

RCRA Inspection Report

1) Inspectors and Authors of Report

Parvez Mallick
Environmental Engineer
RCRA Enforcement Section
Chemical Safety and Land Enforcement Branch
Enforcement and Compliance Assurance Division
U.S. Environmental Protection Agency, Region 4
61 Forsyth Street, S.W.
Atlanta, Georgia 30303
(404) 562-8498

2) Facility Information

First Quality Printing and Packaging LLC
335 Masters Blvd.
Anderson, South Carolina 29626
Anderson County

EPA ID No. SCR000776526

Latitude: 34.45247

Longitude: -82.68051

NAICS: 326112 – Plastics Packaging Film and Sheet Manufacturing and 323111 - Commercial Flexographic Printing

Website: firstquality.com

3) Responsible Officials

Shanari C. Brown, MPH
EHS Manager
First Quality Printing and Packaging LLC
Email: sjbrown@firstquality.com
Phone: (864) 437-2563
Fax: (864) 990-0465
Mobile: (864) 990-0465

Todd Critchlow
Operations Director
First Quality Printing and Packaging LLC
tecritchlow@firstquality.com
Phone: (864) 437-2091
Fax: (864) 990-0465
Mobile: (864) 290-7748

4) **Inspection Participants**

Shanari C. Brown, First Quality Printing and Packaging LLC
Todd Critchlow, First Quality Printing and Packaging LLC
Derrick Vallecillo, First Quality Printing and Packaging LLC
Tom Richmond, S.C. Department of Health and Environmental Control
Elizabeth C. DeLanghe, S.C. Department of Health and Environmental Control
Parvez Mallick, U.S. Environmental Protection Agency, Region 4

5) **Date of Inspection**

December 6, 2022, 10 a.m.

6) **Applicable Regulations**

South Carolina Hazardous Waste Management Act (SCHWMA), S.C. Code Ann. § 44-56-10 et seq., [Resource Conservation and Recovery Act (RCRA) Sections 3002 (42 U.S. Code – Annotated U.S.C.A. 6925 and 6927)], and South Carolina Hazardous Waste Management Regulations (SCHWMR), 25 S.C. Code Ann. Regs. 61-79.260-270, 61-79.273 and 61-79.279 [40 Code of Federal Regulation (C.F.R.), Parts 260 - 270, 273, 278, & 279].

As the State’s authorized hazardous waste program operates in lieu of the federal RCRA program, the citations of those authorized provisions alleged herein will be to the authorized State program; however, for ease of reference, the federal citations will follow in brackets.

Pursuant to S.C. Code Ann. Regs. 61-79.262.15(a) [40 C.F.R. § 262.15(a)], a generator may accumulate as much as 55 gallons of non-acute hazardous waste in containers at or near the point of generation where wastes initially accumulate, which is under the control of the operator of the process generating the waste, without a permit or without having interim status, as required by Section 44-56-60(a)(2) and (b)(3) of the SCHWMA, S.C. Code Ann. § 44-56-60(a)(2) and (b) [Section 3005 of RCRA, 42 U.S.C. § 6925], and without complying with S.C. Code Ann. Regs. 61-79.262.16(b) or R.61-79.262.17(a) [40 C.F.R. § 262.16(b) or §262.17(a)], except as required in S.C. Code Ann. Regs. 61-79.262.15(a)(7) and (8) [40 C.F.R. § 262.15(a)(7) and (8)], provided that the generator complies with the satellite accumulation area conditions listed in S.C. Code Ann. Regs. 61-79.262.15(a) [40 C.F.R. § 262.15(a)] (hereinafter referred to as the “SAA Permit Exemption”).

Pursuant to S.C. Code Ann. Regs. 61-79.262.17 [40 C.F.R. § 262.17], a large quantity generator may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status, as required by Section 44-56-60(a)(2) and (b)(3) of the SCHWMA, S.C. Code Ann. § 44-56-60(a)(2) and (b) [Section 3005 of RCRA, 42 U.S.C. § 6925], provided that the generator complies with the conditions listed in S.C. Code Ann. Regs. 61-79.262.17 [40 C.F.R. § 262.17] (hereinafter referred to as the “LQG Permit Exemption”).

Pursuant to S.C. Code Ann. Regs. 61-79.273.9 [40 C.F.R. § 273.9], a Small Quantity Handler of Universal Waste (SQHUW) is a universal waste handler who does not accumulate 5,000

kilograms or more total of universal waste (batteries, pesticides, mercury-containing equipment, or lamps, calculated collectively) at any time.

