RCRA COMPLIANCE EVALUATION INSPECTION REPORT

1) Inspector and Author of Report

Daryl R. Himes
Environmental Engineer
RCRA Enforcement Section
Enforcement Compliance and Assurance Division
EPA Region 4, AFC-10th Floor
61 Forsyth Street
Atlanta, Georgia 30303
(404) 562-8614

2) Facility Information

Plaskolite South LLC (Plaskolite)
10500 High Point Road
Olive Branch, Mississippi 38654
EPA ID: MSD980799480

NAICS Code: 325211–Plastics Material and Resin Manufacturing

3) Primary Contact

Tom Guleff
Plant Manager

4) Inspection Participants

Timothy Ling	Plaskolite
Tom Guleff,	Plaskolite
Curtiss D. Deener	Plaskolite
Alexander Busby	Plaskolite
William Rider	Mississippi Department of Environmental Quality (MDEQ)
Daryl Himes	EPA, Region 4

5) Date and Time of Inspection

October 25, 2022 9:00 a.m.

6) Applicable Regulations

Mississippi Code of 1972, Miss. Code Ann. § 17-17-1 *et seq.* [Resource Conservation and Recovery Act (RCRA) Sections 3002, 3004, 3005, 3007 and 3008, (42 U.S.C. §§ 6922, 6924, 6925, 6927 and 6928)] and the Mississippi Department of Environmental Quality, Office of

Pollution Control, Mississippi Hazardous Waste Management Regulations (MHWMR), 11 Miss. Admin. Code Pt. 3, R. 1.1-1.24, which adopts and incorporates by reference 40 C.F.R. Parts 260-270, 273, and 279 [40 Code of Federal Regulations (C.F.R.) Parts 260-270, 273, and 279].

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.

Pursuant to 11 Miss. Admin. Code Pt. 3, R. 1.3 [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, which is under the control of the operator of the process generating the waste, without a permit or without having interim status, as required by Mississippi Code of 1972, Miss. Code Ann. § 17-17-27(4) [Section 3005 of RCRA, 42 U.S.C. § 6925], and without complying with 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.16(b) or §262.17(a)], except as required in 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.15(a)(7) and (8)], provided that the generator complies with the satellite accumulation area conditions listed in 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.15(a) (hereinafter referred to as the "SAA Permit Exemption").

Pursuant to 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.17], a large quantity generator (LQG) may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status, as required by Section 17-17-27 of the Mississippi Code of 1972, Miss. Code Ann. § 17-17-27 [Section 3005 of RCRA, 42 U.S.C. § 6925], provided that the generator complies with the conditions listed in 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.17] (hereinafter referred to as the "LQG Permit Exemption").

Note: At the time of the inspection, Mississippi had updated its hazardous waste regulations to include the amendments made by the federal Generator Improvements Rule, 81 Fed. Reg. 85,732 (Nov. 28, 2016). However, because Mississippi has not yet been authorized by the EPA for these amendments, the citations included below are to the previously authorized State generator regulations, effective as of January 2018.

7) Purpose of Inspection

This announced compliance evaluation inspection (CEI) was conducted to evaluate the facility's compliance with applicable requirements of RCRA and corresponding Mississippi Department of Environmental Quality (MS DEQ) regulations.

8) Facility Description

This facility makes acrylic pellets, sheets, and panels, much of which becomes fluorescent light fixture panels. The acrylic pellets are sold to customers for molding purposes.

The facility has about 25.02 acres, with the original main building of 106,000 square feet, the warehouse addition of 56,250 square feet for a total of 162,330 square feet (3.73 acres) under roof. About 200 people work at this location, running the facility 24/7.

The facility's primary operations include reacting methyl methacrylate (MMA) and ethyl acrylate (EA) in a toluene solvent/solution to produce polymethyl methacrylate (PMMA).

As a result of the facility's PMMA production operations, various solvents are generated which become unusable by Plaskolite South.

Some of these solvents area generated and managed as hazardous wastes by the facility. One of the waste streams is generated and managed as solvent sent off-site pursuant to a solvent reuse program.

Plaskolite's most recent notification of hazardous waste activity was received by MDEQ on February 15, 2022. The Hazardous Waste Codes identified as generated by Plaskolite South in this notification included D001 ignitable and F005 listed hazardous waste. Plaskolite South notified as a large quantity generator of hazardous waste (LQG), a large quantity handler of universal waste (LQHUW) and a used oil generator.

9) Previous Inspection History and Contiguous Property Discussion

On August 15, 2018, MS DEQ conducted a RCRA Compliance Evaluation Inspection (CEI) at Plaskolite. Generator violations were observed during that inspection.

