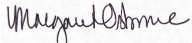


Region 6 - Enforcement & Compliance Assurance Division
INSPECTION REPORT

Inspection Date(s):	02/22-25/2022	
Media Program:	RCRA Compliance Evaluation Inspection	
Regulatory Program(s)	RCRA Large Quantity Generator	
Company Name:	Starpak LTD.	
Facility Name:	Starpak - Houston	
Facility Physical Location:	9690 West Wingfoot Road	
(city, state, zip code)	Houston, TX 77041	
Mailing address:	9690 West Wingfoot Road	
(city, state, zip code)	Houston, TX 77041	
County/Parish:	Harris County	
Facility Phone Number	(713)329-9183	
Facility Contact:	Ignacio Aguirre	Plant Engineer – Environmental Lead
	laguirre@starpakltd.com	
FRS Number:	110017613377	
Identification/Permit Number:	N/A	
Media Identifier Number:	RCRAID: TXR000057513	
NAICS:	326112 Plastics Packaging Film and Sheet (Including Laminated) Manufacturing	
SIC:	3081	
Personnel participating in inspection:		
John Penland	EPA Region 6 (ECDSR)	Senior Environmental Scientist
Debra Pandak	EPA Region 6 (ECDSR)	Senior Environmental Scientist
Ignacio Aguirre	Starpak LTD.	Plant Engineer – Environmental Lead
Viktor Manjarrez	Starpak LTD.	Project Manager – Assistant Plant Manager
Karla Horak	Starpak LTD.	Environmental Engineer
Kassim Mohammed	Starpak LTD.	Pre-press Supervisor
Alan Garcia	Starpak LTD.	Safety Manager
Bill Garriss	Starpak LTD.	Independent Consultant
EPA Lead Inspector Signature/Date	DEBRA PANDAK Digitally signed by DEBRA PANDAK DN: c=US, o=U.S. Government, ou=Environmental Protection Agency, cn=DEBRA PANDAK, 0.9.2342.19000000.100.1.1=68001003655850 Date: 2022.05.06 15:20:07 -05'00'	
	John Penland – Senior Environmental Scientist	Date
Supervisor Signature/Date	 Digitally signed by MARGARET OSBOURNE Date: 2022.05.06 15:35:49 -05'00'	
	Jeff Yurk – Waste Section Chief	Date

Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

During the week of February 20, 2022, I, John Penland, conducted an unannounced inspection of the Starpak, LTD. facility (Starpak) located at 9690 West Wingfoot Road in Houston, Texas for compliance with the Resource Conservation and Recovery Act (RCRA). I was assisted on this inspection by Environmental Protection Agency (EPA) inspector Debra Pandak. The inspection included a walkthrough of the facility's waste generation and management units; a review of the facility records related to hazardous waste management; and a specific evaluation of the facility's compliance with the RCRA air pollution control requirements.

The Starpak facility was targeted for inspection as part of an ongoing investigation into the facility's waste determination and counting procedures. That investigation was initiated by EPA Region 6 during 2019 and remains open. In addition, the solvent wastes generated by the facility have the potential to trigger the RCRA air pollution control requirements; therefore, this inspection is also being conducted as part of the National Compliance Initiative for air emissions from hazardous waste management units.

We concluded the inspection of the Starpak facility on February 25, 2022, with a closing conference where we presented our provisional areas of concern.

This report serves as documentation of all onsite activities and observations during the inspection of the Starpak Houston facility. Photographs taken during the inspection to document onsite observations are included as Appendix 1. A summary of all areas of concern identified during the inspection is provided in Section III.

FACILITY DESCRIPTION

The Starpak facility manufactures printed plastic packaging for use in a variety of consumer markets. Starpak blends individual ink formulations for its printed products using an 80%-20% mixture of n-propyl acetate and n-propyl alcohol as its solvent base. Ethyl Acetate is also used as needed to control for the ink's viscosity and drying time. The n-propyl acetate/n-propyl alcohol mixture is also used as a cleaning agent. Starpak has an extensive solvent recovery system throughout the plant, consisting of pumps, piping, a thermal distillation unit, and associated tanks. A general map of the plant is included in Appendix 2.

The Starpak Houston facility was issued the EPA ID# TXR000057513. Prior to the date of this inspection and since at least November 12, 2019, Starpak has been operating as a handler of universal waste.

The facility operates under the Clean Air Act as a Minor Source of criteria pollutants with New Source Review Permit #108176 governing the operation of its thermal oxidizers and fugitive emissions from the building.

Section II - OBSERVATIONS

We conducted the onsite inspection during normal business hours from February 22 to-25, 2022. During the inspection, the facility was conducting normal operations and all areas of the facility were in use. Throughout the week we visited each of the facility's waste generation, accumulation, and management areas. We also reviewed the facility's operating records pertaining to the facility's RCRA applicability and compliance requirements.

This section provides an abbreviated description of our daily activities. For details Appendix 3 contains the daily summaries provided to facility representatives. These summaries provide information on our observations each day, what was discussed at the end of each day with the facility representatives and any requests for documentation. Unless otherwise specified, the statements cited in this section, or in the daily summaries, reflect those claims made by facility personnel or documents reviewed during the inspection.

February 22, 2022

Debra Pandak and I entered the facility at 0950 where we presented our credentials to Mr. Ignacio Aguirre and informed him that we were there to conduct an inspection of the facility under Section 3007 of the Resource Conservation and Recovery Act (RCRA). I also presented the right of Starpak to assert a Confidential Business Information claim for records requested by EPA. This discussion was followed by a presentation of EPA Region 6's Confidentiality Notice (40 CFR Section 2. 203). Following this introduction, we conducted an inspection opening briefing with Ignacio Aguirre, Viktor Manjarrez, Karla Horak, and Alan Garcia.

Following the opening briefing we conducted a walkthrough of Starpak's production and support areas. This walkthrough included the Printing Press Area, the Ink Blending Room, the Loading Dock, the Printing Press Distillation Area, and the Plate Etching Area. See Appendix 3 for details of EPA observations.

February 23, 2022

On February 23, 2022, I reviewed the contents of the daily summary dated February 22, 2022, with facility representatives. I asked clarifying questions and documented information presented by facility representatives such as how ink returns are generated, identification of waste profiles, and approximate rates of generation for various waste streams including the still bottoms. I also discussed applicability of Hazardous Secondary Materials under 40 CFR 261.4(a)(23). See Appendix 3 for details of EPA observations.

February 24, 2022

The day's inspection began with a review of the daily summary from February 23, 2022. Additional requests for documentation were made related to training records, vapor pressure for the spent solvent and pressure set point for the relief valve on the spent solvent tank. I provided comments on Starpak's Emergency Response Procedures document. See Appendix 3 for details of EPA observations.

February 25, 2022

I facilitated a closing meeting with facility representatives reviewing the areas of concern. During this meeting, Starpak invited their consultant, Bill Garris via conference call. Together we reviewed the outstanding document requests and established a schedule for submittal.

Section III – PRELIMINARY FINDINGS

The following is a list of potential areas of concern discussed with the facility representatives. See Appendix 3 for details of EPA observations.

Ink Wastes

Generation Description- Ink wastes are generated from two separate processes at Starpak: ink formulation and printing. Ink wastes from the blend area are generated when errors occur in formulation and are accumulated in a 55-gallon container near the ink mixers. Ink wastes from the printing operations are collected in 5-gallon buckets when ink is changed from the individual printers and carried by the operators to the PRI distillation room where they are transferred into a 55-gallon drum. Ink wastes are generated by Starpak at a rate of approximately 220 gallons per week.

Waste Properties- The Ink wastes are composed of a mix of n-propanol, n-propyl acetate, pigments, and ethyl acetate with a flash point below 140F.

Waste Disposition- The wastes are shipped through NSSI for fuel blending.

Applicable requirements - Based on the disposition of the ink wastes, the waste meets the definition of solid waste. Based on its low flash point the ink wastes demonstrate the hazardous waste characteristic of flammability (D001). Due to the generating processes and the properties of the ink wastes, the ink wastes qualify for management as universal wastes under the State of Texas' paint and paint related wastes rule 30 TAC 335.262. The profile for this waste describes it as a D001,F003 Universal Waste.

Areas of Concern - Two containers of ink wastes were observed during this inspection. At the time of observation, the containers were not marked with the words "Universal Waste - Paint and Paint-Related Wastes" and did not have their lids secured in the closed position.

Plate Waste

Generation Description - Plate wastes are generated from the distillation of spent solvent from the photo etching process that Starpak uses to manufacture its printing plates. This waste is accumulated at the plate distillation unit in a 55-gallon drum before being moved to the PRI distillation prior to shipping.

Waste properties – The Plate Waste is composed of benzyl alcohol, naphtha, and 2-ethylhexyl acetate with a flash point greater than 140F. The profile for this waste describes it as a Class 1 non-hazardous waste.

Waste Disposition – The Plate Wastes are shipped for disposal by NSSI as a Class 1 nonhazardous waste.

Applicable Requirements – Based on the disposition of the plate wastes, the waste meets the

definition of solid waste. As a Class I solid waste, the plate waste would be subject to the reporting requirement of 30 TAC 335.6.

Areas of Concern – Generators of a Class I solid waste are required to notify and report annually for their generation of hazardous and Class I non-hazardous waste generation under the requirements of 30 TAC 335.6 and 335.9.

Soft Touch Wastes

Generation Description – Soft Touch wastes are generated from the printing operations where Soft Touch is used as a varnish for the printed products.

Waste Properties – The Soft touch waste is composed of a mix of urethane and poly-isocyanate compounds in ethyl acetate. Analytical reports provided by Starpak suggest that the waste has a flash point greater than 140F. The profile for this waste describes it as a D001 and F003 Universal Waste.

Waste Disposition - The wastes are then shipped through NSSI for fuel blending.

Applicable Requirements - Based on the disposition of the Soft Touch wastes, the waste meets the definition of solid waste. Due to the generating processes and the properties of the ink wastes, the ink wastes qualify for management as universal wastes (40 CFR 273) under the State of Texas' paint and paint related wastes rule at 30 TAC 335.262.

Areas of Concern - Two containers of Soft Touch wastes were observed during this inspection. At the time of observation, the containers were not marked with the words "Universal Waste - Paint and Paint-Related Wastes."

Contaminated Rags

Generation Description – Contaminated rags are generated throughout the facility from general cleaning activities. The rags are accumulated in 5-gallon buckets before being transferred to large blue bins located in the PRI distillation room.

Waste properties – The rags are typically contaminated with solvents n-propanol, n-propyl acetate, ethyl acetate, and inks. These contaminants have a flash point of less than 140F.

Waste Disposition – The contaminated rags are laundered offsite and returned to Starpak for reuse.

Applicable Requirements – The waste profile for the contaminated rags waste stream describes it as D001 and F003. Contaminated rags are exempt from the definition of solid waste if they meet the exemption requirements described in 40 CFR 261.4(a)(26).

Areas of Concern - Containers managing contaminated rags must be labeled with the words: "Excluded Solvent-Contaminated Wipes" none of the four containers of solvent contaminated wipes observed during this inspection were appropriately labeled.

Following the initial accumulation of the solvent contaminated rags, they must be placed in a container with the lid affixed to prevent leaks or emissions. The three large bins used for the transport and pre-transport storage of the contaminated rags are not equipped with a seal capable of preventing emissions.

Generators of waste excluded under this exemption must maintain a "Description of the process the generator is using to ensure the solvent-contaminated wipes contain no free liquids at the point of

being laundered or dry cleaned on-site or at the point of being transported off-site for laundering or dry cleaning”. This description had not been provided by Starpak prior to the conclusion of this inspection.

Dirty Solvent

Generation Description – Dirty Solvent is generated from the cleaning of the printing presses and pumped via hard piping to a dirty solvent accumulation tank located in the PRI distillation area. Additional sources of the dirty solvent are from various cleaning operations throughout the facility and from filter changes on the dirty solvent piping. These additional solvent batches are accumulated in a 275-gallon tote located in the “PRI” distillation area.

Waste Properties – Dirty solvent is composed of n-propanol, n-propyl acetate, and ink residues (e.g., pigments and ethyl acetate). The dirty solvent has a flash point of less than 140F.

