

US Environmental Protection Agency – Region 2
 Caribbean Environmental Protection Division
 Response and Remediation Branch



Resource Conservation and Recovery Act (RCRA)
 Compliance Evaluation Inspection

Facility Name:	Alco High Tech Plastic, Inc.		
EPA ID Number:	PRR000027003		
Date of Inspection:	March 27, 2024		
Generator Status in Record:	LQG		
Generator Status at the time of inspection:	LQG		
RCRA Permitted:	No		
Basis for Inspection:	Core Program		
Corrective Action:	No		
Project ID	CEPD-RCRA-23-0441		
Facility Physical Location: (Municipality, PR, zip code)	State Road 159, km 13.5, Zona Industrial Cibuco, Corozal, Puerto Rico 00783		
Geographical Coordinates:	18°20'22.85" N, 66°19'14.87" W		
Facility Owner:	Mr. Gilberto Nieves, President/CEO	(787) 692-0297	
	gilbertonieves@alcohtgroup.com		
	Mailing address: State Road 159, km 13.5, Zona Industrial Cibuco, Corozal, Puerto Rico 00783		
Facility Operator:	Ms. Waleska Canting, Compliance Manager	(939) 599-8532	
	waleskacanting@alcohtgroup.com		
	Mailing address: State Road 159, km 13.5, Zona Industrial Cibuco, Corozal, Puerto Rico 00783		
NAICS:	326100 – Plastics Packaging Film and Sheet (Including Laminated) Manufacturing		
SIC:	2220 – Manufacture of Plastic Products		
Area:	6.5 acres of land property		
Number Employees:	100		
Personnel participating in inspection:			
Eduardo R. Gonzalez, P.E.	EPA Region 2-CEPD	Enforcement Officer	(787) 977-5839 gonzalez.eduardo@epa.gov
Status:	Final		
Record Schedule:	1044(c)		
Multi-media Checklist: ATTACHMENT # N/A		Referral: No	
EPA Lead Inspector Signature/Date	X <u>Eduardo Gonzalez</u> May 24, 2024		
Supervisor Signature/Date	DAVID CUEVAS- X MIRANDA Digitally signed by DAVID CUEVAS-MIRANDA Date: 2024.05.24 10:39:06 -04'00' David N. Cuevas Miranda, Ph.D.		

1 INTRODUCTION

On August 11, 2023, a Resource Conservation and Recovery Act (RCRA) Compliance Evaluation Inspection (the “Inspection”) was conducted at Alco High Tech Plastic, Inc. (the “Facility” or “Alco High Tech”), pursuant to Section 3007 of RCRA. The Facility is located on State Road 159, km 13.5, Zona Industrial Cibuco, Corozal, Puerto Rico 00783.

As part of the Inspection, an opening meeting, walkthrough, documents review and closing meeting were conducted to evaluate Facility’s compliance with the requirements that govern hazardous waste generators, universal waste handlers and used oil generators as per RCRA. Alco High Tech is designated in the RCRAInfo¹ database as a Large Quantity Generator (LQG). According to RCRAInfo database, Alco High Tech has never been inspected by EPA. On June 16, 2021, the Facility submitted to EPA a “Notification of RCRA Subtitle C Activities (EPA Form 8700-12)” to notify hazardous waste activities as Large Quantity Generator for spent solvents such as ignitable (D001), corrosives (D002), and non-halogenated solvents (F003), respectively.

2 OPENING MEETING

An opening meeting was held between Ms. Waleska Canting, Compliance Manager from Alco High Tech and me. I identified myself as EPA RCRA Enforcement Officer and told the Facility representative that the purpose of my visit was to conduct a RCRA Inspection at the Facility to evaluate its hazardous waste management practices and compliance. I discussed the objectives of my Inspection, and the requirements under RCRA for a Large Quantity Generator (LQG). I asked Ms. Canting to provide me for review Alco High Tech’s manifests (last three years), and land disposal records regarding the handling, transportation, and final disposal of hazardous waste generated, and stored at the Facility. I also asked for review the waste analysis plan, weekly inspection records, personnel training requirements, biennial report, waste minimization plan, closure plan, contingency and emergency and preparedness plan, SPCC (Used Oil), and RCRA air emission requirements under 40 CFR § 265 Subparts AA, BB & CC compliance reports.

