

REPORT OF RCRA COMPLIANCE EVALUATION INSPECTION

At

PACKAGING PRODUCTS CORPORATION, LLC

6800 West 61st Street
Mission, Kansas 66202
(913) 262-3033

EPA ID Number: KSD062721956

On

May 23 and 24, 2022

By

U.S. ENVIRONMENTAL PROTECTION AGENCY

Region 7

Enforcement & Compliance Assurance Division

1.0 INTRODUCTION

I performed a Resource Conservation and Recovery Act (RCRA) compliance evaluation inspection (CEI) at Packaging Products Corporation, LLC (PPC), located in Mission, Kansas, on May 23 and 24, 2022. I conducted the inspection under the authority of RCRA Section 3007(a), as amended. During the inspection, I collected the information necessary to determine compliance with the applicable regulatory and statutory requirements. This report and attachments present the results of the inspection. Based on the information obtained during the inspection, I inspected the facility as a State of Kansas and Federal Large Quantity Generator (LQG) of hazardous waste, generator of universal waste lamps and batteries, and used oil generator. PPC was last inspected by the EPA on March 9, 2016. One violation was observed or cited as a result of the 2016 inspection.

2.0 PARTICIPANTS

PPC:

James Pearson, Plant Manager
Aaron Baldwin, Quality Assurance Manager
Rick Meier, INX Employee (Ink Distributor)
Don Gansert, Senior Consultant - Trinity Consultants
Josh Garlock, Associate Consultant - Trinity Consultants (Exit Briefing)

U.S. Environmental Protection Agency (EPA):
Tiffany DeLong, Life Scientist, ECAD
Kenneth Herstowski, Environmental Engineer, ECAD/CB/RCRA
Timothy Evans, Life Scientist, ECAD (Lead Inspector)

3.0 INSPECTION PROCEDURES

On May 23, 2022, Tiffany DeLong, Ken Herstowski, and I arrived at the facility at approximately 9:30 a.m. A drive-by inspection was only possible on the south and east sides of the facility. No apparent issues were observed. However, while parking on the east side of the facility, several 55-gallon drums were observed stored on their sides, outside on the north side of the facility. See Section 4.4.1 for additional information related to the drums. Ms. DeLong, Mr. Herstowski, and I then proceeded to the facility office and asked for Mr. Tom Donovan, listed as site contact on the Hazardous Waste Site Information Verification Report for Inspectors form (Attachment 5). We were informed that Mr. Donovan was no longer employed at PPC, and that Mr. Pearson would be able to assist us. Ms. DeLong, Mr. Herstowski, and I signed in as visitors using an electronic system, and were then introduced to Mr. Pearson. After checking in and receiving visitor passes, Mr. Pearson escorted Ms. DeLong, Mr. Herstowski, and me to a conference room for the in briefing. We were introduced to Mr. Baldwin, who joined us for the in briefing. Mr. Herstowski and I presented Messrs. Pearson and Baldwin with our business cards and EPA credentials. Messrs. Pearson and Baldwin were informed that Ms. DeLong was accompanying Mr. Herstowski and me as an observer. Mr. Gansert joined us in the conference room, approximately 15 minutes into the in briefing. During the in-briefing, I presented Mr. Pearson with a copy of the RCRA Facility Access Information Sheet, March 2013, which provides inspection authority. I explained my need to collect accurate information and presented Mr. Pearson with a copy of Title 18 U.S. Code, Sections 1001 and 1002. As part of the in-briefing, Messrs. Pearson, Baldwin, and Gansert were made aware of PPC's confidentiality rights and informed that a Confidentiality Notice would be provided at the end of the inspection to make, or not to make, any claims. Messrs. Pearson, Baldwin, and Gansert acted as the facility representatives during the on-site inspection activities.

During the inspection, discussions consisted of wastes generated and waste management practices.

Method 21 Monitoring

Mr. Herstowski, Ms. DeLong, and I calibrated a Thermo Fisher Scientific TVA 1000-B organic vapor analyzer (OVA) and a TVA2020 OVA the morning of May 23, 2022, prior to our arrival at the facility (Attachment 7). Mr. Herstowski and I used the OVAs for Method 21 monitoring of volatile organic emissions; both OVAs were equipped with flame ionization detectors (FID). Findings from the operation of the FID-equipped OVAs was recorded on field sheets (Attachment 7).