10) Findings

On October 25, 2022, EPA inspector Daryl Himes, accompanied by William Rider of the MDEQ arrived at Plaskolite at approximately 9:00 a.m. Curtis Deener, the facility's Health and Safety Manager immediately received the inspectors and was shown their credentials. The inspectors were taken by Curtis Deener to conference room for an opening conference with other facility personnel. The inspectors were joined in the conference room by Alexander Busby, Environmental Engineer for Plaskolite, Tom Guleff, Plant Manager and Ryan Simsa, Process Engineer. The inspectors introduced themselves and explained the purpose of the visit. The inspectors described the anticipated use of cameras during the inspection and informed the facility personnel that a request for records would be made at the conclusion of the walkthrough inspection. Prior to performing the walkthrough inspection, the facility representative provided the inspection team with an overview of the facility's history and current operations.

The inspectors described the anticipated use of a digital camera during the inspection and provided a request for records upon completion of a walkthrough inspection. Based upon the number of personnel employed by the facility, the Small Business Regulatory Enforcement Fairness Act's classification of a "small business" is not applicable to the facility. A copy of the EPA's information sheet for small businesses can be found at https://www.epa.gov/sites/production/files/2017-06/documents/smallbusinessinfo.pdf. The EPA inspector also discussed the company's ability, pursuant to 40 C.F.R. §2.203, to assert a business

confidentiality claim for information submitted to EPA. The company did not assert a business confidentiality claim during a review of the facility's production process

Please note that during the walk-through inspection, containers of hazardous waste were observed within satellite accumulation areas (SAAs) and central accumulation areas (CAAs). Unless otherwise noted, each container observed within any SAA was observed to be closed and labeled with the words "Hazardous Waste" and an indication of the hazard contents of the container. Containers in any CAA were observed to be closed, marked with an accumulation start date of less than 90-days and labeled with the words "Hazardous Waste" and an indication of the hazard contents of the container.

In addition, containers of Universal Waste were observed to be properly labeled, dated, and closed at the time of the inspection, unless noted otherwise.

Process Description

The facility's main process is performed using two continuous reaction process areas. These areas are referred to as Units 1 and 2. As described above, MMA and EA are reacted in tanks within a toluene solvent/solution. Reactor, mix and recycle vessels are used by the facility for this production process. Spent solvent resulting from both production units is collected in a single underground tank (T-10) before being sent off-site to an off-site facility which operates a use/reuse facility which uses the toluene mixture as a cleaning agent. Hazardous wastes generated by the facility are collected within 55-gallon containers managed within satellite accumulation areas (SAAs).

Walk-Through Inspection

South Extrusion Area

One 55-gallon container of a hazardous waste referred to as "Huckle Pack Oil" was observed within a SAA in this area (Photo 1). The "Huckle Pack Oil" is composed partially of butyl stearate and has a flash point of less than 140 degrees Fahrenheit. A second 55-gallon container observed within a separate SAA in this area was used for the collection of hazardous waste cleanup materials (Photo 2).

Reactor Area 2

Three individual SAAs were observed in this area for the collection of three separate hazardous waste streams. The individual waste streams were referred to as T-10 waste, Additive W/T2 waste and one drum for the collection of hazardous waste rags and filters (Photo 3).

Central Accumulation Area (CAA)

This area is used for the collection of containerized hazardous waste generated by the facility. The area consisted of a raised and bermed concrete pad covered by a metal roof (Photo 4). Containers observed in the area were placed on pallets at the time of the inspection. Twenty-two 55-gallon containers of hazardous waste were observed on the pad at the time of the inspection

(Photos 5 & 9). One of the containers was not marked with an accumulation start date at the time of the inspection (Photo 6).

Pursuant to 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.34(a)(2)], which is a condition of the LQG Permit Exemption, a generator is required to ensure that the date upon which each period of accumulation begins is clearly marked and visible on each container. T

Tank T10

The underground tank farm area in which Tank T10 is located was observed (Photos 7 & 8). The tank manages toluene solution from the facility's PMMA production operation which is sent off-site to a facility operating a use/reuse program was observed.

Production Area 2

Similar to Reactor Area 2, three individual SAAs were observed in this area for the collection of three separate hazardous waste streams. The individual waste streams were referred to as T-10 waste, Additive W/T2 waste and one drum for the collection of hazardous waste rags and filters (Photo 10).

In addition, two 55-gallon containers were observed in SAAs in this production area for the collection of spent solvents (Photo 11).

Record Review

The following hazardous waste records were reviewed as part of the inspection:

- Last three years of hazardous waste manifests
- Last three years of inspection logs for CAA
- Last three years of hazardous waste training for hazardous waste personnel
- Hazardous waste contingency plan

Closing Conference

The inspection team conducted an exit meeting at the end of the walk-through inspection and review of the facility's hazardous waste records with facility personnel which included Tom Guleff, Timothy Ling and Alexander Busby. During this meeting, the inspectors discussed their preliminary findings made during the inspection.