Waste Disposition – The dirty solvent is reclaimed in a solvent distillation unit and then accumulated in a reclaimed solvent tank located also located in the PRI distillation room. This reclaimed solvent is then returned to the process where it is again used to clean the printing presses.

Applicable Requirements – Based upon the generation description, the dirty solvent would meet the definition for a spent solvent. A spent solvent being reclaimed under the control of the generator is exempt from the definition of solid waste as a hazardous secondary material so long as Starpak meets the requirements for the exemption at 40 CFR 261.4(a)(23). Should Starpak decide to manage this material as Universal Waste under Texas’ Paint and Paint Related Waste definition it would be prohibited from treatment (including reclamation) by 273.31.

Areas of Concern - Hazardous Secondary Materials are required to be managed in a manner that meets the definition of contained (40 CFR 260.10). The tote Starpak uses to accumulate dirty solvent in the PRI Distillation Area was open when observed on Tuesday, February 22, 2022.

Generators of Hazardous Secondary Materials are required to provide notice as required by 40 CFR 260.42. As of this inspection, no record of notification was provided by Starpak.

As part of our evaluation of the hazardous secondary materials exemption requirements, we asked for records concerning the vapor pressure of the dirty solvent and the set pressure for the dirty solvent tank’s pressure relief devices. As of the conclusion of this inspection, the vapor pressure of the dirty solvent had been documented but the set pressure for the pressure relief devices equipped on the dirty solvent tank had not.

Dirty Solvent Still Bottoms

Generation Description – The distillation of spent solvents from the printing process reclaims solvent by removing pigments and other contaminants as still bottoms. These still bottoms are pumped from the unit through hard piping to a 275-gallon container located on the loading dock. According to Ms. Horak, Starpak generates between 3 and 4 containers of this waste per calendar week.

Waste Properties – According to the profile provided by Starpak, the distillation bottoms are composed of approximately 98% ethyl acetate with 2% pigment contaminants with a flash point less than 73F. The profile describes this waste as a D001 and F003 Universal Waste.

Waste Disposition – According to Mr. Aguirre, this waste is shipped to NSSI for fuel blending prior to burning for energy recovery.

Applicable Requirements – Based on the waste disposition, the still bottoms meet the definition of solid waste. Based on its flash point of less than 73F, the waste demonstrates the hazardous waste characteristic of flammability (D001). Even if Starpak wanted to claim its spent solvent as Universal waste, as of June 11, 2020, TCEQ has modified its definition of Paint and Paint Related Waste to exclude materials derived from the reclamation of Paint and Paint Related Waste under the Universal Waste Rules. Therefore, the still bottoms have been determined through this inspection to be hazardous waste.

Areas of Concern -Based on the NOR for the facility at the time of this inspection, Starpak's registration reflects the facility does not generate hazardous waste. Therefore, Starpak has not provided notice to TCEQ that it is generating this hazardous waste. The container used for the accumulation of this waste is marked as Universal Waste, however this waste definition does not appear to apply to this waste. Therefore, this waste is not marked appropriately as described in 40 CFR 262.17.

According to the records provided by Starpak, this waste has been shipped on multiple occasions on bills of lading but not on a hazardous waste manifest as required by 40 CFR 262.20. Therefore, Starpak has on multiple occasions offered this waste for transport without preparing a hazardous waste manifest.

Piping in hazardous waste service is required to be maintained in accordance with 40 CFR 265 Subpart BB. According to Mr. Aguirre, the piping used for transferring the still bottoms from the distillation unit to the still bottom accumulation container is not subject to any fugitive emission monitoring activities.

General Facility Standards

Based on its claimed rate of generation for hazardous waste (Dirty Solvent Still Bottoms), Starpak is a large quantity generator of hazardous waste and therefore required to comply with the Large Quantity Generator requirements of 40 CFR part 262.

Based on its claimed rate of generation for universal waste (Ink Waste, Plate Waste, Soft Touch Waste), Starpak is a large quantify handler of universal waste and therefore required to comply with the requirements of 40 CFR 273 Subpart C.

Based on its claimed rate of generation for hazardous secondary materials (Dirty Solvent), Starpak is required to comply with the requirements of 40 CFR 261.410 and 420.

Areas of Concern - Facilities subject to 40 CFR 261.410 and/or 40 CFR 262.255 are required to maintain adequate aisle spacing. When observed on February 22, 2022, Starpak was not maintaining adequate aisle spacing for its containers located in the PRI distillation area.

Texas requires annual reporting to STEERS for Class 1 Industrial Waste and Hazardous Waste under 30 TAC 335.6. As of this inspection, Starpak had not provided any reporting for its Class 1 Waste or its hazardous waste.

Section IV – FOLLOW UP

Actions taken by Starpak to resolve areas of concern during and following the inspection, such as drum labeling, were documented by Starpak with photographs or other documentation and

submitted to the EPA via the electronic secure online drive. Details of actions taken are provided in Appendix 4. Any information received from Starpak after the inspection was also received via the secure online drive. These documents are accessible to the EPA Enforcement Officer.

Section V – LIST OF APPENDICES

Appendix 1 - Photo Log – Photos taken on 2/22/2022

Appendix 2 - Facility Diagram

Appendix 3 - Daily Summaries

Appendix 4 - Starpak Corrective Actions

Photo Log

Photos Taken on 2-22-2022

FY2022 RCRA Compliance Evaluation Inspection
StarPak Corp, Houston, TX
February 22 to February 25, 2022

Camera Make: Nikon CoolPix
 Model No.: AW120
 Camera Serial Number: 31003827
 EPA Equipment Number: S68180

Photo #	Image #	Date	Time	Subject
1	DSCN0525	2/22/2022	11:23am	Ink waste drum lid not secured with ring
2	DSCN0526	2/22/2022	11:26am	Wipes canister in closed position near mixing area. Inside product storea area.
3	DSCN0527	2/22/2022	11:29 AM	Tote containing still bottoms. Tote located on loading dock. View of tote receiving waste from distillation process.
4	DSCN0528	2/22/2022	11:29 AM	View of tote being filled with labeling shown.
5	DSCN0529	2/22/2022	11:29 AM	Closeup view of label on tote being filled.
6	DSCN0530	2/22/2022	11:31am	View of empty tote behind the one being filled located on loading dock. Note label.
7	DSCN0531	2/22/2022	11:31 AM	View of all totes on loading dock used to receive still bottoms. All empty except the one being filled.
8	DSCN0532	2/22/2022	11:34 AM	View of dirty solvent tote. Large funnel connected to tote on top. Unit open.
9	DSCN0533	2/22/2022	11:34 AM	View of open funnel system connected to dirty solvent tote.
10	DSCN0534	2/22/2022	11:35 AM	View of 1 of 3 observed containers of rags that will go for laundering.
11	DSCN0535	2/22/2022	11:37 AM	Durm of sludge/PRI. View of lable and date. Drum top not secure with ring
12	DSCN0536	2/22/2022	11:38 AM	View of sludge/PRI drum showing label closeup.
13	DSCN0537	2/22/2022	11:38 AM	Top of drum holding sludge/PRI - showing ring not secured
14	DSCN0538	2/22/2022	11:39 AM	Three drums of waste located next to clean solvent (product) drums. Plates sludge waste and soft comex in the drums
15	DSCN0539	2/22/2022	11:41 AM	Signage above waste drums-Satellite Accumulation Area
16	DSCN0540	2/22/2022	11:41 AM	Signage above area with empty containers on wall next to the door entering the area.
17	DSCN0541	2/22/2022	11:43 AM	Distillation system overview

Photo Log - Starpak CEI

FY2022 RCRA Compliance Evaluation Inspection

StarPak Corp, Houston, TX

February 22 to February 25, 2022

Camera Make: Nikon CoolPix

Model No.: AW120

Camera Serial Number: 31003827

EPA Equipment Number: S68180

Photo #	Image #	Date	Time	Subject
18	DSCN0542	2/22/2022	11:45 AM	View of pump under dirty solven tank
19	DSCN0543	2/22/2022	11:46 AM	Open line - no cap on pipe on dirty sovlent tank
20	DSCN0544	2/22/2022	11:51 AM	Buckets with dirty rags and pads. Pads will go for disposal. Rage will be put into larger rag tote for laundering. Note no covers on containers
21	DSCN0545	2/22/2022	11:54 AM	View of labeling by bay door to the facility from dock. Area labeled: EPN-FUG-1
22	DSCN0546	2/22/2022	11:59 AM	IHSOLVE recycling system overview
23	DSCN0547	2/22/2022	12:00 PM	Cyrel washout system - piping
24	DSCN0548	2/22/2022	12:00 PM	Cyrel overview - clean washout solvent container.



Photo #1

PHOTO #1



PHOTO #2



PHOTO #3



PHOTO #4

1/27/22, 3:28 PM <https://network.wastelinq.com/docume...>



Order #: 328017 

UNIVERSAL WASTE
FEDERAL AND/OR STATE LAW PROHIBITS IMPROPER DISPOSAL
If found, contact the nearest police or public safety authority, the
U.S. Environmental Protection Agency or the State Department of
Environmental Protection

GENERATOR INFORMATION:
NSSI/Recovery Services Inc.
5711 Etheridge St, Houston TX 77087
EPA ID: TXD982560294

UN1263

D.O.T PROPER SHIPPING NAME:
RQ, UN1263, Paint related material (UNIVERSAL WASTE
PAINT AND PAINT RELATED MATERIAL), 3, PG II, ERG 128

Waste Name: CE - Paint Liquid/Sludge - 1673774-00
State Waste Codes: UNIV209H PUP:01/28/2022
E.P.A Waste Codes: F005, D001, D005, D006,
D007, D008, 
Manifest ID #: 328017 | Line #: 3 | Seq: 8
Approval Number: 1673774-00 328017-3-8
TSDP: Philip Reclamation Services Houston, LLC

NSSI/Recovery Services Inc.
Waste Name: CE - Paint Liquid/Sludge - 1673774-00

275 Philip Reclamation Order #: 328017
TP Services Houston, LLC PUP:01/28/2022
Per Container Approval Number: 1673774-00 
328017-3-8

https://network.wastelinq.com/documents/satoorder_lab... 31/33



PHOTO #5

UNIVERSAL WASTE

This waste is not regulated by 40CFR Part 261,
but may be subject to Department of Transportation regulations.

Generator - EPA ID TXD 982 560 294

Phone (713) 641-0391

NSSI RECOVERY SERVICES
5711 ETHERIDGE STREET
HOUSTON, TX 77087

UN1263

Proper D.O.T. Shipping Name

HOU-3564N-013

UN1263 PAINT RELATED MATERIAL 3 PGII (UNIVERSAL WASTE - PAINT AND PAINT
RELATED WASTE)



UNIV209H

PCAF01

Doc: 43851-22

BC: MM005260839-013

Ord: 1683426

Mnf: 004385122BOL-2

Prf: 1673774-01

WCN: UNIVERSAL PAINT LIQUID/SLUDGE

Accumulation Date: 01/28/2022

Environmental Protection
GENERATOR INFORMATION:
NSSI/Recovery Services Inc.
5711 Etheridge St. Houston TX 77087
EPA ID: TXD982560294

UN1263

D.O.T. PROPER SHIPPING NAME:
RQ, UN1263, Paint-related material (UNIVERSAL WASTE
PAINT AND PAINT RELATED MATERIAL), 3, PG II, ERG 128

Waste Name: CE - Paint Liquid/Sludge - 1673774-00

State Waste Code: UN1263H

EPA Waste Code: F001, D001, D005, D006

0007, 0008

Manifest ID #: 328017-3-2

Approval Number: 1673774-00

TSDP: Philip Reclamation Services Houston, LLC

Order #: 328017-3-2

NSSI/Recovery Services Inc.

