United States Environmental Protection Agency

REGION 10 Enforcement Division

INSPECTION REPORT

Inspection Date(s):	08/17/2022	Announced: No
Time:	Entry: 9:28 AM (PT)	Exit: 11:13 AM (PT)
Program:	RCRA	
Regulatory Program(s):	Title 40 - ENVIRONMENTAL PROTECTION AGENCY; WASHINGTON STATE REGULATIONS	
If Access is Denied:	N/A	
Company Name:	Paneltech International, LLC	
Facility or Site Name:	Paneltech	
Facility/Site Physical Address:	2999 John Stevens Way	
(City, state, zip code)	Hoquiam, WA 98550	
Type of Operation:	Manufacturing of overlay products using a combination of resin, paper, and other materials.	
Size of Facility:	4 acres	
Length of Facility at Location:	Since 1998	
Geographic Coordinates:	46.969462, -123.855145	
Mailing address: **(Secondary Address)**	Same as above	
Contact Information:	Raeanne Wolfley, Environmental Manager rwolfley@paneltechintl.com (360) 538-1480	
County:	Grays Harbor	
Facility/Site Identifier:	WAH000027813	
NAICS:	325211 – Plastics Material and Resin Manufacturing	
Lead Inspector:		
Katie Bradshaw	KATRINA BRADSHAW Digitally signed by KATRINA BRADSHAW Date: 2022.09.21 11:45:50 -07'00'	
	REGION 10	bradshaw.katrina@epa.gov (206) 553-6318
Peer Review:	MATTHEW QUARTERMAN Digitally signed by MATTHEW QUARTERMAN Date: 2022.09.21 13:31:53 -07'00'	
Matthew Quarterman		
	REGION 10	
Supervisor Review:		
Jen Sullivan	Jennifer A Sullivan Digitally signed by Jennifer A Sullivan Date: 2022.09.22 09:59:17 -07'00'	
	REGION 10	Sullivan.Jennifer.A@epa.gov (206) 553-6978

SECTION I – INTRODUCTION

Purpose of the Inspection/Objective

Type of inspection: CEI - Compliance Evaluation Inspection

This was a Resource Conservation and Recovery Act (RCRA) inspection conducted pursuant to Washington's federally authorized RCRA regulations found at Washington Administrative Code (WAC) 173-303. The facility was inspected to ensure compliance with standards for hazardous waste generators, universal waste management, and used oil management. The inspection was conducted as part of a Core Program requirement for FY 2022.

The facility was also inspected to evaluate compliance with the organic air emissions standards found in 40 CFR Part 265, Subparts AA, BB, and CC, as incorporated by reference into WAC 173-303-690 through -692. The inspection was also conducted as part of the FY 2022 National Compliance Initiative for organic air emissions from RCRA facilities. Prior to arrival at the facility, I performed a calibration and function check on the Toxic Volatile Analyzer (TVA2020), which measures non-specific Volatile Organic Compounds (VOCs) in parts per million (ppm).

Attendees

Title	Name	Phone	Email	Present in Opening Conf.	Present in Closing Conf.
Lead Inspector	Katie Bradshaw	2065536318	bradshaw.katrina@epa.gov	Yes	Yes
Environmental Manager	Raeanne Wolfley	3605381480	rwolfley@paneltechintl.com	Yes	Yes
	Imran Khan			Yes	Yes
Ecology TR Engineer	Stephanie Gase		stga461@ecy.wa.gov	Yes	Yes

Opening Conference

I, EPA Lead Inspector Katie Bradshaw, and Stephanie Gase, Washington Department of Ecology Toxics Reduction Engineer, arrived at the Paneltech facility at 9:28 AM (PT) on 08/17/2022 for an inspection. I presented my credentials to Raeanne Wolfley, Environmental Manager, and informed her that this was an EPA RCRA inspection. The table above presents all the inspection participants.

The inspection team conducted an opening conference at 9:35 AM. Joining us at this time was Raeanne Wolfley, and later, Imran Khan. I explained that we would be inspecting their hazardous waste management activities, gathering information, viewing different areas of the operations, taking photographs, and gathering data from the use of a TVA2020 to detect organic air emissions from hazardous wastes. Unless otherwise noted, the following information was obtained by facility representatives during the inspection.

Facility/Site Description

According to the 2021 Dangerous Waste Annual Report received by the Department of Ecology on 02/16/2022, the landowner and site operator is listed as Paneltech International, LLC.

