

RCRA Inspection Report

1) Inspectors and Authors of Report

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2) Facility Information

Fort Dearborn Company Fountain Inn Plant
100 North Woods Dr.
Fountain Inn, South Carolina 29644
Greenville County

EPA ID No. SCD982096349
Latitude: 34.684147
Longitude: -82.202531
NAICS: 323111 – Commercial Gravure Printing
SIC: 2754 - Commercial Gravure Printing
Website: mcclabel.com

3) Responsible Officials

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4) Inspection Participants

Lee Hill, Fort Dearborn Company Fountain Inn Plant
Bill Stewart, General Manager, Fort Dearborn Company Fountain Inn Plant
Chris Cusack, S.C. Department of Health and Environmental Control, Upstate
Elizabeth C. DeLanghe, S.C. Department of Health and Environmental Control, Columbia
Tom Richmond, S.C. Department of Health and Environmental Control, Columbia
Parvez Mallick, U.S. Environmental Protection Agency, Region 4

5) Date of Inspection

December 7, 2022, 9:30 a.m.

6) Applicable Regulations

South Carolina Hazardous Waste Management Act (SCHWMA), S.C. Code Ann. § 44-56-10 et seq., [Resource Conservation and Recovery Act (RCRA) Sections 3002 (42 U.S. Code – Annotated U.S.C.A. 6925 and 6927)], and South Carolina Hazardous Waste Management Regulations (SCHWMR), 25 S.C. Code Ann. Regs. 61-79.260-270, 61-79.273 and 61-79.279 [40 Code of Federal Regulation (C.F.R.), Parts 260 - 270, 273, 278, & 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 S.C. Code Ann. Regs. 61-79.262.15(a) [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 Section 44-56-60(a)(2) and (b)(3) of the SCHWMA, S.C. Code Ann. § 44-56-60(a)(2) and (b) [Section 3005 of RCRA, 42 U.S.C. § 6925], and without complying with S.C. Code Ann. Regs. 61-79.262.16(b) or R.61-79.262.17(a) [40 C.F.R. § 262.16(b) or §262.17(a)], except as required in S.C. Code Ann. Regs. 61-79.262.15(a)(7) and (8) [40 C.F.R. § 262.15(a)(7) and (8)], provided that the generator complies with the satellite accumulation area conditions listed in S.C. Code Ann. Regs. 61-79.262.15(a) [40 C.F.R. § 262.15(a)] (hereinafter referred to as the “SAA Permit Exemption”).

Pursuant to S.C. Code Ann. Regs. 61-79.262.17 [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 44-56-60(a)(2) and (b)(3) of the SCHWMA, S.C. Code Ann. § 44-56-60(a)(2) and (b) [Section 3005 of RCRA, 42 U.S.C. § 6925], provided that the generator complies with the conditions listed in S.C. Code Ann. Regs. 61-79.262.17 [40 C.F.R. § 262.17] (hereinafter referred to as the “LQG Permit Exemption”).

Pursuant to S.C. Code Ann. Regs. 61-79.273.9 [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 total of universal waste (batteries, pesticides, mercury-containing equipment,

or lamps, calculated collectively) at any time.

7) **Purpose of Inspection**

The purpose of this inspection was to conduct an unannounced compliance evaluation inspection (CEI) to determine Fort Dearborn Company Fountain Inn Plant's compliance with the applicable requirements of RCRA and the corresponding SCDHEC regulations. This was an EPA and South Carolina Department of Health and Environmental Control (SCDHEC) joint inspection.

8) **Facility Description**

Fort Dearborn Company Fountain Inn Plant (hereinafter, "Fort Dearborn Co." or "the facility") is located at 100 North Woods Dr., Fountain Inn, Greenville County, South Carolina. Fort Dearborn Company Fountain Inn Plant manufactures paint container labels for paint manufacturers such as Sherwin Williams, PPG, Benjamin Moore, Glidden, Valspar, Ace Hardware, and Harris. The manufacturing building is 9,000 square-foot on approximately nine acres of land parcel. The facility currently employs approximately 130 employees and operates 24 hours per day, seven days per week.

On November 1, 2021, a private investment firm, Clayton, Dubilier & Rice, acquired Fort Dearborn Company from Advent International, and Multi-Color Corporation (MCC) from Platinum Equity. After the acquisition, Fort Dearborn Company and MCC merged and currently operating and known as MCC. Clayton, Dubilier & Rice is the owner of MCC.