Ms. DeLong, Mr. Herstowski, and I conducted a visual inspection of the following areas:

Pre-Press Area

Cylinder and Plate Storage Area

660 Press Area (Less Than 90 Day Hazardous Waste Accumulation Area)

Plate Mounting Department

Fusion Press Area (Less Than 90 Day Hazardous Waste Accumulation Area)

Infinity Press Area (Less Than 90 Day Hazardous Waste Accumulation Area)

East Side of Infinity Press Area

Mezzanine (Universal Waste Lamp Storage Area)

Press Room North Dock (Excluded Solvent-Contaminated Wipes Container Storage)

Ink Room

Outside Old Ink Room

Distillation Unit

Central Less Than 90 Day Hazardous Waste Accumulation Area

North Dock Area (Two, 750-Gallon Virgin Solvent Storage Tote/Tanks; Solvent from
Distillation Unit)

Regenerative Thermal Oxidizer Area (Outside, on North Side of Facility)

Northwest and Outside of Facility Building (Stacked 55-Gallon Drums)

Maintenance Shop

Laboratory

Information collected during the inspection was documented in a bound notebook, on the KDHE Hazardous Waste Generator Requirements checklist, and as discussed below.

At the conclusion of the inspection, I summarized the findings and recommendations with Messrs. Pearson, Baldwin, Gansert, and Garlock. I provided Mr. Pearson with a Confidentiality Notice (Attachment 1) which he signed as acknowledgement of receipt. Mr. Pearson made no confidentiality claims.

I also provided Mr. Pearson with a Receipt for Documents and Samples (Attachment 2) and Notice of Preliminary Findings (NOPF) (Attachment 3), which Mr. Pearson signed as acknowledgement of receipt.

The following inspection documents were provided to PPC:

Inspection Documents

Confidentiality Notice

*Notice Regarding Proprietary/Confidential Business Information Submitted to or Collected by
EPA In Connection with Inspections (Provided by e-mail on May 27, 2022)*

Receipt of Documents and Samples

Notice of Preliminary Findings

Instructions for Responding to a Notice of Preliminary Findings

EPA Compliance Assistance Handouts

U.S. EPA Small Business Resources (Provided by e-mail on June 3, 2022)

EPA Industry Sector Notebooks List

EPA Compliance Assistance Centers

EPA E-Manifest Fact Sheet

EPA E-Manifest Fact Sheet: Generators

Managing Used Oil – Advice for Small Businesses

Compliance Advisory – Reduction of Hazardous Waste Air Emissions, April 2008

EPA Enforcement Alert – National compliance Initiative Focus on RCRA Air Emissions, June 2020, EPA-F-20001

EPA - Tampering Pollutes Our Air

Fact Sheet – Clean Air Act, Vehicle Aftermarket Defeat Devices and Tampering, March 2020

I followed the inspection procedures discussed in the RCRA CEI Standard Operating Procedure (No. 2321.1D), unless noted differently. Any federal regulatory citations noted in this report are as adopted by reference in the authorized Kansas regulations.

4.0 FINDINGS AND OBSERVATIONS

4.1 General Information/Facility Description and RCRA Status

PPC is a manufacturer of food-grade packaging. PPC is located in one 28,000-square foot building in a mixed retail/residential area. See Attachment 4 for a facility layout. PPC is staffed by 70 employees and operates three eight-hour shifts, Monday through Friday, and one eight hour shift every other Saturday.

PPC's packaging manufacturing process is as follows:

1. 70–80-gauge, flexible plastic (polypropylene or polyethylene) roll stock is added to one of three flexographic printing presses; images are printed onto the roll stock. The roll stock used at the facility is food-grade packaging.
2. The printed plastic, food-grade packaging is either sent to one of four slitter machines to be cut, or it is laminated and then sent to a slitter machine to be cut.
3. The food-grade packaging product is shipped to customers in roll form.

