

INDUSTRIAL USER PRETREATMENT SCREENING INSPECTION REPORT

Inspection Entry Date/Time	06/11/2024 – 8:45 AM (CT)	Announced: No	
Inspection Exit Date/Time	06/11/2024 – 9:30 AM (CT)	Access: Granted	
Weather	Sunny, 70° F		
Media	Water		
Statute(s)/Program(s)	Clean Water Act, NPDES		
Type of Inspection	Industrial User Screening Inspection (Pretreatment Direct Implementation)		
Facility or Site Name	Com-Pac International, Inc.		
Facility/Site Physical Address	800 West Industrial Park Road		
City, State, Zip Code	Carbondale, Illinois 62901		
County/Borough/Parish	Jackson		
Facility GPS Coordinates	37.748161, -89.226284		
Mailing Address (If different)	P.O. Box 2707		
City, State, Zip Code	Carbondale, Illinois 62901		
Owner (If different than facility)	Same	Operator (If Different than Owner)	Same
Address			
City, State, Zip Code			
Location in WWTP Service Area (Yes – Name of WWTP/ or N/A)	City of Carbondale WWTP (sanitary only)		
FRS ID	110001339739		
Permit Number(s) (If Applicable)			
SIC and/or NAICS	SIC 3089/NAICS 326199		
Lead Inspector			
Name: Anne Marie Vincent	Signature/Date: ANNE VINCENT Digitally signed by ANNE VINCENT Date: 2024.08.08 09:30:03 -04'00'		
	Region: EPA Region 5	Email: vincent.annemarie@epa.gov	Telephone Number: (440) 250-1720
Supervisor Review			
Name: Brooke Furio	Signature/Date: BROOKE FURIO Digitally signed by BROOKE FURIO Date: 2024.08.08 09:38:44 -04'00'		
	Region: EPA Region 5	Email: furio.brooke@epa.gov	Telephone Number: (440) 250-1705

SECTION I – INTRODUCTION

Site Entry/Opening Conference and Inspection Objectives

United States Environmental Protection Agency (EPA) Region 5 Inspectors, Anne Marie Vincent and Megan Zale, and Equipment Specialist, Christopher Frame, arrived at Com-Pac International, Inc. (the “Facility”), located at 800 West Industrial Park Road, Carbondale, Illinois 62901, at 8:45 AM (CT) on 6/11/2024 for an unannounced inspection. EPA Region 5 Lead Inspector Anne Marie Vincent presented credentials to Gregory Sprehe, President of the Facility. Lead Inspector Anne Marie Vincent informed the facility representative that this was an EPA Region 5 Industrial User Screening Inspection to gather information on the facility, its industrial processes, its generation and management of on-site industrial process wastewater and any on-site pretreatment systems to treat process wastewater prior to discharge or disposal as authorized by Clean Water Act (CWA) Section 308 and implementing regulations. Following the presentation of credentials, the EPA representatives conducted an opening conference with Gregory Sprehe. Lead Inspector Anne Marie Vincent stated the purpose of the inspection again and explained that they would be completing a checklist of operational questions. In addition to the review of questions, EPA inspectors discussed the right of the Facility to claim Confidential Business Information (CBI) on any document or information shared with EPA during or after the inspection. The Facility did not make any CBI claims during or after the inspection.

This report is based on information supplied by Facility representatives, direct observations made by the EPA Region 5 inspectors, and records and reports maintained by the Facility and Region 5 including: verbal or written statements provided by the Facility representatives during or subsequent to the inspection; and materials, process information, data, or other documents shown, demonstrated, or submitted to the EPA Region 5 inspectors by Facility representatives during or subsequent to the on-site Inspection. In addition, information gathered prior to or subsequent to the Inspection from a review of EPA, State, and/or public records may be included in this report.

