

Region 6 - Enforcement & Compliance Assurance Division
INSPECTION REPORT

Inspection Date(s):	09/20-21/2022 and 09/29-30/2022	
Media Program:	RCRA Compliance Evaluation Inspection	
Regulatory Program(s)	RCRA Large Quantity Generator	
Company Name:	Printpack, Inc.	
Facility Name:	Printpack Converting Plant	
Facility Physical Location:	2005 S Great Southwest Pkwy	
(city, state, zip code)	Grand Prairie, TX 75051	
Mailing address:	same	
(city, state, zip code)	same	
County/Parish:	Tarrant	
Facility Phone Number	(972) 641-4424 x41586	
Facility Contact:	Melissa Birt-Gonzales	EHS Manager 1
	mbirt@printpack.com	
FRS Number:	n/a	
Identification/Permit Number:	NSR Permit # 9981 (exp. 2/12/2024) Title V Permit # O1502 (exp. 10/31/2023)	
Media Identifier Number:	EPA ID # TXR000016493	
NAICS:	326112 - PLASTICS PACKAGING FILM AND SHEET (INCLUDING LAMINATED) MANUFACTURING	
SIC:	n/a	
Personnel participating in inspection:		
John Penland	EPA R6/ECD-SR	Lead Inspector
Gabriel Salinas	EPA R6/ECD-SR	Sr. Inspector
Erin Young-Dahl	EPA R6/ECD-SR	Inspector
Courtney Newman	Texas Commission on Environmental Quality R4	Environmental Inspector
Melissa Birt-Gonzales	Printpack	EHS Manager 1
Robert A. Cullom	Printpack	Corporate Environmental Engineer
EPA Lead Inspector Signature/Date		
	John Penland – Lead Inspector	Date
Supervisor Signature/Date		
	Jeff Yurk – Waste Enforcement Section Chief	Date

Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

On September 20-21 and 29-30, 2022, I, John Penland, conducted an unannounced inspection of the Printpack facility (Printpack) located at 2005 S. Great Southwest Pkwy in Grand Prairie, Texas. The inspection focused on compliance with the Resource Conservation and Recovery Act (RCRA). I was assisted by Environmental Protection Agency inspectors Gabriel Salinas and Erin Young-Dahl, in addition to Texas Commission on Environmental Quality (TCEQ) inspector Courtney Newman. The inspection included a walkthrough of the facility's production process and waste generation and management units as well as a review of facility records related to hazardous waste management.

The Printpack facility was targeted for inspection as part of Environmental Justice as well as Regional and National investigation initiatives to evaluate facilities subject to RCRA Subparts AA, BB, and CC regulations, which are related to air emissions from hazardous waste management units.

This report serves as documentation of all onsite activities and observations during the inspection of the Printpack facility. A summary of all areas of concern identified during the inspection is provided in Section III.

FACILITY DESCRIPTION

The Printpack facility was issued the EPA ID # TXR000016493. At the time of the inspection, Printpack was operating as a Large Quantity Generator (LQG) of hazardous waste.

The Printpack facility manufactures printed plastic packaging for use in a variety of consumer markets and operates from 8 am – 5 pm Monday through Friday. The facility production operations include a photo etching process and three high-volume printing presses. The photo etching process includes a solvent reclamation unit to recycle the mask removal agent. The printing presses generate a spent solvent that is accumulated in a series of 2 spent solvent tanks prior to reclamation in a distillation unit. The distilled solvent is recycled into the printing process. Distillation column bottoms are accumulated in a third tank.

Section II - OBSERVATIONS

Gabe Salinas, Erin Young-Dahl, Courtney Newman, and I conducted the onsite inspection during normal business hours from September 20-21 and September 29-30, 2022. The inspection spanned two weeks due to an employee emergency at the facility. During the inspection, the facility was conducting normal operations and all areas of the facility were in use. Throughout the two weeks, we visited each of the facility's waste generation, accumulation, and management areas, and reviewed the facility's operating records pertaining to the facility's RCRA applicability and compliance requirements.

This section provides an abbreviated description of our daily activities (see Appendix 2). Appendix 1 provides photographs of these observations. Unless otherwise specified, the statements cited in this section reflect those claims made by facility personnel or documents reviewed during the inspection.