RCRA Status

According to the RCRAInfo database, PPC has notified as a State of Kansas and Federal Large Quantity Generator of hazardous waste. I provided Mr. Pearson with a Hazardous Waste Site Info Verification Report for Inspector form (Attachment 5). Mr. Pearson updated the form, adding Mr. Baldwin as the new facility site contact (See Section 4.2, below, for additional information). Based upon the amount and type of hazardous waste generated at PPC, I inspected the facility as a State of Kansas and Federal Large Quantity Generator of hazardous waste, small quantity handler of universal waste, and used oil generator.

4.2 Changes Since Previous Inspection

Aaron Baldwin is the new Quality Assurance Manager. Tom Bruns, Maintenance Manager; John Peden, Lamination Operator; and Tom Donovan, Vice President of Operations are no longer at the facility. Mr. Donovan was listed as the site contact on the most recent Hazardous Waste Site Info Verification Report for Inspectors (Attachment 5). I informed Messrs. Pearson, Baldwin, and Gansert that the State of Kansas requires updates to facility information within 60 days of changes in facility status, such as the name of the site contact. According to Mr. Pearson, Mr. Donovan left the facility on April 14, 2022.

In 2018, the facility installed a CleanPlanet brand distillation unit for use in recycling ink and solvent hazardous waste. The facility first operated the distillation unit in 2019. The distillation unit is located next to the less than 90-day/central accumulation area.

According to facility personnel, the distillation unit is able to process up to 60 gallons of ink and solvent hazardous waste, each time, when operated.

The facility is using a different two-part adhesive at the facility. Flextra Fast adhesive (Part A) and Flextra XR1000 adhesive (Part B) were used at the time of the previous inspection. However, the facility began using H.B. Fuller Company WD4120 (Part A) and Flextra XR1500 (Part B) as a new two-part adhesive. See Section 4.5 and the waste stream table, Attachment 6, for additional information related to the adhesive used at the facility.

4.3 Waste Streams and Waste Management

Information related to waste streams is listed in the Waste Stream Table (Attachment 6).

4.4 Areas Visually Inspected and Related Violations/Issues

4.4.1 Outside, North of Facility Building

Hazardous Waste Determination Not Conducted, 40 CFR 262.11 (NOPF 1) – During inspection of the area outside, north of the facility building, and next to the regenerative thermal oxidizer, I observed six blue 55-gallon polyethylene drums and two white approximately 15-20-gallon polyethylene drums (Photos 21-24). The drums were closed but not labeled. It appeared that all drums contained varying amounts of liquid. I asked Messrs. Pearson and Baldwin if they knew what was in the drums. Messrs. Pearson and Baldwin stated that they did not know what was in the drums. During the record review, I asked Mr. Pearson if PPC needed to conduct a hazardous waste determination for the material within the drums. Mr. Pearson stated that a hazardous waste determination needed to be conducted for the material within the drums.

Failure to Minimize a Release of Hazardous Waste, 40 CFR 265.31 (NOPF Added After Inspection) – During inspection of the area outside, and adjacent to the northeast corner of the facility building, I observed 120 steel and polyethylene 55-gallon drums stacked on their sides. According to Mr. Gansert, the drums were RCRA empty product containers.

However, residual from a drum was actively leaking onto the ground and material identified as white ink by Mr. Pearson had leaked out of a container or containers and had dried on asphalt next to the stacked drums (Photos 25-27). I explained to Mr. Gansert that although the drums may have been considered RCRA empty when stacked outside, any residual material dripping from the drums onto the asphalt would be considered a new point of waste generation.

According to Messrs. Pearson and Baldwin, the facility RCRA Emergency/Contingency & DOT Security Plan, and Waste Minimization Plan, all waste ink and solvent generated at the facility is managed as hazardous waste, and is either recycled on-site or offsite through distillation or shipped offsite to a treatment, storage, or disposal facility. See Attachment 15 for the facility RCRA Emergency/Contingency & DOT Security Plan and Waste Minimization Plan.

I asked Mr. Pearson if the material actively leaking out of the drum would be the same as material listed on the drum label. Mr. Pearson stated that the label on the drum would be the same material leaking out of the drum. During review of facility records, Messrs. Pearson and Baldwin provided me with a material safety data sheet (MSDS) for INX product, Synergy III Process Letdown Veh30, identified as the material actively leaking out of the drum in Photos 25 and 27. According to the SDS, when disposed, the Synergy III Process Letdown Veh30 would, at least, be considered an ignitable hazardous waste, with a flash point estimated to be 73 degrees Fahrenheit (Attachment 8).