Attendees (US EPA, Facility, State, Local)

Organization	Attendee Name	Title	Contact Information	Present Opening Conference	Present Closing Conference
EPA Region 5	Anne Marie Vincent	Lead Inspector	vincent.annemarie@epa.gov 440-250-1720	Yes	Yes
EPA Region 5	Megan Zale	Inspector	zale.megan@epa.gov 440-250-1711	Yes	Yes
EPA Region 5	Christopher Frame	Equipment Specialist	frame.christopher@epa.gov 440-250-1714	Yes	Yes
Com-Pac International, Inc.	Gregory Sprehe	President	gregorysprehe@com-pac.com 618-529-2421 Office 618-534-2660 Cell	Yes	Yes

SECTION II – INDUSTRIAL USER SCREENING CHECKLIST

SECTION II.A – Business Activity/Category

1. If the facility employs or will be employing processes in any of the industrial categories or business activities listed below (regardless of whether they generate wastewater, waste sludge, or hazardous waste), place a check beside that category or business activity. Check all that apply.	
☐ Airport Deicing	☐ Leather Tanning and Finishing
☐ Aluminum Forming	☐ Meat and Poultry Products
☐ Asbestos Manufacturing	☐ Metal Finishing
☐ Battery Manufacturing	☐ Metal Molding and Casting (Foundries)
☐ Canned and Preserved Fruit and Vegetable Processing	☐ Metal Products and Machinery
☐ Canned and Preserved Seafood Processing	☐ Mineral Mining and Processing
☐ Carbon Black Manufacturing	☐ Nonferrous Metals Forming
☐ Cement Manufacturing	☐ Nonferrous Metals Manufacturing
☐ Centralized Waste Treatment	☐ Oil and Gas Extraction
☐ Coal Mining	☐ Ore Mining and Dressing
☐ Coil Coating	☐ Organic Chemicals, Plastics, and Synthetic Fibers
☐ Concentrated Animal Feeding Operation and Feedlots	☐ Paint Formulating
☐ Concentrated Aquatic Animal Production	☐ Paving and Roofing Manufacturing
☐ Construction and Development	☐ Pesticide Chemicals
☐ Copper Forming	☐ Petroleum Refining
☐ Dairy Product Processing or Manufacturing	☐ Pharmaceutical Manufacturing
☐ Dental Office	☐ Phosphate Manufacturing
☐ Electrical and Electronic Components Manufacturing	☐ Photographic Processing
☐ Electroplating	☒ Plastics Molding and Forming (Extrusion)
☐ Explosives Manufacturing	☐ Porcelain Enameling
☐ Fertilizer Manufacturing	☐ Pulp, Paper, and Paperboard Manufacturing
☐ Ferroalloy Manufacturing	☐ Rubber Manufacturing
☐ Glass Manufacturing	☐ Soap and Detergent Manufacturing
☐ Grain Mills	☐ Steam Electric Power Generating
☐ Gum and Wood Chemicals Manufacturing	☐ Sugar Processing
☐ Hospital	☐ Textile Mills
☐ Ink Formulating	☐ Timber Products
☐ Inorganic Chemicals Manufacturing	☐ Transportation Equipment Cleaning
☐ Iron and Steel Manufacturing	☐ Waste Combustors
☐ Landfill	☐ Other:
2. Date of facility construction/operation start date or date(s) of significant process changes (for purposes of existing/new source designation if applicable): MM/YYYY Or MM/DD/YYYY <u>Approximately 1989</u>	