Ms. Canting stated that Alco High Tech did not have any knowledge on how to comply with Subparts AA, BB & CC of RCRA requirements, including the areas that might apply as the hazardous waste containers storage area. She specified that containers holding volatile organic wastes were provided by Safety Kleen Environ System as their main carrier of hazardous wastes and other wastes generated at the Facility. I stated that containers holding spent volatile organic waste must comply with the Department of Transportation (DOT) (49 CFR 178 - Specifications for Packagings) requirements in which covers and containers are manufactured tested and sealed in accordance with the, and the United Nations (UN) Performance Oriented Packaging Standards.

Based on a review of electronic manifests, it was estimated that approximately over 2,200 pounds of hazardous waste are generated at the Facility. I was told by Ms. Canting that there are one central hazardous waste containers storage area and various hazardous waste satellite accumulation areas

¹ RCRA Info and ECHO, EPA’s Enforcement Compliance and History Online System

(SAA) for the management of hazardous wastes in the areas of manufacturing of plastic packaging, printing and diluting inks, and cleaning of plastic processes.

2.1 FACILITY PHYSICAL DESCRIPTION AND OPERATION

Alco High Tech is an industrial Facility engaged in the manufacturing of flexible, custom, and suitable plastic packagings. The Facility began operations in 1995 in Corozal, Puerto Rico and employs approximately 100 full time employees rotating two shifts from Mondays to Fridays depending on the production demands from 6:00 am to 11:00 pm. Alco High Tech is classified as a light manufacturing industry primarily engaged in the manufacturing, assembly, conversion, and extrusion of plastics packaging for medical devices, pharmaceutical consumers, food packages, industrial packaging, heavy construction bags, commercial packaging, product labels, and a variety of custom and flexible packaging.

As part of its manufacturing activities, solid and hazardous wastes are generated. The Facility consists of two (2) large two-story buildings, and five (5) separate freestanding smaller structures, housing the Maintenance Shop, the Mechanical Building (compressors' room), solvents storage, used oil storage and equipment shed. The plant size covers approximately 87,000 sq. ft. in a 6.5 acres of land property in Corozal.

Alco High Tech specializes in the manufacturing of flexible and industrial plastic packaging to suit the needs of all customers. Main process steps employed at the Facility during the manufacturing process include: 1) Extrusion of LDPE (low density Polyethylene); 2) Package Pigmentation; 3) Package Film Printing; 4) Film Lamination; and 5) Film Conversion within others. Products manufactured primarily include Bags, labels for packaging, Film and Bags for food packaging food, drugs, and food bottles, etc. Manufacturing activities at Alco High Tech take place using physical processes only. In order to support Facility's manufacturing processes several chemical solvents are used in the manufacturing of flexible and printing of plastic packaging, equipment cleaning, equipment lubrication and glue removal cleaning processes. Most of these materials are stored in a warehouse located on premises.

2.1 PHYSICAL SETTING

The site is located at approximately 286 feet above mean sea level. **Figure 1** presents the site location on a portion of the US Geological Service (USGS) Topographical Map. **Figure 2** presents an aerial photograph of the site. The closest superficial water body is the Rio Corozal located approximately 1.75 miles to the southwest of the site (see **ATTACHMENT I**).

2.2 SOLID AND HAZARDOUS WASTE GENERATION

Typically, solid waste is generated from the manufacturing of plastics packaging, extrusion, conversion, and assembly of a variety of plastic products, discarded raw materials, impacted rags with solvents, cleaning processes and office paperwork. Their solid waste is disposed of in a municipal landfill with Con Waste.