7) Purpose of Inspection

The purpose of this inspection was to conduct an unannounced compliance evaluation inspection (CEI) to determine First Quality Printing and Packaging LLC's (hereinafter, "FQP&P" or the "facility") compliance with the applicable requirements of RCRA and the corresponding South Carolina Department of Health and Environmental Control (SCDHEC) regulations. This was an EPA and SCDHEC joint inspection.

8) Facility Description

First Quality Printing and Packaging LLC is located at 335 Masters Blvd., Anderson, Anderson County, South Carolina. FQP&P manufactures polyethylene packaging film and prints on polyethylene film for consumer packaging products. The facility receives resin pellets by railcar and is off-loaded into storage tanks located in the resin storage tank farm. The resin pellets are extruded into a plastic film for customized printed packaging sheets or rolls stock. The printing press lines include printing operations of solvent-based ink associated with the products. The facility has been operating at this location since 2010. The facility is housed under 111,000 square feet print parcel. The facility currently employs approximately 130 employees and operates 24 hours per day, seven days per week on 12 hour rotating shifts.

FQP&P is a synthetic minor air pollution source, operation permit no. SC00002000221, and subject to Part 70 requirements.

FQP&P last notified of its regulated waste activity (8700-12) to SCDHEC on January 31, 2022, as a large quantity generator of hazardous waste (LQG) and a small quantity handler of universal waste (SQHUW). FQP&P is a synthetic minor air pollution source, operation permit no SC00002000221, and subject to Part 70 requirements.

9) Previous RCRA Inspection History

FQP&P was last inspected by the SCDHEC on May 29, 2020, and observed several RCRA container management violations at the time of the CEI. FQP&P was inspected by the SCDHEC on July 6, 2016, and found universal waste, container management, and contingency plan violations at the time of the CEI.

FQP&P has never previously been inspected by the EPA for compliance with the federal and the State of South Carolina hazardous waste regulations.

10) Opening Conference

On December 6, 2022, EPA inspector Parvez Mallick accompanied by SCDHEC inspectors Tom Richmond, conducted an announced CEI at First Quality Printing and Packaging LLC, to determine the compliance status of the facility with the RCRA and the State of South Carolina

regulations. Inspectors arrived at FQP&P and were greeted by facility representatives, Shanari C. Brown and Mr. Todd Critchlow. The inspectors introduced themselves, showed credentials, exchanged business cards, and explained the purpose of the visit during an opening conference.

FQP&P staff provided an overview of the facility's history and current operations during the opening conference. The inspectors described the possible use of a digital camera during the inspection and the facility's ability, pursuant to 40 C.F.R. §2.203, to assert a business confidentiality claim for information submitted to the EPA. The facility did not assert a business confidentiality claim. FQP&P does not appear to meet the Small Business Regulatory Enforcement Fairness Act's classification of a "small business," which is generally set by the Small Business Administration using the business' SIC/NAICS code and annual receipts or number of employees. Health and safety protocols and required personal protective equipment were discussed with Shanari C. Brown and Mr. Todd Critchlow, of FQP&P led the inspectors on a tour of the facility's operations.

11) **Findings**

The information in this RCRA inspection report is based on the EPA's December 6, 2022, RCRA CEI.

Ink Storage Room

The Ink Storage Room is used for several operations: storage of virgin inks awaiting to be used in the printing process, a less than 90-day hazardous waste storage area, a Renzmann parts washer, and a 100-gallon solvent recovery unit.

The inspectors observed an open 55-gallon satellite container of waste printing ink (EPA Waste Code D001) near the ink storage/mixing area (Photo #1).

Pursuant to S.C. Code Ann. Regs. 61-79.262.17(a)(4) [40 C.F.R. § 262.17(a)(4)], which is a condition of the SAA Permit Exemption, (A) a container holding hazardous waste must always be closed during accumulation, except when it is necessary to add or remove waste; and (B) A container holding hazardous waste must not be opened, handled, or stored in a manner that may rupture the container or cause it to leak.

In the less than 90-day hazardous waste storage area (central accumulation area-CAA), the inspectors observed signs posted on the wall with the words "Danger – Hazardous Waste Storage Area Unauthorized Persons Keep Out" and "Danger No Smoking No Open Flames and No Sparks." Located on wooden pallets the inspectors observed ten closed 55-gallon containers of spent solvent (EPA Waste Code D001) marked "Hazardous Waste," "Flammable Liquids," and dated with accumulation start dates of 12/5/22, 12/3/22, 12/2/22, 12/11/22, 12/4/22, 12/3/22, 12/1/22, 12/1/22, 12/4/22, and 12/5/22 (Photo #2). This area was designated for storage of "Spent Solvent Only." The facility representative stated that spent solvent containers will be sent to Superior Recycling to recover solvent.