September 20, 2022

Gabe Salinas, Erin Young-Dahl, Courtney Newman, and I entered the facility at 0940 hrs., where I presented my credentials to Ms. Melissa Birt-Gonzales (EHS Manager 1) and informed her that we were there to conduct an inspection of the facility under the authority of Section 3007 of RCRA. I explained the right of Printpack to assert a Confidential Business Information claim for records requested by the EPA, followed by a presentation of EPA Region 6's Confidentiality Notice (40 C.F.R. Section 2.203). I then facilitated an opening briefing at 1000 hrs. with Melissa Birt-Gonzales, where we discussed the purpose of EPA's inspection: assessment of Printpack's compliance with its requirements under RCRA.

Printing Press Area

Each of the three printing presses had two 55-gallon drums staged for the satellite accumulation of hazardous waste (Photo 1). One drum of each pair is dedicated to liquid phase ink/solvent waste from the printers, and the other is dedicated to ink- and solvent-contaminated solid media.

During the inspection, I observed one funnel with its lid not secured in the closed position, one drum with its lid not secured in the closed position, and one drum with a lid that was incorrectly attached and did not provide a vapor-tight seal (Photos 2 & 3). We observed the satellite accumulation drums were correctly labeled as hazardous waste, though each satellite accumulation area appears designed to exceed the 55-gallon limit for hazardous waste accumulation in a satellite accumulation area.

Ink Room

The Ink Room houses the ink manufacturing and blending processes. I found this area to be well-marked with all containers in good condition. This area additionally contains the central accumulation area and the separate distillation room. The storage area met aisle spacing requirements.

Two 55-gallon drums were staged for the satellite accumulation of hazardous waste from the ink manufacturing and blending processes. One drum is dedicated to excess liquid phase ink/solvent waste from the printers and one drum is dedicated to ink and solvent contaminated solid media. The satellite accumulation area appears designed to exceed the 55-gallon limit for the satellite accumulation of hazardous waste.

Distillation Room

The distillation room is located within the ink room, near the entrance from the printing press area, and contains a spent solvent distillation unit. The distillation unit is equipped with a dedicated feed tank. At the time of the inspection, the feed tank was not marked as a hazardous waste tank. I observed an open 55-gallon drum of spent solvent next to the tank with one end of a flex hose inserted (Photos 5 & 6). The

other end of the flex hose connected to the distillation tank. The open spent solvent container was also unlabeled, and no operators were present (Photo 7). I also identified three open-ended lines on the distillation bottoms waste lines, plus one active leak from a line associated with the reclaimed solvent tank (Photo 8). Solvent odors were present in the area. The facility stated line caps are on order. Printpack made a claim of secondary hazardous materials for spent solvent being reclaimed in the distillation area.

External Tank Farm

Tank 5

Tank 5 receives spent solvent from the printing presses and accumulates it prior to solvent reclamation in the solvent recovery unit. Printpack claims the spent solvent accumulated in Tank 5 is a hazardous secondary material. I identified one open-ended line associated with this tank and noticed the tank was not marked as a hazardous waste tank (Photo 9).

Tank 5 had recently experienced a pump failure. While staining was still present, no other indications of the spill remained. After we ended the inspection for the day, Printpack labeled the tank and capped the open-ended line.

Tank 6

Tank 6 receives distillation column bottoms from the solvent reclamation still. It was marked as a solvent waste tank but is not marked with the words "Hazardous Waste" (Photo 10). I identified one open-ended line associated with this tank. As I inspected the top of the tank, I noticed solvent odors present. After we ended the inspection for the day, Printpack labeled the tank and capped the open-ended line. I confirmed this the following day.

Photolithography Area

The facility has two mask removal units which use solvent to remove the mask agent from printing plates. Each is piped to a single solvent reclamation unit located in the distillation area. At the time of the inspection, I noticed a sorbent boom located underneath one of the two mask removal units that had been placed there in advance of a maintenance activity (Photo 11).

Anilox Cleaning Area

The facility has an anilox washing unit with an attached solvent tank.

We departed the facility at 1230 hrs.

September 21, 2022

The inspection team and I arrived at the facility at 1230 hrs. and conducted preliminary document review on this day, including a review and discussion of the facility's waste profiles, waste determinations, and air emissions standards and applicability.

We departed the facility at approximately 1400 hrs.

September 29, 2022

The inspection on this day started at approximately 0920 hrs.