According to Facility's record, Alco High Tech is a RCRA Large Quantity Generator of hazardous waste. Hazardous waste generation mostly from the press's operations and cleaning, and includes the use of solvents like alcohols, acids/ caustics, aerosols, among others. The solvents represent the main

generation of hazardous waste, as well as rags laden with these solvents generated during cleaning and maintenance activities. Waste is accumulated at the Facility's 90-Day Hazardous Waste Accumulation Area for a period not exceeding 90 days and is shipped to an approved, offsite hazardous waste management facilities.

Based on a review of the 2023 Hazardous Waste Biennial Report, the Facility generates hazardous wastes including: waste flammable liquids (n-propyl acetate, n-propanol) (D001), waste flammable liquid, toxic (tetrachloroethylene, naphtha) (D001, D018, D039, F002), and waste solids containing flammable liquid (methyl ethyl ketone) (D035, F005, D001). Most of them were flammable spent solvents. All the hazardous waste are disposed of with Safety Kleen Environ System and according to waste quantities, the Facility is classified as a Large Quantity Generator (LQG). Based on a review of the 2023 Hazardous Waste Biennial Report and the RCRA Contingency Plan (Appendix D) the following hazardous wastestreams were identified and depicted in table below.

Waste Stream	Description	Hazard (EPA waste code)	Point of Generation	Approximate Maximum Quantity per Month
Flammable spent ink with solvent	Flammable liquid from printing and cleaning equipment	Flammable (D001)	Soma Press	3,000 pounds
Solids containing ink/solvents	Rags with alcohols	Flammable (D001)	Presses	300 pounds
Solids containing solvents	Rags with ethyl acetate	Flammable (D001)	Lamination	40 pounds
Rechargeable Lithium batteries	Rechargeable batteries used at the site	Flammable (D001), Reactive (D003) Universal Wastes	Facilities	20 pounds
Fluorescent lamps	Lamp replacement from facilities	Toxic (D009) Universal Wastes	Facilities	25 pounds
Lead acid batteries non-spillable	Batteries used in the site	Corrosive (D002, D008) Universal Wastes	Manufacturing, Warehouse & Truck Fleet	60 pounds
Aerosols can	Lubricants, penetrants, and paints	Flammable (D001) Reactive (D003) Universal Wastes	Manufacturing, Warehouse & Maintenance	10 pounds

Other solid wastes generated at the Facility included discarded plastic residuals and cardboards, imprinted plastics that cannot be recycled, debris from plant maintenance and cleaning activities, paint wastes from painting activities, packaging materials, paper and other waste from Administrative Offices, high and low density polyethylene for recycling of low-quality products or for sale by other plastic companies, and other disposal of sanitation, maintenance, and housekeeping products.

3 FACILITY WALKTHROUGH

Ms. Canting accompanied me during the Facility walkthrough. During the facility walkthrough the manufacturing areas where Satellite Accumulation Areas (SAA) were located, supporting units such as Universal Waste storage area, and Used Oil shed, and the 90-Day Hazardous Waste Accumulation Area (HWAA) were inspected as described below. The observations for each area are described below. Refer to Appendix 1 for pictures taken during the inspection.

3.1 PLASTIC EXTRUSION AREA – PLANT NO. 1

Ms. Canting escorted me to initially inspect the Plastic Extrusion area in which a high-volume manufacturing process was ongoing where raw plastic (pellets) is melted and formed into a continuous plastic layer. This process starts by feeding plastic material (pellets) from a hopper into the barrel of the extruder. The material is gradually melted by the mechanical energy generated by turning screws and by heaters arranged along the barrel (see **Pictures 1 and 2**). Most of the waste generated in this area are plastic residues or discarded plastic layers along with some cardboard boxes.

Observations at this area rendered no concerns regarding the generation or management of hazardous wastes.

3.2 PLASTIC EXTRUSION PRINTING AREA (SOMA) - PLANT NO. 1

I proceeded to inspect the Plastic Extrusion Printing (SOMA) area where plastic pellets are forced through a heated nozzle, melting the material, and depositing it on a print surface roll. At the time of the Inspection, I observed one satellite area (SSA) containing one (1) 55-gallon black steel drum with impacted rags contaminated with spent liquid solvent waste of a mixture of propanol and ink, labeled as “Hazardous Waste,” and “Paños Sucios con Solventes,” and was not identified with its hazard communication pictogram as “Flammable Solids” (see **Picture 3**).

