



ENVIRONMENTAL PROTECTION AGENCY

REGION 1 – NEW ENGLAND

5 POST OFFICE SQUARE, SUITE 100
BOSTON, MASSACHUSETTS 02109-3912

December 19, 2023

Candance Turner
Environmental and Safety Manager
Organic Dyes and Pigments
1 Crownmark Drive
Lincoln, RI 02865

Re: U.S. EPA-Region 1 Inspection Report of Organic Dyes and Pigments, November 7, 2023

Dear Ms. Turner:

In accordance with current policy, I am providing you with a copy of the final inspection report summarizing observations made during the November 7, 2023, inspection of your facility.

This inspection was conducted under the authority of RCRA.

Please contact me at 617-918-1309 or maisano.ryan@epa.gov if you have any questions.

Sincerely,

Ryan Maisano, Physical Scientist
Waste and Chemical Compliance Section

cc: Nicole Pelletier, Rhode Island Department of Environmental Management

Disclaimer: Unless otherwise noted, this report describes conditions at the facility/property as observed by EPA inspector(s), and/or through records provided to and/or information reported to EPA inspector(s) by facility representatives and as understood by the inspector(s). This report may not capture all operations or activities ongoing at the time of the inspection. This report does not make final determinations on potential areas of concern. Nothing in this report affects EPA's authorities under federal statutes and regulations to pursue further investigation or action.

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BOSTON, MASSACHUSETTS 02109-3912

RCRA Compliance Inspection of:

Organic Dyes and Pigments

1 Crownmark Drive

Lincoln, RI 02908

November 7, 2023

Date of Inspection

Ryan Maisano, Physical Scientist
Waste and Chemical Compliance Section

December 19, 2023

Date Inspection Report Approved

Mary Jane O'Donnell, Manager
Waste and Chemical Compliance Section

December 19, 2023

Date Inspection Report Finalized

December 19, 2023

Date Inspection Report Transmitted to Facility

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RCRA HAZARDOUS WASTE INSPECTION REPORT

I. GENERAL INFORMATION

- a. **Facility Name:** Organic Dyes and Pigments
- b. **Inspection Date:** November 7, 2023
- c. **Inspection Type:** RCRA Compliance Evaluation Inspection (CEI)
- d. **EPA Inspectors:** Ryan Maisano, Physical Scientist
Drew Meyer, Environmental Scientist
- e. **EPA ID Number:** RID050325026
- f. **NAICS:** 325130 Synthetic Dye and Pigment Manufacturing
- g. **Street Address:** 1 Crownmark Drive, Lincoln, RI 02865
- h. **Mailing Address:** 1 Crownmark Drive, Lincoln, RI 02865
- i. **Facility Contacts:** Candace Turner
Environmental & Safety Manager
Phone: 401.434.3300 Ext 110
Email: cturner@organicdye.com
- John D'Amelio
President
Phone: 401.434.3300
Email: jdamelio@organicdye.com
- j. **Generator Status (per RCRAInfo):** Large Quantity Generator (LQG)
- k. **Date first notified as a generator (per RCRAInfo):** 12/7/1987

- l. **Date of most recent notification in RCRAInfo:** 2/16/2022
- m. **Current Property Owner:** Acrivis LTD., 6 Linlew Drive, Derry, NH 03038
- n. **Current Operator:** Organic Dyes and Pigments LLC., 1 Crownmark Drive, Lincoln, RI 02865
- a. **Wastes generated (per most recent RCRAInfo notification):** D001, D002, D007, F003, F010

Report Attachments:

ATTACHMENT 1 – Digital photo log of photos taken by EPA inspectors throughout the inspection.