On this day, the team and I conducted air emissions monitoring at Tank 6 and in the distillation area. I identified a 20,000 ppm leak at the connection between the flame arrestor and conservation vent for the closed vent system on top of Tank 6 (see 40 C.F.R. § 265.1083 (c)(1)). A first attempt at repair was made by Printpack shortly after this leak was detected, and I verified the repair in the afternoon. In lieu of monitoring under Method 21, Printpack applies the alternate screening standard identified in §8.3.3 of Method 21, wherein the formation of bubbles in a soap solution may be used in certain circumstances to identify leaks.

We departed the facility at 1530 hrs.

Section III – AREAS OF CONCERN

- I observed multiple instances of unlabeled, open, or unsecured drums containing hazardous waste throughout the satellite accumulation areas and distillation area.
- Based on EPA's monitoring, an emissions leak from the connection between the flame arrestor and conservation vent on top of Tank 6 was detected with a reading of 20,000 ppm. Based on a CC applicability determination memo provided by the facility, Tank 6 is subject to Subpart CC requirements.
- Tank inspections are not conducted on the weekends.
- I observed multiple instances of open lines in the distillation area and in the external tank farm.
- The dirty solvent tank, Tank 5, and Tank 6 were not labeled as "Hazardous Waste."
- Training records for RCRA-applicable employees will be reviewed and assessed for their completeness and compliance with LQG training and recordkeeping requirements.
- Requested a written Subpart BB procedure and diagram of components subject to Subpart BB. None was available depicting piping and ancillary equipment between distillation unit and Tank 6.

On September 30, 2022, we conducted a closing conference with Printpack employees Melissa Birt-Gonzales and Robert Cullom. The conference was held remotely over Microsoft TEAMS. We reviewed the above areas of concern noted during the inspection.

Section IV – FOLLOW UP

Actions taken by Printpack to resolve any areas of concern were documented by the facility with photographs or other documentation medium and submitted to the EPA via a shared OneDrive folder. Any information received from the facility after the inspection was also received in this way. These documents are accessible to the assigned EPA Enforcement Officer as applicable.

Section V – LIST OF APPENDICES

Appendix 1: Photographs taken 09/20/2022

Appendix 2: Daily Summaries

Appendix 1

Photograph Log



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 1

Location: Printpack Converting Plant		
City: Grand Prairie	County/Parish: Tarrant	State: Texas



Photo File Name: DSCN0809.jpg	Date of Photo: 09/20/2022	Time: 1108 hrs
Photographer: Gabe Salinas, EPA Inspector		
Witness: Erin Young-Dahl, EPA Inspector		
Description: View of two satellite accumulation containers next to one of the printing presses.		



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 2

Location: Printpack Converting Plant		
City: Grand Prairie	County/Parish: Tarrant	State: Texas



Photo File Name: DSCN0810.jpg	Date of Photo: 09/20/2022	Time: 1109 hrs
Photographer: Gabe Salinas, EPA Inspector		
Witness: Erin Young-Dahl, EPA Inspector		
Description: Closeup of a satellite accumulation drum with an unsecured lid.		



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 3

Location: Printpack Converting Plant		
City: Grand Prairie	County/Parish: Tarrant	State: Texas



Photo File Name: DSCN0811.jpg	Date of Photo: 09/20/2022	Time: 1109 hrs
Photographer: Gabe Salinas, EPA Inspector		
Witness: Erin Young-Dahl, EPA Inspector		
Description: Closeup of a satellite accumulation drum with an unsecured funnel.		



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 4

Location: Printpack Converting Plant		
City: Grand Prairie	County/Parish: Tarrant	State: Texas



Photo File Name: DSCN0812.jpg	Date of Photo: 09/20/2022	Time: 1122 hrs
Photographer: Gabe Salinas, EPA Inspector		
Witness: Erin Young-Dahl, EPA Inspector		
Description: View of equipment leak from piping carrying clean solvent.		



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 5

Location: Printpack Converting Plant		
City: Grand Prairie	County/Parish: Tarrant	State: Texas



Photo File Name: DSCN0813.jpg	Date of Photo: 09/20/2022	Time: 1125 hrs
Photographer: Gabe Salinas, EPA Inspector		
Witness: Erin Young-Dahl, EPA Inspector		
Description: Overview of solvent reclamation area. Note open dirty solvent drum.		