I also observed a second satellite area (SSA) containing one (1) 55-gallon black steel drum with spent liquid solvent waste containing a mixture of propanol mix 80/20 and ink waste, labeled as “Hazardous Waste,” and “Propanol Mix 80/20 Con Tinta,” and was not identified with its hazard communication pictogram as “Flammable Liquids” (see **Picture 4**). According to Ms. Canting, the mixture of propanol mix 80/20 and ink waste is generated from ink changes and cleaning of the machine after printing campaigns.

There was a third SSA with a washing machine for the cleaning of printing anilox rollers. As explained by Ms. Canting, anilox rollers are part of a printing ink unit and used ink storage medium to provide a

defined amount of ink during the printing process. The SSA contained one (1) 300-gallon stainless steel tank used for cleaning anilox rollers which generates spent solvents characterized as corrosive-oxidizer, and human irritant. The SSA was not labeled with the words, "Hazardous Waste," nor identified with its hazard communication pictogram as "Corrosive Liquids" (see **Picture 5**).

I explained to Ms. Canting that pursuant to 40 CFR § 262.15(a)(5), a generator must mark or label its container with the words "Hazardous Waste," and must include an indication of the hazards of the content such as ignitable, corrosive, reactive, or toxic, a hazard communication consistent with the Department of Transportation requirements at 49 CFR Part § 172 Subpart E (labeling) or Subpart F (placarding), a hazard statement or pictogram consistent with the Occupational Safety and Health Administration Hazard Communication Standard at 29 CFR § 1910.1200; or a chemical hazard label consistent with the National Fire Protection Association code 704.

As observed by EPA Inspector, all containers were filled with spent solvents, and/or rags impacted with spent solvents which were not clearly labeled, coded, or identified with its hazard communication pictograms.

3.3 INK WAREHOUSE (WIP) AREA - PLANT NO. 1

I proceeded to inspect the Ink Warehouse area where all new ink products are stored in 5-gallon pails (i.e., Cyan, Magenta, Yellow and Black) for immediate use in plastic printing machines (see **Picture 6**).

Observations at this area rendered no concerns regarding the generation or management of hazardous wastes.

3.4 ALCOHOL WAREHOUSE AREA – BACKYARD SHED

I proceeded to inspect the Alcohol Warehouse area where all Propanol Mix 80/20 solvent products (i.e., UN 1993 – Flammable Liquids) are stored in two (2) 275-gallon totes for future use in plastic printing machines (see **Picture 7**). At this area, I observed a part-washer machine that was used to clean anilox and/or plaster rollers until the new SAA Washing Machine unit was installed nearby the plastic printing machines. According to Ms. Canting, this part-washer has been discontinued and emptied over a year ago and is not currently in use (see **Picture 8**).

In addition, I observed one (1) ½-cut 55-gallon blue plastic drum "open" with impacted rags contaminated with spent liquid solvent waste of a mixture of propanol and ink, not labeled as "Hazardous Waste," nor identified with its hazard communication pictogram as "Flammable Solids" (see **Picture 9**). I explained to Ms. Canting that pursuant to 40 CFR § 262.15(a)(4) a container holding hazardous waste must be closed at all times during accumulation, except when adding, removing, or consolidating waste. Also, I reiterated that pursuant to 40 CFR § 262.15(a)(5), a generator must mark or label its container with the words "Hazardous Waste," and must include an indication of the hazards of the content such as ignitable, corrosive, reactive, or toxic or a hazard communication pictogram,

3.5 SOLVENTS & INK WAREHOUSE STORAGE AREA – BACKYARD SHED

I proceeded to inspect the Solvents & Ink Warehouse Storage area in which all new solvent and ink products are stored in 55-gallon drums and 5-gallon pails for future use in the manufacturing of flexible plastic packagings and plastic printing machines. The area is a 20' X 40' open metal shed warehouse with reinforced concrete floor and protected with cyclone fence. It has an estimated storage capacity of over 500 5-gallon containers and drums. As observed, the base floor was free of cracks or gaps, and it was designed to contain leaks and spills in a collection sump. The room is well vented and provided with ambient controlled temperature in the area.

