

RCRA Compliance Evaluation Inspection Report

1) **Inspector and Author of Report**

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2) **Facility Information**

Sonoco Products Company
1854 Central Florida Pkwy
Orlando, Florida 32837

County: Orange
Latitude: 28.406618
Longitude: -81.401172
EPA ID Number: FLD043049428

Primary NAICS: 322219 – Other Paperboard Container Manufacturing
SIC Code: 2652 – Setup Paperboard Boxes

3) **Responsible Official**

Shannon Embry, Production Manager, Sonoco Products Company
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4) **Inspection Participants**

Parvez Mallick, US EPA Region 4
Miranda Rothenberger, Florida Department of Environmental Protection (FDEP)
Mackenzie Black, FDEP
Shannon Embry, Production Manager, Sonoco Products Company
Ronald Shorter, Metal Department Supervisor, Sonoco Products Company

5) **Dates of Inspection**

July 15, 2021, 10:00 a.m.

6) **Applicable Regulations**

Resource Conservation and Recovery Act (RCRA) Sections 3002, 3005 and 3007 (42 U.S.C. §§ 6922, 6925 and 6927), and the regulations promulgated pursuant thereto at 40 Code of Federal Regulations (C.F.R.) Parts 260-270, 273 and 279.

Florida Statutes (F.S.) Chapter 403.702 et seq., and the regulations promulgated pursuant thereto and set forth at the Florida Administrative Code (Fla. Admin. Code Ann. r.), Chapters 62-710, 62-730 and 62-750.

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 Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.17], a LQG may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status, as required by Section 403.722 of the Florida Statutes, Fla. Stat. § 403.722 [Section 3005 of RCRA, 42 U.S.C. § 6925], provided that the generator complies with the conditions listed in Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.17] (hereinafter referred to as the "LQG Permit Exemption").

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [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 403.722 of the Florida Statutes, Fla. Stat. § 403.722 [Section 3005 of RCRA, 42 U.S.C. § 6925], and without complying with Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.16(b) or §262.17(a)], except as required in Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.15(a)(7) and (8)], provided that the generator complies with the satellite accumulation area conditions listed in Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.15(a)] (hereinafter referred to as the "SAA Permit Exemption").

7) **Purpose of Compliance Evaluation Inspection**

On July 15, 2021, Miranda Rothenberger and Mackenzie Black, Florida Department of Environmental Protection (FDEP), and Parvez Mallick, U.S. EPA, conducted a routine compliance evaluation inspection of Sonoco Products Company (Sonoco or the facility) to determine the facility's compliance with state and federal hazardous waste regulations. This was an EPA lead inspection. Sonoco was represented by Mr. Shannon Embry, Production Manager, Sonoco Products Company and Mr. Ronald Shorter, Metal Department Supervisor, Sonoco Products Company. Upon entering the facility, the inspectors introduced themselves, showed their credentials and explained the purpose of the visit and a description of the facility's process was discussed. The inspectors described the anticipated use of digital camera during the inspection. The inspectors briefly discussed the company's ability, pursuant to 40 C.F.R. § 2.203, to assert a business confidentiality claim for information submitted to EPA. The company did not

assert a business confidentiality claim. The inspection participants also discussed health and safety protocols and required personal protective equipment before Mr. Embry led the inspectors on a tour of the facility operations.

8) **Facility Description**

Sonoco Products Company is a manufacturer of food grade cans used primarily for frozen food products. The company manufactures metal can ends and fiberboard grade bodies. The facility has five container lines and five multi-die presses. Sonoco operates Sunday from 10 pm through Friday at 10 pm, employing 82 employees on 3 shifts. City of Orlando utilities provides potable water and sanitary sewer services.

The facility originally notified FDEP as a small quantity generator (SQG) of hazardous waste on June 14, 1983, under the name Boise Cascade Composite Can and was issued EPA identification number FLD043049428. The facility notified FDEP of a corporate name change to Sonoco Products Company on June 4, 1987. The facility most recently notified FDEP as a large quantity generator (LQG) of hazardous waste on March 31, 2020 and retains EPA identification number FLD043049428. Hazardous wastes generated at the facility are flammable liquid/solids, organic wastes, methyl isobutyl ketone, methyl isobutyl ketone, mineral spirits, and paint waste.

In the Coating Department, tin sheets are fed into a machine where an ultraviolet coating is applied. The coating material is stored in a 280-gallon tote next to the coating line. The sheet is flipped over, and a food grade solvent coating is applied. This side of the sheet becomes the can end that comes in contact with the food. The sheet is cured in a 400°F oven for ten minutes to eliminate fugitive volatile organic compounds. If necessary, a paraffin wax coating is applied to the sheet as a final coating. The finished sheet is bundled and transferred to the Metal Department.

The Metal Department operates multi-die presses to punch a circular can end for the appropriate can size. The can end is rolled to form a lip and a liquid rubber gasket is applied to the lip of the can end to form a seal. The can end is inspected for quality, bundled, and transferred to the Can Department.