Hazardous waste is generated from adhesives, curing agents, propynol blend solvent and printing inks from the printing process. Excluded Solvent Contaminated Wipes are utilized for cleaning of equipment. Fort Dearborn Co. last notified of its regulated waste activity (8700-12) to SCDHEC on January 31, 2022, as a large quantity generator of hazardous waste and a small quantity handler of universal waste.

9) **Previous RCRA Inspection History**

Fort Dearborn Co. was last inspected by the SCDHEC on January 17, 2019, and observed RCRA container management, universal waste, weekly inspections, and contingency plan violations at the time of the CEI. On March 25, 2019, Fort Dearborn Co. signed a Consent Order to resolve violations found during the January 17, 2019, SCDHEC inspection with a civil penalty of \$7,200. Fort Dearborn Co. has never previously been inspected by the EPA for compliance with the federal and the State of South Carolina hazardous waste regulations.

10) **Opening Conference**

On December 7, 2022, EPA inspector Parvez Mallick accompanied by SCDHEC inspectors Chris Cusack, Elizabeth C. DeLanghe, and Tom Richmond, conducted an announced CEI at Fort Dearborn Co. to determine the compliance status of the facility with the RCRA and the State of South Carolina regulations. Inspectors arrived at Fort Dearborn Co. and were greeted by facility representative, Lee Hill. The inspectors introduced themselves, showed credentials, exchanged business cards, and explained the purpose of the visit during an opening conference.

Fort Dearborn Co. staff provided an overview of the facility's history and current operations during the opening conference. The inspectors described the possible use of a digital camera during the inspection and the facility's ability, pursuant to 40 C.F.R. §2.203, to assert a business confidentiality claim for information submitted to the EPA. The facility did not assert a business confidentiality claim. Fort Dearborn Co. 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. Health and safety protocols and required personal protective equipment were discussed with Mr. Lee Hill, of Fort Dearborn Co. Mr. Hill led the inspectors on a tour of the facility's operations.

11) **Findings**

The information in this RCRA inspection report is based on the EPA's December 7, 2022, RCRA CEI.

Plate Room

The Plate Room contained a Magnus Printer and Glunz & Jensen 85 HDX photopolymer plate production processor. The printer burns an image onto a thin aluminum metal plate which can be processed in the Glunz & Jensen 85 HDX photopolymer plate production processor and finished offset plate can be used to print paint container labels. The processor uses Fujifilm LP-DZ developer and LP-DRZ digital plate replenisher to produce the offset aluminum plates. The inspectors observed two 2.5-gallon containers of LP-DZ developer and LP-DRZ digital plate replenisher connected to the Glunz & Jensen 85 HDX processor. Both containers were open and marked "corrosive" (Photo #1). At the time of the inspection, the plate room operator stated that LP-DZ developer and LP-DRZ replenisher in the plate processor is in continuous use until the operator makes a determination to change out the chemicals. The LP-DZ developer is discharged into the sanitary sewer line of the local wastewater utility, REWA (Greenville County Wastewater Treatment Utility). The inspectors inquired if the facility had a discharge permit with REWA. On January 5, 2023, REWA sent an email to Fort Dearborn Co. and copied SCDHEC stating that the Fort Dearborn Co. did not require a wastewater discharge permit at this time. The facility is allowed to discharge spent diluted developer into the sewer system.

The facility representative stated that the spent replenisher is emptied into an open unmarked 5-gallon satellite container (Photo #2) and then transported and stored into a 55-gallon container in the Press Room's fire cabinet. The Press Room is accessed by exiting the Printer Room door and the fire cabinet is located against the wall that separates the Printer Room and Press Room. At the time of the inspection, the inspectors observed that the open and unmarked 5-gallon container had no waste in it.

The inspectors explained that storing hazardous waste or a hazardous waste container in a different location/building is not considered a satellite accumulation area (SAA). The 55-gallon accumulation container is not "at or near" the point of generation (POG) and is not "under the control of the operator." In general, POG means the point at which the waste is generated, prior to any dilution, mixing or other alterations; or prior to any time during the management of the waste where the waste properties may change due to exposure to the environment or other

factors. The SAA could be located within a room or storage cabinet provided the room or storage cabinet is at or near the POG and under the operator's control. Locating a SAA outside of the building in which the hazardous waste is generated may be regarded as placing it beyond the "at" or "near" the POG and would no longer be "under the control of the operator." If a generator accumulates hazardous waste away from the POG, it should be accumulated under the more rigorous accumulation standards for less than 90-day hazardous waste storage area or in a central accumulation area (CAA). The facility must keep hazardous waste containers in the designated satellite accumulation area, always be closed during accumulation, except when it is necessary to add or remove waste, mark the container with the words "Hazardous Waste," and with an indication of the hazards of the contents.