Observations at this area rendered no concerns regarding the generation or management of hazardous wastes.

3.6 DIESEL TANKS AREA – BACKYARD

I proceeded to inspect the Diesel Tanks area located in the backyard of the Facility. This area consists of an outdoor 3,000-gallon steel double tank and one 1,000-gallon steel tank provided with a zinc roof both storing diesel to supply the energy demand of the manufacturing of flexible plastic packaging. According to Facility record, Alco High Tech has developed and implemented several environmental release prevention, control, and countermeasure plans, which included:

- An Oil Release Prevention, Control & Countermeasures (SPCC) Plan (40 CFR §112.7); and,
- Best Management Practices (BMP) plans to prevent releases of oil, hazardous wastes, and hazardous materials to stormwater.

Observations at this area rendered no concerns regarding the generation or management of hazardous wastes.

3.7 90-DAY HAZARDOUS WASTE ACCUMULATION AREA (HWAA)

I proceeded to inspect the 90-day Hazardous Waste Accumulation area (HWAA) in which all hazardous waste collected from all manufacturing processes and satellite accumulation areas (SSAs) are transferred and stored at this area. Also, all hazardous waste generated from plastic printing machines, as well as any discarded or damaged products are transferred to this area before final disposition with Safety Kleen Environ System. The area is in an annex building where an area on the 1st floor has been habilitated and secured with cyclone fence to store hazardous wastes. It is an enclosed area with reinforced concrete floor and contain a drainage system that flows toward stormwater collection system. It has an estimated storage capacity of 50 55-gallon drums. As observed, the base floor was free of cracks or gaps, and it was designed to contain leaks and spills in a collection sump. The area has a sign posted reading "Hazardous Waste Storage Area – Unauthorized Persons Keep Out." The room is well vented and provided with ambient controlled temperature in the area.

Inside the 90-day Hazardous Waste Accumulation area, I observed the following:

- i. Three (3) 55-gallon blue plastic drums containing aqueous wastes generated from the cleaning activities of the cooling system of the SOMA Printing Machine. All drums' contents were

- characterized as non-hazardous and were clearly labeled with the words, “Non-Hazardous Waste,” (see **Picture 10**).
- ii. Two (2) 55-gallon drums, one steel black and the other plastic white, containing rags impacted with glue and spent acetone and methyl ethyl ketone generated from cleaning activities of the plastic lamination process. Both drums were clearly labeled with the words, “Hazardous Waste,” and dated on March 7, 2024, and March 11, 2024, respectively, coded as “D035” (MEK -methyl ethyl ketone), and one of them (steel black) identified with its hazard communication pictograms as, “Flammable.” The 55-gallon white plastic drum did not have its hazard communication pictograms (see **Picture 11**).
 - iii. Seven (7) 55-gallon blue plastic drums containing spent liquid solvent waste made up of a mixture of propanol mix 80/20 and ink waste and coded as “D001” (Ignitable). All drums were clearly labeled with the words, “Hazardous Waste,” and dated on February 13, 2024, February 15, 2024, February 20, 2024, February 28, 2024, March 7, 2024, and two March 11, 2024, respectively. Also, all drums were identified with its hazard communication pictograms as, “Flammable Liquids” (**Picture 12**).
 - iv. Two (2) 55-gallon drums, one steel black and the other plastic white, containing unknown water paints identified with its hazard communication pictograms as, “Flammable Liquids,” without proper hazardous waste determination or characterized, “Hazardous Waste,” or “Non-Hazardous Waste.” Both drums appeared to be abandoned and were covered with dust. I asked Ms. Canting about the origin of these drums for which she replied that no one knew about from where or when these drums were placed in this storage area for hazardous wastes (see **Picture 13**).