Waste Name: CE - Paint Liquid/Sludge - 1673774-00

275 Philip Reclamation

TP Services Houston, LLC

Per Container Approval Number: 1673774-00

Order #: 328017-3-2

1673774-00

328017-3-2

1673774-00

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1673774-00

FLAMMABLE LIQUID

3

PHOTO #6



PHOTO #7



PHOTO #8



PHOTO #9

DIRTY
SOLVENT
DATE: 11/13/2012



PHOTO #10



PHOTO #11



HAZARDOUS
WASTE

Waste Ink	
Label- No 104	
Accumulation Start Date and Time 02/22/22	
Make Ready Name	
Accumulation Stop Date and Time	
Make Ready Name	

PHOTO #12



PHOTO #13



PHOTO #14

SATELLITE
ACCUMULATION
AREA
HAZARDOUS
WASTE

ONLY SLUDGE
DRUMS

CAUTION
HAZARDOUS WASTE
SATELLITE ACCUMULATION AREA
UNAUTHORIZED PERSONNEL
KEEP OUT



PHOTO #15



PHOTO #16



PHOTO #17



PHOTO #18



PHOTO #19



PHOTO #20



EPN-FUG-1

WARNING
DO NOT ENTER AREA
WHEN ALARM IS SOUNDING,
EXPOSURE TO CARBON DIOXIDE
GAS MAY BE FATAL.
THIS AREA PROTECTED BY
A CARBON DIOXIDE
FIRE EXTINGUISHING SYSTEM.

FIRE
DEPT.

2 3 0

PHOTO #21



PHOTO #22



PHOTO #23



PHOTO #24

APPENDIX 2

FACILITY LAYOUT



Appendix 3

Daily Summaries

2-22- through 2-25-2022

Pandak, Debra

From: Penland, John
Sent: Tuesday, February 22, 2022 10:54 PM
To: laguirre@starpakltd.com; Pandak, Debra
Cc: Yurk, Jeffrey
Subject: Daily Summary February 22, 2022 - FY2022 RCRA Investigation at the Starpak facility located in Houston, Texas (TXR000057513)
Attachments: cbi form RCRA 2-19-20.pdf

All, Here is a summary of my notes from today's inspection. If there are any errors or omissions please let me know.

Introduction

During the week of February 20, 2022, I, John Penland, will be conducting an unannounced inspection of the Starpak, LTD. facility (Starpak) located at 9690 West Wingfoot Road in Houston, Texas for compliance with the Resource Conservation and Recovery Act (RCRA). I will be assisted on this inspection by Environmental Protection Agency (EPA) inspector Debra Pandak. The inspection will include walkthroughs of the facility's hazardous waste generation and management units; a review of the facility records related to hazardous waste management; and a specific evaluation of the facility's compliance with the RCRA air pollution control requirements.

Purpose

The Starpak facility was targeted for inspection as part of an ongoing investigation into the facility's waste determination and counting procedures. The investigation was initiated by EPA Region 6 during FY2019 and remains open. In addition, the solvent wastes generated by the facility have the potential to trigger the RCRA air pollution control requirements; therefore this inspection is also being conducted as part of the National Compliance Initiative for air emissions from hazardous waste management units.

Inspection Attendees:

NAME	TITLE	REPRESENTING	PHONE	EMAIL
John Penland	Sr. Environmental Scientist – Lead Inspector	US EPA Region 6	214-665-9717	Penland.john@epa.gov
Debra Pandak	Sr. Environmental Scientist – Asst. Inspector	US EPA Region 6	214-665-7565	Pandak.debra@epa.gov
Viktor Manjarrez	Project Manager Asst. Plant Manager	Starpak LTD		
Ignacio Aguirre	Plant Engineer Environmental Lead	Starpak LTD	713-201-5801	laguirre@starpakltd.com
Karla Horak	Environmental Engineer	Starpak LTD		
Kassim Mohammed	Pre-press Supervisor	Starpak LTD		

Daily Summary

- Initial Entry to the facility - 9:50am
- Opening meeting start – 10:00am

- I presented my credentials to Mr. Aguirre and informed him that Debra Pandak and I were there to conduct an inspection of the facility under the authority of section 3007 of the Resource Conservation and Recovery Act
- We discussed the authority for the inspection – RCRA Section 3007 - For purposes of developing or assisting in the development of any regulation or enforcing the provisions of this chapter, any person who generates, stores, treats, transports, disposes of, or otherwise handles or has handled hazardous wastes shall, upon request of any officer, employee or representative of the Environmental Protection Agency, duly designated by the Administrator, or upon request of any duly designated officer, employee or representative of a State having an authorized hazardous waste program, furnish information relating to such wastes and permit such person at all reasonable times to have access to, and to copy all records relating to such wastes. For the purposes of developing or assisting in the development of any regulation or enforcing the provisions of this chapter, such officers, employees or representatives are authorized—
 - (1) to enter at reasonable times any establishment or other place where hazardous wastes are or have been generated, stored, treated, disposed of, or transported from;
 - (2) to inspect and obtain samples from any person of any such wastes and samples of any containers or labeling for such wastes.
- We discussed the purpose of EPA’s inspection – Assessment of Starpak’s compliance with its requirements under RCRA, including, but not limited to, the requirements for: waste determination and counting; waste marking; waste container management; use of the hazardous waste manifest; emergency planning; personnel training; and air pollution control requirements for hazardous waste units.
- Discussed the right of Starpak to assert a Confidential Business Information claim for records requested by EPA (see attachment)
- Discussed the process for transferring electronic records – EPA has set up a Microsoft OneDrive folder with access limited to John Penland, Debra Pandak, and Ignacio Aguirre.
- Discussed the inspection process – the inspection will be conducted February 22 through February 25, 2022. The participants will meet at the facility at 9:30am each day to conduct the onsite portion of the inspection and discuss the findings of the ongoing records review. The records review will be conducted by the inspectors independently offsite throughout the week. Daily summaries will be provided by the inspectors at the end of each day to ensure a clear communication of questions and findings. The meeting Friday, February 25, 2022 will be reserved for a closing conference, where EPA will summarize the overall findings of the inspection to that point and provide a plan for concluding any unfinished evaluation.
- Meeting concluded with a safety briefing at approximately 11:00am
- General Facility Process – The Starpak facility manufactures printed plastic packaging for use in a variety of consumer markets. The facility production operations include a photo etching process and ten, high-volume printing presses. The photo etching process includes a solvent reclamation unit (plate distillation unit) to recycle the mask removal agent. The printing presses generate a spent solvent which is accumulated in a spent solvent tank prior to reclamation in a distillation unit. The distilled solvent is recycled into the printing process.
 - According to Mr. Aguirre, the printing solvent is a blend of n-propanol and n-propyl acetate.
- Clean Air Act Permitting – According to Mr. Aguirre, the facility is under the emissions threshold for CAA title V permitting. The facility operates under a minor source New Source Review Permit.
- Facility Walkthrough
 - Beginning at approximately 11:00am
 - Printing press area –
 - We physically inspected 3 of the individual presses.
 - Each press is equipped with an enclosure where ink blend feed containers and the solvent cleaning pumps are located. The solvent cleaning pumps are each hard piped to the spent solvent tank in the distillation area.
 - Strong solvent odors are pervasive in the area. The entire building is maintained at negative pressure to prevent solvent emissions to the outside atmosphere.

- o Ink Blending Area –
 - The ink blending area is used to formulate each individual ink batch used in the printing process. Blends are controlled for color, drying time, and consistency.
 - One 55-gallon container of ink waste was located in the area. The drum was marked with the words “ink waste” and the lid was open.
 - One small can was located in the area for the accumulation of ink contaminated rags. The can was unmarked and the lid unsecured.
 - Solvent odors are pervasive in the area.
- o Dock area –
 - Four totes located in this area are used for the accumulation of still bottoms from the press solvent distillation unit. At the time of this inspection, 3 of the totes were empty and one was attached to the distillation unit via piping and a flex hose. The totes were each marked as “Universal Waste – Paint and Paint Related Material.”
 - The rolling door leading to this area from the main building was marked as EPN-FUG-1, a designation usually associated with a CAA permit provision.
- o Press distillation area –
 - spent solvent from the printing press area is accumulated in the spent solvent tank located in this area.
 - 2 solvent reclamation distillation units are located in this area, but only one is routinely in use. The second smaller unit is in place as a backup. Each of the 2 distillation units has an associated clean solvent tank to accumulate the reclaimed solvent. The bottoms from the distillation units are pumped via hard piping through the wall to the dock area tote.
 - Two hazardous waste storage area signs are located in this room, one for hazardous waste storage and one for satellite accumulation. However, these signs did not appear to designate segregated management areas dedicated to hazardous waste accumulation. Instead, raw material containers were intermingled with waste containers resulting in a scenario where it was difficult to differentiate the containers.
 - 3 large blue bins marked as “Dirty Rags” and “Flammable Liquid” were located in this area, each with an unsecured lid. 4 unlabeled five-gallon pails (3 without lids) full of ink and solvent contaminated rags and pads were located beneath a work bench.
 - One tote marked as “dirty solvent” was located in this area. The tote was being used to accumulate spent solvent at the time of this inspection. The tote was equipped with an open funnel/drip tray which allowed the tote contents to volatilize to the building. According to Mr. Kassim Mohammed, the tote received solvent and sludges from the inline filter one the dirty solvent tank (cleaned 3x per day). The tote was not being actively filled or emptied throughout the observation period.
 - One open-ended line was identified on the spent solvent tank.
 - One 55-gallon drum marked as “Sludge PRI” was located in this area
 - One 55-gallon drum marked as “Plates Sludge Waste” was located in this area
 - 2 Drums marked as “waste Soft. Comexi” were located in this area
 - No containers present in this area were marked as “Universal Waste” or as “Hazardous Waste”
 - Several drums of Ethyl Acetate were present in this area. According to Mr. Aguirre, ethyl acetate is used as an ingredient in the ink blending process.
 - Several drums of Isopropyl Alcohol were present in this area. According to Mr. Aguirre, isopropyl alcohol is used as a surface disinfectant in the facility.
 - Solvent odors were pervasive in this area.
- o Plate Distillation Unit
 - The plate distillation unit is connected to the photo-etching process via hard piping without any intermediate spent solvent accumulation unit.
 - The distillation bottoms are collected in a 55-gallon drum, accessible through a door on the unit.
- Daily Wrap up meeting

- o Following the conclusion of the facility walkthrough we discussed extent of the records request presented to Mr. Aguirre but not discussed in-depth prior to the walkthrough.
 - A current notice of Regulated Waste Activity (typically presented as part of a biennial waste report or as part of the STEERS submittal)
 - A current copy of the facility Contingency Plan and Emergency Procedures (may also be part of a broader Emergency Response Plan)
 - Personnel training records related to hazardous waste activities for selected personnel. The current request includes:
 - Mr. Ignacio Aguirre
 - Ms. Karla Horak
 - Mr. Kassim Mohammed
 - Facility Maps – preferably identifying the solid waste generation and management areas
 - Facility waste profiles for any solid waste generated since 2019. Include documentation relevant to the waste determination made for each waste (i.e. analytical reports or documentation to support generator knowledge)
 - Safety Data Sheets for each solvent used throughout the facility.
 - Manifests and accompanying land disposal restriction notices for any hazardous waste shipped for offsite disposal since 2019
 - Bills of lading or any other document used to accompany any shipment of any waste since 2019
 - Any active RCRA or CAA permits
 - Engineering diagrams for the waste generating processes and solvent reclamation systems.
 - Annual Waste Summaries since 2019.
 - Any agreement between Starpak and any subsequent waste handler or Treatment, Storage, or Disposal Facility pertaining to the disposition of Starpak’s wastes.
 - SOPs related to waste generating, reclamation, or management processes
- Departed Facility at approximately 12:30pm

Topics for discussion on February 23, 2022

- o Profiles associated with solvent and ink wastes (including rags) indicate the presence of ethyl acetate in significant concentrations
- o Profile for the plate waste indicates a flash point of 145F.
- o Current NOR indicates Universal Waste only – Effective 6-11-2020, still bottoms destined for disposal or for recycling by burning for energy recovery are excluded from the definition of Universal waste. See, 30 TAC 335.262(b) and RG-370

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Pandak, Debra

From: Penland, John
Sent: Thursday, February 24, 2022 12:30 PM
To: iaguirre@starpakltd.com; Pandak, Debra
Cc: Yurk, Jeffrey
Subject: Daily Summary February 23, 2022 - FY2022 RCRA Investigation at the Starpak facility located in Houston, Texas (TXR000057513)