Next to the spent solvent drums, there were three 55-gallon containers of flammable solids (EPA Waste Code D001) dated 12/4/22, 12/6/22, and 11/20/22; five 55-gallon containers of waste

printing ink (EPA Waste Code D001) dated 12/2/22, 11/29/22, 12/1/22, 12/6/22, and 12/4/22; one 55-gallon container of still bottoms (EPA Waste Code D001 and F003) dated 11/17/22. The containers were marked “Hazardous Waste” and with an indication of the hazards of the contents. In a corner, there was a closed empty 55-gallon containers of aerosol cans marked “Universal Waste” and dated 6/14/22.

FQP&P uses a Renzmann press part cleaning machine for small and large press parts, doctor blades, pans, anilox sleeves and rollers and miscellaneous items (Photo #3). Rotating spray heads and solvent jets ensure that small pieces in the production process are cleaned to a sanitary level for food packaging. The spent solvent from the parts washer is collected in a 55-gallon container and sent to the on-site distillation unit for solvent recovery located near the Renzmann press part cleaning machine.

Next to the Renzmann press part cleaning machine area, there was a 150-gallon spent solvent tank (Photo #4) and a 100-gallon solvent recovery (distillation) unit (Photo #5). The spent solvents are generated from the “turbo wash” process of the printing presses located in the Printing Press Hall and the press parts cleaning machine located in the Ink Storage Room. The spent solvent with solids and other impurities generated from the two locations are evaluated for re-useable solvent quality and accordingly either sent to the 150-gallon spent solvent storage tank for distillation process or stored in 55-gallon containers for disposal in the less than 90-day hazardous waste storage area. Re-useable spent solvent is pumped from the 150-gallon tank to the 100-gallon distillation unit which uses heat to separate solids and impurities. The reclaimed solvent is pumped to a reclaimed solvent tank and still-bottom is collected in a 55-gallon container. During the inspection, the 55-gallon still-bottom container was marked “Flammable Liquids” but not marked “Hazardous Waste.” Once the 55-gallon still bottom container is full then container is moved to the less than 90-day hazardous waste storage area. The reclaimed solvent from the distillation process is subsequently drummed and re-used in the printing process.

Pursuant to S.C. Code Ann. Regs. 61-79.262.15(a)(5) [40 C.F.R. § 262.15(a)(5)], which is a condition of the SAA Permit Exemption, a generator is required to mark or label its containers (i) with the words “Hazardous Waste.”

The inspectors observed that the 150-gallon spent solvent tank was marked “Dirty Solvent Tank” and “High-High 95%” and with a “Flammable” hazard of the contents (Photo #4). The tank was not marked with the words “Hazardous Waste” or had an accumulation start date.

Pursuant to S.C. Code Ann. Regs. 61-79.262.17(a)(5)(i) [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 the following: the words “Hazardous Waste,” and the date upon which each period of accumulation begins clearly visible for inspection on each container.

A 55-gallon container marked “NS-1055 Solvent Blend 80/20” and with a “Flammable Liquid” hazard of the contents was connected to the spent solvent tank during the inspection. The 55-gallon container was not marked “Hazardous Waste.” There were additional two closed 55-gallon containers of spent solvent marked “Flammable Liquid” hazard of the contents stored near

the Renzmann press part cleaning machine. The containers were not marked with the words “Hazardous Waste.”

Pursuant to S.C. Code Ann. Regs. 61-79.262.15(a)(5) [40 C.F.R. § 262.15(a)(5)], which is a condition of the SAA Permit Exemption, a generator is required to mark or label its containers (i) with the words “Hazardous Waste.”

The inspectors observed a 5-gallon step can container accumulating solvent rags between the corner of parts washer and distillation unit area (Photo #6). The open container was marked “Oily Waste Can.” The facility representative indicated that the rags are managed as excluded solvent rags.