As observed by the EPA Inspector, most of the drums and containers were clearly labeled with the words, “Hazardous Waste,” were dated with its accumulation start dates from the date of generation and identified with its hazard communication pictograms as required by RCRA requirements. Additionally, all the drums and containers holding hazardous waste were closed and in good conditions. No leaks were observed on the floor.

The 90-day Hazardous Waste Accumulation area at Alco High Tech was equipped with fire alarms, emergency system and security system. However, the emergency telephone located inside of the HWAA was out of service, and I recommended that it must be repaired promptly.

3.8 PLASTIC LAMINATION AREA – PLANT NO. 2

I proceeded to inspect the Plastic Lamination area where two or more layers of material are put together to create multi-layered plastic sheet. Laminating improves the physical properties of a plastic sheet, such as the impact strength, stability, and sound insulation. As part of the plastic lamination, glue is applied to plastic layers to put them together. At the time of the Inspection, I observed two satellite areas (SSAs) containing each one (1) 55-gallon black steel drum with impacted rags contaminated with glue and spent ethyl acetate, labeled as “Hazardous Waste,” and “Paños Sucios con Pega y Acetato,” and was not identified with its hazard communication pictogram as “Flammable Solids” (see **Picture 14**).

I reiterated that pursuant to 40 CFR § 262.15(a)(5), a generator must mark or label its container with the words "Hazardous Waste," and must include an indication of the hazards of the content such as ignitable, corrosive, reactive, or toxic or a hazard communication pictogram,

3.9 UNIVERSAL WASTE STORAGE AREA - BACKYARD SHED

I proceeded to inspect the Universal Waste Storage area in which stores spent fluorescent-lamps, ballasts, and other lamps for the lighting maintenance of the Facility and open areas. The area is a 20' X 20' open metal shed warehouse with reinforced concrete floor and protected with cyclone fence and doors. As observed, the base floor was free of cracks or gaps, and it was designed to contain leaks and spills in a collection sump. The room is well vented and provided with ambient controlled temperature in the area.

Inside the Universal Waste Storage area, I observed the following:

- i. Five (5) square cardboard boxes (1'x1'x 4') packing over forty (40) 4-foot spent fluorescent lamps, some open and not labeled with the words, "Universal Waste," or dated with their accumulation start dates (see **Pictures No. 15** and **No.16**).

I stated that pursuant to 40 CFR 273.14(e), each lamp or a container or package in which lamps are contained must be labeled or marked clearly with the words, "Universal Waste-Lamp(s)," or "Waste Lamp(s)," or "Used Lamp(s)." I also stated that pursuant to 40 CFR § 273.13(d)(1), a small quantity handler of universal waste 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.

3.10 USED OIL STORAGE AREA – FRONT YARD SHED

I proceeded to inspect the Used Oil Storage area where used oil generated from service and maintenance of truck fleet are stored. The area is a 10' X 10' enclosed metal shed warehouse with reinforced concrete floor and protected with cyclone fence. As observed, the base floor was free of cracks or gaps, and it was designed to contain leaks and spills in a collection sump. The room is well vented and provided with ambient controlled temperature in the area.

According to Ms. Canting, light mechanic repairs and preventive maintenance to truck fleet is performed at this Facility. Oil and filter changes are part of the truck's preventive maintenance program. Used oil is placed in 55-gallon drums and 5-gallon containers and stored in this Used Oil Storage area. Used Oil impacted materials are disposed of as domestic garbage. No hazardous waste determination has been made on the used oil impacted materials before disposal of and/or mixed with their solid waste. Used oil filters are not punctured and/or crushed, nor hot drained between 24 - 48 hours before been disposed of with the local used oil collector company. At the time of the Inspection, Ms. Canting indicated that Used Oil is collected and disposed of with Jesus Oil Recycling.