Inspection Attendees:

NAME	TITLE	REPRESENTING	PHONE	EMAIL
John Penland	Sr. Environmental Scientist – Lead Inspector	US EPA Region 6	214-665-9717	Penland.john@epa.gov
Debra Pandak	Sr. Environmental Scientist – Asst. Inspector	US EPA Region 6	214-665-7565	Pandak.debra@epa.gov
Viktor Manjarrez	Project Manager Asst. Plant Manager	Starpak LTD		
Ignacio Aguirre	Plant Engineer Environmental Lead	Starpak LTD	713-201-5801	iaguirre@starpakltd.com
Karla Horak	Environmental Engineer	Starpak LTD		
Alan Garcia	Safety Manager	Starpak LTD		

Daily Summary

- Inspection start – 9:43am
 - Review of Daily Summary February 22, 2022
 - A more accurate process description is available in Starpak’s CAA NSR permit application.
 - Printing Process
 - 11 printing presses are operated at Starpak. 10 in the main printing press area and an 11th in another area of the building.
 - Ink returns are generated in the printing area and carried to the Distillation (PRI) Room where they are added to a 55-gallon drum. This is the drum observed on February 22 and marked as PRI Sludge/Ink waste.
 - This Ink waste is assigned profile # PL1-182705 (8-17-2018) and generated at a rate of approximately 110-gallons per week
 - Blending Process
 - Ink waste generated in blend room assigned to profile # PL1-182705 (8-17-2018) and is generated at a rate of approximately 110-gallons per week
 - Profile PL1-182705 designates the waste as being D001,F003 Universal Waste with up to 10% ethyl acetate. According to Mr. Aguirre, this is incorrect since the ethyl acetate is present as an ingredient in the ink and not being used as a solvent.
 - Dock Area
 - Still bottoms are generated at a rate of between approximately 825 and 1100 gallons per week.

- The still bottoms are assigned to profile # PL1-182705 (7-19-2018) – This is an identical profile # to the ink waste but describes a completely different waste stream with different composition
- The profile for the still bottoms designates the waste as D001, F003 and indicates a composition of up to 99% Ethyl Acetate. According to Mr. Aguirre this is incorrect since the still bottoms should be primarily composed of Propanol and Propyl Acetate. Any Ethyl acetate present is from its use as part of the ink blend and not because of its use as a solvent.
- Distillation area
 - The rags present in the area are being laundered and reused in the plant. However, they are not marked or managed in accordance with 40 CFR 260.4(a)(26)
 - The Dirty solvent tote in the distillation room is used to accumulate spent solvent generated through cleaning activities throughout the facility and filter changes on the dirty solvent tank. The solvent in this tote is then siphoned into the dirty solvent tank for reclamation.
 - Soft Touch drums observed on February 22 are assigned Profile # AG1-190216 which designates the waste as D001, F003 Universal Waste with up to 100% Ethyl Acetate. This needs clarification since this profile was not directly discussed on February 23.
 - Spill cleanup of the dirty solvent or inks, regardless of the activity that resulted in the spill, need to be collected and contained in a timely fashion. Otherwise these spills become solid(and potentially hazardous) waste.
- Plate Distillation
 - The plate waste is assigned profile # PL1-190410 which designates the waste as Non-hazardous. Review of the SDS for the raw material solvent shows that the Flash Point is >62C and the solvent is not composed of any listed ingredients.
- Applicable Standards based on our current review of the process and documents provided by Starpak
 - o Since the facility is claiming the spent solvent as a Hazardous Secondary Material being reclaimed under control of the generator (40 CFR 261.4(a)(23)), Starpak would be required to comply with the Emergency Preparedness Standards of 40 CFR 261.400
 - o As a Hazardous Secondary Material management process, all units managing the dirty solvent waste would need to meet the requirements of the *contained* definition at 40 CFR 260.10
 - o As of June 11, 2020, the still bottoms generated from the solvent distillation unit would not qualify for management under the universal waste standards. Based on the claimed rate of generation stated above, the facility would be generating >1000 kg of hazardous waste per calendar month and be required to comply with the large quantity generator standards of 40 CFR part 262
 - o Since the facility is laundering and reusing its contaminated rags, Starpak would be need to comply with the requirements of 40 CFR 261.4(a)(26) in order to exempt these rags from the solid and hazardous waste rules.
 - o Piping and ancillary equipment conveying still bottoms between the bottom of the distillation unit and the container accumulating that waste would be subject to the requirements of 40 CFR 265 Subpart BB, as incorporated by reference in 40 CFR 262.17(1)(i).
 - o For any waste being managed as universal waste under Texas' Paint and Paint Related Waste rules, Starpak would need to comply with the requirements of 30 TAC 335.262
- Departed Facility at approximately 1:45pm

Discussion topics planned for February 24

- Employee Training
 - o Contents of Hazardous waste Training
 - o Emergency preparedness training
 - o DOT Training
 - o Operator Training
 - o One additional employee requested: Juan Espara(sp?)

- Missing Generation rate info
 - Plate waste (PL1-190410)
 - Rags (PL2-190604)
- Duplicate Profile numbers
 - PL1-182705
- Missing profiles
 - PL1-190210 (Ink and Still bottom Waste?)
 - PL1-200325 (battery?)
 - PL1-190703 (used oil?)
 - PL1-190403 (Fluorescent Lamps?)
 - PL1-190604 (Anilox Cleaner?)(Dibasic Ester?)
 - LP1-102021 (Absorbent Sand?)
 - PL1-190719 (Lead Acid Batteries?)
 - PL1-210211 (Used Oil Rags?)
- Content of ERP
- Facility inspections
- Contained definition for HSM units
 - Vapor pressure of dirty solvent
 - Set pressure for tank relief valves
- Requested documents

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Pandak, Debra

From: Penland, John
Sent: Thursday, February 24, 2022 11:11 PM
To: iaguirre@starpakltd.com; Pandak, Debra
Cc: Yurk, Jeffrey
Subject: Daily Summary February 24, 2022 - FY2022 RCRA Investigation at the Starpak facility located in Houston, Texas (TXR000057513)

Inspection Attendees:

NAME	TITLE	REPRESENTING	PHONE	EMAIL
John Penland	Sr. Environmental Scientist – Lead Inspector	US EPA Region 6	214-665-9717	Penland.john@epa.gov
Debra Pandak	Sr. Environmental Scientist – Asst. Inspector	US EPA Region 6	214-665-7565	Pandak.debra@epa.gov
Ignacio Aguirre	Plant Engineer Environmental Lead	Starpak LTD	713-201-5801	iaguirre@starpakltd.com
Karla Horak	Environmental Engineer	Starpak LTD		

Daily Summary

- Inspection start – 3:45pm (start delayed due to an emergency at the facility)
- Reviewed February 23, 2022 Daily Summary
 - Plate waste is generated at a rate of approximately 330-440 gallons per week
 - Soft Touch waste is generated at a rate of approximately 110-165 gallons per week
 - Requested DOT training records
 - Requested ERP training records
 - Requested position descriptions for employees subject to training requirements of RCRA
- Discussed the definition of contained for the Hazardous Secondary Materials units (see 260.10)
 - Requested the vapor pressure for the spent solvent and the pressure set point for the pressure relief valve for the spent solvent tank
- Reviewed the facility inspection checklist. This inspection checklist includes the waste containers and many of the requirements for large quantity generators of hazardous waste.
 - Requested the completed facility inspection checklists for the prior 3 years (2019-2022)
- Discussed content and disposition of the Starpak ERP
 - The ERP will be reviewed for compliance with the standards of 261 Subpart M and 262 Subpart M
 - The ERP does not include a list of emergency response equipment
 - According to Ms. Horak, the ERP was sent via certified mail to the local emergency response contacts.
 - Requested these certified mail receipts
- Discussed documentation of corrective measures
 - Please upload documentation or any actions that Starpak takes to address Areas of Concern identified by EPA during this inspection. I have added a new subfolder to the OneDrive for these records.
- Departed Facility at 5:45pm

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Pandak, Debra

From: Penland, John
Sent: Sunday, March 6, 2022 8:18 PM
To: iaguirre@starpakltd.com; Pandak, Debra
Cc: Yurk, Jeffrey
Subject: Closing Meeting Summary - February 25, 2022 - FY2022 RCRA Investigation at the Starpak facility located in Houston, Texas (TXR000057513)

Inspection Attendees:

NAME	TITLE	REPRESENTING	PHONE	EMAIL
John Penland	Sr. Environmental Scientist – Lead Inspector	US EPA Region 6	214-665-9717	Penland.john@epa.gov
Debra Pandak	Sr. Environmental Scientist – Asst. Inspector	US EPA Region 6	214-665-7565	Pandak.debra@epa.gov
Viktor Manjarrez	Project Manager Asst. Plant Manager	Starpak LTD		
Ignacio Aguirre	Plant Engineer Environmental Lead	Starpak LTD	713-201-5801	iaguirre@starpakltd.com
Karla Horak	Environmental Engineer	Starpak LTD		
Bill Garris	Independent Consultant	Starpak LTD	336-462-7064	

Closing Meeting Summary

- Meeting start – 10:12am
- Introduction
 - RCRA 3007 – This inspection was conducted under the authority of RCRA section 3007. The findings of this inspection will be documented in an inspection report which will be sent to Starpak upon completion. I strongly recommend that Starpak respond, in writing, to the findings contained in that report.
 - CBI – As of the conclusion of the inspection, Starpak has not asserted any claims of confidential business information for the records or photographs obtained. Should Starpak wish to make a claim of CBI, I encourage you to complete and return the CBI packet I attached to my email on Tuesday, February 22.
 - Process based inspection description – This inspection followed a process based inspection process. Using this method, EPA inspectors review the waste generating processes, waste characteristics, and waste management procedures to determine the applicable standards that pertain to the facility's operations.
- Provisional Inspection Findings
 - Ink Wastes
 - Generation Description- Ink wastes are generated from two separate processes at Starpak: ink formulation and printing. Ink wastes from the blend area are generated when errors occur in formulation and are accumulated in a 55-gallon container near the ink mixers. Ink wastes from the printing operations are collected in 5-gallon buckets when ink is changed from the individual

printers and carried by the operators to the PRI distillation room where they are transferred into a 55-gallon drum. Ink wastes are generated by Starpak at a rate of approximately 220 gallons per week

- Waste Properties- The Ink wastes are composed of a mix of n-propanol, n-propyl acetate, pigments, and ethyl acetate with a flash point below 140F
- Waste Disposition- The wastes are shipped through NSSI for fuel blending.
- Applicable requirements – Based on the disposition of the ink wastes, the waste meets the definition of solid waste. Based on its low flash point the ink wastes demonstrate the hazardous waste characteristic of flammability (D001). Due to the generating processes and the properties of the ink wastes, the ink wastes qualify for management as universal wastes under the State of Texas’ paint and paint related wastes rule. The profile for this waste describes it as a D001,F003 Universal Waste.
- Areas of Concern:
 - 2 containers of ink wastes were observed during this inspection. At the time of observation the containers were not marked with the words “Universal Waste - Paint and Paint-Related Wastes” and did not have their lids secured in the closed position.