Pursuant to S.C. Code Ann. Regs. 61-79.261.4(a)(26)(i) [40 C.F.R. § 261.4(a)(26)(i)], solid wastes which are not hazardous wastes exclusion - the solvent-contaminated wipes, when accumulated, stored, and transported, are contained in non-leaking, closed containers that are labeled “Excluded Solvent-Contaminated Wipes.” The containers must be able to contain free liquids, should free liquids occur. During accumulation, a container is considered closed when there is complete contact between the fitted lid and the rim, except when it is necessary to add or remove solvent-contaminated wipes. When the container is full, or when the solvent-contaminated wipes are no longer being accumulated, or when the container is being transported, the container must be sealed with all lids properly and securely affixed to the container and all openings tightly bound or closed sufficiently to prevent leaks and emissions.

Printing Press Hall

In this area, the facility feeds its film product into a flexographic printing process. The film, printing substrate, moves across a series of rollers into a central impression drum enclosure. The film is pressed between the central impression drum and a roller containing an inked printing plate to form an impression on the substrate. The inspectors observed the following containers in the separate satellite accumulation areas:

- One closed 55-gallon container of non-hazardous scrap metal;
- One closed 55-gallon container of flammable solids (EPA Waste Code D001) marked “Hazardous Waste”;
- 55-gallon open latched container of spent solvent (EPA Waste Code D001) marked “Hazardous Waste” with an indication of the hazard of the contents (Photo #7);
- One closed 55-gallon gray container of solvent containing wipes marked “Waste Wipes Only,” “No Free Liquids,” and “Excluded Solvent-Contaminated Wipes.” The markings were illegible because of paint splash on the labels;
- One closed 55-gallon blue container of solvent containing wipes marked “Used Blue Microfiber Wipes Only,” “No Free Liquids,” and “Excluded Solvent-Contaminated Wipes”;
- One open 5-gallon container of solvent wipes. The container was not marked “Excluded Solvent-Contaminated Wipes” (Photo #8).

Pursuant to S.C. Code Ann. Regs. 61-79.261.4(a)(26)(i) [40 C.F.R. § 261.4(a)(26)(i)], solid wastes which are not hazardous wastes exclusion – the solvent-contaminated wipes,

when accumulated, stored, and transported, are contained in non-leaking, closed containers that are labeled “Excluded Solvent-Contaminated Wipes.” The containers must be able to contain free liquids, should free liquids occur. During accumulation, a container is considered closed when there is complete contact between the fitted lid and the rim, except when it is necessary to add or remove solvent-contaminated wipes. When the container is full, or when the solvent-contaminated wipes are no longer being accumulated, or when the container is being transported, the container must be sealed with all lids properly and securely affixed to the container and all openings tightly bound or closed sufficiently to prevent leaks and emissions.

Extrusion High Bay

According to the facility representative, the extrusion process consists of four lines with four racking systems with each having a resin feeding hopper, a heated barrel, a rotating screw, a screen changer, a die adapter and a base. The inspectors observed that polyurethane resin is pumped from outside storage tank into daily bins in the Extrusion High Bay area and then fed into the extruders, that in turn, feeds melted plastic to a circular die ring. The die ring generates a tube of plastic film which travels vertically until cooled and then is turned back downward to a winder, where it is formed into rolls of film. The inspectors observed a 35-gallon container marked “Non-hazardous Waste” solids with a DOT corrosive sign. There was a closed 15-gallon container for liquid corrosive waste (D002) marked “Hazardous Waste.” One open latched 55-gallon container of solvent rags marked “Flammable Solids (rags)”. The container was not marked “Excluded Solvent-Contaminated Wipes.”

Pursuant to S.C. Code Ann. Regs. 61-79.261.4(a)(26)(i) [40 C.F.R. § 261.4(a)(26)(i)], solid wastes which are not hazardous wastes exclusion – the solvent-contaminated wipes, when accumulated, stored, and transported, are contained in non-leaking, closed containers that are labeled “Excluded Solvent-Contaminated Wipes.” The containers must be able to contain free liquids, should free liquids occur. During accumulation, a container is considered closed when there is complete contact between the fitted lid and the rim, except when it is necessary to add or remove solvent-contaminated wipes. When the container is full, or when the solvent-contaminated wipes are no longer being accumulated, or when the container is being transported, the container must be sealed with all lids properly and securely affixed to the container and all openings tightly bound or closed sufficiently to prevent leaks and emissions.

Plate Room

In this area, printing plates are placed on the rollers to be incorporated into the printing process. No hazardous waste was observed in this area.