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 6

Location: Printpack Converting Plant		
City: Grand Prairie	County/Parish: Tarrant	State: Texas



Photo File Name: DSCN0814.jpg	Date of Photo: 09/20/2022	Time: 1125 hrs
Photographer: Gabe Salinas, EPA Inspector		
Witness: Erin Young-Dahl, EPA Inspector		
Description: Closeup of open, unlabeled container that holds dirty solvent. Hose inserted into the drum feeds to the dirty solvent tank for reclamation.		



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 7

Location: Printpack Converting Plant		
City: Grand Prairie	County/Parish: Tarrant	State: Texas



Photo File Name: DSCN0815.jpg	Date of Photo: 09/20/2022	Time: 1125 hrs
Photographer: Gabe Salinas, EPA Inspector		
Witness: Erin Young-Dahl, EPA Inspector		
Description: Closeup of dirty solvent tank in the solvent reclamation area. The tank is missing a "Hazardous Waste" marking.		



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 8

Location: Printpack Converting Plant		
City: Grand Prairie	County/Parish: Tarrant	State: Texas



Photo File Name: DSCN0816.jpg	Date of Photo: 09/20/2022	Time: 1134 hrs
Photographer: Gabe Salinas, EPA Inspector		
Witness: Erin Young-Dahl, EPA Inspector		
Description: Open-ended lines in the solvent reclamation area.		



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 9

Location: Printpack Converting Plant		
City: Grand Prairie	County/Parish: Tarrant	State: Texas



Photo File Name: DSCN0817.jpg	Date of Photo: 09/20/2022	Time: 1159 hrs
Photographer: Gabe Salinas, EPA Inspector		
Witness: Erin Young-Dahl, EPA Inspector		
Description: Open-ended line in piping under Tank 5.		



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 10

Location: Printpack Converting Plant		
City: Grand Prairie	County/Parish: Tarrant	State: Texas



Photo File Name: DSCN0818.jpg	Date of Photo: 09/20/2022	Time: 1204 hrs
Photographer: Gabe Salinas, EPA Inspector		
Witness: Erin Young-Dahl, EPA Inspector		
Description: View of Tank 6 label. There are no "Hazardous Waste" markings on the tank.		



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 11

Location: Printpack Converting Plant		
City: Grand Prairie	County/Parish: Tarrant	State: Texas



Photo File Name: DSCN0819.jpg	Date of Photo: 09/20/2022	Time: 1216 hrs
Photographer: Gabe Salinas, EPA Inspector		
Witness: Erin Young-Dahl, EPA Inspector		
Description: Boom in photolithography area under a mask removal unit.		

Appendix 2

Daily Summaries

Young-Dahl, Erin

From: Penland, John
Sent: Tuesday, September 20, 2022 6:35 PM
To: Young-Dahl, Erin; Salinas, Gabriel; Courtney Newman; mbirt@printpack.com
Cc: Yurk, Jeffrey; Erin Gorman
Subject: Daily Summary for FY2022 RCRA CEI - Printpack Grand Prairie, TX (TXR000016493) - September 20, 2022

All, Here is a summary of my notes from today's inspection. If there are any errors or omissions please let me know.

Introduction

During the week of September, 2022, I, John Penland, will be conducting an unannounced inspection of the Printpack Grand Prairie Converting facility (Printpack) located at 2006 South Great Southwest Parkway in Grand Prairie, Texas for compliance with the Resource Conservation and Recovery Act (RCRA). I will be assisted on this inspection by Environmental Protection Agency (EPA) inspectors Gabe Salinas and Erin Young-Dahl, and Texas Commission for Environmental Quality (TCEQ) investigator Courtney Newman. The inspection will include walkthroughs of the facility's hazardous waste generation and management units; a review of the facility records related to hazardous waste management; and a specific evaluation of the facility's compliance with the RCRA air pollution control requirements.

Purpose

The Printpack facility was targeted for inspection as part of an ongoing National Compliance Initiative for air emissions from hazardous waste management units.