II. FACILITY DESCRIPTION

Organic Dyes and Pigments, LLC. (“Organic Dyes and Pigments” or “Facility”) is a large quantity generator that produces dyes, pigments, and chemical auxiliaries. Acrivis LTD is the company that owns the property that Organic Dyes and Pigments leases. Organic Dyes and Pigments currently operates the business on the property as it has since 2019. Organic Dyes and Pigments operated at another address before moving in 2019. The Facility notified initially on 12/07/1987. The waste codes generated, per the most recent biennial report, are D001, D002, D007, F003, F010. Organic Dyes and Pigments is located in an industrial park that is approximately one mile from a shopping center. The closest school is approximately three miles away. Organic Dyes and Pigments has another location in the United States that is located in South Carolina. The majority of the employees in the United States are located at the Rhode Island location. The Lincoln site does not accumulate hazardous waste in tanks and does not treat hazardous waste on site.

III. INSPECTION IN-BRIEF

EPA inspectors arrived at the Facility at 1 Crownmark Drive, Lincoln, RI on the morning of Tuesday, November 7, 2023. The EPA inspection team (“inspection team”) consisted of Ryan Maisano and Drew Meyer. The inspection team arrived at the main entrance of the building and checked in with the front desk. The front desk called Candance Turner, the Environmental & Safety Manager. The inspection team presented their EPA credentials to Ms. Turner and informed her they were there to perform an unannounced RCRA compliance evaluation inspection. The inspection team was led by Ms. Turner to a conference room to start the in-brief. Business cards were given out at that time. The following personnel were present at the in-brief:

EPA:	Ryan Maisano, Physical Scientist Drew Meyer, Environmental Scientist
Facility:	Candance Turner, Environmental & Safety Manager

EPA inspectors started the briefing by providing an overview of the inspection. The team listed records that would be requested, areas of interest, photos, and explained confidential business information (“CBI”). The team informed Ms. Turner that she should notify the team if any photo taken during the walkthrough contained CBI. The team explained the scope of the inspection to Ms. Turner. The team then requested information on the business, processes, and generation of hazardous waste.

The following information about the business and operations was relayed by Ms. Turner during the opening conference:

Organic Dyes and Pigments, Lincoln, RI employs around 35 people. The employees operate during the day: 7:00am to 5:30pm or 8:00am to 4:30pm. The business operates Monday through Friday. The facility has been in business for over 75 years. Organic Dyes and Pigments has been in its current locations since 2019. The current building is two floors, but the second floor is filled with offices. The facility has two 90-day hazardous waste accumulation areas (HWAA) and two satellite accumulation areas (SAA).

Organic Dyes and Pigments in Lincoln manufactures pigments, dyes, and chemical auxiliaries. The facility mixes the colors for each dye or pigment in house, then containerizes them, and ships to the customer. Hazardous waste produced onsite is bad batch dye waste, filter press waste, air handling system waste, and floor sweepings. The facility assumes they are hazardous because of the chrome content. Each shipment is not sampled and profiled due to lack of staffing at the facility. There is a QC lab on site that performs QA/QC of dye mixes for customers. No major spills since the move in 2019. The facility does not import or export hazardous waste. Organic Dyes and Pigments has a discharge permit with Narragansett Bay Commission. Chemical Production waste is discharged to the plant with pH adjustment.

The facility does not have used oil or aerosol can waste. Universal waste consists of old computers.

PPE for the facility tour was discussed and it was determined to include only steel toed boots with covers to prevent staining.

The facility includes only one main building. The areas of the main buildings are:

- Warehouse
- Dye Production
- Chemical Production
- Wastewater Treatment
- Maintenance
- Chemical Production
- Shipping Warehouse
- Lab

The inspection team completed in-brief discussion and then conducted the walk-through portion of the inspection.

IV. FACILITY TOUR

This section consists of observations by EPA Inspectors during the physical tour of the Facility. Please see Attachment 1 for a digital photo log of photos taken throughout the inspection.