Approximately 4-6 ounces of the residual Synergy III was observed to have leaked out of the drum, and approximately one cup of dried white ink was observed on the asphalt. According to Mr. Gansert, the white ink had been on the ground approximately two years.

During the inspection, facility personnel tightened the lid ring on the drum, in an attempt to stop the residual Synergy III product from leaking onto the asphalt.

An e-mail was sent to the facility on July 8, 2022, informing the facility of the additional citation (Attachment 9).

4.4.2 Fusion Press Area

Hazardous Waste Satellite Accumulation Container Not Closed, 40 CFR 265.173(a)

(NOPF 2) –During inspection of the Fusion Press area, I observed one black metal 55-gallon satellite accumulation drum (Photos 7-9). The drum was approximately half full of hazardous waste spent ink/solvent solids (including, but not limited to, waste ink dippers, waste toner cups, solvent-contaminated mop heads, and A-5313 solvent saturated rags) and was labeled with the words “Hazardous Waste”. However, the drum lid was open/not latched.

Mr. Baldwin attempted to close the container at the time of the inspection (Photo 10). However, the container lid latch was not able to stay in place and appeared to be bent, allowing the lid to open.

4.4.3 Facility-Wide

Excluded Solvent-Contaminated Wipes Containers Not Closed, 40 CFR 261.4(a)(26)(i) (NOPF 3) – During inspection of the facility building, I observed the following, full, approximately 21-gallon capacity step cans, labeled with the words “Excluded Solvent-Contaminated Wipes”:

- One container located in the 660/Kidder Press area (Photo 1)
- One container located in the Fusion Press area (Photo 7)
- One container located on the east side of the Infinity Press area (Photo 11)

Pressing down on the tops of the three containers, listed above, I noticed the lids did not make a complete seal. Solvent-contaminated wipes would not be considered solid waste, and would be eligible for exclusion, provided that containers used to accumulate the wipes are closed. According to the Code of Federal Regulations, “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.”.

Failure to Minimize a Release of Hazardous Waste, 40 CFR 265.31 (NOPF Added After Inspection) – During inspection of the facility building interior, I observed what appeared to be waste ink on the floor, walls, and on the outside of hazardous waste containers (Photos 2-8, 10-12, and 15-19). As an example of, and similar to, what was observed throughout the facility on the floor, walls, and on the outside of hazardous waste containers, I asked Mr. Baldwin what the material was in the sanitation run (Photos 4 and 12). According to Mr. Baldwin, the material on the walls and floor in the sanitation run would include both ink and solvent. I asked Mr. Baldwin why the ink and solvent was on the floor and walls in these areas. Mr. Baldwin stated that he was unsure why the ink and solvent would be on the floor and walls. I commented to Messrs. Pearson, Baldwin, and Gansert regarding the buildup of hazardous waste ink and solvent on the rims of container and funnel lids. I pointed out that a build-up of ink and solvent waste on the rims of container and funnel lids could keep hazardous waste containers from properly closing.

An e-mail was sent to the facility on July 8, 2022, informing the facility of the additional citation (Attachment 9).

4.4.4 Mezzanine (Universal Waste Lamp Storage Area)

Universal Waste Lamps Accumulated for Longer than One Year, 40 CFR 273.15(a) (NOPF 4) – During inspection of the mezzanine, I observed two cardboard boxes containing spent fluorescent lamps – one small 4-foot-long box containing 12 spent lamps and one large 4-foot-long box containing 42 spent lamps (Photos 13 and 14). Both boxes were closed and labeled with the words “Waste Lamps”. However, the boxes were not marked with an accumulation start date. I asked Mr. Pearson if PPC employed any other way to track the accumulation start date for the lamps or to demonstrate the length of time that the waste lamps had been accumulated from the date the lamps became a waste and were first added to the boxes. Mr. Pearson stated that PPC was not employing any other way to track the date of accumulation for the spent lamps.