The can body is wound in the Can Department. Recycled fiberboard is fed onto spindles, which wind the material into a can body. A can end is placed on one side of the can body and a plastic seal is attached to the outside of the can end. A label is then applied to the can body using an adhesive. The finished can is transferred to the Warehouse/Shipping Department for storage prior to shipping to the customer.

9) **Inspection Findings**

Can Department

Cans are produced and labeled in this area using five can assembly lines. Spent paper towels, waste adhesive, and used oil are generated in this area. Emergency equipment observed in the area consisted of fire extinguishers, fire suppression sprinklers, and first aid kits.

Cans are formed from rolls of paper that are wound to form a tube using adhesive. Excess adhesive from the equipment is captured in a bucket. The waste adhesive is water based, non-hazardous glue. The amount of liquid glue going to sewer is minimal, around few ounces per

day. One of the production lines utilizes an extruder to apply the adhesive to the paper. Cleaning of the extruder involves either scraping the dried adhesive or using vinegar and water. The liquid waste is placed in a bucket below the unit and is disposed in the sewer and solid waste, dried adhesive and spent paper towels, is disposed in the trash. After forming, the tubes are then cut to specified lengths. A seamer crimps a metal end cap to the finished can. An elevated work area is used to palletize finished cans for shipping.

During the inspection, the facility provided a copy of the safety data sheets for the adhesives, 9B 230-10 and 9B 215-20, used in the Can Department. A review of the safety data sheets indicated that waste adhesives would not be hazardous waste or any hazardous waste constituents present in the adhesive products.

Near the can line four, the inspectors observed one 55-gallon container of hazardous waste aerosols marked "Flammable." The container was determined to be a satellite accumulation area (SAA) but was not marked "Hazardous Waste."

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.15(a)(5)(i)], 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." In an email dated July 21, 2021, Mr. Embry sent a photo of the container now labeled "Hazardous Waste."

Coating Department

In this area a coating is applied on each side of the black iron steel sheets prior to punching out the can end in the Metal Department. The inspectors observed two eye washes and one eye wash/shower emergency equipment located at the coating line.

Ultraviolet and food-based solvent coatings are used. Methyl isobutyl ketone (MIBK) is used as a thinner during the coating process and a closed-loop system returns any excess MIBK for reuse. The coating is applied via roll application. Spent MIBK and paper towels are managed as hazardous waste and transferred to a SAA at the end of each shift.

The Coating Department had three separate SAA containers located in a bermed area, approximately eighteen inches high. Emergency equipment noted in the area consisted of a fire extinguisher, an emergency response supply cabinet, and a container of absorbent material. At the time of the inspection the following containers were present:

- One 55-gallon container of used oil marked "Used Oil;"
- One 55-gallon container of hazardous waste labelled flammable solids, but not labeled "Hazardous Waste;"
- One 55-gallon container of hazardous waste labelled flammable liquids, but not labeled "Hazardous Waste;" and
- One 55-gallon container of hazardous waste labelled flammable aerosols, but not labeled "Hazardous Waste."

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.15(a)(5)(i)], 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." In an email dated July 21, 2021, Mr. Embry sent photos of the containers now labeled "Hazardous Waste".

The inspectors observed that all waste containers in the Coating Department were closed, in

good condition, and marked with the hazards of the contents. To the right of Coating Department, there was a small room that houses a 40-gallon parts washer using MIBK solvent to clean printing parts. The spent solvent is removed, as needed, and managed as flammable liquid hazardous waste in the SAA.

The less than 90-Day Hazardous Waste area/central accumulation area (CAA) is located in the northeast corner of the facility, in the same warehouse space as the Coating Department. At the time of the inspection the following containers were present:

- One 55-gallon container marked “Hazardous Waste Flammable” solids dated 06/23/21; and
- Two 55-gallon containers marked “Hazardous Waste Flammable” liquid and dated 06/23/21 and 07/13/21.

All containers were closed and in good condition. Emergency equipment such as a spill kit and a fire extinguisher were noted in the area.

Maintenance Area

The Maintenance Area generates oily rags that the facility manages as flammable solid hazardous waste. The inspectors observed two 8-ft boxes of universal waste lamps that were marked with one of the following phrases: “Universal Waste-Lamp(s),” or “Waste Lamp(s),” or “Used Lamps.”

Pursuant to Fla. Admin. Code Ann. r. 62-730.185(1) [40 C.F.R. § 273.14(e)], a SQHUW must label or mark each lamp or container of lamps clearly with one of the following phrases: “Universal Waste-Lamp(s),” or “Waste Lamp(s),” or “Used Lamps.” In an email dated July 21, 2021, Mr. Embry sent a photo of the boxes now labelled “Universal Waste Lamps.” Lamps are sent for disposal to Veolia ES Technical Solutions, LLC (FL0000207449), located at 342 Marpan Lane, Tallahassee, Florida.

Metal Department

Two can end sizes are fabricated in this area, all other can ends are purchased and ready to attach to the can, including the rubber gasket. An elevated work area is used to palletize finished cans for shipping. This area is adjacent to the palletizing area in the Can Department.