11) Signed

DARYL HIMES Digitally signed by DARYL HIMES Date: 2022.12.09 13:33:24 -05'00'

Daryl R. Himes — Date
Environmental Engineer

12) Concurrence

ARACELI CHAVEZ

Digitally signed by ARACELI CHAVEZ
Date: 2022.12.09 14:35:11 -05'00'

Araceli B. Chavez
Chief
RCRA Enforcement Section

Date

ATTACHMENT A

Plaskolite South LLC

Olive Branch, Mississippi

COMPLIANCE EVALUATION INSPECTION

MSD980799480

October 25, 2022

Photos taken by Daryl R. Himes
Photos taken with Canon Power Shot Elph 360 HS

Photo 1 – Drum of Hazardous Waste "Huckle Pack Oil" in South Extrusion Area SAA

Photo 2 – Drum of Hazardous Waste Cleanup materials in South Extrusion Area

Photo 3 – Three SAAs in Reactor 2 Area

Photo 4 – Container Collection Area

Photo 5 – Missing Accumulation Start Date on Drum in CAA

Photo 6 - Container Collection Area

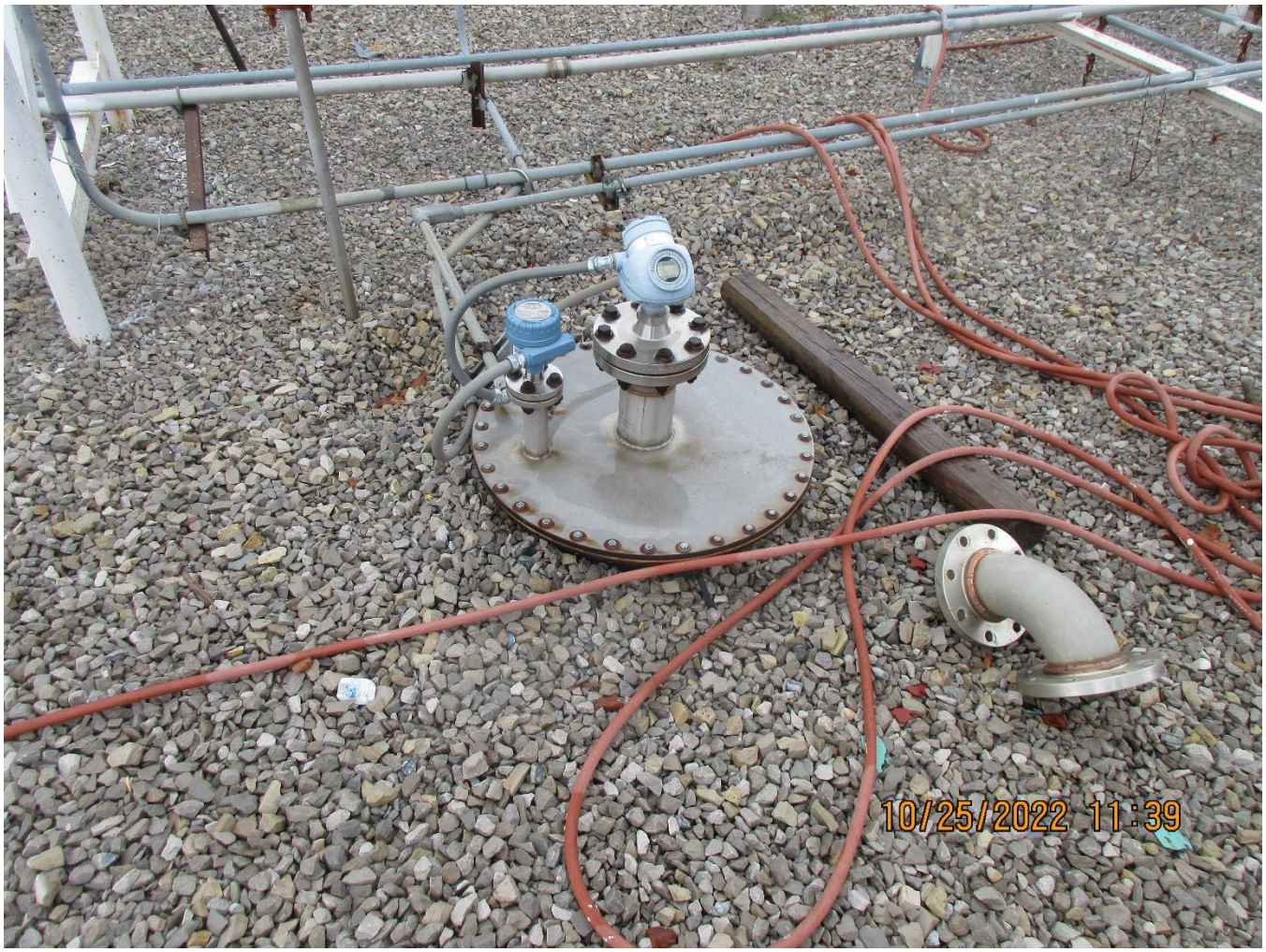

Photo 7 – Top of Underground Tank T-10.