Air Compressor Room

Air compressors are stored in this room for general operations at the facility. The inspectors observed the following universal wastes:

- One open 8-ft long box of waste lamps marked “Universal Waste - Lamps” and dated 8/12/22 (Photo #9);
- One closed 5-ft long box of waste lamps marked “Universal Waste - Lamps” and dated 8/16/22;

- One closed 55-gallon container of broken lamps marked “Hazardous Waste” and with an indication of the hazard, toxic (D008);
- One 5-gallon container of lead acid batteries marked “Universal Waste - Batteries” and dated 6/9/22;
- One 5-gallon container of waste nickel-cadmium batteries marked “Universal Waste - Batteries” and dated 4/8/22;
- One closed 55-gallon container of waste lithium batteries marked “Universal Waste - Batteries” and dated 5/5/22;
- One closed 5-gallon container of lamp ballasts marked non-hazardous (Photo #10).
Please note that leaking PCB ballast or fluorescent light ballast containing greater than 50 ppm of PCB must be managed as PCB waste and disposed in a facility regulated under the Federal Toxic Substances Control Act (TSCA).

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

Reclaim Area

Off-specification plastic products to be claimed and/or reused in the process are stored in this area. No hazardous waste was observed in this area.

Main Electrical Area

The facility distributes electricity throughout the facility from this area. The electrical control panels and switches are located in this room. No hazardous waste was observed in this area.

Warehouse and Shipping Dock

This area receives raw materials and ships final products for distribution. No hazardous waste was observed in this area.

12) Record Review

After the walkthrough, the inspectors requested and reviewed the facility’s applicable manifests, weekly inspection records, RCRA quarterly reports, training records, and contingency plan. Unless otherwise specified, all records and documents reviewed were considered satisfactory at the time of inspection.

FQP&P used the following transporters in 2020 through 2022.

Safety-Kleen Systems, Inc. – TXR000081205
Clean Harbors Environmental Services, Inc. – MAD039322250
Superior Transportation Logistics LLC – INR000104224
Reclaimed Energy Inc. – IND000780403
Robbie D. Wood Inc. – ALD067138891

FQP&P used the following TSDF in 2020 through 2022.

Safety-Kleen Systems, Inc. – KYD053348108
Reclaimed Energy Inc. – IND000780403
Clean Harbors Deer Park, LLC – TXD055141378

The facility's 2023 biennial report is due in by March 31, 2023. FQP&P 2021 biennial report indicated that the facility generated 300,291 lbs. of hazardous waste during 2020 calendar year.

Description of Hazardous Waste	EPA Waste Code Number	Quantity generated during 2020
Waste solids containing flammable liquids	D001	19,801 lbs.
Waste flammable liquids alcohol acetate	D001	6,870 lbs.
Waste flammable liquids spent solvent	D001	179,012 lbs.
Oil based paint in cans	D001,D005, D006, D007, and D008	350 lbs.
Waste printing ink	D001	93295 lbs.
Flexicoat OPV	D001	842 lbs.
Lab pack items	D001 and D002	121 lbs
Total		300,291 lbs.

A contingency plan describes actions facility personnel must take in response to fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water at the facility. The inspectors reviewed the Emergency Action Plan, RCRA contingency plan (Plan). The Plan was revised on February 1, 2022. The inspectors observed the Plan was not updated with the current emergency contacts, does not describe arrangements agreed to with the local police department, fire department, other emergency response teams, emergency response contractors, equipment suppliers, local hospitals or the Local Emergency Planning Committee. The plan does not include a list, with the location and a physical description, of all emergency equipment at the facility, and a brief outline of its capabilities. There was also no quick reference guide as a part of the contingency plan.

Pursuant to S.C. Code Ann. Regs. 61-79.262.17(a)(6) [40 C.F.R. § 262.17(a)(6)], which incorporates S.C. Code Ann. Regs. 61-79.262.261(d) [40 C.F.R. § 262.261(d)], and is a condition of the LQG Permit Exemption, the plan must list names and emergency telephone numbers of all persons qualified to act as emergency coordinator (see R.61-79.262.264), and this list must be kept up to date. Where more than one person is listed, one must be named as primary emergency coordinator and others must be listed in the order in which they will assume responsibility as alternates. In situations where the generator facility has an emergency coordinator continuously on duty because it operates twenty-four hours per day, every day of the year, the plan may list the staffed position (e.g., operations manager, shift coordinator, shift operations supervisor) as well as an emergency telephone number that can be guaranteed to be answered at all times.