Inside the Used Oil Storage area, I observed the following:

- i. One (1) 55-gallon blue steel drums with impacted rags with used oil not marked with the words, "Used Oil" (see **Picture No. 17**).
- ii. One (1) 55-gallon blue steel drums with impacted used oil filters not marked with the words, "Used Oil" (see **Picture No. 18**).
- iii. Five (5) 55-gallon blue/white plastic drums with used oil not marked with the words, "Used Oil" (see **Picture No. 19**).
- iv. Seven (7) 5-gallon orange/gray plastic containers with used oil not marked with the words, "Used Oil" (see **Picture No. 20**).
- v. Two (2) 5-gallon orange plastic containers "Open" with used oil not marked with the words, "Used Oil" (see **Picture No. 20**).
- vi. One (1) 5-gallon yellow plastic containers with spent coolant without a proper hazardous waste determination or characterized, "Hazardous Waste," or "Non-Hazardous Waste" (see **Picture No. 19**).

4 DOCUMENTS REVIEW

The following documents were reviewed as required by the RCRA Program after the walkthrough inspection:

4.1 WASTE ANALYSIS

A Full RCRA analysis was provided on a Detailed Profile Report attached to each Manifest prepared by Safety Kleen Environ System containing all Toxic Characteristic Leaching Procedure (Test Method SW 1311) tests, and other analytical methods or knowledge of the waste. All wastestreams generated by the Facility were identified, tested, codified, and disposed of as required by the land disposal restrictions (LDRs). The Waste Analysis Plan appeared to be in compliance.

4.2 MANIFEST RECORDS AND LAND DISPOSAL RESTRICTION FORMS (LDR)

Manifests and associated LDRs for all incoming and outgoing shipments for the last three years were reviewed in hard copies and in an electronic format. Most of the hazardous waste are disposed of by Safety Kleen Environ System and/or Clean Harbour to a destination in Bartow, Florida, USA. One of the most recent shipments manifested the disposal of 7,280 lbs (> 1000kg) on February 7, 2024. All appeared to be properly maintained and in compliance.

4.3 PERSONNEL TRAINING RECORDS

The Facility provided a Record of Training for the personnel associated with the management of hazardous waste. The Record of Training detailed the kind of training, date, and completion status provided by an outside contractor, Ramon Cardona Environmental Consulting, dated on January 12, 2024. It appeared to be properly maintained and in compliance.

4.4 WEEKLY LOG RECORDS

All weekly logs records for daily and weekly SSAs and hazardous waste container storage areas were not available for review. According to Ms. Canting no weekly inspections are conducted at the Facility, therefore it was found not to be in compliance.

4.5 JOB TITLE & DESCRIPTION RECORDS

Pursuant to 40 CFR § 262.17(a)(7)(iv), large quantity generators must provide for review a job title for each position at the Facility related to hazardous waste management, and the name of the employee filling each job. In addition, it must provide a written job description for each position including the requisite skill, education, or other qualifications, and duties of Facility personnel assigned to each position. Information provided appeared to be properly maintained and in compliance.

4.6 AIR EMISSIONS STANDARD RECORDS

Pursuant to 40 CFR § 262.17(a)(1)(i) referring to 40 CFR Part 265 Subpart AA, BB, and CC – All Facility record for accumulation of hazardous waste in container related to the RCRA air emission requirements were requested. According to Ms. Canting, Alco High Tech does not have any knowledge that the Facility was required to comply with 40 CFR Part 265 Subparts CC of RCRA requirements for the management and control of air emissions of hazardous waste stored in containers. All associated information regarding RCRA Subpart CC Air Emissions Standard controls air emissions for containers was found not to be to compliance.

4.7 CONTINGENCY AND EMERGENCY PREPAREDNESS PLAN

There was a RCRA Hazardous Waste Contingency Plan, dated April 2023, which outlines the procedures and activities required for the prevention of, and response to, hazardous waste releases at the Facility located in Corozal. In general, the plan provided contingency and emergency preparedness procedures in case of an emergency incident. The plan also provided a list of names and telephones in case of an emergency and proper procedures in a case of an emergency. As observed the RCRA Contingency Plan was ready accessible, and so the plan was also posted and accessible to all employees and provided to emergency agencies. (i.e., Fire Department, Hospitals, Police Department, and Civil Defense). Additionally, the Facility was equipped with alarm systems, sprinkler systems, telephones, certified extinguishers nearby areas where hazardous wastes were stored in the Facility. A “RCRA Contingency Plan Quick Reference Guide RCRA” was also provided for review. All appeared to be properly maintained and in compliance.