Section II.B – Facility Sewer Information

1.	Is the facility presently connected to a public or private sanitary sewer system? ☐ Yes/Private ☒ Yes/Public ☐ No If Yes: Are any process wastewater streams discharged directly to the public or private sewer system? ☐ Yes ☒ No Does the facility have a permit with the local POTW or are they a co-permittee on a permit to discharge untreated process wastewater to the public sewer system? ☐ Yes ☐ No <u>Not Applicable</u> If yes: POTW/WWTP Name _____, Permit # _____ If No, have you applied for a sanitary sewer connection? ☐ Yes ☐ No									
2.	Is there an on-site treatment system for process wastewater? ☐ Yes ☒ No (If yes, also See Section II.H) If Yes: Does the treatment system effluent discharge to the public sewer system? ☐ Yes ☐ No <u>Not Applicable</u> If Yes: Does the facility have a permit to discharge the effluent to the public sewer system? ☐ Yes ☐ No If Yes: Permit # _____									
3.	List the location, diameter, and average flow of each discharge pipe that connects to the sanitary sewer system.									
	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <th style="width: 33%;">Location of Sewer Connection</th> <th style="width: 33%;">Diameter of Pipe (inches)</th> <th style="width: 33%;">Average Flow (gpd)</th> </tr> <tr> <td>Unknown for regular sanitary</td> <td>Unknown</td> <td>Unknown</td> </tr> <tr> <td> </td> <td> </td> <td> </td> </tr> </table>	Location of Sewer Connection	Diameter of Pipe (inches)	Average Flow (gpd)	Unknown for regular sanitary	Unknown	Unknown			
Location of Sewer Connection	Diameter of Pipe (inches)	Average Flow (gpd)								
Unknown for regular sanitary	Unknown	Unknown								

Section II.C – Facility Operational Characteristics

1.	Provide the following shift information:							
		Mon	Tue	Wed	Thu	Fri	Sat	Sun
	Shifts Per Workday	(3) 8-hr shifts East Production Building	(3) 8-hr shifts East Production Building	(3) 8-hr shifts East Production Building	(3) 8-hr shifts East Production Building	(3) 8-hr shifts East Production Building		
		(1) 8-hr shift warehouse	(1) 8-hr shift warehouse	(1) 8-hr shift warehouse	(1) 8-hr shift warehouse	(1) 8-hr shift warehouse		
		(2) 10-hr shifts West Production Building	(2) 10-hr shifts West Production Building	(2) 10-hr shifts West Production Building	(2) 10-hr shifts West Production Building	None - West Production Building		
2.	Indicate whether the business activity is:							
	☒ Continuous throughout the year							
	☐ Seasonal Months when business operates: ☐ J ☐ F ☐ M ☐ A ☐ M ☐ J ☐ J ☐ A ☐ S ☐ O ☐ N ☐ D							
3.	Indicate whether the facility discharge is:							
	☒ Continuous throughout the year (Typical sanitary only)							
	☐ Seasonal Months when discharges occur: ☐ J ☐ F ☐ M ☐ A ☐ M ☐ J ☐ J ☐ A ☐ S ☐ O ☐ N ☐ D							
4.	List types and amounts (mass or volume per day) of raw materials used or planned for use:							
	Raw Material				Amount			
	Plastic resins/pellets				Not readily known – but amounts purchased are tracked in system			
	Plastic films							
	*More specific/complete material lists are available from inventory system							

Section II.C – Facility Operational Characteristics (Continued)

5.	List types and quantities (mass or volume per day) of chemicals used or planned for use:	
	Chemical	Quantity
	Alcohols (For product printing process)	Not readily known
	Printing inks (For product printing process)	
	Water (For product printing process)	
6.	Brief general description of all operations at this facility (detailed process unit information noted in Section II.F). Dry inputs to produce blown plastic tubes used to produce bags. Cooling/chilling system cools motors and blows cooled air onto plastic products after extrusion.	
7.	Request copies of the process diagram, flow diagram, and/or general facility diagram (if previous responses warrant more detailed information to understand the processes, flows or sewer connections). ☐ Yes ☒ No	

Section II.D – Spill Prevention

1.	Do you have liquid storage containers (tanks, drums, totes, bins, ponds, etc.) at your facility? ☒ Yes ☐ No	
2.	Do you have floor drains in the manufacturing area or where liquids are stored? ☐ Yes ☒ No	
	If yes, where do floor drains drain to? There are no floor drains. Printing ink alcohols are stored in special storage areas within the plant.	
3.	Indicate whether an accidental spill at your facility could lead to a discharge to any of the following. Check all that apply.	
	☐ On-site disposal/treatment system	☐ Ground (outside)
	☐ Public sanitary sewer system	☒ Floor (inside) – Cleaned via mop
	☐ Storm drain	☐ Other – Specify:
4.	Does facility have a spill prevention plan to prevent spills of liquids from entering the Control Authority's collection/sewer system? ☐ Yes ☐ No ☒ N/A (No potential for spill to discharge to public sewer/collection system)	