Pursuant to S.C. Code Ann. Regs. 61-79.262.17(a)(6) [40 C.F.R. § 262.17(a)(6)], which

incorporates S.C. Code Ann. Regs. 61-79.262.261(e) [40 C.F.R. § 262.261(e)], and is a condition of the LQG Permit Exemption, the contingency plan must include a list of all emergency equipment at the facility where this equipment is required. This list must be kept up to date. In addition, the plan must include the location and a physical description of each item on the list, and a brief outline of its capabilities.

Pursuant to S.C. Code Ann. Regs. 61-79.262.262(a) [40 C.F.R. § 262.256(a)], which is a condition of the LQG Permit Exemption, the large quantity generator must submit a copy of the contingency plan and all revisions to all local emergency responders (i.e., police departments, fire departments, hospitals, and state and local emergency response teams that may be called upon to provide emergency services). This document may also be submitted to the Local Emergency Planning Committee, as appropriate.

13) **Closing Conference**

Upon conclusion of the inspection, a closing conference was conducted in the presence of FQP&P staff, Shanari C. Brown and Todd Critchlow. The facility was informed of the preliminary findings at the time of the inspection.

14) **Conclusion**

Based on the CEI conducted on December 6, 2022, FQP&P, was inspected as a large quantity generator of hazardous waste and a small quantity handler of universal waste.

15) **Signed**

PARVEZ
MALLICK

Digitally signed by PARVEZ
MALLICK
Date: 2023.02.21 08:23:54
-05'00'

Parvez Mallick
Environmental Engineer
RCRA Enforcement Section

Date

16) **Concurrence**

ARACELI
CHAVEZ

Digitally signed by
ARACELI CHAVEZ
Date: 2023.02.21 10:21:11
-05'00'

Araceli B. Chavez
Chief
RCRA Enforcement Section

Date

First Quality Printing and Packaging LLC
SCR000776526
December 6, 2022
RCRA CEI Photographs
Photographs by Tom Richmond, SCDHEC



Photo #1 - open 55-gallon satellite container of waste printing near the ink storage/mixing area.



Photo #2 – 90-day hazardous waste storage area.



Photo #3 - Renzmann press part cleaning machine.



Photo #4 - 150-gallon spent solvent tank.



Photo # 5 - 100-gallon solvent recovery (distillation) unit.



Photo #6 – One 5-gallon step can container accumulating solvent rags.



Photo #7 - open latched container of spent solvent marked "Hazardous Waste" with an indication of the hazard of the contents.

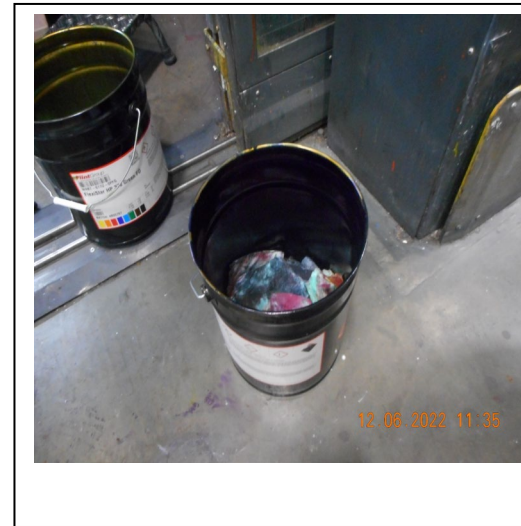


Photo #8 – An open 5-gallon container of solvent wipes.



Photo #9 – An open 8-ft long box of waste lamps marked “Universal Waste Lamps” and dated 8/12/22.

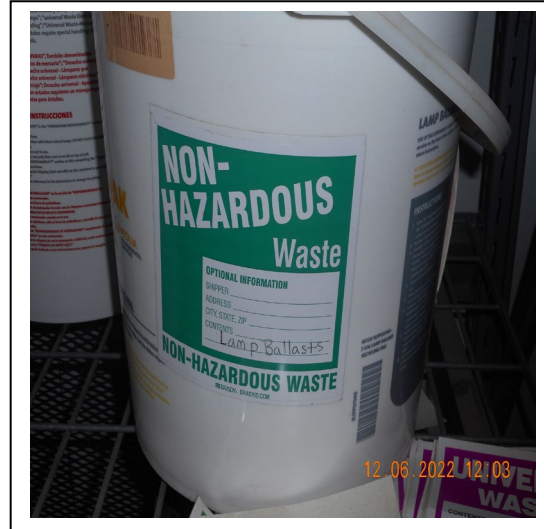


Photo #10 – One 5-gallon container of lamp ballasts marked non-hazardous.