4.8 BIENNIAL REPORT

The Hazardous Waste Report for 2023 was submitted electronically on February 28, 2024, in RCRA Info Site. The Biennial Report described all the wastestreams generated and managed by the Facility including waste flammable liquids (n-propyl acetate, n-propanol) (D001), waste

flammable liquid, toxic (tetrachloroethylene, naphtha) (D001, D018, D039, F002), and waste solids containing flammable liquid (methyl ethyl ketone) (D035, F005, D001). It appeared to be properly documented and in compliance.

4.9 WASTE MINIMIZATION

Pursuant to 40 CFR § 262.27, large quantity generator must have a program in place to reduce the volume and toxicity of waste generated to the degree it is economically practicable for the method of treatment, storage, or disposal currently available which minimizes the present and future threat to human health and the environment. The Facility did not have a Waste Minimization Plan (WMP) at Alco High Tech Corozal, and therefore, it was found not to be in compliance.

5 CLOSING MEETING

After completion of the walkthrough and document review, I met with Ms. Waleska Canting, Compliance Manager from Alco High Tech to conduct a closing meeting. I indicated that the purpose of the closing meeting is to inform the Facility's representatives about the RCRA observations. I indicated to Ms. Canting that I wanted to discuss some EPA's observations before I can reach a full compliance determination of the RCRA program. Based on EPA Inspection findings, I discussed the following topics that needed Facility consideration:

- i. EPA Inspector identified some solid waste stored at the Facility without a proper hazardous waste determination or characterized, as "Hazardous Waste," or "Non-Hazardous Waste."
- ii. At the 90-day Hazardous Waste Accumulation area as part of the emergency preparedness system it was found that emergency telephone located inside of the HWAA was out of service and needed to be repaired promptly.
- iii. EPA Inspector found various drums and containers located in the HWAA and SAAs that must be marked or labeled with the words "Hazardous Waste," and must include an indication of the hazards of the content such as ignitable, corrosive, reactive, or toxic or a hazard communication pictogram.
- iv. It is required to conduct weekly inspections that include the inspection of drums and container holding hazardous waste and verify if they are properly closed, and in good working conditions and document each inspection in a notebook and take corrective measures if anything is out of order or insecure.
- v. Facility is required to comply with the air emissions requirements under RCRA for the management and control of air emissions of hazardous waste stored in drums and containers.
- vi. Facility must develop a Waste Minimization Plan to reduce the volume and toxicity of waste generated to the degree it is economically practicable for the method of treatment, storage, or disposal currently available which minimizes the present and future threat to human health and the environment.
- vii. EPA Inspector identified some cardboard boxes with spent fluorescent lamps that were not labeled with the words, "Universal Waste-Lamp(s)," and prevent them from brokage.

- viii. EPA Inspector identified some drums and containers with Used Oil that were not properly labelled with the words, "Used Oils," some were open, and needed to comply with used oil filter requirements.

6 COMPLIANCE ASSISTANCE

The EPA inspector discussed with Alco High Tech Plastic's representative the specific RCRA program regulations that apply to the Facility, and how to stay in compliance in case they decide to minimize or recover waste streams and implement waste minimization/pollution prevention procedures as required by RCRA.

7 CONCLUSION & FOLLOW-UP ACTIONS

Based on EPA's observations of the Inspection of regulated areas and completion of a document review session, EPA has determined that the hazardous waste management program at Alco High Tech Plastic was not satisfactory as required by the RCRA program, and potential violations on applicable hazardous waste regulations were found. Therefore, I communicated to Ms. Canting that any further enforcement action regarding potential violations were tentative and are pending administrative review by EPA.

8 ATTACHMENTS

- I. Figure 1- Facility Location Map and Figure -2 Aerial Photograph
- II. Photolog and Camera Roll (include all pictures taken during the inspection)