



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION I
5 POST OFFICE SQUARE, SUITE 100
BOSTON, MASSACHUSETTS 02109-3912

URGENT MATTER - EARLY WARNING NOTICE

February 2, 2024

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

RE: NOTICE OF POTENTIAL VIOLATION of the Resource Conservation and Recovery Act (RCRA), the Hazardous and Solid Waste Amendments of 1984 (HSWA) and RI -State of Rhode Island and Providence Plantations Rules and Regulations for Hazardous Waste Management (Rhode Island Rules). The State of Rhode Island has been granted final authorization by EPA to administer certain portions of RCRA.

Dear Ms. Turner:

On November 7, 2023, representatives of the United States Environmental Protection Agency ("EPA") conducted a RCRA Compliance Evaluation Inspection. The purpose of this inspection was, in part, to determine the compliance of Organic Dyes and Pigments, EPA ID # RID050325026, with the relevant hazardous waste management regulations for the State of Rhode Island and the corresponding federal Hazardous Waste Management Regulations found at 40 C.F.R. Parts 260-273.

As a follow up to the exit interview provided by EPA at the conclusion of the offsite compliance monitoring inspection of your facility, a partial written list of deficiencies is provided below to summarize the potential violations/areas of concern identified. Additional potential violations or areas of concern determined subsequent to EPA's inspection may also be included in the list below. You are requested to take immediate action on your part to evaluate this listing below and take corrective measures where necessary.

Potential Violations/Areas of Concern:

1. Failure to document weekly container inspections
2. Failure to make adequate waste determinations
3. Failure to separate possible incompatible materials
4. Failure to appropriately date containers of hazardous waste
5. Failure to appropriately label containers of hazardous waste
6. Failure to post emergency information near telephones at the site of accumulation
7. Failure to maintain a hazardous waste training plan and records of training
8. Failure to conduct hazardous waste training

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9. Failure to submit an updated copy of the Contingency Plan to local authorities
10. Failure to designate hazardous waste storage areas

This letter is EPA's initial response to potential hazardous waste violations and areas of concern that were observed during our November 7, 2023 inspection of your facility. The primary purpose of this letter is to identify potential problem areas and seek compliance. This Notice does not limit or otherwise preclude EPA from taking civil or criminal enforcement action pursuant to Section 3008 of RCRA, 42 U.S.C. § 6928 with regard to these or other violations that may be determined. EPA is continuing to investigate and evaluate Organic Dyes and Pigments compliance under RCRA and may take an enforcement action as appropriate.

I urge you to take immediate positive steps to remedy the above-cited potential violations/areas of concern. If you have any questions regarding this letter or how to comply with RCRA requirements, please contact Ryan Maisano of my staff at (617) 918-1309 or at maisano.ryan@epa.gov.

Sincerely,

**MARY
ODONNELL**

Digitally signed by
MARY O'DONNELL
Date: 2024.02.02
10:04:25 -05'00'

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

cc: Nicole Pelletier, Rhode Island Department of Environmental Management