S.C. Code Ann. Regs. 61-79.262.17(a)(4) [40 C.F.R. § 262.17(a)(4)], which is a condition of the SAA Permit Exemption, a container holding hazardous waste must always be closed during accumulation, except when it is necessary to add or remove waste; and a container holding hazardous waste must not be opened, handled, or stored in a manner that may rupture the container or cause it to leak. In addition, S.C. Code Ann. Regs. 61-79.262.15(a)(5) [40 C.F.R. § 262.15(a)(5)], which is a condition of the SAA Permit Exemption, a generator is required to mark or label its containers with the words "Hazardous Waste" and with an indication of the hazards of the contents.

Pursuant to S.C. Code Ann. Regs. 61-79.262.15(a) [40 C.F.R. § 262.15(a)], which is a condition of the SAA Permit Exemption, a generator may accumulate as much as 55 gallons of non-acute hazardous waste and/or either one quart of liquid acute hazardous waste listed in § 261.31 or § 261.33(e) or 1 kilogram (2.2 pounds) of solid acute hazardous waste listed in § 261.31 or § 261.33(e) in containers at or near any 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 interim status and without complying with the requirements of parts 124, 264 through 267, and 270, provided that all of the conditions for exemption in this section are met. A generator may comply with the conditions for exemption in this section instead of complying with the conditions for exemption in section 262.16(b) or 262.17(a), except as required in section 262.15(a)(7) and (8).

Press Room

After the Plate Room walk through, the inspectors walked to the fire cabinet in the Press Room. There was a 55-gallon container of solvent waste marked "Hazardous Waste – Flammable Liquid" for Blanket Roller Wash (Photo #3). This is the same container that is used to accumulate replenisher waste from the Plate Room. At the time of the inspection, the 55-gallon waste container's lid was not secured. The inspectors informed that this area must be designated as a less than 90-day hazardous waste storage, CAA, not a SAA since the replenisher waste is brought to the Press Room from the Plate Room. The inspectors informed the facility representatives that weekly inspections are required for all less than 90-day hazardous waste storage area locations. A LQG must look for leaking containers and for deterioration of containers caused by corrosion or other factors and keep inspection records for at least three years.

Pursuant to S.C. Code Ann. Regs. 61-79.262.15(a)(4) [40 C.F.R. § 262.15(a)(4)], which is a condition of the SAA Permit Exemption, a container holding hazardous waste must always be closed during accumulation, except: (i) when it is necessary to add or remove waste; or (ii) When temporary venting of a container is necessary (A) For the proper operation of equipment, or (B) To prevent dangerous situations, such as build-up of extreme pressure.

A second 55-gallon container marked “Non-Hazardous Wastes, Profile 61448” was observed in the fire cabinet. The lid to the Non-Hazardous drum was not closed at the time of the inspection. A spill kit and a fire extinguisher with emergency contact information was observed stored next to the fire cabinet.

An empty 5-gallon step can was marked “Oily Waste Can” in the HE4 Press area. The inspectors requested that the facility to determine if the container was used specifically for storage of oily waste or solvent contaminated rags. It appeared that container contained solvent contaminated rags. The inspector stated that the solvent contaminated rags must be handled per S.C. Code Ann. Regs. 61-79.261.4(b)(18) [40 C.F.R. § 261.4(b)(18)].

At the HE4 Press, the inspectors observed one 55-gallon SAA container marked “Hazardous Waste – Flammable Liquid.” At the time of the inspection, a yellow plastic funnel was observed attached to the open bung, with wastes inside of the funnel. The inspectors observed that waste was not being actively added at the time of the inspection (Photo #4).