o Plate Waste

- Generation Description - Plate wastes are generated from the distillation of spent solvent from the photo etching process that Starpak uses to manufacture its printing plates. This waste is accumulated at the plate distillation unit in a 55-gallon drum before being moved to the PRI distillation prior to shipping.
- Waste properties – The Plate Waste is composed of benzyl alcohol, naphtha, and 2-ethylhexyl acetate with a flash point greater than 140F. The profile for this waste describes it as a Class 1 non-hazardous waste.
- Waste Disposition – The Plate Wastes are shipped for disposal by NSSI as a Class 1 non-hazardous waste
- Applicable Requirements – Based on the disposition of the plate wastes, the waste meets the definition of solid waste. As a class I solid waste, the plate waste would be subject to the reporting requirement of 30 TAC 335.6
- Areas of Concern –
 - Generators of a Class I solid waste are required to notify and report annually for their generation of hazardous and class I non-hazardous waste generation under the the requirements of 30 TAC 335.6 and 335.9

o Soft Touch Wastes

- Generation Description – Soft Touch waste are generated from the printing operations where Soft Touch is used as a varnish for the printed products.
- Waste Properties – The Soft touch waste is composed of a mix of urethane and poly-isocyanate compounds in ethyl acetate. Analytical reports provided by Starpak suggest that the waste has a flash point greater than 140F. The profile for this waste describes it as a D001,F003 Universal Waste.
- Waste Disposition - The wastes are then shipped through NSSI for fuel blending.
- Applicable Requirements - Based on the disposition of the Soft Touch wastes, the waste meets the definition of solid waste. Due to the generating processes and the properties of the ink wastes, the ink wastes qualify for management as universal wastes (40 CFR 273) under the State of Texas’ paint and paint related wastes rule at 30 TAC 335.262
- Areas of Concern
 - 2 containers of Soft Touch wastes were observed during this inspection. At the time of observation the containers were not marked with the words “Universal Waste - Paint and Paint-Related Wastes”

o Anilox Cleaner Waste (not directly observed during the inspection)

- Generation Description – Anilox Cleaner is used to clean and remove ink from the anilox (the roller that applies ink to the printing plate in the press) between printing runs. The cleaner is generated as a batch when it is removed from the anilox cleaning unit.
- Waste Properties – The anilox cleaner is composed of potassium hydroxide, ethanolamine, 2-butoxyethanol, pigments, and water. The pH for this waste is indicated on the profile as being greater than 12.5. The profile for this waste describes it as a D002, F003, F005 Universal Waste.
- Waste Disposition – The waste is shipped by NSSI as a universal waste for disposal. However, the ultimate means of disposal for this waste was not discussed as of the end of this inspection.
- Applicable Requirements – As a declared Universal Waste, the anilox cleaner is subject to the universal waste rules of 40 CFR 273 and the Paint and Paint Related Waste Rule of 30 TAC 335.262
- Areas of Concern – None, since this waste was not observed during this inspection.
- o Contaminated Rags
 - Generation Description – Contaminated Rags are generated throughout the facility from general cleaning activities. The rags are accumulated in 5 gallon buckets before being transferred to large blue bins located in the PRI distillation room.
 - Waste properties – The rags are typically contaminated with solvents n-propanol, n-propyl acetate, ethyl acetate, and inks. These contaminants have a flash point of less than 140F
 - Waste Disposition – The contaminated rags are laundered offsite and returned to Starpak for reuse.
 - Applicable Requirements – The waste profile for the Contaminated Rags waste stream describes it as D001, F003. Contaminated Rags are exempt from the definition of solid waste as long as they meet the exemption requirements described in 40 CFR 261.4(a)(26).
 - Areas of Concern
 - Containers managing contaminated rags must be labeled with the words: “Excluded Solvent-Contaminated Wipes” none of the four containers of solvent contaminated wipes observed during this inspection were appropriately labeled.
 - Following the initial accumulation of the solvent contaminated rags, they must be placed in a container with the lid affixed so as to prevent leaks or emissions. The three large bins used for the transport and pre-transport storage of the contaminated rags is not equipped with a seal capable of preventing emissions.
 - Generators of waste excluded under this exemption must maintain a “Description of the process the generator is using to ensure the solvent-contaminated wipes contain no free liquids at the point of being laundered or dry cleaned on-site or at the point of being transported off-site for laundering or dry cleaning”. This description had not been provided by Starpak prior to the conclusion of this inspection.
- o Dirty Solvent
 - Generation Description – Dirty Solvent is generated from the cleaning of the printing presses and pumped via hard piping to a dirty solvent accumulation tank located in the PRI distillation area. Additional sources of the dirty solvent are from various cleaning operations throughout the facility and from filter changes on the dirty solvent piping. These additional solvent batches are accumulated in a 275-gallon totes located in the PRI distillation area.
 - Waste Properties – Dirty Solvent is composed of n-propanol, n-propyl acetate, and ink residues (including pigments and ethyl acetate). The dirty solvent has a flash point of less than 140F.
 - Waste Disposition – The dirty solvent is reclaimed in a solvent distillation unit and then accumulated in a reclaimed solvent tank located the PRI distillation room. This reclaimed solvent is then returned to the process where it is again used to clean the printing presses.
 - Applicable Requirements – Based upon the generation description, the dirty solvent would meet the definition for a spent solvent. A spent solvent being reclaimed under the control of the generator is exempt from the definition of solid waste as a hazardous secondary material so long as Starpak meets the requirements for the exemption at 40 CFR 261.4(a)(23). Should

Starpak decide to manage this material as Universal Waste under Texas' Paint and Paint Related Waste definition it would be prohibited from treatment (including reclamation) by 273.31.

- Areas of Concern
 - Hazardous Secondary Materials are required to be managed in a manner that meets the definition of *contained* (40 CFR 260.10). The tote Starpak uses to accumulate dirty solvent in the PRI Distillation Area was open when observed on Tuesday, February 22, 2022.
 - Generators of Hazardous Secondary Materials are required to provide notice as required by 40 CFR 260.42. As of this inspection, no record of notification was provided by Starpak.
 - As part of our evaluation of the hazardous secondary materials exemption requirements, we asked for records concerning the vapor pressure of the dirty solvent and the set pressure for the dirty solvent tank's pressure relief devices. As of the conclusion of this inspection, the vapor pressure of the dirty solvent had been documented but the set pressure for the pressure relief devices equipped on the dirty solvent tank had not.
- Dirty Solvent Still Bottoms
 - Generation Description – The distillation of spent solvents from the printing process reclaims solvent by removing pigments and other contaminants as still bottoms. These still bottoms are pumped from the unit through hard piping to a 275-gallon container located on the loading dock. According to Ms. Horak, Starpak generates between 3 and 4 containers of this waste per calendar week.
 - Waste Properties – According to the profile provided by Starpak, the distillation bottoms are composed of approximately 98% ethyl acetate with 2% pigment contaminants with a flash point less than 73F. The profile describes this waste as a D001, F003 Universal Waste.
 - Waste Disposition – According to Mr. Aguirre, this waste is shipped to NSSI for fuel blending prior to burning for energy recovery.
 - Applicable Requirements – Based on the Waste's disposition, the still bottoms meet the definition of solid waste. Based on its flash point of less than 73F, the waste demonstrates the hazardous waste characteristic of flammability (D001). Even if Starpak wanted to claim its spent solvent as Universal waste, as of June 11, 2020, TCEQ has modified its definition of Paint and Paint Related Waste to exclude materials derived from the reclamation of Paint and Paint Related Waste under the Universal Waste Rules. Therefore, the still bottoms have been determined through this inspection to be hazardous waste.
 - Areas of Concern
 - Based on the NOR for the facility at the time of this inspection, Starpak does not generate hazardous waste. Therefore, Starpak has not provided notice to TCEQ that it is generating this hazardous waste.
 - The container used for the accumulation of this waste is marked as Universal Waste, however that definition does not appear to apply to this waste. Therefore, this waste is not marked appropriately as described in 40 CFR 262.17.
 - According to the records provided by Starpak, this waste has been shipped on multiple occasions on bills of lading but not on a hazardous waste manifest as required by 40 CFR 262.20. Therefore, Starpak has on multiple occasions offered this waste for transport without preparing a hazardous waste manifest.
 - Piping in hazardous waste service is required to be maintained in accordance with 40 CFR 265 Subpart BB. According to Mr. Aguirre, the piping used for transferring the still bottoms from the distillation unit to the still bottom accumulation container is not subject to any fugitive emission monitoring activities.
- General Facility Standards

- Based on its claimed rate of generation for hazardous waste (Dirty Solvent Still Bottoms), Starpak is a large quantity generator of hazardous waste and therefore required to comply with the Large Quantity Generator requirements of 40 CFR part 262.
- Based on its claimed rate of generation for universal waste (Ink Waste, Plate Waste, Soft Touch Waste), Starpak is a large quantify handler of universal waste and therefore required to comply with the requirements of 40 CFR 273 Subpart C.
- Based on its claimed rate of generation for hazardous secondary materials (Dirty Solvent), Starpak is required to comply with the requirements of 40 CFR 261.410 and 420.
- Areas of Concern
 - Facilities subject to 40 CFR 261.410 and/or 40 CFR 262.255 are required to maintain adequate aisle spacing. When observed on February 22, 2022, Starpak was not maintaining adequate aisle spacing for its containers located in the PRI distillation area
 - Starpak has provided its facility response plan. This document and the associated attachments will be reviewed for compliance with the requirements of 40 CFR 261 and 262 Subpart M.
 - Texas requires annual reporting to STEERS for Class 1 Industrial Waste and Hazardous Waste under 30 TAC 335.6. As of this inspection, Starpak had not provided any reporting for its Class 1 Waste or its hazardous waste.
 - Large quantity generators of hazardous waste are required to comply with the training requirements of 40 CFR 262.17. As of this inspection, Starpak has provided training records for the specific personnel requested. These records will be reviewed for compliance with the aforementioned requirements.
- Next Steps
 - Starpak will continue to provide records for evaluation by EPA.
 - EPA will issue a final inspection report following the conclusion of this inspection.
 - The document submission link will remain open until the inspection report is finalized.
- Departed Facility at approximately 1:45pm

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APPENDIX 4

STARPAC CORRECTIVE ACTIONS

Pandak, Debra

From: Ignacio Aguirre <IAguirre@starpakltd.com>
Sent: Friday, February 25, 2022 9:51 AM
To: Penland, John; Pandak, Debra
Cc: Yurk, Jeffrey
Subject: RE: Daily Summary February 24, 2022 - FY2022 RCRA Investigation at the Starpak facility located in Houston, Texas (TXR000057513)

Hello John,

I have reviewed the records for 2021, and for the soft touch we were generating waste at a rate of 55-65 gal/week. Also I do have records of training for the items that the ERP is pointing. I am working to upload those.

Thanks,

Ignacio

From: Penland, John <Penland.John@epa.gov>
Sent: Thursday, February 24, 2022 11:11 PM
To: Ignacio Aguirre <IAguirre@starpakltd.com>; Pandak, Debra <Pandak.Debra@epa.gov>
Cc: Yurk, Jeffrey <yurk.jeffrey@epa.gov>
Subject: Daily Summary February 24, 2022 - FY2022 RCRA Investigation at the Starpak facility located in Houston, Texas (TXR000057513)

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Inspection Attendees:

NAME	TITLE	REPRESENTING	PHONE	EMAIL
John Penland	Sr. Environmental Scientist – Lead Inspector	US EPA Region 6	214-665-9717	Penland.john@epa.gov
Debra Pandak	Sr. Environmental Scientist – Asst. Inspector	US EPA Region 6	214-665-7565	Pandak.debra@epa.gov
Ignacio Aguirre	Plant Engineer Environmental Lead	Starpak LTD	713-201-5801	iaguirre@starpakltd.com
Karla Horak	Environmental Engineer	Starpak LTD		

Daily Summary

- Inspection start – 3:45pm (start delayed due to an emergency at the facility)
- Reviewed February 23, 2022 Daily Summary

- o Plate waste is generated at a rate of approximately 330-440 gallons per week
 - o Soft Touch waste is generated at a rate of approximately 110-165 gallons per week
 - o Requested DOT training records
 - o Requested ERP training records
 - o Requested position descriptions for employees subject to training requirements of RCRA
- Discussed the definition of contained for the Hazardous Secondary Materials units (see 260.10)
 - o Requested the vapor pressure for the spent solvent and the pressure set point for the pressure relief valve for the spent solvent tank
- Reviewed the facility inspection checklist. This inspection checklist includes the waste containers and many of the requirements for large quantity generators of hazardous waste.
 - o Requested the completed facility inspection checklists for the prior 3 years (2019-2022)
- Discussed content and disposition of the Starpak ERP
 - o The ERP will be reviewed for compliance with the standards of 261 Subpart M and 262 Subpart M
 - o The ERP does not include a list of emergency response equipment
 - o According to Ms. Horak, the ERP was sent via certified mail to the local emergency response contacts.
 - Requested these certified mail receipts
- Discussed documentation of corrective measures
 - o Please upload documentation or any actions that Starpak takes to address Areas of Concern identified by EPA during this inspection. I have added a new subfolder to the OneDrive for these records.
- Departed Facility at 5:45pm

John Penland
 Senior Environmental Scientist (ECDSR)
 Enforcement and Compliance Assurance Division
 Waste Enforcement Branch
 EPA Region 6 1201 Elm St., Suite 500
 Dallas, Texas 75270
 (214)665-9717

Pandak, Debra

From: Ignacio Aguirre <IAguirre@starpakltd.com>
Sent: Friday, February 25, 2022 6:00 PM
To: Penland, John; Pandak, Debra
Cc: Yurk, Jeffrey
Subject: RE: Daily Summary February 24, 2022 - FY2022 RCRA Investigation at the Starpak facility located in Houston, Texas (TXR000057513)

John,

The profile PI-1-182705 signed on 8-17-18 supersedes the one signed on 7-19-18.

