Mountain, Georgia 30083
DeKalb County
EPA ID GAD003285665

3) Responsible Officials

Jon Douglas Knous
Safety Coordinator
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James Oliver
Environmental Health and Safety Manager
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4) Inspection Participants

Jon Douglas Knous, Graphic Packaging International, LLC–Stone Mountain
James Oliver, Graphic Packaging International, LLC–Stone Mountain
Todd Steele, Sun Chemical Ink Tech II
Brooke York, U.S. Environmental Protection Agency, Region 4
Mark Anthony Relon, U.S. Environmental Protection Agency, Region 4
Ashley Hall, Generator Compliance Unit, Hazardous Waste Management Program

5) Date and Time of Inspection

May 18, 2022, 9:45am

6) Applicable Regulations

Resource Conservation and Recovery Act (RCRA) Sections 3002 (42 U.S. Code–Annotated U.S.C.A. 6925 and 6927), and 40 Code of Federal Regulation (C.F.R.) Parts 260 - 270, 273, 278, & 279; Georgia Hazardous Waste Management Act, Ga. Code Ann. § 12-8-60 *et seq.*, and Georgia Hazardous Waste Management Rules, Ga. Comp. R. and Regs. 391-3-11.01 to 391-3-11.18 (2016 and 2018).

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.18 [40 C.F.R. § 273.9], a small quantity handler of universal waste (SQHUW) is a universal waste handler who does not accumulate 5,000 kilograms or more of universal waste (batteries, pesticides, mercury-containing equipment, lamps, or aerosol cans, calculated collectively) at any time.

As the State's authorized hazardous waste program operates in lieu of the federal RCRA program, the citations of those authorized provisions alleged herein will be to the authorized State program; however, for ease of reference, the federal citations will follow in brackets.

7) Purpose of Inspection

The purpose of this inspection was to conduct an unannounced compliance evaluation inspection to determine Graphic Packaging International, LLC–Stone Mountain (hereinafter, "Graphic Packaging" or the "facility") compliance with the applicable requirements of RCRA and the corresponding Georgia regulations. This was an EPA lead inspection.

8) Previous Inspection History

On July 7, 2016, Georgia Department of Natural Resources, Environmental Protection Division (GAEPD) conducted the most recent RCRA CEI at the subject facility and found no apparent violations of RCRA's requirements.

9) Facility Description

Graphic Packaging is a folding paperboard box manufacturing facility located in DeKalb County, Georgia. The facility has operated since 1956 and is owned by their Atlanta office. Graphic Packaging has 3 buildings: Building A, B, and C. Building A is where the inspection took place; it occupies an area of 125,000 square feet. Building A is where all the processing occurs while Building B and C are warehouses for storage of finished goods. There are currently 288 total employees, of which 56 are temporary workers. Access to the facility was controlled through the front office where only facility personnel are granted entry. The inspectors had to locate available personnel in order to gain entry upon arrival.

The facility is a Very Small Quantity Generator (VSQG) with their latest notification dated July

10, 2020. The waste code the facility generated is D001. Graphic Packaging has a Synthetic Minor permit issued July 7, 2021. The NAICS Number for this facility is 322212.

Graphic Packaging produces food-grade paperboard for packaging and/or holding various food items. With 4 water-based presses (3 flexographic [hereinafter, "flexo"] and 1 gravure), the facility prints or coats paperboards which then form into a particular shape requested by the client and sent off for use. The gravure press, ink carts with cylinders are sent to ink pots if replacement of ink is necessary for proper cleaning and printing. The flexo presses, depending on the type, coat, print images/lettering, or apply plastic film sheets on the paperboard. Ink is mixed in an ink room. Ink mixing uses a water based flush. Each press has their own designated use to continue the process of creating the paperboard while the formers shape the finished product. Finished products are then stored until shipment occurs; scrap paperboard is recycled after being baled.