The five multi-die presses operating in this area punch out can ends from a metal sheet and crimp a lip on the can ends. Maintenance of the equipment includes removing used oil and cleaning with a rag and mineral spirits. Used rags are collected in a red flip-top container and disposed as hazardous waste. Scrap metal is placed in a dumpster and recycled. The finished can ends are bagged and sent to the Can Department to be attached to the cans.

The multi-die presses use an open lubrication system, which results in spills of the lubricant to the floor. A mop and bucket are stationed at each multi-die press. Universal Cleaner is mixed with water in the bucket and the mop is used to clean spilled lubricant. The cleaner consists of 2-butoxyethanol, potassium hydroxide, ammonia, and isopropyl alcohol. The wastewater is transferred to the wastewater recycling system at the end of each shift.

Record Review

The inspectors reviewed Weekly inspection records for July 2018 to July 2021. The last weekly inspection occurred on July 12, 2021 and was conducted by Mr. Shorter. Three instances were

noted where weekly inspections were not conducted at least once in a calendar week:

- September 21, 2020 to October 6, 2020 (15 days);
- December 26, 2019 to January 20, 2020 (25 days); and
- February 15, 2021 to March 2, 2021 (15 days).

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(3), generators of hazardous waste who accumulate hazardous waste on-site under 40 C.F.R. § 262.16, and § 262.17 [as adopted in subsection 62-730.160(1), F.A.C.], shall maintain written documentation of the inspections required under 40 C.F.R. Part 265 [as adopted in subsection 62-730.180(2), F.A.C.], and 40 C.F.R. § 262.16 and § 262.17 [as adopted in subsection 62-730.160(1), F.A.C.]. The generator shall keep the written documentation of the inspections under this section for at least three years from the date of the inspection. At a minimum, this documentation shall include the date and time of the inspection, the legibly printed name of the inspector, the number of containers, the condition of the containers, a notation of the observations made, and the date and nature of any repairs or other remedial actions.

The contingency plan (CP) was missing a list of the spills kits and eye wash stations and the facility also failed to prepare a quick reference guide (QRG). The inspectors informed the facility that Sonoco must update the CP and draft a QRG for FDEP/EPA review. After the review is completed, the updated CP and QRG must be submitted to the local emergency responders.

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.17(a)(6)], which incorporates Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.261], and is a condition of the LQG Permit Exemption, a contingency plan must include the following: (e) The plan must include a list of all emergency equipment at the facility (such as fire extinguishing systems, spill control equipment, communications and alarm systems (internal and external), and decontamination equipment), 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 Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.17(a)(6)], which incorporates Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.262(b)], and is a condition of the LQG Permit Exemption, a large quantity generator that first becomes subject to these provisions after May 30, 2017 or a large quantity generator that is otherwise amending its contingency plan must at that time submit a quick reference guide of the contingency plan to the local emergency responders identified at paragraph (a) of this section or, as appropriate, the Local Emergency Planning Committee.

In an email dated July 29, 2021, Mr. Embry submitted an updated CP and QRG and FDEP and EPA for review. Mr. Shannon Embry and Brian Stiller were listed as emergency coordinators.

Hazardous waste shipping manifests for July 2018 to July 2021 were reviewed and found to be in compliance. A land disposal restriction notification is signed with each manifest. Triumvirate Environmental Services (FLD981018773) is used as a transporter and Triumvirate Environmental Services (FLD980559728) is used as a designated disposal facility.

The inspectors review of training records indicated that Brian Stiller had not completed 2018, 2019, and 2020 hazardous waste annual training and Shannon Embry had not completed

2019 and 2020 hazardous waste annual training. The inspectors informed the facility to ensure that training for 2021 is completed by December 31, 2021.

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.17(a)(7)(iii)], which is a condition of the LQG Permit Exemption, facility personnel must take part in an annual review of the initial training required in paragraph 40 C.F.R. § 262.17(a)(7)(i) of this section. A large quantity generator must ensure that this program includes all the elements described in the document required under paragraph (a)(7)(iv) of this section.

Position descriptions were reviewed and were found to be in compliance. The Biennial report for reporting year 2019 was submitted to FDEP on March 31, 2020. A review of Biennial report indicated the following waste quantities were reported:

- D001 and F003 RQ waste, flammable liquid, methyl isobutyl ketone, paint. Mineral spirits from cleanup activities in coating and can departments – 12,455 pounds; and
- D001 and F003 RQ waste flammable liquid/solids, organic, methyl isobutyl ketone – 350 pounds.

10) Closing Conference

A closing conference was conducted at the conclusion of the inspection. Mr. Shannon Embry and Mr. Ronald Shorter participated in the closing conference. The observations made during the inspection were discussed and the inspection was concluded. Sonoco was inspected as a large quantity generator of hazardous waste. Corrective actions were completed prior to the issuance of this report.

11) Signed

Parvez Mallick
Inspector and Author of Report

Date

12) Concurrence and Approval

Araceli B. Chavez
Chief
RCRA Enforcement Section

Date