The tour of the Facility took place on November 7, 2023. The following personnel were present for all or part of the tour:

EPA: Ryan Maisano, Physical Scientist
Drew Meyer, Environmental Scientist

Facility: Candance Turner, Environmental & Safety Manager

Main Building- Warehouse

Powders and totes of liquid are accepted in the warehouse by truck. Orders are taken from the customers and the powders or liquid mixed per the order are placed into smaller drums. A 90-day hazardous waste accumulation area is located in the warehouse (See Photos #1-4). It includes two yellow flammable cabinets and a small area next to them along the wall. The one flammable cabinet had methanol and acetone product in it at the time of the inspection. The

other hazardous waste flammable cabinet was empty at the time of the inspection. There was a fire extinguisher in the area and a sprinkler system for fire suppression. A hazardous waste sign was posted on the wall and on the one flammable cabinet used for waste. The inspection log for the past month for the HWAA was posted on the office near the HWAA (See Photo #6). The log does not have a location for the inspector to sign. No emergency contact list was posted. Two of the drums at the time of the inspection were on secondary containment.

The following are the waste containers observed by the inspection team at the time of the inspection.

- 1 black 55-gallon drum NA3077 Hazardous Waste Solid, Chromium, 9, III Dry Filter Press 9/13/2023
- 1 Blue 55-gallon drum NA3077 Hazardous Waste Solid, Chromium, 9, III Dry Filter Press 10/4/2023
- 1 black 55-gallon drum NA3077 Hazardous waste Solid, Chromium, 9, III Dyes, Floor Sweeping with Chromium 10/18/2023

While the inspection team was still in the warehouse, there was a satellite area that the lab uses to put dye samples in drums. The SAA was lined up on the wall outside of the lab. The SAA drums were not individually labeled as hazardous waste. Ms. Turner mentioned that the lab places 35-gram chrome sample retains only in these drums. The sample retains are held on for three years then they are wasted in these drums. There was a sign denoting the SAA as hazardous waste. One open black drum is also located in the area, but it is used for trash.

The following are the waste containers observed by the inspection team in the satellite area at the time of the inspection.

- Three black 55-gallon drums labeled as chrome sample retains only. The drums were not labeled as hazardous waste at the time of the inspection.

Main Building-Dye Production

In the Dye Production area of the main building there were five 2,200-pound mixers. The mixer takes the dry dye powder and mixes based on customer requirements or requests. The order comes from the customer, then goes to the warehouse to pick the dyes which includes the formula, and then the dyes are added to these mixers. Waste from this area is floor sweepings and cleaning out of tanks for each product. The waste floor sweepings are assumed hazardous due to the chrome content and taken to the HWAA, according to Ms. Turner. Dye clean outs are taken to another HWAA area. This waste is shipped as hazardous because of the chrome content and the dye is too viscous and will gum up the filter press (See Photo #7). There was no spill control equipment or emergency contact list at the time of the inspection in the HWAA.

The following are the waste containers observed by the inspection team at the time of the inspection.

- 2 clear 275-gallon totes labeled as NA3087 Hazardous Waste Liquid, NOS Chromium, 9, III 10/12/2023 and 10/31/2023

The inspection team went further into the Dye Production area with Ms. Turner and came upon an area that included different wood and secondary containment pallets. The pallets held various boxes and five-gallon buckets. These boxes and buckets contained chemicals that are pending evaluation, according to Ms. Turner. The chemicals were in containers of various sizes and colors. Most of the containers appeared to be labeled. It was unsure to the inspection team if any of the containers were dated. Ms. Turner mentioned the chemicals might still be usable by the Facility. Ms. Turner mentioned they were still processing and were left over from the move into this building in 2019. Ms. Turner also mentioned they did not have an inventory of what is on the pallets. (See Photos #8-17)

Main Building-Wastewater Treatment

The Facility's wastewater treatment tanks are located in this area (See Photos # 18-19). The permit from Narraganset Bay Commission was posted on the tanks. Treatment includes flocculation, pH adjustment, then to discharge (See Photos # 20). Ms. Turner mentioned the facility also checks for color before discharge.

The air filtration unit was located in the wastewater treatment area. There was a SAA under the air filtration unit. A 55-gallon drum was located there and not labeled (See Photos # 21-25). The SAA includes a yellow sign on the air filtration unit that denotes the area as SAA and the drum as hazardous.

The following are the waste containers observed by the inspection team at the time of the inspection. All drums were closed at the time of the inspection unless noted.