10) Opening Conference

On May 18, 2022, EPA inspectors Brooke York and Mark Anthony Relon, accompanied by GAEPD inspector Ashley Hall, arrived at Graphic Packaging at approximately 9:45am. James Oliver, Environmental Health and Safety Manager, immediately received the inspectors. James Oliver, and the inspectors were joined by Jon Douglas Knous, for the opening conference. The inspectors introduced themselves, showed their credentials to James Oliver and Jon Douglas Knous, and explained the purpose of the visit. The inspectors described the anticipated use of equipment (digital camera), during the inspection, and provided a request for records. The inspectors discussed the company's ability, pursuant to 40 C.F.R. § 2.203, to assert a business confidentiality claim for information submitted to the EPA. The company did not assert a business confidentiality claim. The inspection participants also discussed health and safety protocols and required personal protective equipment before James Oliver and Jon Douglas Knous led the inspectors on a tour of the Facility operations.

Jon Douglas Knous provided an overview of the facility's history and current operations during the opening conference. The company does not appear to meet the Small Business Regulatory Enforcement Fairness Act's classification of a "small business," which is generally set by the Small Business Administration using the business' SIC/NAICS code and annual receipts or number of employees. Therefore, the EPA inspector did not provide a copy of the agency's information sheet for small businesses, which can be found at https://www.epa.gov/compliance/small-business-resources-information-sheet.

11) Findings

Press 7293

This water-based gravure press contains the ink cart with the cylinder, an ink pot, and a bucket to fill virgin ink into the ink pot (Photographs 1 and 2). Inspectors observed one 55-gallon container and one 35-gallon container for the accumulation of nonhazardous waste and waste rags, respectively. Facility representatives informed inspectors that the area was used to accumulate (hereinafter, "accumulation area") water based nonhazardous waste and that each press had an accumulation area. Throughout the facility, underneath multiple pillars there are buckets with

plastic tubes and yellow roof tarps called rain diverters to catch rainwater. Facility representatives explained that since Building A had a flat roof, water would leak into the facility which could potentially impact the processes and quality of the resulting product.

Press 7272

Press 7272 is a flexographic press that presses paperboard with a coating. The press sump, as well as the floor, was covered in dry coating (Photograph 3). Inspectors observed an open black 5-gallon bucket (Photograph 3) filled with the solidified coating, which facility representatives indicated would be discarded after being full. An accumulation area consisted of two 30-gallon containers for used mopheads and rags and one 55-gallon container for liquids. One Brute 75-gallon trash can was observed to hold an empty container of Anilox Renew. Todd Steele, Sun Chemical Ink Tech II, explained that Anilox Renew cleans the rubber cylinders in the press. Based on the inspectors review of the SDS, Anilox Renew is a hazardous waste when discarded.

Wash Station

The wash station is fed with water for cleaning rags, mopheads, and press cylinders/sumps. A 275-gallon container designated for cleaner washout was observed (Photograph 4). When filled, the container is sent to the waste area where it is stored prior to offsite disposal via a bulk truck. Containers are reused. A 55-gallon container with a label of Nitro Non-Corrosive Heavy Duty Ink Dissolver (hereinafter, "Nitro") was observed (Photograph 5). Nitro is used to clean the rags and mopheads.

Press 7248

Also known as the "Frankenstein" press, this flexographic press clear coats the front parts of the paperboard. Accumulation area contained 4 small containers approximately 5-7 gallon of used rags and two 55-gal containers with new black and red ink for production use.

Press 7240

This flexographic press is more automatic regarding the cleaning and printing process. An empty 37-pound (lb) net weight container of 2-Dimethylaminoethanol was observed in a trash container near the Press 7240 wash station (Photographs 6 and 7). Todd Steele explained that the 2-Dimethylaminoethanol was an additive to prevent clotting of ink, which makes the printing clear and legible. The ink in Press 7240 is required to be 9.1-9.5 pH. Operators use the additive to achieve the correct pH. Three 55-gallon containers that accumulate runoff from the printing press were observed (Photograph 8 and 9). One 55-gallon container was observed holding used rags and waste ink, which was not properly labeled as nonhazardous waste or other words that would clearly convey the contents of the containers to emergency response personnel. The facility should properly label all containers, including non-hazardous waste.