According to their website (www.paneltechintl.com), the products manufactured at the facility include overlays (medium density, high density, and general purpose), films, saturated media, and Fortrex™.

Facility Info

Number of employees	55
Weather Conditions	Sunny, dry, 70s
Operating Hours	Monday through Friday, 24 hours per day; some weekends, depending on workload
What type of generator facility notified?	Large Quantity Generator (LQG)
What type of generator facility verified as?	LQG, according to Raeanne Wolfley during opening conference

Process Description

The manufacturing process includes water, methanol, phenol and formaldehyde, which cook 13-18 hours (depending on product type), then pumped into storage tanks. At the wet end department, they pump a certain amount of resin into mix tanks (dyes, pigments, wetting, fentac compounds, etc.), which is then pumped into a run tank. Paper product is then dipped into a pan for saturation. The saturation ovens cure the overlay. In the middle containments, the product is added glue and sometimes additional time in oven (depending on the product). The chiller rolls stop the curing process, and the product is then wound up into a roll, which goes to a sheeter, on a pallet, and shipped off to the customer. Most of the hazardous waste is generated at the wet end. If the facility makes too much, it goes to a tote. The facility has made some process improvements since the last inspection, and they are able to reuse everything in the totes, which has significantly reduced the amount of hazardous waste. However, if shelf life expires, it becomes hazardous waste, and is shipped offsite to a hazardous waste treatment storage and disposal facility (TSDF). The most recent shipment was June 27, 2022, which was approximately 2,500 pounds. Imran Khan said that by the end of the year, with more process improvements, they are hoping to become a medium or small quantity generator. At the time of the inspection, there was no hazardous waste on site, but Raeanne Wolfley said that they still considered themselves to be a large quantity generator and could be generating more hazardous waste soon with current manufacturing processes.

The facility has a Title V (Major Source) air permit, which is currently in the renewal process. They also have a National Pollutant Discharge Elimination System (NPDES) permit, which allows discharge into the Hoquiam Publicly Owned Treatment Works (POTW), and an industrial storm water permit issued by the Washington Department of Ecology. Distillate from the resin cooking process is mostly water, but contains trace amounts of phenol and formaldehyde, which is collected into tanks and treated prior to discharge to the sewer system.

During the tour, we looked at the facility's processes, in addition to hazardous waste management practices, generation points, and accumulation areas. We looked for wastes that facility representatives had not yet identified or designated as hazardous. We also observed the facility's universal waste and used oil management. Specifically, we inspected the following areas of the facility listed below.

Only those areas in which we observed areas of concern or noted other pertinent issues are discussed in this inspection report.

Building(s)

Building/Area/Sub-area	Process Description	Area Of Concern
A5 Warehouse	**Hazardous Waste Central Accumulation Area**	**Yes**

SECTION II – OBSERVATIONS AND RECORDS REVIEW

Observations

Building: A5 warehouse	**Contains CBI:** No
Observation #: KB1-OB-001	**Date:** 08/17/2022
Universal waste did not have accumulation start date. During the inspection, Brent Phillips wrote accumulation date of February 17, 2022, which was later verified.	

Records Review

I reviewed the following records on site:

- Hazardous waste manifests from 2021 to present
- Training records for Raeanne Wolfley and Brent Phillips (hazardous waste handler)
- Contingency Plan
- 2022 weekly inspections

SECTION III – AREAS OF CONCERN

The presentation of areas of concern does not constitute a formal compliance determination or violation.

Building: A5 Warehouse	**Area:**	**Sub-area:**
KB1-OB-001		
Universal waste did not have accumulation start date. During the inspection, Brent Phillips wrote accumulation date of February 17, 2022, which was later verified.	**Citations: WAC 173-303**	

SECTION IV – FOLLOW UP

I observed no follow up necessary at the time of the inspection.

Closing Conference

During the closing conference, I told Raeanne Wolfley and Imran Khan that I did not see any areas of concern during the records review. I said that the only area of concern during the tour of the facility was the lack of an accumulation start date on the universal waste, but that was corrected while on site. I explained that I was not making a compliance determination on site, and that any follow up would likely come from a compliance officer. I thanked them for their time and cooperation and departed the facility at 11:13 AM.

Communication Log

No additional information received by REGION 10 after exiting the Facility on 08/17/2022.