Inspection Attendees:

NAME	TITLE	REPRESENTING	PHONE	EMAIL
John Penland	Sr. Environmental Scientist – Lead Inspector	US EPA Region 6	214-665-9717	Penland.john@epa.gov
Gabe Salinas	Sr. Environmental Scientist – Asst. Inspector	US EPA Region 6	214-665-8483	Salinas.gabriel@epa.gov
Erin Young-Dahl	Environmental Scientist – Asst. Inspector	US EPA Region 6	214-665-3166	Youngdahl.erin@epa.gov
Courtney Newman	Environmental Investigator	TCEQ Region 4	817-588-5809	Courtney.newman@tceq.texas.gov
Melissa Gonzales	EHS Manager 1	Printpack	972-641-4421 ext. 41586	mbirt@printpack.com

Daily Summary

- Initial Entry to the facility - 09:40am
- Opening meeting start – 10:00am
 - I presented my credentials to Mrs. Gonzales and informed her that we were there to conduct an inspection of the facility under the authority of section 3007 of the Resource Conservation and Recovery Act

- We discussed the authority for the inspection – RCRA Section 3007 - For purposes of developing or assisting in the development of any regulation or enforcing the provisions of this chapter, any person who generates, stores, treats, transports, disposes of, or otherwise handles or has handled hazardous wastes shall, upon request of any officer, employee or representative of the Environmental Protection Agency, duly designated by the Administrator, or upon request of any duly designated officer, employee or representative of a State having an authorized hazardous waste program, furnish information relating to such wastes and permit such person at all reasonable times to have access to, and to copy all records relating to such wastes. For the purposes of developing or assisting in the development of any regulation or enforcing the provisions of this chapter, such officers, employees or representatives are authorized—
 - (1) to enter at reasonable times any establishment or other place where hazardous wastes are or have been generated, stored, treated, disposed of, or transported from;
 - (2) to inspect and obtain samples from any person of any such wastes and samples of any containers or labeling for such wastes.
- We discussed the purpose of EPA’s inspection – Assessment of Printpack’s compliance with its requirements under RCRA, including, but not limited to, the requirements for: waste determination and counting; waste marking; waste container management; use of the hazardous waste manifest; emergency planning; personnel training; and air pollution control requirements for hazardous waste units.
- Discussed the right of Printpack to assert a Confidential Business Information claim for records requested by EPA (see attachment)
- Discussed the process for transferring electronic records – EPA has set up a Microsoft OneDrive folder with access limited to the inspection participants ( [LINK](#)).
- Discussed the inspection process – the inspection will be conducted September 20 through September 23, 2022. The participants will meet at the facility at 9:00am each day to conduct the onsite portion of the inspection and discuss the findings of the ongoing records review. The records review will be conducted by the inspectors independently offsite throughout the week. Daily summaries will be provided by the inspectors at the end of each day to ensure a clear communication of questions and findings. The meeting Friday, September 23, 2022 will be reserved for a closing conference, where EPA will summarize the overall findings of the inspection to that point and provide a plan for concluding any unfinished evaluation.
- General Facility Process – The Printpack facility manufactures printed plastic packaging for use in a variety of consumer markets. The facility production operations include a photo etching process and three, high-volume printing presses. The photo etching process includes a solvent reclamation unit) to recycle the mask removal agent. The printing presses generate a spent solvent which is accumulated in a series of 2 spent solvent tanks prior to reclamation in a distillation unit. The distilled solvent is recycled into the printing process. Distillation column bottoms are accumulated in a third tank.
- Initial request for compliance records, including:
 - Hazardous waste notification form: 8700-12 or equivalent (NOR)
 - A current Hazardous Waste Contingency Plan including records of distribution
 - Facility Maps identifying solid waste management units, if available
 - A facility process Diagram for spent solvent management, if available
 - Facility waste profiles for any solid waste generated since 2019. Include documentation relevant to the waste determination made for each waste (i.e. analytical reports or documentation to support generator knowledge)
 - Any Hazardous Waste Manifests since 2019 not previously uploaded to E-manifest
 - Any currently effective contract or agreement between the facility and any waste management company or TSDF
 - Facility SOPs related to the generation or management of hazardous waste
 - RCRA Unit inspection records since 2019 for tanks and container storage areas