In addition, there was a 55-gallon container for solvent contaminated wipes. At the time of the inspection, the lid to the container was laying on the floor, leaning against the container. The lid on the floor had labeling stating “Excluded Solvent Contaminated Wipes”, although the labeling was damaged but still legible at the time of the inspection (Photo #5). The Facility was unable to provide the name and address of the laundry or dry cleaner receiving the solvent contaminated wipes during the inspection, nor the description of the process the generator is using to ensure the solvent contaminated wipes contain no free liquids at the point of being laundered or dry cleaned. The hinged lid was replaced with the lid that was marked “Excluded Solvent Contaminated Wipes” and secured to the 55-gallon drum at the time of the inspection and after the inspection, documentation from Aramark showing bi-monthly pickups for rags were provided by Fort Dearborn Co. An additional closed 55-gallon closed container marked “Excluded Solvent Contaminated Wipes” was also observed in this area.

Pursuant to S.C. Code Ann. Regs. 61-79.261.4(b)(18) [40 C.F.R. § 261.4(b)(18)], Solid-contaminated wipes, except for wipes that are hazardous waste due to the presence of trichloroethylene, that are sent for disposal are not hazardous waste from the point of generation, provided that the solvent-contaminated wipes, when accumulated, stored, and transported, are contained in non-leaking, closed containers that are labeled “Excluded Solvent-Contaminated Wipes.” The containers must be able to contain free liquids, should free liquids occur. During accumulation, a container is considered closed when there is complete contact between the fitted lid and the rim, except when it is necessary to add or remove solvent-contaminated wipes. When the container is full, or when the solvent-contaminated wipes are no longer being accumulated, or when the container is being transported, the container must be sealed with all lids properly and securely affixed to the container and all openings tightly bound or closed sufficiently to prevent leaks and

emissions. Generators must maintain the name and address of the landfill or combustor that is receiving the solvent-contaminated wipes; documentation that the solvent-contaminated wipes are accumulated for no more than 180 days from the start date of accumulation for each container prior to being sent for disposal; and a description of the process the generator is using to ensure solvent-contaminated wipes contain no free liquids at the point of being transported for disposal.

Pursuant to S.C. Code Ann. Regs. 61-79.262.15(a)(4) [40 C.F.R. § 262.15(a)(4)], which is a condition of the SAA Permit Exemption, a container holding hazardous waste must always be closed during accumulation, except: (i) when it is necessary to add or remove waste; or (ii) When temporary venting of a container is necessary (A) For the proper operation of equipment, or (B) To prevent dangerous situations, such as build-up of extreme pressure.

At the Line HE-3, the inspectors observed the following containers:

- A closed 55-gallon SAA container marked “Hazardous Waste – Flammable Liquid” and an indication of the hazards of the contents;
- One blue 55-gallon container marked “Excluded Solvent Contaminate Wipes”;
- One 5-gallon step can marked “Oily Rags” but contained solvent contaminated rags.

Pursuant to S.C. Code Ann. Regs. 61-79.261.4(b)(18) [40 C.F.R. § 261.4(b)(18)], Solid-contaminated wipes, except for wipes that are hazardous waste due to the presence of trichloroethylene, that are sent for disposal are not hazardous waste from the point of generation, provided that the solvent-contaminated wipes, when accumulated, stored, and transported, are contained in non-leaking, closed containers that are labeled “Excluded Solvent-Contaminated Wipes.” The containers must be able to contain free liquids, should free liquids occur. During accumulation, a container is considered closed when there is complete contact between the fitted lid and the rim, except when it is necessary to add or remove solvent-contaminated wipes. When the container is full, or when the solvent-contaminated wipes are no longer being accumulated, or when the container is being transported, the container must be sealed with all lids properly and securely affixed to the container and all openings tightly bound or closed sufficiently to prevent leaks and emissions. Generators must maintain the name and address of the landfill or combustor that is receiving the solvent-contaminated wipes; documentation that the solvent-contaminated wipes are accumulated for no more than 180 days from the start date of accumulation for each container prior to being sent for disposal; and a description of the process the generator is using to ensure solvent-contaminated wipes contain no free liquids at the point of being transported for disposal.