SECTION V – EPA METHOD 21 MONITORING ACTIVITIES

I used a ThermoFisher Toxic Vapor Analyzer 2020 (TVA2020), designated as TVA SB7986. The EPA TVA2020 response time is approximately five seconds. I sampled the components on the tanks in the resin plant area and did not get any reading above background level of 2 ppm.

SECTION VI – LIST OF APPENDICES

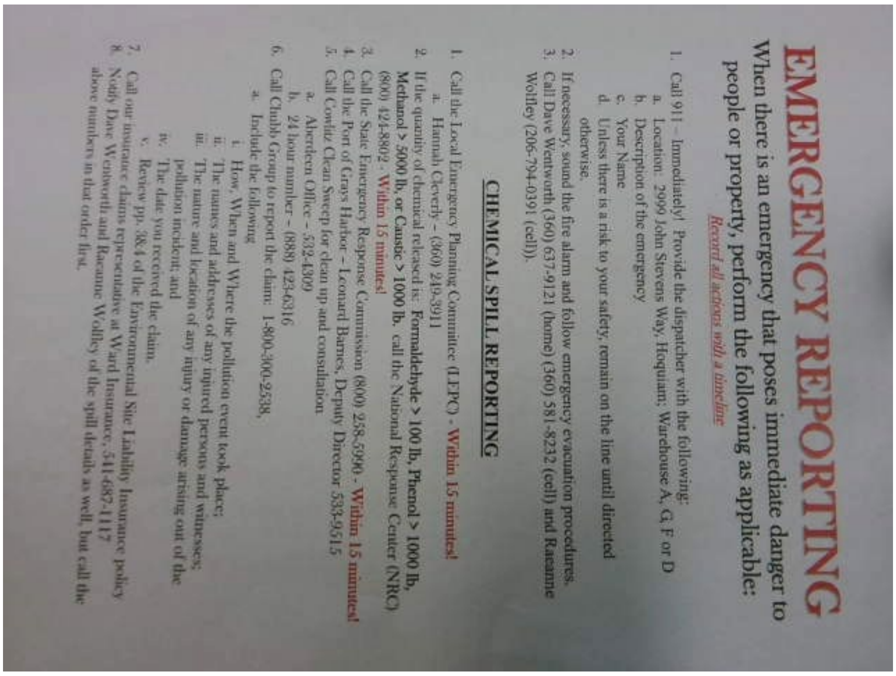
Photo Log

Document Type	Document Name	Contains CBI	Contains PII	Uploaded By	Date Received
Field Inspection Notes	Field_Notes_WAH000027813v1.0.pdf	No	No	Katie Bradshaw	08/18/2022

PANELTECH INTERNATIONAL LLC

Inspection Date(s): 08/17/2022 - 08/17/2022

APPENDIX 1: PHOTO LOG



EMERGENCY REPORTING

When there is an emergency that poses immediate danger to people or property, perform the following as applicable:

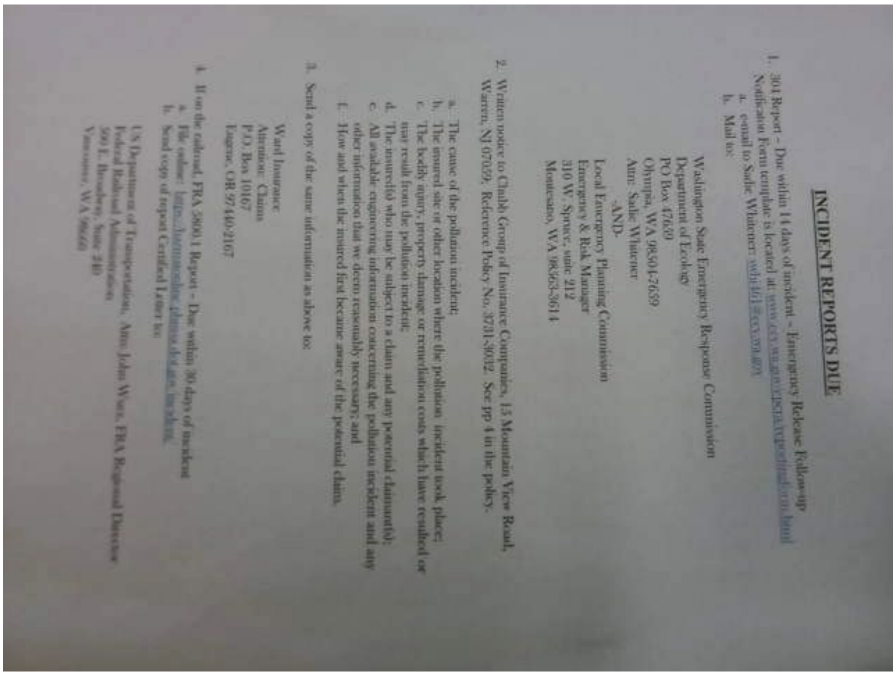
Record all actions with a timeline

1. Call 911 – Immediately! Provide the dispatcher with the following:
   a. Location: 2999 John Stevens Way, Hoquiam; Warehouse A, G, F or D
   b. Description of the emergency
   c. Your Name
   d. Unless there is a risk to your safety, remain on the line until directed otherwise.
2. If necessary, sound the fire alarm and follow emergency evacuation procedures.
3. Call Dave Wentworth (360) 637-9121 (home) (360) 581-8232 (cell) and Raeanne Wolfley (206-794-0391 (cell)).

CHEMICAL SPILL REPORTING

1. Call the Local Emergency Planning Committee (LEPC) - Within 15 minutes!
   a. Hannah Cleverly – (360) 249-3911
2. If the quantity of chemical released is: **Formaldehyde > 100 lb, Phenol > 1000 lb, Methanol > 5000 lb, or Caustic > 1000 lb.** call the National Response Center (NRC) (800) 424-8802 - Within 15 minutes!
3. Call the State Emergency Response Commission (800) 258-5990 - Within 15 minutes!
4. Call the Port of Grays Harbor – Leonard Barnes, Deputy Director 533-9515
5. Call Cowlitz Clean Sweep for clean up and consultation
   a. Aberdeen Office – 532-4309
   b. 24 hour number – (888) 423-6316
6. Call Chubb Group to report the claim: 1-800-300-2538,
   a. Include the following
      i. How, When and Where the pollution event took place;
      ii. The names and addresses of any injured persons and witnesses;
      iii. The nature and location of any injury or damage arising out of the pollution incident; and
      iv. The date you received the claim.
      v. Review pp. 3&4 of the Environmental Site Liability Insurance policy
7. Call our insurance claims representative at Ward Insurance, 541-687-1117
8. Notify Dave Wentworth and Raeanne Wolfley of the spill details as well, but call the above numbers in that order first.

Contingency Plan page 1	IMG-20220817100527527129289.jpg	
08/17/2022 10:05 AM	Photographer: Katie Bradshaw	
	No CBI	No PII



INCIDENT REPORTS DUE

1. 304 Report – Due within 14 days of incident – Emergency Release Follow-up Notification Form template is located at: [illegible]
   a. e-mail to Sadie Whitener: [illegible]
   b. Mail to:

      Washington State Emergency Response Commission
      Department of Ecology
      PO Box 47659
      Olympia, WA 98504-7659
      Attn: Sadie Whitener
      -AND-
      Local Emergency Planning Commission
      Emergency & Risk Manager
      310 W. Spruce, suite 212
      Montesano, WA 98563-3614

2. Written notice to Chubb Group of Insurance Companies, 15 Mountain View Road, Warren, NJ 07059. Reference Policy No. 3731-3032. See pp 4 in the policy.
   a. The cause of the pollution incident;
   b. The insured site or other location where the pollution incident took place;
   c. The bodily injury, property damage or remediation costs which have resulted or may result from the pollution incident;
   d. The insured(s) who may be subject to a claim and any potential claimant(s);
   e. All available engineering information concerning the pollution incident and any other information that we deem reasonably necessary; and
   f. How and when the insured first became aware of the potential claim.
3. Send a copy of the same information as above to:

   Ward Insurance
   Attention: Claims
   P.O. Box 10167
   Eugene, OR 97440-2167

4. If on the railroad, FRA 5800.1 Report – Due within 30 days of incident
   a. File online: [illegible]
   b. Send copy of report Certified Letter to:

      US Department of Transportation, Attn: John Winn, FRA Regional Director
      Federal Railroad Administration
      500 E. Broadway, Suite 240
      Vancouver, WA 98660

Contingency Plan page 2	IMG-20220817100538538769994.jpg	
08/17/2022 10:05 AM	Photographer: Katie Bradshaw	
	No CBI	No PII