I asked Mr. Pearson if he knew when the lamps might have first been added to the boxes. Mr. Pearson stated that the date, September 4, 2019, on an invoice for the last shipment of lamps would be the closest date for an accumulation start date (Attachment 10).

4.4.5 Maintenance Shop

Container of Used Oil Not Marked with the Words “Used Oil”, 40 CFR 279.22 (c)(1) (NOPF 5) - During inspection of the facility maintenance shop, I observed one blue polyethylene 55-gallon drum and one black steel 55-gallon drum of used oil. Both containers were labeled with the words “Used Oil”. I also observed one full blue 40-gallon polyethylene drum containing used oil. The 40-gallon drum was not labeled with the words “Used Oil” (Photos 28 and 29).

Facility personnel labeled the drum with the words “Used Oil”, addressing NOPF 5 at the time of the inspection (Photo 30).

4.4.6 Distillation Unit

Transfer of Hazardous Waste In or Out of Container Not Minimizing Exposure of Waste to Atmosphere, 40 CFR 265.1087(c)(3)(ii) (NOPF 7) – During inspection of the distillation unit area, I observed a 55-gallon drum of hazardous waste spent ink/solvent liquid that was actively being pumped into a 330-gallon distillation tote/tank (Photos 17, 18, and 20). The pump equipment within the drum was not sealed and no facility personnel were observed performing the unloading operation (Photos 17 and 18). According to container Level 1 standards (containers in size between 26.4 and 121.5 gallons), “. . . the owner or operator shall promptly secure the closure devices in the closed position and install covers, as applicable to the container, if the person performing the unloading operation leaves the immediate vicinity of the container”.

At the time of the inspection, Rick Meier, Ink Room Manager, attached the pump to the drum bung hole, addressing NOPF 7 at the time of the inspection (Photo 19).

On the NOPF left with the facility, this was inadvertently cited as Transfer of Hazardous Waste In or Out of Container Not Minimizing Exposure of Waste to Atmosphere, 40 CFR 265.1087(d)(2) for container Level 2 standards.

Failure to Implement Standards for the Distillation Unit Tote/Tank in Volatile Hazardous Waste Service, including but not limited to, 40 CFR 265 Subpart J, BB, and CC (NOPF Added After Inspection) – During inspection of the distillation unit area, I observed an approximately 330-gallon tote located next to the distillation unit (Photos 17, 31, and 32). 55-gallon drums and less than 90-day accumulation totes are brought to the distillation unit area, where the contents of those hazardous waste drums and totes are transferred to the distillation unit tote/tank, prior to being pumped into the distillation unit. The tote/tank was properly dated and labeled, and was being used to accumulate hazardous waste spent ink/solvent liquid. Mr. Gansert stated that Trinity Consultants assisted PPC with setting up the distillation unit and tote/tank. According to Messrs. Pearson, Baldwin, and Gansert, the tote/tank is dedicated for use solely with the distillation unit.

According to Mr. Gansert, the pumps and piping attached to the tote are not removed. I asked Mr. Gansert how the tote was defined by the facility i.e., process equipment or a tank. Mr. Gansert stated that he wasn't sure how to categorize use of the tote at the facility. Based upon use as a stationary piece of equipment, the tote appears to meet the definition of a hazardous waste tank. According to Mr. Gansert, the CleanPlanet, AlwaysClean model distillation unit was installed at PPC in 2018 and began operating in 2019.

Standards required to be implemented under 40 CFR 265 Subpart J include daily inspections of the distillation tote/tank and ancillary equipment and confirmation that the distillation unit area provides adequate secondary containment for the distillation tote/tank.

Standards required to be implemented under 40 CFR 265 Subpart BB include:

40 CFR 265.1050(c)	Each piece of hazardous waste equipment must be marked to distinguish it from other equipment.
40 CFR 265.1052(a)(1)	Hazardous waste pumps must be monitored monthly using methods outlined in §265.1063(b) (Part 60, Reference Method 21).
40 CFR 265.1052(a)(2)	Hazardous waste pumps must be visually inspected, weekly, for dripping liquids.
40 CFR 265.1057(a)	Hazardous waste valves must be monitored monthly using methods outlined in §265.1063(b) (Part 60, Reference Method 21).
40 CFR 265.1064(a)(1)	Records must be maintained, as required by Subpart BB.