Used Oil Area

Used oil generated from preventative maintenance at the facility is stored in this area. A 275-gallon container was observed labeled "used oil" with an unlatched (not fully closed/locked) red funnel on top (Photograph 10). Nine (9) 55-gallon containers filled with single-use oil contaminated rags and seven (7) 30-gallon containers with unsecured (flappable) red tops filled with washable rags were observed. The room adjacent to the used oil area is the compressor room and was previously utilized as a Central Accumulation Area (CAA).

Ink Room
Ink dispenser mixes various types of ink. Between each use head cleaner, Anilox Renew and water are used to clean the head of the ink dispenser. The spent cleaning solution is then put in a waste container to be sent to the waste area. The facility has characterized the spent cleaning solution as a nonhazardous waste, and manages it as such.

Washhouse/Wastewater Accumulation Area
Flexowash (FW-3000-2) is a cleaning process for press cylinders (Photographs 11 and 12). Wash 3 is a wash option that uses Nitro as a surfactant with temperature at 126°F. Two (2) 275-gallon containers for accumulation of solid waste and wastewater were observed. Product Nitro and Anilox Renew were also observed.

Waste Area
Nine (9) 55-gallon containers of nonhazardous waste were observed. Empty 55-gallon containers collected and no longer in use are sent to waste handler as needed.

Tank Farm
A total of eight (8) tanks were observed (Photographs 14 to 29), six (6) solvent tanks and two (2) diesel tanks. Facility representatives explained that the tanks were previously (more than 10 years) used to hold raw materials used in the manufacturing process. The inspectors observed the following vertical cylinder above ground tanks:

1) Tank 1 labeled "Blend #8 50% Acetone and 50% Ethyl Acetate." Tank 1 was equipped with a sight glass, used to measure the height of its contents, which appeared to read 4.75 feet(ft). A National Fire Prevention Association (NFPA) 704 label included a Health Hazard (blue) of 1, Flammability Hazard (red) of 3, and Stability Hazard (yellow) of 0; from 0 being a minimal hazard to 4 being a severe hazard under the Occupational Safety and Health Administration (OSHA) Hazard Communication Standard (Photograph 20).
2) Tank 2 had a Flammable label and a NFPA 704 label with a Health Hazard (blue) of 2, Flammability Hazard (red) of 3, and Stability Hazard (yellow) of 0. A sight glass measurement read 4-ft.
3) Tank 3 had a NFPA 704 label with a Health Hazard (blue) of 1, Flammability Hazard (red) of 3, and Stability Hazard (yellow) of 0 (Photograph 22). A sight glass measurement read 4–4.5 ft (Photograph 23).
4) Tank 4 labeled 80% Normal Propyl (N.P.) Acetate 20% Heptane with sight glass measurement 1.5-ft. A Flammable label with an unwritten NFPA 704 label was found (Photograph 14).
5) Tank 5 had an unwritten NFPA 704 label and a broken sight glass measurement of 6–7 ft (Photograph 15-17).
6) Tank 6 labeled "Ethyl Acetate" a NFPA 704 label with a Health Hazard (blue) of 1, Flammability Hazard (red) of 3, and Stability Hazard (yellow) of 0 (Photograph 18). A sight glass measurement read 4–5 ft (Photograph 19).
7) Tank 7 labeled "Tank Empty Out of Service" had an unwritten NFPA 704 label with no sight glass (Photograph 26).
8) Tank 8 labeled "Diesel" had an unwritten NFPA 704 label and a sight glass measurement of

8ft and 4-inches(in) (Photograph 24-25).

The tanks did not appear to be fully/properly decommissioned, and had been out of service for more than 10 years. The inspectors requested documentation regarding the tanks closure certification, or/and decommissioning.