Compressor Area

The Compressor Room is also designated to store universal wastes. At the time of the inspection, the inspectors observed the following containers in the Compressor Room:

- A closed 55-gallon container with an aerosol can puncturing device in the Compressor Area accumulating liquid aerosol waste. The container was marked “Non-Hazardous Waste”, but a waste determination was not available for review. The inspectors requested that an accurate waste determination be made as to whether liquid aerosol waste is a

- hazardous waste in order to ensure waste properly managed according to applicable RCRA regulations. Please provide the waste determination to the EPA and SCDHEC;
- A 4-foot-long cardboard container marked “Universal Waste – Lamps” with an accumulation start date of 8/21. No year was listed with the date and the container was open. The facility representative closed lamp container during the inspection;
 - A 4-foot-long cardboard container of universal waste lamps. The container was closed but was not marked “Universal Waste – Lamps” and did not have an accumulation start date on the container. The facility affixed an “Universal Waste - Lamps” markings and a date (12/7/2022) before the end of the inspection.

Pursuant to S.C. Code Ann. Regs. 61-79.262.11 [40 C.F.R. § 262.11], a person who generates a solid waste, as defined in S.C. Code Ann. Regs. 61-79.261.2 [40 C.F.R. § 261.2], must use the steps articulated in S.C. Code Ann. Regs. 61-79.262.11 [40 C.F.R. § 262.11] to make an accurate determination as to whether that waste is a hazardous waste in order to ensure wastes are properly managed according to applicable RCRA regulations.

Pursuant to S.C. Code Ann. Regs. 61-79.273.13(d)(1) [40 C.F.R. § 273.13(d)(1)], a SQHUW must contain any lamp in containers or packages that are structurally sound, adequate to prevent breakage, and compatible with the contents of the lamps. Such containers and packages must remain closed and must lack evidence of leakage, spillage or damage that could cause leakage under reasonably foreseeable conditions.

Pursuant to S.C. Code Ann. Regs. 61-79.273.15(c) [40 C.F.R. § 273.15(c)], a SQHUW who accumulates universal waste must be able to demonstrate the length of time that the universal waste has been accumulated from the date it becomes a waste or is received.

Pursuant to S.C. Code Ann. Regs. 61-79.273.14(e) [40 C.F.R. § 273.14(e)], a SQHUW must label or mark each lamp or a container or package in which such lamps are contained must be labeled or marked clearly with one of the following phrases: “Universal Waste - Lamp(s),” or “Waste Lamp(s),” or “Used Lamp(s)”.

Central Accumulation Area (CAA)

The facility’s central accumulation hazardous waste storage area is located outside on a 2,640 square feet concrete pad with secondary containment (Photo #6). A galvanized roof covers parts of the CAA pad. The CAA was designated by signage and emergency contact numbers were posted on the wall. Spill kits and overpack containers were observed on the pad of the CAA. In addition, a fire extinguisher and additional spill kit was observed at the doorway leading out into the storage pad. At the time of the inspection, the inspectors observed the following containers:

- One 55-gallon container marked “Non-Hazardous – Profile 61448”;
- Two closed 55-gallon containers of waste stored on a wooden pallet marked “Hazardous Waste – Flammable Liquid,” with an indication of the hazards of the contents, and both dated 12/2/22;
- A 55-gallon container of waste, profile number 92849, marked “Hazardous Waste – Flammable Liquid,” with an indication of the hazards of the contents, and an accumulation start date of 11/28/22;

- Three closed 55-gallon containers of solvent wipes marked “Excluded Solvent Contaminate Wipes”.

In a corner of the CAA concrete pad, the inspectors observed an open drain (Photo #7) connected to the stormwater drain. According to Lee Hill, a valve is used to control the CAA pad drain closed and locked to prevent releases from entering the stormwater drain (Photo #8). Upon further investigation, it was observed that the CAA drain valve was open and unlocked. No evidence of sheen, odor, or a release was observed at the time of the inspection within the drain. Lee Hill closed the valve and secured the drain with a lock and chain during the inspection.

Pursuant to S.C. Code Ann. Regs. 61-79.262.17(a)(6) [40 C.F.R. § 262.17(a)(6)], which incorporates S.C. Code Ann. Regs. 61-79.262.251 [40 C.F.R. § 262.251], and is a condition of the LQG Permit Exemption, a large quantity generator must maintain and operate its facility to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment.

12) **Record Review**

The inspectors requested the last three years of hazardous waste manifests, quarterly reports, land disposal restriction forms, hazardous waste employee training documentation, weekly hazardous waste storage inspections, the contingency plan, most recent waste minimization report and job titles and position descriptions. Unless otherwise specified, all records and documents reviewed were considered satisfactory at the time of inspection.