- 1 black 55-gallon drum labeled as "Reactive Black Atext" It was not securely closed at the time of the inspection. The drum appeared to be about 1/3 full at the time of the inspection. Not labeled as hazardous waste
- 1 Black 55-gallon drum not labeled.

Main Building-Maintenance

Light maintenance is done on different machines in the Maintenance Area of the main building. One black, 55-gallon drum labeled as waste oil was located in the area (See Photo #26). There was a small, open, plastic container located near the drum (See Photo #27). The plastic container held a dark liquid and did not have any markings. Ms. Turner did not know what the liquid in the container was.

Main Building-Chemical Production

In the Chemical Production Area, mixing of liquid dyes is performed. The process for customer orders is similar to the dry dye production. Totes marked as non-hazardous chemical rinse was located in the area. The totes are managed by Veolia. At the time of the inspection there were eleven 250-gallon totes (See Photos # 28-29). Spill management materials were located in this area.

Main Building-Shipping Warehouse

The shipping warehouse includes shelves of product to be sent to customers and raw materials. An SAA was located in the warehouse which contained a 30-gallon drum that was marked as "Floor Sweepings HAZ." Ms. Turner confirmed the drum contained hazardous chrome floor sweepings (See Photos # 30-32). It was not labeled at the time of the inspection. Boxes of raw materials, powdered dyes, are located near the SAA. Ms. Turned mentioned that these will be used in the future (See Photos # 32-34).

The following is the waste containers observed by the inspection team at the time of the inspection. The drum was closed at the time of the inspection.

- 1 blue 55-gallon drum marked only as "Floor Sweepings HAZ." (See Photo # 30)

Two flammable cabinets were located at the end of the warehouse. Ms. Turner advised the inspection team that the chemicals located in the cabinets are product. Ms. Turner informed the inspection team that Organic Dyes and Pigments does not mix anything flammable on site.

A second air handler unit was located near the shipping warehouse with an SAA under the unit. The white 55-gallon drum was not labeled at the time of the inspection (See Photos #35-36).

Main Building-Lab

The lab had two SAAs located in the area. One was located near the hood in front of a flammable cabinet. The waste generated in the hood is placed in the container. The hazardous waste SAA sign was located on the hood.

The following is the waste container observed by the inspection team at the time of the inspection in this SAA.

- 1 clear 5-gallon container labeled as hazardous waste flammable, toxic, ignitable, Acetonitrile

The other SAA located in the lab is on the other side of the lab. The hazardous waste SAA sign is located above the drum on the wall (See Photos # 37-38).

The following is the waste container observed in this SAA by the inspection team at the time of the inspection.

- 1 black, 30-gallon drum labeled as hazardous waste, Acetone/DOW ASOL Solvent mix in jars contains CR3 (See Photos # 39-40).

V. RECORDS REVIEW

The inspection team reviewed documents off-site. The HWAA weekly inspection log was reviewed during the walk-through portion of the inspection.

Manifests/LDRs

The inspection team reviewed hazardous waste manifests and land disposal restriction notifications from shipments made by Organic Dyes and Pigments during 2021, 2022, and 2023. US Ecology and Veolia are listed as transporters and destination facilities during that time. Signers of manifests are Edens Laguerre and Candace Turner. No issues noted on the manifests or LDRs.

Inspection Logs

The inspection team reviewed inspection logs for 2021-2023. The HWAA is done weekly with no weeks missed during the time period reviewed. The inspection logs are not signed by the inspector.

Training/Job Descriptions

The inspection team reviewed Organic Dyes and Pigments training certificates and training logs. The last hazardous waste training done at the facility was done on 6/8/2023 by J.J. Keller & Associates. A hazardous waste internal training was done by Ms. Turner when employees onboard. The hazardous waste training is included in the Safety/ISO training and in the annual right to know training. The inspection team reviewed the 2023 annual HAZCOM training outline given to employees. Training sign in sheets were also reviewed. No issues were noted on the training documentation.