Section II.E – Water Supply

1.	Water Source:		
	☒ Municipal Water Utility	Specify: City of Carbondale	
	Name as listed on water bill: Com-Pac International		
	Address: 800 West Industrial Park Road, Carbondale, IL 62901		
	☐ Private Well		
	☐ Surface Water		
	☐ Other:		
2.	Provide the following information for all water usage at the facility:		
	Type of Water Use	Average Water Usage (gpd)	Estimated or Measured
	☒ Sanitary	Unknown	
	☒ Non-contact cooling water (Closed loop chilling system)	Unknown : Make-up water can be added as needed to the closed loop system.	
	☐ Boiler feeding		
	☐ Process		
	☐ Equipment/facility washdown		
	☐ Contact cooling water		
	☐ Air pollution control		
	☐ Irrigation and lawn watering		
	☐ Contained in product		
	☐ Other:		
	Total:		

Section II.F – Wastewater Discharge Information

1.	Provide the following information for all wastewater generated (gallons per day - GPD) at the facility:					
	Type of Wastewater	Average Volume (GPD)	Maximum Volume (GPD)	Estimated or Measured	Type of Discharge	Discharges To
	☒ Sanitary	Unknown	Unknown		Continuous	Sanitary
	☐ Non-contact cooling water					
	☐ Boiler blowdown					
	☐ Process wastewater	Use table below.				
	☐ Equipment/facility washdown					
	☐ Contact cooling water					
	☐ Air pollution control					
	☐ Stormwater runoff	Stormwater flow to storm sewer system – no stormwater collection/ diversion on site. Closed loop vacuum tube system in place for unloading plastic pellets from rail car/hopper truck into storage, no potential contact with stormwater. Vacuum tube system also moves pellets from storage to production lines.				
	☐ Other:					

Section II.F – Wastewater Discharge Information (Continued)

2. Provide the following information for process wastewater generated by each unit process:						
Unit Process Description	Average Wastewater Generated (gpd)	Maximum Wastewater Generated (gpd)	Estimated or Measured	Type of Discharge	Discharges To	
None – No wastewater generated in plastic packaging production						

3. Flow Rates for discharge of process wastewater to the sanitary sewer system: N/A						
Average daily flow rate (gpd): N/A			Maximum daily flow rate (gpd): N/A			
Peak hourly flow rate (gpd): N/A						
Hours per day of wastewater discharge to sanitary sewer system: (e.g., 8)						
Mon	Tue	Wed	Thu	Fri	Sat	Sun

4. Do batch discharges to the sanitary sewer system occur (or will occur)? ☐ Yes ☐ No N/A						
Number of batch discharges per time period (specify per day, week, month, etc.): N/A						
Average volume per batch discharge (gal): N/A						
Flow rate (gpm): N/A						

5. Do you have (or plan to have) continuous wastewater flow metering equipment at this facility? ☐ Yes ☐ No N/A						
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6. Do you have (or plan to have) automatic sampling equipment at this facility? ☐ Yes ☐ No N/A						
If yes, describe the present or future location of the automatic sampling equipment and describe the equipment:						
N/A						

Section II.F – Wastewater Discharge Information (Continued)

7.	Has the discharge at this facility changed historically? ☐ Yes ☒ No Are any process changes or expansions planned during the next three years that could alter wastewater volumes or characteristics (i.e., substantially increase/decrease flow characteristics/flow rates) to the sewer in the future? ☐ Yes ☒ No
	If yes, briefly describe these changes and their effects on the wastewater volume and characteristics:
	N/A
8.	Are any recycling or reclamation systems in use or planned? ☐ Yes ☒ No
	If yes, briefly describe the recovery process, substance recovered, percent recovered, and the concentration in the spent solution:
	No recycling of waste chemicals. No process wastewater to recycle. Facility does recycle scrap plastic material from the production process.