Following the inspection Graphics Packing contracted Miller Environmental Group (Miller) to determine the closure status of the six (6) solvent tanks and two (2) diesel tanks. Miller arrived onsite on June 15, 2022.

On June 16, 2022, Miller completed the removal of approximately 270-gallons of flammable liquids from the solvent tanks, 2,000-gallon vertical above ground storage tanks. Miller generated approximately 2,800-gallon of petroleum contact water from the cleaning of the six (6) solvent tanks. A tank is considered empty when its contents have been drained to the fullest extent possible. It is impossible to determine how much solvent was remaining in the tanks when they were removed from the process. However, an accurate waste determination should have been made of the remaining solvent that was left after not properly decommissioning.

On June 17, 2022, Miller removed approximately 300-gallons of diesel from Tank 7. Miller reported Tank 8 empty upon opening. Miller collected 300 gallons of petroleum contact water from the two diesel tanks and 350 gallons of rinse water.

On July 13, 2022, Graphic Packaging contacted the inspectors confirming that the petroleum contact water had no diesel present. Lab testing indicated it as rainwater.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.11], a person who generates a solid waste, as defined in Ga. Comp. R. and Regs. 391-3-11-.07(1) [40 C.F.R. § 261.2], must determine if that waste is a hazardous waste following the methods articulated in Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.11].

Graphic Packing personnel informed inspectors that the facility stopped using the tanks for manufacturing processes more than 10 years ago. Inspectors observed that the tanks did not appear to have been properly decommissioned and continued to hold waste. The Facility appears to have failed to make an accurate determination as to whether waste left in the tanks was hazardous waste. The waste in the tanks was not exempted from the waste determination because it remained in the tanks for more than 90 days from the date the tanks ceased to be operated.

Former 7405 and 7410
The formers mechanically press to organize, and fold finished product.

Maintenance Room
Outside the Maintenance Room, inspectors observed a 55-gallon container labeled hazardous waste “Empty Aerosol Cans Only” (Photograph 30 and 31). The container was not at or near the point of generation. However, facility representatives explained that they are managing the aerosol cans as universal waste until they are brought into the Maintenance Room. Inside the Maintenance Room, inspectors observed an aerosol can puncturing system that did not include

an air filter on top of a 55-gallon container labeled hazardous waste (Photograph 32).

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.15(a)], a generator may accumulate as much as 55 gallons of non-acute hazardous waste in containers at or near the point of generation where wastes initially accumulate.

Inspectors explained the universal waste rules and the limitations of large quantity generator's ability to treat hazardous waste in containers, which requires compliance with Organic Air Emission Standards. However, the facility was not operating as a large quantity generator at the time of the inspection.

Graphic Packaging manages universal waste lamps, ballasts, and batteries inside a utility room within the Maintenance Room. According to the records provided during the inspection, the facility did not ship universal waste offsite during calendar year 2021. The most recent shipment of universal waste lamps and batteries was made in 2019.

The inspectors observed nine (9) containers of universal waste lamps (Photographs 33 and 34). One unlabeled 4-ft box of used lamps, which was closed and not marked with an accumulation start date. One 4-ft box labeled universal waste lamps, which was closed and marked with an accumulation start date. Three (3) unlabeled 4-ft boxes of used lamps, which were closed and not marked with an accumulation start date. Two open unlabeled (2) small boxes of used lamps, which were not marked with an accumulation start date. Two (2) open unlabeled 8-ft boxes of used lamps, which were not marked with an accumulation start date. The inspectors observed six (6) containers of universal waste batteries in this area during the inspection. Four (4) closed labeled 5-gal containers of used batteries, which were not marked with an accumulation start date. Two closed labeled 5-gallon containers of used batteries, which were marked with an accumulation start date. The oldest date observed on any container of lamps was August 6, 2021, and any container of batteries was June 25, 2019. Since the most recent shipment of universal waste offsite was made in 2019, there is no clear way to demonstrate the length of time the following universal wastes had been stored onsite and available review at the time of the inspection.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.18 [40 C.F.R. § 273.14(e)], a SQHUW must label or mark each lamp or container of lamps clearly with one of the following phrases: "Universal Waste-Lamp(s)," or "Waste Lamp(s)," or "Used Lamps."

