RCRA Compliance Evaluation Inspection Report

1) Inspector and Author of Report

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2) Facility Information

Inteplast Engineered Films Corp.
7549 Brokerage Drive
Orlando, Florida 32809-5625
County: Orange
Latitude: 28.453796
Longitude: -84.418123
EPA ID Number: FLD984201251
Primary NAIC: 323111 – Commercial Gravure Printing
Other NAICS: 326111 – Plastics Bag and Pouch Manufacturing

3) Responsible Official

Mr. James Sciaino, Plant Manager
Phone: (407) 630-1706
Email: jsciaino@inteplastef.com

4) Inspection Participants

Mr. James Sciaino, Plant Manager Inteplast Engineered Films Corp.
Mr. Michael Eckoff, Inspector, Florida Department of Environmental Protection (FDEP)
Ms. Kristen Johannessen, Inspector, FDEP
Mr. David A. Champagne, Inspector, U.S. EPA

5) Date of Inspection

April 8, 2021 09:00 a.m.

6) Applicable Regulations

Resource Conservation and Recovery Act (RCRA) Sections 3002, 3005 and 3007 (42 U.S.C. §§ 6922, 6925 and 6927), and the regulations promulgated pursuant thereto at 40 Code of Federal Regulations (C.F.R.) Parts 260-270, 273 and 279.

Florida Statutes (F.S.) Chapter 403.702 et seq., and the regulations promulgated pursuant thereto and set forth at the Florida Administrative Code (Fla. Admin. Code Ann. r.), Chapters 62-710, 62-730 and 62-750.

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 Fla. Admin. Code Ann. r. 62-730.185(1) [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, lamps, or aerosol cans, calculated collectively) at any time.

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.15(a)], a generator may accumulate as much as 55 gallons of non-acute hazardous waste in containers at or near the point of generation where wastes initially accumulate, 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 403.722 of the Florida Statutes, Fla. Stat. § 403.722 [Section 3005 of RCRA, 42 U.S.C. § 6925], and without complying with Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.16(b) or §262.17(a)], except as required in Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.15(a)(7) and (8)], provided that the generator complies with the satellite accumulation area conditions listed in Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.15(a)] (hereinafter referred to as the "SAA Permit Exemption").

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [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 403.722 of the Florida Statutes, Fla. Stat. § 403.722 [Section 3005 of RCRA, 42 U.S.C. § 6925], provided that the generator complies with the conditions listed in Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.17] (hereinafter referred to as the "LQG Permit Exemption").

7) Purpose of Compliance Evaluation Inspection

On April 8, 2021, Mr. Michael Eckoff, Florida Department of Environmental Protection (FDEP), and David Champagne, U.S. EPA, conducted a routine compliance evaluation inspection of Inteplast Engineered Films Corp. (Inteplast or facility) to determine the facility's compliance with state and federal hazardous waste regulations. This was an EPA lead inspection. Inteplast was represented by Mr. James Sciaino, Plant Manager. Upon entering the facility, the inspectors introduced themselves, showed their credentials and explained the purpose of the visit. The facility representatives provided a description of the facility and a process-based inspection was conducted.

8) Compliance History

Inteplast was last inspected May 24, 2017 as a large quantity generator of hazardous waste. The following violations were identified:

- 62-730.150(2)(b) [State statutory or Regulatory requirement that is broader-in-scope than federal RCRA requirements]; Required to notify under Rule 62-730.181, F.A.C, shall notify the Department of all changes in status and shall use the 8700-12FL – Florida Notification of Regulations Waste Activity Form
- 40 C.F.R. § 262.11; Make a hazardous waste determination
- 40 C.F.R. § 262.34(a); Date a hazardous waste container
- 40 C.F.R. § 262.41(a); Submit a biennial report
- 40 C.F.R. § 265.52(d); List names and addresses for emergency coordinator(s)
- 40 C.F.R. § 265.52(e); List of emergency equipment
- 40 C.F.R. § 265.54(d); Contingency plan update with new Emergency Coordinator
- 40 C.F.R. § 265.173(a); Keep a container closed during storage
- 40 C.F.R. § 265.174; Conduct weekly inspections

9) Facility Description

Inteplast Engineered Films Corp. formulates high quality plastic films for printers, converters, and end users with simple mandate. Inteplast is located at 7549 Brokerage Drive in Orlando, Florida. The most recent Hazardous Waste Generator Notification (EPA Form 8700-12) dated February 28, 2020, characterized the facility as a large quantity generator (LQG) of hazardous waste. The facility operates its extrusion department 24 hours a day, 7 days a week, and the printing department operates 24 hours a day 5 days a week. Inteplast began operations in the 65,000 sq. ft. building in 2011 and currently has approximately 70 employees.