Standards required to be implemented under 40 CFR 265 Subpart CC include:

40 CFR 265.1085(c)(4) 40 CFR 265.1089(a)	Inspect tank air emission control equipment annually.
40 CFR 265.1089(b)	Develop and implement a written plan and schedule to perform inspections and monitoring.
40 CFR 265.1090	Maintain records required by Subpart CC.

An e-mail was sent to the facility on July 8, 2022, informing the facility of the additional citation (Attachment 9).

4.4.7 Less Than 90-Day Accumulation Totes - 660/Kidder Press, Fusion Press, and Infinity Press Areas

Level 2 Controls Not Used on Totes, 40 CFR 265.1087(d) (NOPF 9) – During inspection of the 660/Kidder Press, Fusion Press, and Infinity Press areas, I observed funnels attached to the less than 90-day, 330-gallon totes used to accumulate hazardous waste spent ink/solvent liquid (Photos 2, 3, 6, and 15).

The totes were labeled, dated, and closed. However, Level 2 control requirements were not being met, due to the attached funnels. Level 2 control requirements apply to containers with a volume greater than 121.5 gallons.

Because the facility is an LQG of hazardous waste, PPC is subject to 40 CFR Part 265, Subpart CC (Subpart CC). Subpart CC addresses control of air emissions from containers used to store or accumulate hazardous waste with a volatile organic concentration of 500 parts per million (ppm) or greater. During review of the safety data sheet, Mr. Herstowski was able to confirm that the A-5313 solvent, used to clean the presses, had a volatile organic concentration greater than 500 ppm (Attachment 11).

A container using Level 2 controls is one of the following:

- (i) A container that meets the applicable U.S. Department of Transportation (DOT) regulations on packaging hazardous materials for transportation as specified in paragraph (f) of this section.
- (ii) A container that operates with no detectable organic emissions as defined in 40 CFR § 265.1081 of this subpart and determined in accordance with the procedure specified in paragraph (g) of this section.
- (iii) A container that has been demonstrated within the preceding 12 months to be vapor-tight by using 40 CFR part 60, appendix A, Method 27 in accordance with the procedure specified in paragraph (h) of this section.

4.4.8 Records Review

Weekly Inspections

Mr. Herstowski reviewed documents entitled “Weekly Hazardous Waste Inspection” for May 2019 through May 2022. Inspections had been conducted for totes and drums of hazardous waste.

No apparent issues were observed during review of inspection records.

Manifests and Shipping Documents

Prior to arriving at the facility, I had conducted an on-line inspection of electronic manifests from May 2019 through April 21, 2022, using RCRAInfo.

All manifests appeared to be complete, signed by the designated facility, and were accompanied by land disposal restriction (LDR) notification forms. I also reviewed the following paper manifests at the facility:

- 016714518 FLE dated May 6, 2022
- 016714834 FLE dated May 19, 2022 (signed copy not yet returned to PPC)

No apparent issues were observed during review of manifests and LDR notification forms.

2021 Comprehensive Biennial Report

Prior to arriving at the facility, I was able to review the facility 2021 biennial report using RCRAInfo.

No apparent issues were observed during review of the 2021 comprehensive biennial report.

Contingency Plan

Messrs. Pearson and Baldwin provided me with a copy of the PPC document entitled “RCRA Emergency/Contingency & DOT Security Plan” (Attachment 15).

The contingency plans appeared to be complete with no apparent issues.

Waste Minimization Plan

Messrs. Pearson and Baldwin provided me with a copy of the facility waste minimization plan (Attachment 15).

The waste minimization plans appeared to be complete with no apparent issues.