- Currently effective CAA Title V and NSR permits for hazardous waste management units
- Safety Data Sheets for the solvent used in press and anilox cleaning and photoetching
- Facility Walkthrough
 - Beginning at approximately 10:45am
 - Printing press area –
 - We physically inspected the 3 individual presses.
 - Each press has a pair of 55-gallon drums staged for the satellite accumulation of hazardous waste. One drum is dedicated to liquid phase ink/solvent waste from the printers and one drum is dedicated to ink and solvent contaminated solid media.
 - During our inspection of these waste accumulation areas we identified:
 - 1 funnel with its lid not secured in the closed position
 - 1 drum lid with its lid not secured in the closed position
 - 3 drums with open bungs
 - 1 drum lid with its lid not correctly attached to provide a vapor tight seal
 - In general the drums were properly labeled as hazardous waste
 - In general each satellite accumulation area appears designed to exceed the 55-gallon limit for the accumulation of hazardous waste in a satellite accumulation area
 - Ink Room
 - We physically inspected the <90-day container accumulation area. The area was well marked and each container appeared to be in good condition and appropriately labeled. Aisle spacing requirements were met
 - A pair of 55-gallon drums was staged for the satellite accumulation of hazardous waste. One drum is dedicated to liquid phase ink/solvent waste from the printers and one drum is dedicated to ink and solvent contaminated solid media. In general the satellite accumulation area appears designed to exceed the 55-gallon limit for the accumulation of hazardous waste in a satellite accumulation area
 - Distillation Room
 - The Spent Solvent distillation Unit is equipped with a dedicated feed tank.
 - At the time of this inspection the tank was not marked as a hazardous waste tank.
 - An open container of spent solvent was present in this area with a flex hose prepared to empty the container into the distillation feed tank. No operators were present. The open spent solvent container was also unlabeled.
 - We identified 2 open-ended lines on the distillation bottoms pump for the column.
 - We identified one active leak from a line associated with the reclaimed solvent tank.
 - External Tank Farm
 - Tank 5 receives spent solvent from the printing presses and accumulates it prior to reclamation in the solvent recovery unit.
 - We identified one apparent open-ended line associated with this tank
 - This tank is not marked as a hazardous waste tank
 - The tank had recently experienced a pump failure. While staining was still present, no other indications of the spill remained.
 - Tank 6 receives distillation column bottoms from the solvent reclamation still
 - We identified one open-ended line associated with this tank
 - This tank is marked as a solvent waste tank but is not marked with the words “Hazardous Waste”
 - Photolithography area
 - The facility has two mask removal units which use solvent to remove the mask agent from printing plates. Each is piped a single solvent reclamation unit located in the distillation area.

- At the time of this inspection we found sorbent boom located underneath one of the two mask removal units from a prior spill. This spill cleanup residue had been left in place following the repair of the leak.
- Anilox Cleaning Area
 - The facility has an anilox washing unit with an attached solvent tank.
- Daily Wrap up meeting
- Departed Facility at approximately 12:30pm

Topics for discussion on September 21, 2022

- Waste Profile Review
- Tank evaluation
- A discussion on the applicability of definitions for Universal Wastes and Hazardous Secondary Materials

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 Senior Environmental Scientist (ECDSR)
 Enforcement and Compliance Assurance Division
 Waste Enforcement Branch
 EPA Region 6 1201 Elm St., Suite 500
 Dallas, Texas 75270
 (214)665-9717

Young-Dahl, Erin

From: Penland, John
Sent: Wednesday, September 28, 2022 9:58 PM
To: Salinas, Gabriel; Young-Dahl, Erin; Courtney Newman; Robert Arthur Cullom; Melissa Birt Gonzalez
Subject: Daily Summary for FY2022 RCRA CEI - Printpack Grand Prairie, TX (TXR000016493) - September 21, 2022
Attachments: cbi form RCRA 2-19-20.pdf

All, Here is a summary of my notes from last Wednesday's inspection. If there are any errors or omissions please let me know.

Inspection Attendees:

NAME	TITLE	REPRESENTING	PHONE	EMAIL
John Penland	Sr. Environmental Scientist – Lead Inspector	US EPA Region 6	214-665-9717	Penland.john@epa.gov
Gabe Salinas	Sr. Environmental Scientist – Asst. Inspector	US EPA Region 6	214-665-8483	Salinas.gabriel@epa.gov
Erin Young-Dahl	Environmental Scientist – Asst. Inspector	US EPA Region 6	214-665-3166	Youngdahl.erin@epa.gov
Courtney Newman	Environmental Investigator	TCEQ Region 4	817-588-5809	Courtney.newman@tceq.texas.gov
Melissa Gonzales	EHS Manager 1	Printpack	972-641-4421 ext. 41586	mbirt@printpack.com
Robert A. Cullom	Corporate Environmental Engineer	Printpack		bcullom@printpack.com