10) Inspection Findings

Plate Mounting Room

Plates are used to make designs on film. After a plate has been used, the facility uses isopropyl alcohol (IPA) to wipe down the machine and plates. At the time of the inspection, there was not a hazardous waste container in this satellite accumulation area (SAA). A facility representative stated that he disposes of the solvent contaminated rag, immediately after use, in a hazardous waste container located in the hazardous waste central accumulation area (CAA). At the time of the inspection, the inspection team made note and notified the facility of a strong solvent odor radiating from this room.

Plate Mounting, Film Production Floor - Hazardous Waste Central Accumulation Area

At the time of the inspection, there were sixteen (16) 55-gallon hazardous waste containers in the CAA. The containers were double stacked in two rows of 4 containers. This area lacked aisle space and was difficult for the inspection team to conduct the CEI of the Plate Mounting Room and Film Production Floor's CAA (Photographs 1 and 2 of 21).

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.17(a)(6)], which incorporates Fla. Admin. Code Ann. R. 62-730.160(1) [40 C.F.R. § 262.255], and is a condition of the LQG Permit Exemption, a generator is required to maintain aisle space to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment to any area of facility operation in an emergency, unless aisle space is not needed for any of these purposes.

Hazardous waste labels, containing the accumulation dates and significant information containing the contents of the container, were not clearly visible at the time of the inspection (Photographs 1, 3, and 4 of 21).

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R § 262.17(a)(5)(i)(C)], which is a condition of the LQG Permit Exemption, the date upon which each period of accumulation begins, must be clearly visible for inspection on each container.

At the time of the inspection, the facility was storing hazardous waste in a CAA and did not take precautions to prevent an accidental ignition of ignitable waste by posting "No Smoking" signs (Photograph 3 of 21).

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R § 262.17(a)(1)(vi)(B)], which is a condition of the LQG Permit Exemption, special conditions for accumulation of ignitable/reactive waste require LQGs to take precautions to prevent accidental ignition or reaction of ignitable or reactive waste and "No Smoking" signs must be conspicuously placed wherever there is a hazard from ignitable or reactive waste.

At the time of the inspection, the sixteen (16) hazardous waste containers stored in the CAA were not labeled with the indication of the hazards of the contents (Photograph 4 of 21).

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.17(a)(5)(i)], which is a condition of the LQG Permit Exemption, a generator must mark or label its containers with an indication of the hazards of the contents.

At the time of the inspection, within the immediate location of the CAA, there was no decontamination eye-wash station present (Photograph 3 of 21).

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.17(a)(6)], which incorporates Fla. Admin. Code Ann. R. 62-730.160(1) [40 C.F.R. § 262.252(c)] and is a condition of the LQG Permit Exemption, all areas deemed applicable by Fla. Admin. Code Ann. R. 62-730.160(1) [40 C.F.R. § 262.250] must be equipped with decontamination equipment.

Printing Department and Central Accumulation Area

Located in this department are two (2) 8-color printers and two (2) 10-color printing press machines. Also located in this department are two (2) Regenerative Thermal Oxidizers (RTO 1 and RTO 2) that oxidize and decompose volatile organic compounds (VOCs). The RTO has various towers which contain specialized thermal ceramic material and consists of a four-step process of heating, incineration, recovery, and purging. The RTO has an industrial-grade air pollution control device that uses high temperatures to combust and decompose VOCs into carbon dioxide (CO2) and water vapor. These

machines appeared to be operational, and visually free of leaks at the time of the inspection.

Waste generated in the Ink Dispensing Room and the Printing Department, are collected, and stored in a CAA within this designated area. At the time of the inspection there were three (3) 55-gallon hazardous waste containers in this CAA. All containers were labeled and dated. One container was not closed during accumulation at the time of the inspection (Photograph 5 of 21).

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) 262.17(a)(1)(iv)(A), which is a condition of the LQG Permit Exemption, a container holding hazardous waste must always be closed during accumulation, except when it is necessary to add or remove waste.

At the time of the inspection, the facility was storing hazardous waste in a CAA and did not take precautions to prevent an accidental ignition of ignitable waste by posting "No Smoking" signs (Photograph 6 of 21).

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R § 262.17(a)(1)(vi)(B)], which is a condition of the LQG Permit Exemption, special conditions for accumulation of ignitable/reactive waste require LQGs to take precautions to prevent accidental ignition or reaction of ignitable or reactive waste and "No Smoking" signs must be conspicuously placed wherever there is a hazard from ignitable or reactive waste.