Training Certificates Reviewed:

- Candace Turner
 - OSHA 8 Hour Hazwoper Refresher-2020
 - RCRA Hazardous Waste Management for Generators 2020 and 2023
- Keith Golderesi
 - RCRA and DOT Refresher from Eduwhere 2021

Contingency Plan

The inspection team reviewed the Organic Dyes and Pigments contingency plan. The contingency plan was updated by the facility in 2023. The plan is updated annually or earlier if

changes occur. The contingency plan was distributed to the Lincoln/Limerock Fire Department, Rhode Island Department of Environmental Management, and Veolia (emergency spill response). The emergency response coordinators at the facility are Candance Turner, Environmental & Safety Manager and the backup is John D'Amelio, President. Other Coordinators are listed in the plan are Mark Rollins, Controller, Luis Obispo, Plant Manager, and Joe Moistoso, Maintenance.

The contingency plan includes:

- Process Flow and Equipment
- Building Layout
- Emergency Response Coordinators
- Evacuation Plans/Routes
- Spill Response
- Gas Release Response
- Confined Space Emergencies
- Bomb Threat Procedures
- Weather Related Emergencies
- Chemicals on site
- Emergency contact agencies with phone numbers
- Emergency Equipment stored on site
 - PPE
 - Fire Response
 - First Aid Kits
 - Bloodborne Pathogen Kits
 - Eye Wash and Shower Stations
- Training

Additional Documents

The inspection team reviewed the master chemicals inventory excel sheet for Organic Dyes and Pigments. No issues noted.

Authorized signer email from Robert Nero from Rhode Island Department of Environmental Management. No issues noted.

VI. INSPECTION OUTBRIEF

An out-brief conference was conducted based on the inspection team's findings and areas of concerns during the walkthrough. The following personnel were present for the closing conference:

EPA: Ryan Maisano, Physical Scientist
Drew Meyer, Environmental Scientist

Facility: Candance Turner, Environmental & Safety Manager

The EPA inspection team relayed the following areas of concern that arose from observations throughout the inspection.

Areas of Concern:

1. Weekly hazardous waste accumulation area inspection logs are not signed by the inspector.
2. Emergency Contact Lists were not posted at HWAAs.
3. Chrome Lab Retain Waste drums in SAA near Lab were not labeled as hazardous waste.
4. Spill kits were not present in SAA in Shipping Warehouse and Wastewater Treatment.
5. Chemicals pending evaluation in the Dye Production area that has been located there since 2019 according to Ms. Turner. Organic Dyes and Pigments does not have a list of chemicals that are stored in this area. No waste determinations have been made on any of the chemicals in this area and there could be compatibility issues.
6. SAAs under the air filtration units in the Wastewater Treatment area and Shipping Warehouse are not labeled.
7. A black 55-gallon drum located near the SAA in the Wastewater Treatment area is not labeled.
8. A blue 55-gallon drum located in the Shipping Warehouse with "Floor Sweepings HAZ" written on it was not properly labeled.
9. There appeared to be no RCRA training for Edens Laguerre in 2022 who signed manifests.
10. Proof the contingency plan was provided to local hospitals and police departments was not provided.
11. RCRA training for emergency coordinators listed in the contingency plan was not provided. John D'Amelio, Mark Rollins, Controller, Luis Obispo, and Joe Moistoso were all missing proof of RCRA training.

The inspection team noted that if Ms. Turner makes any changes as a result of this inspection to inform the team and send any documents or photos to the team. Following this discussion, the inspection team left the premises, concluding the on-site portion of the inspection.

The following documentation was received via SharePoint from Ms. Turner by the inspection team on November 15, 2023.

1. The weekly HWAA area inspection logs were updated to allow signatures from the inspector.
2. Spill kits were added to the SAAs in Shipping Warehouse and Wastewater Treatment.
3. The two 55-gallon drums under the air filtration units in the Wastewater Treatment area and Shipping Warehouse have been labeled.
4. The 55-gallon drum of floor sweepings in the Shipping Warehouse was labeled.