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.18 [40 C.F.R. § 273.15(a) and (c)], a SQHUW may accumulate universal waste no longer than one year and must to be able to demonstrate the length of time that the universal waste has accumulated from the date that it became a waste or was received.

Pursuant Ga. Comp. R. and Regs. 391-3-11-.18 [40 C.F.R. § 273.13(d)], a SQHUW must manage universal waste lamps in a way that prevents releases of any universal waste or component of a universal waste to the environment.

Waste Manifest Records: The inspectors reviewed available hazardous waste manifest records

for shipments of hazardous waste sent since 2019. Hazardous waste manifest records show that D002 hazardous waste corrosives are shipped to Tradebe Treatment and Recycling of Tennesee, LLC (TND000772186), and the most recent shipment was made on March 6, 2019. The records included signed return copies of manifests for shipments sent during this timeframe.

3) **Closing Conference**

The inspectors conducted the exit meeting at 3:40pm with Jon Douglas Knous and James Oliver. During this meeting, the inspectors stated the preliminary findings of the inspection. Graphic Packaging agreed to provide tank certification, by July 2, 2022. On June 7, 2022, Graphic Packaging provided the inspectors information on tank inspections for proper cleaning and decommissioning or reuse. The facility contracted Miller Environmental Group for tank inspections and cleanup. Small amounts of residue were found in some tanks. A report from Miller Environmental Group will be completed for recommendations on cleanup and disposal.

The inspectors requested that the facility properly label aerosol cans as universal waste and discontinue the use of the aerosol can puncturing device, if they determined that they would not be managing the aerosols as hazardous waste. On June 10, 2022, the facility provided the inspectors evidence of their corrective actions.

4) **Inspection Findings**

Based on the observations made during the inspection, Graphic Packaging was apparently deficient with the following RCRA requirements:

- **Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.11], a person who generates a solid waste, as defined in Ga. Comp. R. and Regs. 391-3-11-.07(1) [40 C.F.R. § 261.2], must determine if that waste is a hazardous waste following the methods articulated in Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.11].**

- **Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.15(a)], a generator may accumulate as much as 55 gallons of non-acute hazardous waste in containers at or near the point of generation where wastes initially accumulate.**

- **Pursuant to Ga. Comp. R. and Regs. 391-3-11-.18 [40 C.F.R. § 273.14(e)], a SQHUW must label or mark each lamp or container of lamps clearly with one of the following phrases: "Universal Waste-Lamp(s)," or "Waste Lamp(s)," or "Used Lamps."**

  Pursuant to Ga. Comp. R. and Regs. 391-3-11-.18 [40 C.F.R. § 273.15(a) and (c)], a SQHUW may accumulate universal waste no longer than one year and must to be able to demonstrate the length of time that the universal waste has accumulated from the date that it became a waste or was received.

- **Pursuant Ga. Comp. R. and Regs. 391-3-11-.18 [40 C.F.R. § 273.13(d)], a SQHUW must manage universal waste lamps in a way that prevents releases of any universal**

waste or component of a universal waste to the environment.

5) **List of Appendices**

Appendix 1–Photo Log:
35 Photos taken on: May 18, 2022
Photos taken by: Brooke York

6) **Signed**

MARK ANTHONY RELON Digitally signed by MARK ANTHONY RELON
Date: 2022.07.21 10:37:31 -04'00'

Mark Anthony Relon — Date
Environmental Engineer

BROOKE YORK Digitally signed by BROOKE YORK
Date: 2022.07.21 12:49:45 -04'00'