Located in the Worker Station of the Printing Department, the facility was managing six (6) 55-gallon containers, two (2) 10-gallon containers, and a 5-gallon container of spent solvent-contaminated rags. The inspection team asked the facility to make a hazardous waste determination on the spent solvent-contaminated rags prior to disposal (Photographs 7-9 of 21).

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.11], a person who generates a solid waste, as defined in Fla. Admin. Code Ann. r. 62-730.030(1) [40 C.F.R. § 261.2], must 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 articulated in Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.11].

Ink Dispensing Room

Paint is formulated and mixed in this area. At the time of the inspection, there was D001 paint-related hazardous waste in a 55-gallon container in a SAA that was not closed, not labeled with the words "Hazardous Waste" nor an indication of the hazard of the contents (Photographs 10 and 11 of 21).

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.15(a)(4)], which is a condition of the SAA Permit Exemption, a generator is required to keep containers of hazardous waste closed at all times during accumulation, except when adding, removing, or consolidating waste; or when temporary venting of a container is necessary for the proper operation of equipment, or to prevent dangerous situations, such as build-up of extreme pressure.

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.15(a)(5)(i) and (ii)], which is a condition of the SAA Permit Exemption, a generator is required to mark or label its containers (i) with the words "Hazardous Waste" and (ii) with an indication of the hazards of the contents.

During the mixture process of various paint-related products, paint containing hazardous materials is subsequently splattered on the walls and floor of the room. This room must be maintained and operated to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste.

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. 262.17(a)(6)], which incorporates Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. 262.251] and is a condition of the LQG Permit Exemption, facilities must be maintained and operated to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste.

Maintenance Department

Aerosol cans are used for various touch-ups and general maintenance on parts or machines and are thrown in the regular trash. The inspection team requested a hazardous waste determination for the municipal disposal of unpunctured aerosol cans (Photograph 12 of 21).

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.11], a person who generates a solid waste, as defined in Fla. Admin. Code Ann. r. 62-730.030(1) [40 C.F.R. § 261.2], must 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 articulated in Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.11].

The maintenance department generates spent rags. At the time of the inspection, it was unclear how the facility was managing two (2) 10-gallon containers storing spent rags. A hazardous waste determination was requested (Photographs 13 and 14 of 21).

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.11], a person who generates a solid waste, as defined in Fla. Admin. Code Ann. r. 62-730.030(1) [40 C.F.R. § 261.2], must 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 articulated in Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.11].

The maintenance department has a two milling machines. At the time of the inspection, a waste determination was requested for the scrap metal and documentation indicating where the metal is shipped for disposal or recycling (Photographs 15 and 16 of 21).

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.11], a person who generates a solid waste, as defined in Fla. Admin. Code Ann. r. 62-730.030(1) [40 C.F.R. § 261.2], must 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 articulated in Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.11].

Maintenance Parts Room

Located in the Maintenance Parts Room was storage for universal waste. At the time of the inspection, there was a 4-foot container of universal waste lamps that was not labeled, dated, or closed. There were two (2) additional 4-foot containers of universal waste lamps that were labeled, but not dated, or closed. There were also four (4) 8-foot universal waste lamps that were not in containers, labeled or dated

(Photographs 17-21 of 21).

Pursuant Fla. Admin. Code Ann. r. 62-730.185(1) and Fla. Admin. Code Ann. r. 62-737.400(5) [40 C.F.R. § 273.13(d)], a SQHUW must manage universal waste lamps in a way that prevents releases of any universal waste or component of a universal waste to the environment.

Pursuant to Fla. Admin. Code Ann. r. 62-730.185(1)[40 C.F.R. § 273.14(e)], a SQHUW must label or mark each lamp or container of lamps clearly with one of the following phrases: "Universal Waste-Lamp(s),"or "Waste Lamp(s)," or "Used Lamps."

Pursuant to Fla. Admin. Code Ann. r. 62-730.185(1) and Fla. Admin. Code Ann. r. 62-737.400(7) [40 C.F.R. § 273.15(a) and (c)], a SQHUW may accumulate universal waste no longer than one year and must to be able to demonstrate the length of time that the universal waste has accumulated from the date that it became a waste or was received.

Records

On Monday April 19, 2021, Mr. Sciaino emailed the EPA and FDEP copies of weekly inspections from 2018, 2019 and 2020. The inspection team conducted a record review of the facility's weekly inspections for the hazardous waste central accumulation area storage location. The weekly inspection log did not identify the two CAAs so it is unclear whether both locations are inspected. The following weekly inspections were noted to span beyond seven days.