Section II.G – Slug Discharge Control

1.	Do you have the potential for a slug discharge to the sewer system? ☐ Yes ☒ No A slug discharge is any discharge of a non-routine episodic nature, including but not limited to an accidental spill or a non-customary batch discharge, which has a reasonable potential to cause interference or pass-through, or in any other way violate the POTW's regulations, local limits, or permit conditions [40 CFR 403.8(f)(2)(v)].
2.	Describe the type of potential slug discharge, including quality and content.
	N/A
3.	Describe the current mechanisms for prevention of slug discharges.
	N/A

Section II.H – Treatment

1.	Is any form of process wastewater treatment (see list below) used at this facility? ☐ Yes ☒ No If yes, place a check beside the treatment devices or processes that are used (or will be used) for treating wastewater or sludge at this facility. Check all that apply.		
	☐ Air flotation	☐ Grease trap	☐ Screen
	☐ Centrifuge	☐ Grinding filter	☐ Sedimentation
	☐ Chemical precipitation	☐ Grit removal	☐ Septic tank
	☐ Chlorination	☐ Ion exchange	☐ Solvent separation/recovery
	☐ Cyclone	☐ Neutralization, pH correction	☐ Spill protection
	☐ Filtration	☐ Ozonation	☐ Sump
	☐ Flow equalization	☐ Reverse osmosis	☐ Rainwater diversion or storage
	☐ Grease or oil separation		
	☐ Biological treatment: Specify		
	☐ Other chemical treatment: Specify		
	☐ Other physical treatment: Specify		
	☐ Other:		
2.	Do you have a treatment operator(s)? ☐ Yes ☐ No Not Applicable If yes, provide the following information:		
	Name:		Operator Class/Type:
	Title:	Hours:	Phone:
	Name:		Operator Class/Type:
	Title:	Hours:	Phone:
	Name:		Operator Class/Type:
	Title:	Hours:	Phone:
	Name:		Operator Class/Type:
	Title:	Hours:	Phone:
3.	Is any form of wastewater treatment (or changes to existing wastewater treatment) planned for this facility within the next three years? ☐ Yes ☒ No If yes, describe any changes in treatment or disposal methods planned or under construction for the wastewater discharge to the sanitary sewer and estimated completion dates.		
	N/A		
4.	Does the process wastewater treatment system effluent discharge to a surface waterbody? ☐ Yes ☐ No If Yes: Does the facility have a permit to discharge the effluent directly to a waterbody? <u>Not Applicable</u> ☐ Yes ☐ No If Yes: Permit # _____		

Section II.I – Non-Discharged Wastes

1.	Are any waste liquids or sludges generated and not disposed of in the sanitary sewer system? ☒ Yes ☐ No		
	If no, skip the remainder of Section II.I.		
	If yes, list in the table below:		
	Waste Generated	Quantity (per year)	Disposal Method
	Alcohol/ink mixtures	Unknown – available in billing documents	Third party contractor
2.	If any facility wastes are sent to an off-site centralized waste treatment facility, identify the facility and the wastes that it receives.		
	N/A		
3.	If an outside firm removes any of the wastes, list the name, address, and permit number of all waste haulers:		
	Name	Address	Permit Number (if applicable)
	Unknown by President – Would be available in bills and office documents		
4.	Have you been issued any federal, state, or local environmental permits? ☒ Yes ☐ No		
	If yes, list the permits:		
	Per President: Air permit. Ozone permit (for evaporation of printing ink. No limits but is tracked)		
5.	Describe where and how waste liquids and sludges are stored prior to disposal.		
	Collected in drums and buckets for third party contractor to pick up. It is characterized as non-hazardous due to the dilution per Mr. Sprehe, Facility President.		

SECTION III – CLOSING CONFERENCE AND FOLLOW UP

Closing Conference

The EPA Region 5 Lead Inspector, Anne Marie Vincent, held a closing conference at 9:15 AM (CT) on 6/11/2024. During the closing conference, Lead Inspector Anne Marie Vincent restated the purpose of the inspection survey and explained that a copy of the final survey inspection checklist will be provided to Com-Pac International, Inc.

At the time of the inspection, EPA did not request any follow up documents.

Communication Log

EPA did not receive any additional information following the inspection.