I spoke to our waste disposal company and we have verified that the profile you see as 180725 should have been 182705 and they have mistyped the profile.

They also have assured me that the waste is being treated as hazardous waste from day one and that the end use has been fuel blending. They will provide me with the necessary documentation to prove the mentioned statement.

I will be uploading the documents you have request within the timeline you have set.

Thanks,

Ignacio

From: Penland, John <Penland.John@epa.gov>
Sent: Thursday, February 24, 2022 11:11 PM
To: Ignacio Aguirre <IAguirre@starpakltd.com>; Pandak, Debra <Pandak.Debra@epa.gov>
Cc: Yurk, Jeffrey <yurk.jeffrey@epa.gov>
Subject: Daily Summary February 24, 2022 - FY2022 RCRA Investigation at the Starpak facility located in Houston, Texas (TXR000057513)

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John Penland

Senior Environmental Scientist (ECDSR)

Enforcement and Compliance Assurance Division

Waste Enforcement Branch

EPA Region 6 1201 Elm St., Suite 500

Dallas, Texas 75270

(214)665-9717

Pandak, Debra

From: Ignacio Aguirre <IAguirre@starpakltd.com>
Sent: Friday, March 4, 2022 5:23 PM
To: Penland, John; Pandak, Debra
Cc: Yurk, Jeffrey
Subject: RE: Daily Summary February 24, 2022 - FY2022 RCRA Investigation at the Starpak facility located in Houston, Texas (TXR000057513)
Attachments: Starpak Waste

Good evening John,

As I mentioned before NSSI miss typed the profile # 182705 as # 180725, see please the statement from NSSI regarding the profile #182705.

I will upload this e mail into your one drive and a picture of a tote with the correct label (Hazardous waste) as a corrective action regarding to still bottoms.

Regarding the pressure setting you were asking for the tank vent is 0.4psi, which is above the 0.33 psi vapor pressure of the solvent contained in the tank.

If you want any more information please let me know.

Thanks,

Ignacio

From: Penland, John <Penland.John@epa.gov>
Sent: Thursday, February 24, 2022 11:11 PM
To: Ignacio Aguirre <IAguirre@starpakltd.com>; Pandak, Debra <Pandak.Debra@epa.gov>
Cc: Yurk, Jeffrey <yurk.jeffrey@epa.gov>
Subject: Daily Summary February 24, 2022 - FY2022 RCRA Investigation at the Starpak facility located in Houston, Texas (TXR000057513)

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John Penland	Sr. Environmental Scientist – Lead Inspector	US EPA Region 6	214-665-9717	Penland.john@epa.gov
Debra Pandak	Sr. Environmental Scientist – Asst. Inspector	US EPA Region 6	214-665-7565	Pandak.debra@epa.gov
Ignacio Aguirre	Plant Engineer Environmental Lead	Starpak LTD	713-201-5801	iaguirre@starpakltd.com
Karla Horak	Environmental Engineer	Starpak LTD		

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- Departed Facility at 5:45pm

John Penland

Senior Environmental Scientist (ECDSR)

Enforcement and Compliance Assurance Division

Waste Enforcement Branch

EPA Region 6 1201 Elm St., Suite 500

Dallas, Texas 75270

(214)665-9717



31 HA1/Y/0721/USA/AA5805/0721/0721
0721/0721

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Schutz, USA@schutz.net

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CONTENTS:
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CONTAINS HAZARDOUS WASTE

FLAMMABLE LIQUID
3

Safe Value
Valve Protection System
Prevents Valve Leaks

Pandak, Debra

From: Ignacio Aguirre <IAguirre@starpakltd.com>
Sent: Tuesday, March 8, 2022 5:18 PM
To: Penland, John; Pandak, Debra
Cc: Yurk, Jeffrey
Subject: RE: Closing Meeting Summary - February 25, 2022 - FY2022 RCRA Investigation at the Starpak facility located in Houston, Texas (TXR000057513)
Attachments: 8540_SPEC.pdf; 7800_SPEC-1.pdf

Good evening John,

Attached are the cut sheets for the conservation vents, as mentioned in my previous communications, the set pressure is 0.4 psi.

Thanks,

Ignacio

From: Penland, John <Penland.John@epa.gov>
Sent: Sunday, March 6, 2022 8:18 PM
To: Ignacio Aguirre <IAguirre@starpakltd.com>; Pandak, Debra <Pandak.Debra@epa.gov>
Cc: Yurk, Jeffrey <yurk.jeffrey@epa.gov>
Subject: Closing Meeting Summary - February 25, 2022 - FY2022 RCRA Investigation at the Starpak facility located in Houston, Texas (TXR000057513)

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Inspection Attendees:

NAME	TITLE	REPRESENTING	PHONE	EMAIL
John Penland	Sr. Environmental Scientist – Lead Inspector	US EPA Region 6	214-665-9717	Penland.john@epa.gov
Debra Pandak	Sr. Environmental Scientist – Asst. Inspector	US EPA Region 6	214-665-7565	Pandak.debra@epa.gov
Viktor Manjarrez	Project Manager Asst. Plant Manager	Starpak LTD		
Ignacio Aguirre	Plant Engineer Environmental Lead	Starpak LTD	713-201-5801	iaguirre@starpakltd.com
Karla Horak	Environmental Engineer	Starpak LTD		
Bill Garris	Independent Consultant	Starpak LTD	336-462-7064	

Closing Meeting Summary

- Meeting start – 10:12am
- Introduction
 - RCRA 3007 – This inspection was conducted under the authority of RCRA section 3007. The findings of this inspection will be documented in an inspection report which will be sent to Starpak upon completion. I strongly recommend that Starpak respond, in writing, to the findings contained in that report.
 - CBI – As of the conclusion of the inspection, Starpak has not asserted any claims of confidential business information for the records or photographs obtained. Should Starpak wish to make a claim of CBI, I encourage you to complete and return the CBI packet I attached to my email on Tuesday, February 22.
 - Process based inspection description – This inspection followed a process based inspection process. Using this method, EPA inspectors review the waste generating processes, waste characteristics, and waste management procedures to determine the applicable standards that pertain to the facility's operations.
- Provisional Inspection Findings
 - Ink Wastes
 - Generation Description- Ink wastes are generated from two separate processes at Starpak: ink formulation and printing. Ink wastes from the blend area are generated when errors occur in formulation and are accumulated in a 55-gallon container near the ink mixers. Ink wastes from the printing operations are collected in 5-gallon buckets when ink is changed from the individual printers and carried by the operators to the PRI distillation room where they are transferred into a 55-gallon drum. Ink wastes are generated by Starpak at a rate of approximately 220 gallons per week
 - Waste Properties- The Ink wastes are composed of a mix of n-propanol, n-propyl acetate, pigments, and ethyl acetate with a flash point below 140F
 - Waste Disposition- The wastes are shipped through NSSI for fuel blending.
 - Applicable requirements – Based on the disposition of the ink wastes, the waste meets the definition of solid waste. Based on its low flash point the ink wastes demonstrate the hazardous waste characteristic of flammability (D001). Due to the generating processes and the properties of the ink wastes, the ink wastes qualify for management as universal wastes under the State of Texas' paint and paint related wastes rule. The profile for this waste describes it as a D001,F003 Universal Waste.
 - Areas of Concern:
 - 2 containers of ink wastes were observed during this inspection. At the time of observation the containers were not marked with the words "Universal Waste - Paint and Paint-Related Wastes" and did not have their lids secured in the closed position.
 - Plate Waste
 - Generation Description - Plate wastes are generated from the distillation of spent solvent from the photo etching process that Starpak uses to manufacture its printing plates. This waste is accumulated at the plate distillation unit in a 55-gallon drum before being moved to the PRI distillation prior to shipping.
 - Waste properties – The Plate Waste is composed of benzyl alcohol, naphtha, and 2-ethylhexyl acetate with a flash point greater than 140F. The profile for this waste describes it as a Class 1 non-hazardous waste.
 - Waste Disposition – The Plate Wastes are shipped for disposal by NSSI as a Class 1 non-hazardous waste
 - Applicable Requirements – Based on the disposition of the plate wastes, the waste meets the definition of solid waste. As a class I solid waste, the plate waste would be subject to the reporting requirement of 30 TAC 335.6
 - Areas of Concern –

- Generators of a Class I solid waste are required to notify and report annually for their generation of hazardous and class I non-hazardous waste generation under the requirements of 30 TAC 335.6 and 335.9
- o Soft Touch Wastes
 - Generation Description – Soft Touch waste are generated from the printing operations where Soft Touch is used as a varnish for the printed products.
 - Waste Properties – The Soft touch waste is composed of a mix of urethane and poly-isocyanate compounds in ethyl acetate. Analytical reports provided by Starpak suggest that the waste has a flash point greater than 140F. The profile for this waste describes it as a D001,F003 Universal Waste.
 - Waste Disposition - The wastes are then shipped through NSSI for fuel blending.
 - Applicable Requirements - Based on the disposition of the Soft Touch wastes, the waste meets the definition of solid waste. Due to the generating processes and the properties of the ink wastes, the ink wastes qualify for management as universal wastes (40 CFR 273) under the State of Texas' paint and paint related wastes rule at 30 TAC 335.262
 - Areas of Concern
 - 2 containers of Soft Touch wastes were observed during this inspection. At the time of observation the containers were not marked with the words "Universal Waste - Paint and Paint-Related Wastes"
- o Anilox Cleaner Waste (not directly observed during the inspection)
 - Generation Description – Anilox Cleaner is used to clean and remove ink from the anilox (the roller that applies ink to the printing plate in the press) between printing runs. The cleaner is generated as a batch when it is removed from the anilox cleaning unit.
 - Waste Properties – The anilox cleaner is composed of potassium hydroxide, ethanolamine, 2-butoxyethanol, pigments, and water. The pH for this waste is indicated on the profile as being greater than 12.5. The profile for this waste describes it as a D002, F003, F005 Universal Waste.
 - Waste Disposition – The waste is shipped by NSSI as a universal waste for disposal. However, the ultimate means of disposal for this waste was not discussed as of the end of this inspection.
 - Applicable Requirements – As a declared Universal Waste, the anilox cleaner is subject to the universal waste rules of 40 CFR 273 and the Paint and Paint Related Waste Rule of 30 TAC 335.262
 - Areas of Concern – None, since this waste was not observed during this inspection.
- o Contaminated Rags
 - Generation Description – Contaminated Rags are generated throughout the facility from general cleaning activities. The rags are accumulated in 5 gallon buckets before being transferred to large blue bins located in the PRI distillation room.
 - Waste properties – The rags are typically contaminated with solvents n-propanol, n-propyl acetate, ethyl acetate, and inks. These contaminants have a flash point of less than 140F
 - Waste Disposition – The contaminated rags are laundered offsite and returned to Starpak for reuse.
 - Applicable Requirements – The waste profile for the Contaminated Rags waste stream describes it as D001, F003. Contaminated Rags are exempt from the definition of solid waste as long as they meet the exemption requirements described in 40 CFR 261.4(a)(26).
 - Areas of Concern
 - Containers managing contaminated rags must be labeled with the words: "Excluded Solvent-Contaminated Wipes" none of the four containers of solvent contaminated wipes observed during this inspection were appropriately labeled.
 - Following the initial accumulation of the solvent contaminated rags, they must be placed in a container with the lid affixed so as to prevent leaks or emissions. The three large bins used for the transport and pre-transport storage of the contaminated rags is not equipped with a seal capable of preventing emissions.