A contingency plan describes actions facility personnel must take in response to fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water at the facility. During the document review, the facility provided a copy of a contingency plan for review which was incomplete. On 12/8/22, the facility provided the updated copy via email of the Emergency Action Plan/Contingency Plan (CP) which was drafted on July 14, 2022. The inspectors review indicated that CP does not provide evidence of arrangements agreed to with the local police department, fire department, other emergency response teams, emergency response contractors, equipment suppliers, local hospitals or the Local Emergency Planning Committee. The CP did not include types/names of hazardous wastes and hazard associated with each hazardous waste present at any one time (e.g., toxic paint wastes, spent ignitable solvent, corrosive acid); the estimated maximum amount of each hazardous waste that may be present at any one time; identification of any hazardous wastes where exposure would require unique or special treatment by medical or hospital staff; a map of the facility showing where hazardous wastes are generated, accumulated and treated; routes for accessing these wastes; and street map of the facility in relation to surrounding businesses, schools and residential areas. There was also no quick reference guide as a part of the contingency plan.

Pursuant to S.C. Code Ann. Regs. 61-79.262.17(a)(6) [40 C.F.R. § 262.17(a)(6)], which incorporates S.C. Code Ann. Regs. 61-79.262.262(a) [40 C.F.R. § 262.262(a)], and is a condition of the LQG Permit Exemption, a generator is required to submit a copy of the contingency plan and all revisions to all local emergency responders. This document may

also be submitted to the Local Emergency Planning Committee, as appropriate.

Pursuant to S.C. Code Ann. Regs. 61-79.262.17(a)(6) [40 C.F.R. § 262.17(a)(6)], which incorporates S.C. Code Ann. Regs. 61-79.262.262(b) [40 C.F.R. § 262.262(b)], and is a condition of the LQG Permit Exemption, a large quantity generator that first becomes subject to these provisions after May 30, 2017 or a large quantity generator that is otherwise amending its contingency plan must at that time submit a quick reference guide of the contingency plan to the local emergency responders identified at paragraph (a) of this section or, as appropriate, the Local Emergency Planning Committee. The quick reference guide must include the following elements: (1) The types/names of hazardous wastes in layman's terms and the associated hazard associated with each hazardous waste present at any one time (e.g., toxic paint wastes, spent ignitable solvent, corrosive acid); (2) The estimated maximum amount of each hazardous waste that may be present at any one time; (3) The identification of any hazardous wastes where exposure would require unique or special treatment by medical or hospital staff; (4) A map of the facility showing where hazardous wastes are generated, accumulated and treated and routes for accessing these wastes; (5) A street map of the facility in relation to surrounding businesses, schools and residential areas to understand how best to get to the facility and also evacuate citizens and workers; (6) The locations of water supply (e.g., fire hydrant and its flow rate); (7) The identification of on-site notification systems (e.g., a fire alarm that rings off site, smoke alarms); and (8) The name of the emergency coordinator(s) and 7/24-hour emergency telephone number(s) or, in the case of a facility where an emergency coordinator is continuously on duty, the emergency telephone number for the emergency coordinator.

Pursuant to S.C. Code Ann. Regs. 61-79.262.17(a)(7) [40 C.F.R. § 262.17(a)(7)], a LQG personnel must successfully complete a program of classroom instruction, online training (e.g., computer-based or electronic), or on-the-job training that teaches them to perform their duties in a way that ensures compliance with the hazardous waste regulations. In addition to the initial RCRA training, LQG personnel must complete an annual refresher on RCRA. The facility's July 14, 2022, CP indicated that Preston Lewis and Tom Toft are the emergency coordinators and Bill Stewart and Lee Hill are alternate emergency coordinators. No RCRA training records were available for Preston Lewis, Tom Toft, and Bill Stewart. No hazardous waste training records for other employees handling hazardous wastes were available or had seemingly been trained at the time of the inspection. Job Titles and Position Descriptions reviewed did not identify hazardous waste duties for staff that handle hazardous wastes (Plate Room, Press Room, and other operators handling hazardous waste). Lee Hill emailed a copy of his job title/job description (Maintenance Manager) on December 7, 2022, for review which did include descriptions of this position and hazardous waste duties. It did not include a written description of necessary training relating to hazardous waste responsibilities.