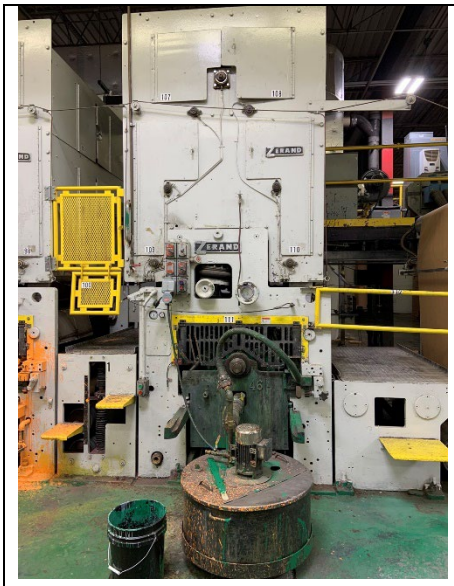
Brooke York — Date
Environmental Engineer

Concurrence

ARACELI CHAVEZ Digitally signed by ARACELI CHAVEZ
Date: 2022.07.21 12:51:57 -04'00'

Araceli B. Chavez — Date
Chief
RCRA Enforcement Section

Appendix I
Graphic Packaging International, LLC – Stone Mountain
RCRA CEI Photographs
Brooke York, US EPA

	
Press 7293 with ink pot and bucket to fill ink pot. Photograph 1 taken at 10:56am.	Virgin ink drum near Press 7293. Photograph 2 taken at 11:00am.
	
Press 7272 with dry coating in bucket and on floor. Photograph 3 taken at 11:14am	Wash station with 275-gal container for cleaner washout. Photograph 4 taken at 11:27am

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Brooke York, US EPA

	
55-gal container with Nitro label near wash station. Photograph 5 taken at 11:28am	37-lb net weight container with 2-Dimethylaminoethanol near Press 7240 wash station. Photograph 6 taken at 11:45am
	
37-lb net weight container with 2-Dimethylaminoethanol near Press 7240 wash station. Photograph 7 taken at 11:46am	Three 55-gal containers of Press 7240 runoff. Photograph 8 taken at 11:57am

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One of three 55-gal containers from Press 7240 runoff opened. Photograph 9 taken at 11:57am	275-gal container with funnel labeled "Used Oil." Photograph 10 taken at 12:00pm

	
Flexowash (FW-3000-2) with setting options for washing press cylinders. Photograph 11 taken at 12:14pm	Flexowash (FW-3000-2) with two 275-gal containers. Photograph 12 taken at 12:16pm

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Photograph 13 taken at 12:16pm	Tank farm (8 tanks total). Photograph 14 taken at 12:21pm
	
Tank 5 site glass measurement. Photograph 15 taken at 12:32pm	Tank 5 site glass measurement. Photograph 16 taken at 12:32pm

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Brooke York, US EPA

	
Tank 5 with labels. Photograph 17 taken at 12:32pm	Tank 6 with labels. Photograph 18 taken at 12:33pm
	
Tank 6 site glass measurement. Photograph 19 taken at 12:34pm	Tank 1 with labels. Photograph 20 taken at 12:35pm

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Tank 1 with labels. Photograph 21 taken at 12:37pm	Tank 3 with labels. Photograph 22 taken at 12:40pm
	
Tank 3 site glass measurement. Photograph 23 taken at 12:40pm	Tank 8 with labels. Photograph 24 taken at 12:42pm