Daily Summary

- Inspection start – approximately 9:00am
- Review of inspection notes from September 20, 2022
 - Attached CBI form
 - Address cited in notes needs street number to be revised to 2005
 - Additional operations at the facility are: laminate application and extrusion; product sizing; and warehousing
 - An additional SAA is used for the management of waste from the application of laminate using solvent based adhesives
 - The SAA drums located next to the presses did have all bungs caps installed but these were obscured by tape
 - The leak at the distillation unit was repaired after we identified it.
 - The boom identified beneath the mask removal machine in the plate manufacturing area was not spill residue but instead had been placed in advance of a maintenance activity.
 - Printpack has made a claim of hazardous secondary materials for spent solvent being reclaimed in the distillation area and accumulated in Tank 5. See 40 CFR 261.4(a)(23)

- According to Mr. Cullom appropriate notice has been submitted. Need Copy.
 - Hazardous waste tanks have been labeled and OELs closed.
- Air Emissions standards and applicability
 - In lieu of Monitoring under Method 21, the facility applies the alternate screening standard identified in section 8.3.3 of method 21
 - As part of our review we are trying to identify waste determination records for compliance with 40 CFR 261.1083
 - Initial review of one of the waste profiles appears to record this information inaccurately
- Inspection End
 - Inspection ended early due to employee emergency

John Penland
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 Waste Enforcement Branch
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 Dallas, Texas 75270
 (214)665-9717

Young-Dahl, Erin

From: Penland, John
Sent: Thursday, September 29, 2022 10:40 PM
To: Young-Dahl, Erin; Salinas, Gabriel; Melissa Birt Gonzalez; Courtney Newman; Robert Arthur Cullom
Cc: Erin Gorman; Yurk, Jeffrey
Subject: Daily Summary for FY2022 RCRA CEI - Printpack Grand Prairie, TX (TXR000016493) - September 29, 2022

All, Here is a summary of my notes from today's inspection. If there are any errors or omissions please let me know.
Inspection Attendees:

NAME	TITLE	REPRESENTING	PHONE	EMAIL
John Penland	Sr. Environmental Scientist – Lead Inspector	US EPA Region 6	214-665-9717	Penland.john@epa.gov
Gabe Salinas	Sr. Environmental Scientist – Asst. Inspector	US EPA Region 6	214-665-8483	Salinas.gabriel@epa.gov
Erin Young-Dahl	Environmental Scientist – Asst. Inspector	US EPA Region 6	214-665-3166	Youngdahl.erin@epa.gov
Courtney Newman	Environmental Investigator	TCEQ Region 4	817-588-5809	Courtney.newman@tceq.texas.gov
Melissa Gonzales	EHS Manager 1	Printpack	972-641-4421 ext. 41586	mbirt@printpack.com
Robert A. Cullom	Corporate Environmental Engineer	Printpack		bcullom@printpack.com

Daily Summary

- Inspection start – approximately 9:20am
- Review of inspection notes from September 21, 2022
 - Robert Cullom presented a CC applicability determination memo. Requested a copy
 - Requested Subpart J records for Tank 6
 - Requested a written Subpart BB procedure and diagram of components subject to Subpart BB. None available depicting piping and ancillary equipment between distillation unit and tank 6
- Air Emissions Monitoring
 - Visited the distillation area and tank farm to monitor piping and ancillary equipment; and closure devices for the hazardous secondary material and hazardous waste tank systems.
 - 3 OELs observed on tank bottoms waste lines at the distillation unit. According to Mr. Cullom the line caps are on order.
 - 20,000ppm leak identified at the connection between the flame arrestor and conservation vent for the closed vent system on tank 6.
 - A first attempt at repair was made shortly after this leak was detected and I verified the repair in the afternoon.

- Contingency plan
 - The facility's hazardous waste contingency plan is incorporated in to the facility-wide ERP.
 - The plan's currently active version dates back to 2018 and does not include an updated list of emergency coordinators.
 - The plan is currently undergoing revision and will include the quick reference guide required by 40 CFR 262.262
 - I have also requested a record of distribution for the contingency plan
 - The plan will be reviewed in more detail following the conclusion of the onsite portion of the inspection
- Training Records
 - Discussed the review standards for the training requirements of 40 CFR 262.17(a)(7)
 - Requested training records for the following personnel:
 - Jarvis Curley
 - Barry Long
 - Melissa Birt
 - Bill Roper
 - Roni Hartfield
- Facility Inspection Records
 - Tank inspections are not conducted on weekends.
 - Inspectors do not typically inspect the top of the tanks
- Additional Record requested
 - Operating records showing a <90-day thru-put for the contents of Tank 6
- Departed facility around 1530

John Penland

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