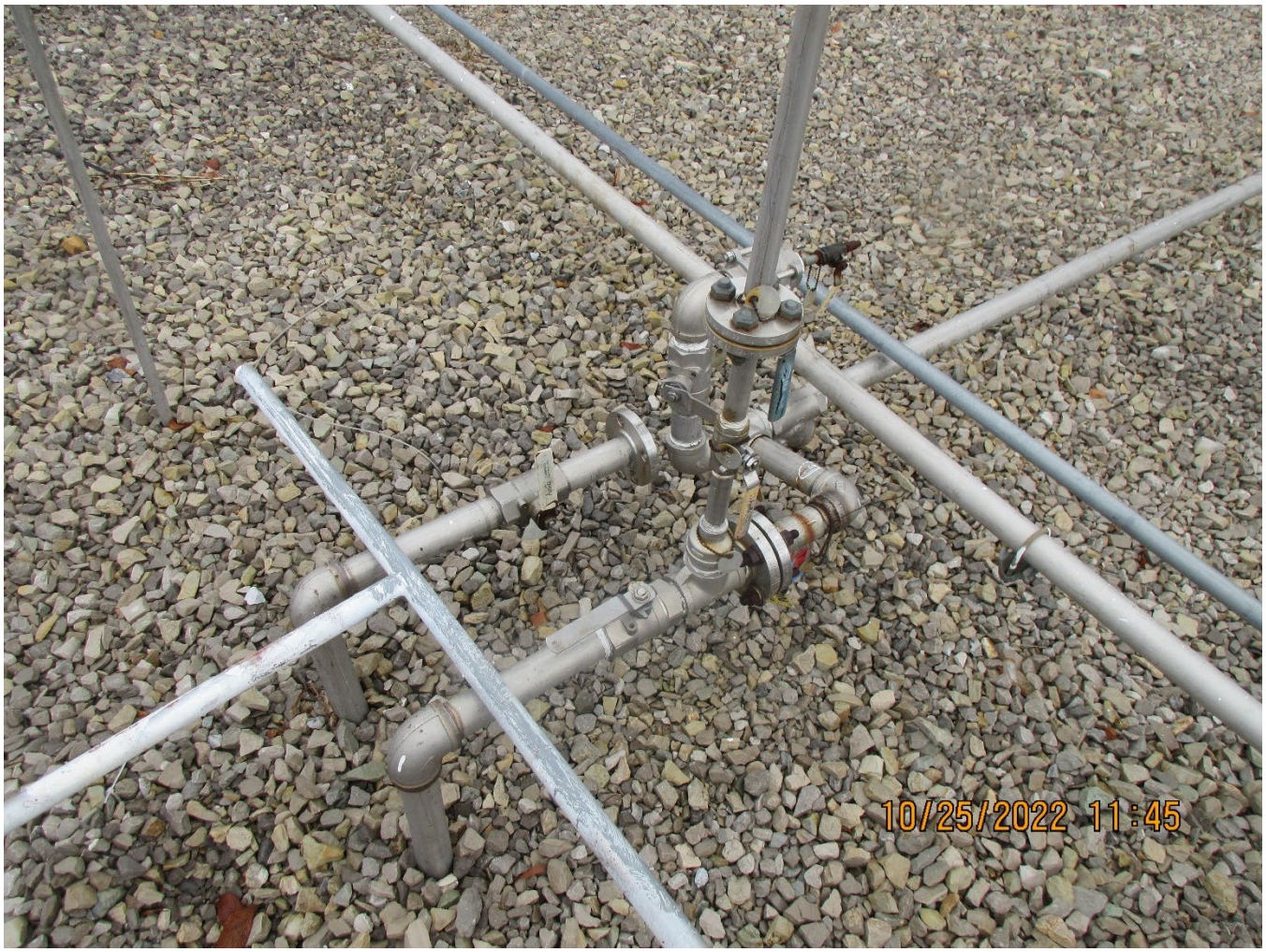

Photo 8 – Ancillary Equipment for Tank T-10.

Photo 9 – Central Accumulation Area

Photo 10 – SAAs in Production Area 2

Photo 11 – Two additional SAAs in Production Area 2