Pursuant to S.C. Code Ann. Regs. 61-79.262.17(a)(7) [40 C.F.R. § 262.17(a)(7)], which is a condition of the LQG Permit Exemption, the LQG must maintain the following documents and records at the facility: (i) Facility personnel must successfully complete a program of classroom instruction, online training, or on-the-job training that teaches them to perform their duties in a way that ensures the facility's compliance with the regulations; (ii) Facility personnel must complete personnel training within six months of being hired or of being assigned to a new position at the Facility; (iii) Facility personnel must take part in an

annual review of the initial training required by this section; and/or (iv) the generator must maintain training records that include, among others: the job title for each position at the facility related to hazardous waste management, and the name of the employee filling each job; a written job description for each position; a written description of the type and amount of both introductory and continuing training that will be given to each person filling a position; and records documenting that the training required has been given to and completed by Facility personnel.

Weekly inspection reports were reviewed for the period of 2020 to 2022. The inspector discovered that weekly inspection reports were missing for the periods between May 15, 2020, to August 21, 2020; January 3, 2021, to January 10, 2021; and November 21, 2021, to November 27, 2021.

Pursuant to S.C. Code Ann. Regs. 61-79.262.17(a)(1)(v) [40 C.F.R. § 262.17(a)(1)(v)], which is a condition of the LQG Permit Exemption, a generator is required to, at least weekly, inspect central accumulation areas looking for leaking containers and for deterioration of containers caused by corrosion or other factors.

Pursuant to S.C. Code Ann. Regs. 61-79.265.15(d), the owner or operator must record inspections in an inspection log or summary. He must keep these records for at least three years from the date of inspection. At a minimum, these records must include the date and time of the inspection, the name of the inspector, a notation of the observations made, and the date and nature of any repairs or other remedial actions.

13) **Closing Conference**

Upon conclusion of the inspection, a closing conference was conducted in the presence of Fort Dearborn Co. staff, Lee Hill. The facility was informed of the preliminary findings at the time of the inspection.

14) **Conclusion**

Based on the CEI conducted on December 7, 2022, Fort Dearborn Co., was inspected as a large quantity generator of hazardous waste and a small quantity handler of universal waste.

15) **Signed**

PARVEZ
MALLICK

Digitally signed by PARVEZ
MALLICK
Date: 2023.02.23 13:52:11
-05'00'

Parvez Mallick
Environmental Engineer
RCRA Enforcement Section

Date

16) **Concurrence**

ARACELI CHAVEZ Digitally signed by
ARACELI CHAVEZ
Date: 2023.02.23
16:18:58 -05'00'

Araceli B. Chavez
Chief
RCRA Enforcement Section

Date

Fort Dearborn Company Fountain Inn Plant
SCR982096349
December 7, 2022
RCRA CEI Photographs
Photographs by Christopher Cusack, SCDHEC



Photo #1 - open 55-gallon container of LP-DZ developer and LP-DRZ digital plate replenisher.

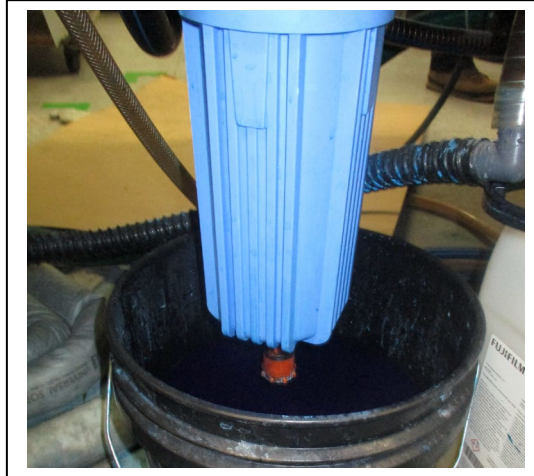


Photo #2 – An open and unmarked 5-gallon container to store waste LP-DRZ digital plate replenisher under the Glunz & Jensen 85 HDX machine.



Photo #3 – One 55-gallon container marked “Hazardous Waste – Flammable Liquid” in the Press Room fire cabinet.



Photo #4 – Open 55-gallon container marked “Hazardous Waste – Flammable Liquid” with an yellow plastic funnel in the HE4 Press Room area.



Photo # 5 – An open 55-gallon container of “Excluded Solvent Contaminated Wipes” with a lid on the floor.



Photo #6 – Three 55-gallon containers in the Central Accumulation Area pad.



Photo #7 – CAA pad drain. The drain is connected to the stormwater drain (Photo #8).



Photo #8 – Stormwater from the CAA pad (Photo #7) discharges into the stormwater drain.