- January 22, 2018 through January 31, 2018 (9 days)
- March 7, 2018 through March 21, 2018 (14 days)
- June 11, 2019 through June 19, 2019 (8 days)
- November 12, 2019 through December 18, 2019 (36 days)
- December 18, 2019 through December 26, 2019 (8 days)
- April 8, 2020 through April 17, 2020 (9 days)
- June 30, 2020 through July 8, 2020 (8 days)
- September 21, 2020 through September 29, 2020 (8 days)

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [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.

On Monday April 19, 2021, Mr. Sciaino emailed the EPA and FDEP a copy of the facility's Contingency Plan and Quick Reference Guide. The most recent contingency plan was dated April 20, 2020, and Quick Reference Guide document, version 1.0.0, was dated April 14, 2021. At the time of the inspection, a quick reference guide of the contingency plan had not been created or submitted to local emergency responders.

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.17(a)(6)], which incorporates Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.262(b)] and is a condition of the Large Quantity Generator Exemption, a large quantity generator that is amending its contingency plan must at the time submit a quick reference guide of the contingency plan to the local emergency

responders identified in paragraph (a) of this section.

On Monday April 19, 2021, Mr. Sciaino emailed the EPA and FDEP copies of 2018, 2019, and 2020 manifests. Certificate of Disposals from the designated facility were attached. Inteplast utilizes the following transporters to transfer hazardous waste:

- Univar Solutions USA Inc. EPA ID: TXR000084869 (2020)
- Freehold Cartage Inc. EPA ID: NJD054126164 (2020)

The facility utilizes Giant Resource Recovery EPA ID: SCD036275626 for the disposal of hazardous waste generated on site.

On Monday April 19, 2021, Mr. Sciaino emailed the EPA and FDEP training record documentation. Mr. Rafael Nieto and Mr. Jeremy Steffan completed a RCRA Hazardous Waste Management Webinar on December 16, 2020. The training was conducted by Lion Technology Inc. The most recent training document for Mr. James Sciaino was for a two-day RCRA Hazardous Waste Management Workshop dated October 22, 2019. Training was not provided for eight of the ten members on the Emergency Response Team listed in the contingency plan. Facility personnel must take part in an annual review of the initial training.

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.17(a)(7)(iii)], which is a condition of the LQG Permit Exemption, facility personnel must take part in an annual review of the initial training required in paragraph 40 C.F.R. § 262.17(a)(7)(i) of this section.

At the time of the inspection, no written job descriptions were provided for positions at the facility related to hazardous waste management. On Monday April 19, 2021, Mr. Sciaino emailed the EPA and FDEP a document describing the job descriptions for hazardous waste management related positions within the facility. This document was not dated and presumed to have been created after the inspection.

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.17(a)(7)(iv)(A)], large quantity generators must maintain the job title for each position at the facility related to hazardous waste management, and the name of the employee filling each job.

11) Summary

The inspectors conducted the exit meeting with facility team presenting the preliminary results of the inspection. Inteplast Engineered Films Corp was inspected as a large quantity generator of hazardous waste. At the time of the inspection, the facility did not appear to be in compliance with some requirements of RCRA. The inspection concluded at approximately 12:00 hours.

12) Signed

_____ _____

David Champagne Date
Inspector and Author of Report

13) <u>Concurrence and Approval</u>

ARACELI CHAVEZ

Digitally signed by ARACELI CHAVEZ
Date: 2021.05.20 10:53:52 -04'00'

Araceli B. Chavez
Chief
RCRA Enforcement Section

Date

RCRA CEI Photographs for
Inteplast Engineered Films Corp.
7549 Brokerage Drive
Orlando, Florida 32809-5625
Taken by: David Champagne, U.S. EPA
April 8, 2021
Camera Model: Google Pixel XL