- Generators of waste excluded under this exemption must maintain a “Description of the process the generator is using to ensure the solvent-contaminated wipes contain no free liquids at the point of being laundered or dry cleaned on-site or at the point of being transported off-site for laundering or dry cleaning”. This description had not been provided by Starpak prior to the conclusion of this inspection.
- o Dirty Solvent
 - Generation Description – Dirty Solvent is generated from the cleaning of the printing presses and pumped via hard piping to a dirty solvent accumulation tank located in the PRI distillation area. Additional sources of the dirty solvent are from various cleaning operations throughout the facility and from filter changes on the dirty solvent piping. These additional solvent batches are accumulated in a 275-gallon totes located in the PRI distillation area.
 - Waste Properties – Dirty Solvent is composed of n-propanol, n-propyl acetate, and ink residues (including pigments and ethyl acetate). The dirty solvent has a flash point of less than 140F.
 - Waste Disposition – The dirty solvent is reclaimed in a solvent distillation unit and then accumulated in a reclaimed solvent tank located the PRI distillation room. This reclaimed solvent is then returned to the process where it is again used to clean the printing presses.
 - Applicable Requirements – Based upon the generation description, the dirty solvent would meet the definition for a spent solvent. A spent solvent being reclaimed under the control of the generator is exempt from the definition of solid waste as a hazardous secondary material so long as Starpak meets the requirements for the exemption at 40 CFR 261.4(a)(23). Should Starpak decide to manage this material as Universal Waste under Texas’ Paint and Paint Related Waste definition it would be prohibited from treatment (including reclamation) by 273.31.
 - Areas of Concern
 - Hazardous Secondary Materials are required to be managed in a manner that meets the definition of *contained* (40 CFR 260.10). The tote Starpak uses to accumulate dirty solvent in the PRI Distillation Area was open when observed on Tuesday, February 22, 2022.
 - Generators of Hazardous Secondary Materials are required to provide notice as required by 40 CFR 260.42. As of this inspection, no record of notification was provided by Starpak.
 - As part of our evaluation of the hazardous secondary materials exemption requirements, we asked for records concerning the vapor pressure of the dirty solvent and the set pressure for the dirty solvent tank’s pressure relief devices. As of the conclusion of this inspection, the vapor pressure of the dirty solvent had been documented but the set pressure for the pressure relief devices equipped on the dirty solvent tank had not.
- o Dirty Solvent Still Bottoms
 - Generation Description – The distillation of spent solvents from the printing process reclaims solvent by removing pigments and other contaminants as still bottoms. These still bottoms are pumped from the unit through hard piping to a 275-gallon container located on the loading dock. According to Ms. Horak, Starpak generates between 3 and 4 containers of this waste per calendar week.
 - Waste Properties – According to the profile provided by Starpak, the distillation bottoms are composed of approximately 98% ethyl acetate with 2% pigment contaminants with a flash point less than 73F. The profile describes this waste as a D001, F003 Universal Waste.
 - Waste Disposition – According to Mr. Aguirre, this waste is shipped to NSSI for fuel blending prior to burning for energy recovery.
 - Applicable Requirements – Based on the Waste’s disposition, the still bottoms meet the definition of solid waste. Based on its flash point of less than 73F, the waste demonstrates the hazardous waste characteristic of flammability (D001). Even if Starpak wanted to claim its spent solvent as Universal waste, as of June 11, 2020, TCEQ has modified its definition of Paint and Paint Related Waste to exclude materials derived from the reclamation of Paint and Paint

Related Waste under the Universal Waste Rules. Therefore, the still bottoms have been determined through this inspection to be hazardous waste.

- Areas of Concern
 - Based on the NOR for the facility at the time of this inspection, Starpak does not generate hazardous waste. Therefore, Starpak has not provided notice to TCEQ that it is generating this hazardous waste.
 - The container used for the accumulation of this waste is marked as Universal Waste, however that definition does not appear to apply to this waste. Therefore, this waste is not marked appropriately as described in 40 CFR 262.17.
 - According to the records provided by Starpak, this waste has been shipped on multiple occasions on bills of lading but not on a hazardous waste manifest as required by 40 CFR 262.20. Therefore, Starpak has on multiple occasions offered this waste for transport without preparing a hazardous waste manifest.
 - Piping in hazardous waste service is required to be maintained in accordance with 40 CFR 265 Subpart BB. According to Mr. Aguirre, the piping used for transferring the still bottoms from the distillation unit to the still bottom accumulation container is not subject to any fugitive emission monitoring activities.

o General Facility Standards

- Based on its claimed rate of generation for hazardous waste (Dirty Solvent Still Bottoms), Starpak is a large quantity generator of hazardous waste and therefore required to comply with the Large Quantity Generator requirements of 40 CFR part 262.
- Based on its claimed rate of generation for universal waste (Ink Waste, Plate Waste, Soft Touch Waste), Starpak is a large quantify handler of universal waste and therefore required to comply with the requirements of 40 CFR 273 Subpart C.
- Based on its claimed rate of generation for hazardous secondary materials (Dirty Solvent), Starpak is required to comply with the requirements of 40 CFR 261.410 and 420.
- Areas of Concern
 - Facilities subject to 40 CFR 261.410 and/or 40 CFR 262.255 are required to maintain adequate aisle spacing. When observed on February 22, 2022, Starpak was not maintaining adequate aisle spacing for its containers located in the PRI distillation area
 - Starpak has provided its facility response plan. This document and the associated attachments will be reviewed for compliance with the requirements of 40 CFR 261 and 262 Subpart M.
 - Texas requires annual reporting to STEERS for Class 1 Industrial Waste and Hazardous Waste under 30 TAC 335.6. As of this inspection, Starpak had not provided any reporting for its Class 1 Waste or its hazardous waste.
 - Large quantity generators of hazardous waste are required to comply with the training requirements of 40 CFR 262.17. As of this inspection, Starpak has provided training records for the specific personnel requested. These records will be reviewed for compliance with the aforementioned requirements.

o Next Steps

- Starpak will continue to provide records for evaluation by EPA.
- EPA will issue a final inspection report following the conclusion of this inspection.
- The document submission link will remain open until the inspection report is finalized.
- Departed Facility at approximately 1:45pm

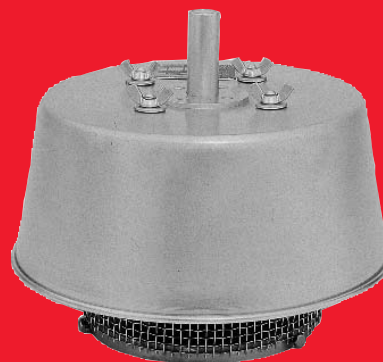
John Penland
Senior Environmental Scientist (ECDSR)
Enforcement and Compliance Assurance Division
Waste Enforcement Branch
EPA Region 6 1201 Elm St., Suite 500
Dallas, Texas 75270

(214)665-9717

SERIES 7800

End-of-Line Emergency Pressure Vent

- Sizes 2" (DN 50) through 24" (DN 600)
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SERIES 7800

OBJECTIVE

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Under normal operating conditions, the pallet assembly is closed providing a vapor-tight seal. In the event of an emergency (fire involvement of the tank) the pallet lifts to vent excess vapors thereby protecting the tank from dangerous over-pressurization. Pallet automatically closes and reseals when the pressure is reduced.

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Available Options.

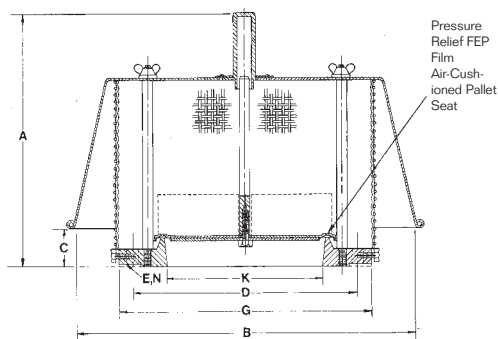
- Alternate diaphragm materials
- Material certifications for castings
- Lower than standard minimum pressure settings
- Mechanical or electronic indication of vent opening
- FEP coating
- Kynar® coating (*Kynar® is a Registered Trademark of Arkema, Inc.*)
- Special cleaning & packaging for the storage of ultrapure liquids

Series	Size	Base Flange/ Seat	Weather- Hood	Pallet* Pallet*	Pallet Diaphragm
7800	2"-12"	Aluminum	Aluminum	Aluminum	FEP Film
7800	16"-24"	Steel/316 S.S.	Steel	Aluminum	FEP Film
C7800	2"-12"	Steel/316 S.S.	Steel	316 S.S.	FEP Film
C7800	16"-24"	Steel/316 S.S.	Steel	316 S.S.	FEP Film
E7800	2"-12"	Aluminum	Aluminum	316 S.S.	FEP Film
F7800	2"-12"	316 S.S.	316 S.S.	316 S.S.	FEP Film
F7800	16"-24"	316 S.S.	316 S.S.	316 S.S.	FEP Film
M7800	2"-12"	Alloy C	C276	C276	FEP Film
M7800	16"-24"	C276	C276	C276	FEP Film

* On steel and aluminum vents, weights are steel or lead. On stainless steel vents, weights are stainless steel or lead. On C276 vents, weights are C276 or lead.

2" through 12" Aluminum vents flanged to mate with 125# ANSI and DIN PN 16 flat face flanges. Steel, stainless steel and C276 units flanged to mate with 150# ANSI and DIN PN 16 raised face flanges. 16" through 24" vents flanged to mate with applicable ANSI or API flat face flange connections.

DIMENSIONS & ORDERING INFORMATION



Dimensions shown are for reference only,
contact Factory for certified drawings.

Cat. No.*	Pipe Size K	Ht. A	Width B	C	B.C. D	Dia. E	Dia. G	Holes N
7802H	2"	8 $\frac{1}{4}$ "	8 $\frac{1}{2}$ "	$\frac{3}{4}$ "	4 $\frac{3}{4}$ "	$\frac{5}{8}$ "-11	6"	Stud
7802DNH	DN 50	210mm	216mm	19mm	125mm	M16x2	165mm	Stud
7803H	3"	10 $\frac{1}{4}$ "	12 $\frac{1}{4}$ "	2 $\frac{1}{8}$ "	6"	$\frac{3}{4}$ "	7 $\frac{1}{2}$ "	4
7803DNH	DN 80	260mm	311mm	54mm	160mm	18mm	200mm	8
7804H	4"	10 $\frac{9}{16}$ "	12 $\frac{1}{4}$ "	2 $\frac{3}{8}$ "	7 $\frac{1}{2}$ "	$\frac{3}{4}$ "	9"	8
7804DNH	DN 100	268mm	311mm	60mm	180mm	18mm	220mm	8
7806H	6"	13 $\frac{3}{8}$ "	14 $\frac{1}{2}$ "	2 $\frac{1}{16}$ "	9 $\frac{1}{2}$ "	$\frac{7}{8}$ "	11"	8
7806DNH	DN 150"	333mm	362mm	68mm	240mm	22mm	285mm	8
7808H	8"	15 $\frac{1}{4}$ "	17"	3 $\frac{3}{8}$ "	11 $\frac{1}{4}$ "	$\frac{7}{8}$ "	13 $\frac{1}{2}$ "	8
7808DNH	DN 200	387mm	432mm	86mm	295mm	22mm	340mm	12
7810H	10"	16 $\frac{5}{8}$ "	22 $\frac{3}{4}$ "	2 $\frac{1}{4}$ "	14 $\frac{1}{4}$ "	1"	16"	12
7810DNH	DN 250	422mm	578mm	57mm	355mm	26mm	405mm	12
7812H	12"	18 $\frac{5}{8}$ "	25 $\frac{5}{8}$ "	2 $\frac{3}{4}$ "	17"	1"	19"	12
7812DNH	DN 300	473mm	638mm	70mm	410mm	26mm	460mm	12
7816ASA	16"	20"	26 $\frac{3}{4}$ "	6 $\frac{5}{8}$ "	21 $\frac{1}{4}$ "	1 $\frac{1}{8}$ "	23 $\frac{1}{2}$ "	16
7816DN	DN 400	508mm	679mm	168mm	525mm	30mm	580mm	16
7820ASA	20"	20"	32"	6 $\frac{5}{8}$ "	25"	1 $\frac{1}{4}$ "	27 $\frac{1}{2}$ "	20
7820API	20"	20"	32"	6 $\frac{5}{8}$ "	23 $\frac{1}{2}$ "	$\frac{3}{4}$ "	26"	16
7820DN	DN 500	508mm	813mm	168mm	650mm	33mm	715mm	20
7824ASA	24"	21"	40"	6 $\frac{5}{8}$ "	29 $\frac{1}{2}$ "	1 $\frac{3}{8}$ "	32"	20
7824API	24"	21"	40"	6 $\frac{5}{8}$ "	27 $\frac{1}{2}$ "	$\frac{3}{4}$ "	30"	20
7824DN	DN 600	533mm	1016mm	168mm	770mm	33mm	840mm	20

* Cat. No. designates Aluminum Housing & Pallets, see chart on the reverse for other materials of construction.