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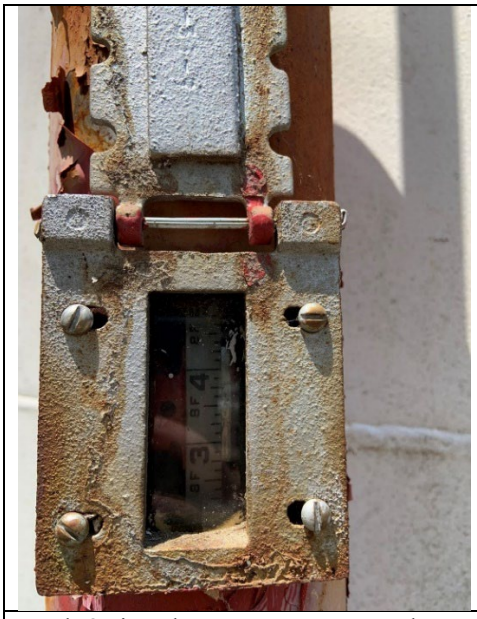
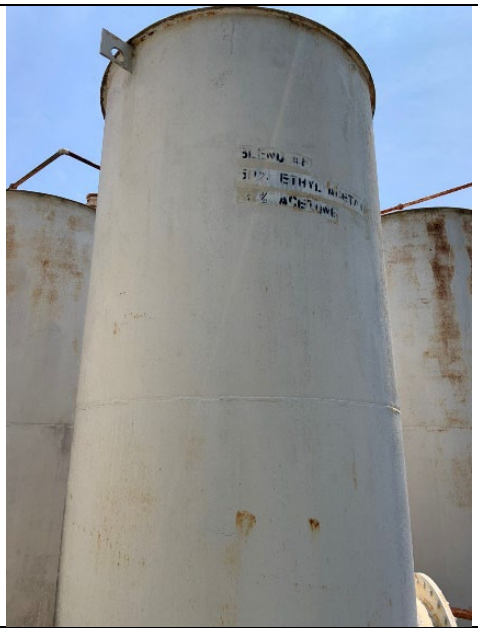
	
Tank 8 site glass measurement. Photograph 25 taken at 12:42pm	Tank 7 with labels. Photograph 26 taken at 12:43pm
	
Rust buildup on tanks and material covering the second containment floor. Photograph 27 taken at 12:44pm	Tank 1 with label. Photograph 28 taken at 12:44pm

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Tank 7. Photograph 29 taken at 12:46pm	55-gal container outside maintenance room. Photograph 30 taken at 1:02pm
	
55-gal container hazardous waste label outside maintenance room. Photograph 31 taken at 1:04pm	55-gal container with aerosol can liquid remover inside maintenance room. Photograph 32 taken at 1:05pm

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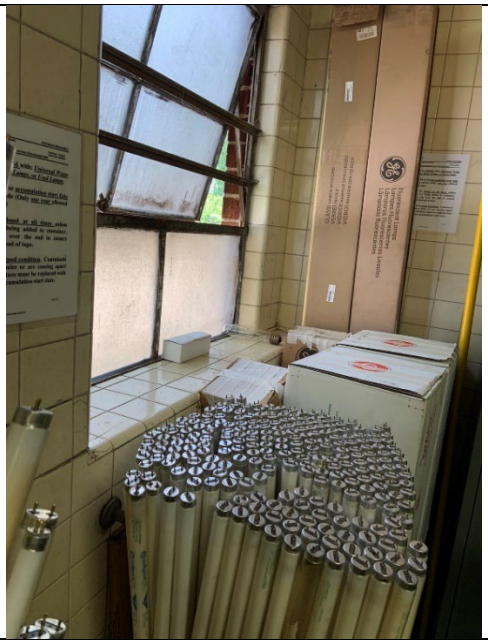
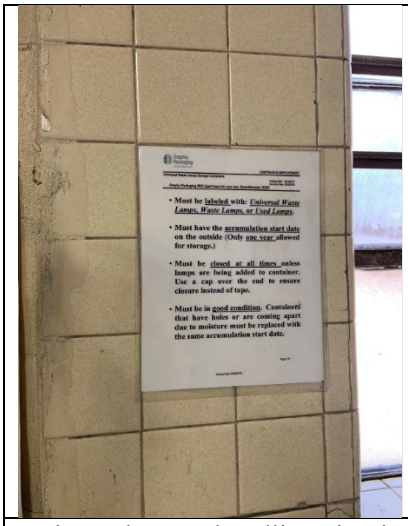
	
Universal waste lamps in utility room. Photograph 33 taken at 1:09pm	Universal waste lamps in utility room. Photograph 34 taken at 1:09pm

	
Universal waste handling sign in utility room. Photograph 35 taken at 1:12pm	