Photograph 1 of 21: Plate Mounting, Film Production Floor - Hazardous Waste CAA

Photograph 2 of 21: Plate Mounting, Film Production Floor - Hazardous Waste CAA

Photograph 3 of 21: Plate Mounting, Film Production Floor - Hazardous Waste CAA

Photograph 4 of 21: Plate Mounting, Film Production Floor - Hazardous Waste CAA

Photograph 5 of 21: Printing Department - Hazardous Waste CAA

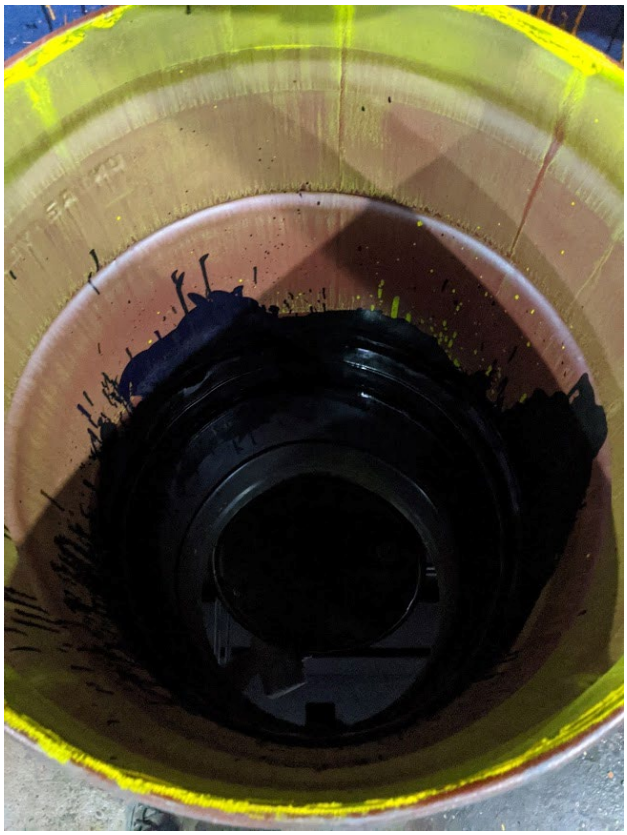
Photograph 6 of 21: Printing Department - Hazardous Waste CAA

Photograph 7 of 21: Spent Rag Collection Area

Photograph 8 of 21: Spent Rag Collection Area

Photograph 9 of 21: Spent Rag Collection Area

Photograph 10 of 21: Ink Dispensing Room – Hazardous Waste SAA



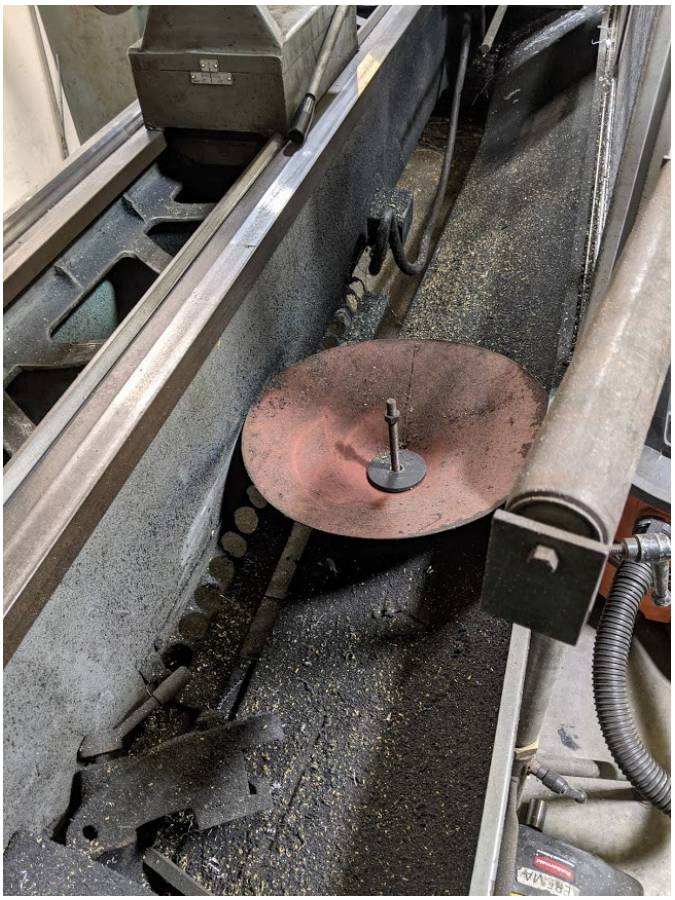
Photograph 11 of 21: Ink Dispensing Room – Hazardous Waste SAA

Photograph 12 of 21: Maintenance Department – Aerosol Can Disposal

Photograph 13 of 21: Maintenance Department – Spent Rag Collection Container

Photograph 14 of 21: Maintenance Department – Spent Rag Collection Container

Photograph 15 of 21: Maintenance Department – Scrap Metal Generation Area


Photograph 16 of 21: Maintenance Department – Scrap Metal Generation Area

Photograph 17 of 21: Maintenance Parts Room – Universal Waste Storage Area

Photograph 18 of 21: Maintenance Parts Room – Universal Waste Storage Area

Photograph 19 of 21: Maintenance Parts Room – Universal Waste Storage Area

Photograph 20 of 21: Maintenance Parts Room – Universal Waste Storage Area

Photograph 21 of 21: Maintenance Parts Room – Universal Waste Storage Area