PRESSURE AND/OR VACUUM SETTINGS (Consult factory for settings outside of STANDARD range.)

Flange Size	STANDARD MINIMUM SETTINGS						STANDARD MAXIMUM SETTINGS					
	PRESSURE ONLY						PRESSURE			VACUUM		
	Aluminum			Other Materials			All Materials			All Materials		
	oz./in. ²	in.W.C.	kPa	oz./in. ²	in.W.C.	kPa	oz./in. ²	in.W.C.	kPa	oz./in. ²	in.W.C.	kPa
2" / DN 50	1.00	1.73	0.43	1.00	1.73	0.43	48.00	83.04	20.68	N / A	N / A	N / A
3" / DN 80	1.00	1.73	0.43	1.00	1.73	0.43	48.00	83.04	20.68	N / A	N / A	N / A
4" / DN 100	1.00	1.73	0.43	1.00	1.73	0.43	48.00	83.04	20.68	N / A	N / A	N / A
6" / DN 150	1.00	1.73	0.43	1.00	1.73	0.43	48.00	83.04	20.68	N / A	N / A	N / A
8" / DN 200	1.00	1.73	0.43	1.00	1.73	0.43	48.00	83.04	20.68	N / A	N / A	N / A
10" / DN 250	1.00	1.73	0.43	1.00	1.73	0.43	48.00	83.04	20.68	N / A	N / A	N / A
12" / DN 300	1.00	1.73	0.43	1.00	1.73	0.43	48.00	83.04	20.68	N / A	N / A	N / A
16" / DN 400	1.00	1.73	0.43	1.00	1.73	0.43	11.90	20.59	5.13	N / A	N / A	N / A
18" / DN 450	1.00	1.73	0.43	1.00	1.73	0.43	11.90	20.59	5.13	N / A	N / A	N / A
20" / DN 500	1.00	1.73	0.43	1.00	1.73	0.43	8.00	13.84	3.45	N / A	N / A	N / A
24" / DN 600	1.00	1.73	0.43	1.00	1.73	0.43	11.00	19.03	4.74	N / A	N / A	N / A

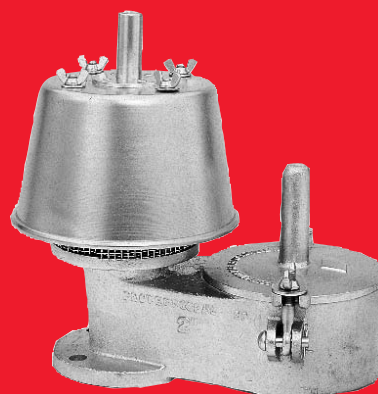
SERIES 8540

End-of-Line Conservation Pressure / Vacuum Breather Vent



PROTECTOSEAL

- Sizes 2" (DN 50) through 12" (DN 300)
- Settings achieved by weight loading
- Reduces costly evaporation losses
- Leakage rate of less than 1 SCFH of air at 90% of set point
- Patented, FEP Film "Air-Cushioned Seating"
- Low-leak pallet design - certified test reports
- Conforms to the latest ATEX Directive
- Factory tested / certified for leakage and correct settings
- Available in Aluminum, Ductile Iron, Stainless Steel, Carbon Steel, and Alloy C / C276



SERIES 8540

OBJECTIVE

The Protectoseal Series 8540, End-of-Line Pressure / Vacuum Conservation Vent provides both pressure and vacuum relief to maintain tank's vapor space within safe operating parameters. Vent settings minimize loss of product. Under pressure venting conditions, tank vapors are expelled to atmosphere.

TECHNIQUE

Pallets in the vent housing allow intake of air and outflow of vapors as the tank normally breathes in and out. Pallets open and close to permit only the intake or outlet relief necessary to remain within permissible working pressures and avoid damage to tank

Peripheral pallet assembly guides and center pallet stem guides insure proper alignment of pallet assembly on the seat and smooth lifting and reseating action.

Optimized Performance Vents™

Protectoseal's "Optimized Performance Vents" incorporate patented features that provide the optimum overall vent performance with regard to sealing, set point, flow and resealing (blow down).

SPECIAL FEATURES

Fast Inspection, Easy Maintenance. Design and light weight of entire unit permits easy, convenient handling for inspection and maintenance.

Maintains Accurate Pressure Settings. Set points are accurate to within +/- 3% across the entire range of available settings.

Air-Cushioned Seating. A flat, smooth diaphragm of FEP film is supported on both sides of an annular channel to form a floating air seal with the seat. An outer support rim assures proper seating.

Automatic Condensate Drainage. Self-draining housing body and drip rings keep condensate away from seating surfaces. Vent is protected from freezing, binding and clogging.

Low-Leakage. Vent leakage is no more than 1 SCFH at 90% of the set pressure. Pressure tested against leakage through castings and gasketed joints.

Sizes Available. 2" (DN 50) through 12" (DN 300) sizes.

Aluminum flanged to mate with 125# ANSI and DIN PN 16 flat face flanges. All other materials mate with 150# ANSI and DIN PN 16 raised face flanges. Other drilling patterns are also available upon special request.

PRO-FLOW® Sizing and Selection Software.

Use PRO-FLOW® to select the correct size unit for pressure and vacuum relief calculated in accordance with API 2000, ISO 28300, NFPA 30 and OSHA 1910.106.

CONSTRUCTION

A comprehensive range of materials is offered as shown in the chart below. Non-metallic (thermoplastic resin & FRP) construction available. Other materials and features can be furnished upon request.

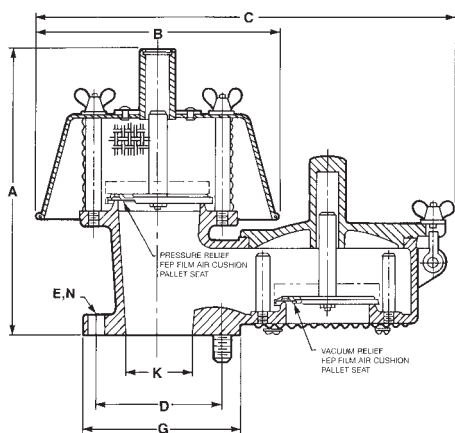
Available Options.

- Alternate diaphragm materials
- Material certifications for castings
- Lower than standard minimum pressure and vacuum settings
- Higher than standard maximum vacuum settings
- Mounting connections added to vacuum port
- Steam jacketing available
- Electronic indication of vent opening
- FEP coating
- Kynar® coating (*Kynar® is a Registered Trademark of Arkema, Inc.*)
- Special cleaning & packaging for the storage of ultrapure liquids

Series	Housing	Pallet	Pallet Diaphragm	Weight Material
8540H	Aluminum 356	Aluminum	FEP Film	Steel or Lead
C8540H	Ductile Iron	316 S.S.	FEP Film	Steel or Lead
CS8540H	Cast Steel	316 S.S.	FEP Film	Steel or Lead
F8540H	316 S.S.	316 S.S.	FEP Film	S.S. or Lead
RE8540H	Aluminum 356	316 S.S.	FEP Film	Steel or Lead
M8540H	Alloy C	C276	FEP Film	C276 or Lead

Note: Aluminum flanged to mate with 125# ANSI and DIN PN 16 flat face flanges. All other materials mate with 150# ANSI and DIN PN 16 raised face flanges.

DIMENSIONS & ORDERING INFORMATION



Dimensions shown are for reference only,
contact Factory for certified drawings.

Cat. No.*	Flange K	Ht. A	Width B	Length C	B.C. D	Dia. G	Dia. E	Holes N
8542H	2"	14"	9½"	15½"	4¾"	6"	¾"	4
8542DNH	DN 50	356mm	241mm	394mm	125mm	165mm	18mm	4
8543H	3"	16¾"	11½"	17½"	6"	7½"	¾"	4
8543DNH	DN 80	425mm	292mm	445mm	160mm	200mm	18mm	8
8544H	4"	18½"	13"	20¼"	7½"	9"	¾"	8
8544DNH	DN 100	470mm	330mm	514mm	180mm	220mm	18mm	8
8546H	6"	23⅞"	17"	26½"	9½"	11"	⅞"	8
8546DNH	DN 150"	587mm	432mm	673mm	240mm	285mm	22mm	8
8548H	8"	25"	19½"	31¼"	11¼"	13½"	⅞"	8
8548DNH	DN 200	635mm	495mm	794mm	295mm	340mm	22mm	12
8550H	10"	27"	23¼"	37¼"	14¼"	16"	1"	12
8550DNH	DN 250	686mm	591mm	946mm	355mm	405mm	26mm	12
8552H	12"	30½"	25½"	41"	17"	19"	1"	12
8552DNH	DN 300	775mm	648mm	1041mm	410mm	460mm	26mm	12

* Cat. No. designates Aluminum Housing & Pallets, please refer to chart on the reverse for other materials of construction.

PRESSURE AND/OR VACUUM SETTINGS (Consult factory for settings outside of STANDARD range.)

Flange Size	STANDARD MINIMUM SETTINGS						STANDARD MAXIMUM SETTINGS					
	PRESSURE & VACUUM						PRESSURE			VACUUM		
	Aluminum			Other Materials			All Materials			All Materials		
	oz./in. ²	in.W.C.	kPa	oz./in. ²	in.W.C.	kPa	oz./in. ²	in.W.C.	kPa	oz./in. ²	in.W.C.	kPa
2" / DN 50	0.50	0.87	0.22	0.75	1.30	0.32	48.00	83.04	20.68	11.00	19.03	4.74
3" / DN 80	0.50	0.87	0.22	0.75	1.30	0.32	48.00	83.04	20.68	11.00	19.03	4.74
4" / DN 100	0.50	0.87	0.22	0.75	1.30	0.32	48.00	83.04	20.68	7.40	12.80	3.19
6" / DN 150	0.50	0.87	0.22	0.75	1.30	0.32	48.00	83.04	20.68	18.00	31.14	7.76
8" / DN 200	0.50	0.87	0.22	0.75	1.30	0.32	48.00	83.04	20.68	18.00	31.14	7.76
10" / DN 250	0.50	0.87	0.22	0.75	1.30	0.32	48.00	83.04	20.68	19.00	32.87	8.19
12" / DN 300	0.50	0.87	0.22	0.75	1.20	0.32	48.00	83.04	20.68	23.00	39.79	9.91

ADDITIONAL PRODUCTS FROM PROTECTOSEAL

Series 18540



Pipe-Away Pressure Vacuum Relief Vent for applications that require hazardous vapors be processed into manifolded piping and not released into the atmosphere.

Series 7800



Emergency Vent protects tanks against rupture or explosion resulting from excessive internal pressure caused by exposure to fires.

Series 4950



Vent Line / In-Line Parallel Plate Flame Arrester is designed for installation in open vent pipe or bleed lines from storage or processing tanks. Suitable for NEC Group D (IEC Group IIA) vapors.

Series 830



Combination Pressure / Vacuum Relief Vent & Flame Arrester provides pressure and vacuum relief as well as protection from propagation of externally introduced flames. Suitable for NEC Group D (IEC Group IIA) vapors.