Personnel Training

Ms. DeLong reviewed personnel training documentation. According to Mr. Gansert, he provides training to PPC employees, at the facility, using training material developed by Trinity Consulting. Topics covered within the training material include, but are not limited to:

- Waste Determinations
- Container Management
- Universal Waste
- Used Oil
- Manifesting
- Drum Closure

Specific shift training curriculum includes, but is not limited to:

- Weekly Inspections
- RCRA Emergency/Contingency & DOT Security Plan Review
- Spills
- Response to Fires
- Safety Data Sheets
- Facility Evacuation
- Emergency Equipment
- Container Management
- Universal Waste
- Used Oil
- Solvent-Contaminated Rags
- Batteries
- Aerosol Cans
- Waste Minimization Plan

Training Not Conducted in 2020 and Five Employees Not Trained in 2021, 40 CFR

265.16(c) (NOPF 6) – During review of the document entitled, “Hazardous Waste Training Matrix”, Ms. DeLong noted that no employees had been trained in 2020 and five employees had not been trained in 2021 (Attachment 12). Mr. Gansert stated that he provides the training to PPC employees. When asked about the missing training, Mr. Gansert stated that it was a company decision to not provide training in 2020, due to the ongoing threat presented by the COVID-19 pandemic. According to Mr. Gansert, training is only provided in person, at the facility. Furthermore, Mr. Gansert stated that the last time he had attended refresher training was in the year 2000.

The Hazardous Waste Training Matrix also indicated that James Pearson, Ricky Meier, Dewey Thomas, Chad Hiesburger, and Tahirovic Farad did not receive training in 2021, due to the COVID-19 pandemic. See the top of Page 3 in Attachment 12 for job titles and hazardous waste duties associated with the five employees. Twenty-two other employees did receive annual refresher training in 2021.

It should be noted that the NOPF provided to the facility at the time of inspection only indicated four employees missing training in 2021.

Preparedness and Prevention

Emergency Equipment Testing and Inspection - During the inspection, I noted ABC-rated fire extinguishers throughout the facility had been inspected by Cintas Fire Protection, Lenexa, Kansas, in December 2021. The water supply for the facility sprinkler system is also tested and serviced by Cintas. According to Messrs. Pearson and Baldwin, a powder suppression system has been installed in the main ink room.

No apparent issues were observed during review of emergency equipment testing and inspection records.

Familiarize Local Authorities

According to an e-mail provided to me by Messrs. Pearson and Baldwin, Johnson County Emergency Management, the Mission Kansas Police Department, and AdventHealth Shawnee Mission hospital had all been contacted on November 19, 2021, satisfying requirements outlined in 40 CFR 265.37(a)(1) and (4).

Telephone and Internal Communication in Case of An Emergency

According to Messrs. Pearson and Baldwin, a telephone system is used for internal and external communication. The phone system also allows for paging. Messrs. Pearson and Baldwin estimated the distance between the Kidder Press, less than 90-day accumulation tote and the nearest phone to be approximately 20 feet; the distance between the Fusion and Infinity Press, less than 90-day accumulation totes and the nearest phone is approximately 75 feet.

4.5 Additional RCRA and Non-RCRA Related Issues

Uncured Adhesive Waste

H.B. Fuller Company WD4120 (Part A) and non-harden Flextra XR1500 adhesive (Part B) are used in the laminator area of the facility (See Attachment 13 for safety data sheets (SDS)). The Part A and Part B products are combined and used to adhere a plastic laminate to rolled plastic packaging. Waste liquid adhesive is generated and accumulated at the laminator in a 4-foot by 6-foot-long plastic tray/tub. An estimated 10 to 15 gallons of waste adhesive is allowed to dry in the tray/tub, prior to being disposed in the facility compactor each month. Based upon the SDSs for Part A and Part B products, PPC has determined the solidified waste adhesive to be a non-hazardous waste. However, according to the SDS, the WD4120 (Part A) contains 30-50 percent methylene bisphenyl diisocyanate, 10-30 percent diphenylmethane-2,4-diisocyanate, and 1-5 percent diphenylmethane-2,2-diisocyanate. According to the EPA link, below, "Diisocyanates are well known dermal and inhalation sensitizers in the workplace and have been documented to cause asthma, lung damage, and in severe cases, fatal reactions. Worker exposures are already subject to protective controls in occupational settings."

Furthermore, a revision to the Immediately Dangerous to Life or Health Concentrations (IDLH) occurred in May of 1994 for methylene bisphenyl isocyanate, according to the Center for Disease Control. At that time, the IDLH was lowered from 100 mg/m³ to 75 mg/m³, based on acute inhalation toxicity data in animals (<https://www.cdc.gov/niosh/idlh/101688.html>).

Because the WD4120 (Part A) could possibly pose a health risk, PPC may want to evaluate any potential health effects that could result from employee exposure while working near or with uncured adhesive at the laminator.

<https://www.epa.gov/assessing-and-managing-chemicals-under-tsca/risk-management-methylene-diphenyl-diisocyanate-mdi-and>

Background Organic Vapor Concentrations

While using the Thermo Fisher Scientific TVA 1000-B organic vapor analyzer, Mr. Herstowski detected organic vapor inside the lobby of the facility building above 75 ppm and in the production area of the facility building between 250-350 ppm.

5.0 SUMMARY

I inspected PPC as a Federal and State of Kansas Large Quantity Generator of hazardous waste, small quantity handler of universal waste, and used oil generator.

Hazardous waste requirements reviewed during this inspection are discussed above and are noted on the KDHE Hazardous Waste Generator Requirements checklist included in the facility file as field notes.

The following preliminary findings/issues were noted as discussed above:

1. Hazardous Waste Determination Not Conducted, 40 CFR 262.11 (NOPF 1)
2. Hazardous Waste Satellite Accumulation Container Not Closed, 40 CFR 265.173(a) (NOPF 2)
3. Excluded Solvent-Contaminated Wipes Containers Not Closed, 40 CFR 261.4(a)(26)(i) (NOPF 3)
4. Universal Waste Lamps Accumulated for Longer than One Year, 40 CFR 273.15(a) (NOPF 4)
5. Container of Used Oil Not Marked with the Words “Used Oil”, 40 CFR 279.22 (c)(1) (NOPF 5)
6. Training Not Conducted in 2020 and Five Employees Not Trained in 2021, 40 CFR 265.16(c) (NOPF 6)
7. Transfer of Hazardous Waste In or Out of Container Not Minimizing Exposure of Waste to Atmosphere, 40 CFR 265.1087(c)(3)(ii) (NOPF 7). This was inadvertently cited as 40 CFR 265.1087(d)(2).
8. ~~List of Equipment in Contact with Hazardous Waste for Less Than 300 Hours Annually, Not Identified~~ (Compliance determined at time of inspection, Attachment 14)
9. Level 2 Controls Not Used on Totes, 40 CFR 265.1087(d)
10. Failure to Minimize a Release of Hazardous Waste, 40 CFR 265.31 (NOPF Added After Inspection)
11. Non-Implementation of Standards for Distillation Unit Tote/Tank in Volatile Hazardous Waste Service, including but not limited to, 40 CFR 265 Subpart J, BB, and CC (NOPF Added After Inspection)

Other than the items noted above, no other apparent preliminary findings were observed or cited. However, EPA post-inspection review of this report may change or add to my findings.

**TIMOTHY
EVANS**

Digitally signed by
TIMOTHY EVANS
Date: 2022.07.21
12:21:00 -05'00'

Timothy R. Evans
Life Scientist
ECAD/CB/RCRA, EPA Region 7

AMBER WHISNANT

Digitally signed by
AMBER WHISNANT
Date: 2022.07.22
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Amber Whisnant
Section Chief
ECAD/CB/RCRA, EPA Region 7

Attachments

1. Confidentiality Notice (1 page)
 2. Document of Receipt (1 page)
 3. NOPF (2 pages)
 4. Facility Map (1 page)
 5. Hazardous Waste Site Info Verification Report for Inspector (2 pages)
 6. Waste Stream Table (11 pages)
 7. OVA Calibrations and Field Sheet (9 pages)
 8. Synergy III Process Letdown Veh30 SDS (5 pages)
 9. July 8, 2022 E-mail to Facility - Additional NOPFs (3 pages)
 10. Lamp Shipment Invoice (1 page)
 11. Barsol A-5313 Solvent SDS (10 pages)
 12. Hazardous Waste Training Matrix (4 pages)
 13. H.B. Fuller Company WD4120 (Part A) and Non-Harden Flextra XR1500 Adhesive (Part B) SDSs (9 pages)
 14. Piping Exemption – 300 Hours Per Year (1 page)
 15. RCRA Emergency/Contingency & DOT Security Plan and Waste Minimization Plan (138 pages)
- Photo Log (5 pages)
Photos (16 pages/32 photos)