Florida Department of

Environmental Protection

Hazardous Waste Inspection Report

FACILITY INFORMATION:

Facility Name: International Paper Co Pensacola Mill

On-Site Inspection Start Date: 06/26/2012 **On-Site Inspection End Date:** 06/26/2012

ME ID#: 26581 **EPA ID#:** FLD008166639

Facility Street Address: 375 Muscogee Rd, Cantonment, Florida 32533-1422

Contact Mailing Address: 375 Muscogee Rd, Cantonment, Florida 32533-1422

County Name: Escambia **Contact Phone:** (850) 968-4258

NOTIFIED AS:

SQG (100-1000 kg/month)
Used Oil

INSPECTION TYPE:

Routine Inspection for SQG (100-1000 kg/month) facility

Routine Inspection for Used Oil Generator facility

INSPECTION PARTICIPANTS:

Principal Inspector: Melissa D. Woehle, Environmental Specialist

Other Participants: Aaron Mitchell, Environmental Specialist; John Taylor, Environmental Engineer

LATITUDE / LONGITUDE: Lat 30° 36' 20.8682" / Long 87° 19' 25.6923"

SIC CODE: 2621 - Manufacturing - paper mills

TYPE OF OWNERSHIP: Private

Introduction:

The International Paper Company - Pensacola Mill, located in Cantonment, Florida (IP), operates 24 hours per day seven days per week and currently employs approximately 450 people (down from 600 in 2009). A paper mill has been in operation at this location since 1941. IP last notified the Department as a small quantity generator of hazardous waste (SQG) in 2012 and is registered as a used oil burner through June 30, 2013. IP was last inspected for hazardous waste and used oil management in July 2009 with no violations cited.

Department personnel Melissa Woehle and Aaron Mitchell conducted an unannounced hazardous waste inspection of IP on June 26, 2012 to ensure compliance with the Resource Conservation and Recovery Act (RCRA). The inspection was facilitated by John Taylor, IP Environmental Engineer.

Process Description:

Operations at the mill include wood and chip handling, Kraft pulping, chemical recovery, bleaching, and paper manufacturing. IP produces liner board and fluff pulp through the traditional Kraft pulping process. IP discontinued production of uncoated Xerox paper in 2008. Support and auxiliary operations include mill services such as water supply, equipment and vehicle maintenance, machining, preventive predictive maintenance, laboratory analysis, wastewater treatment and air pollution abatement. IP employs contract labor for activities such as painting, welding and heavy equipment operation.

Hazardous wastes (HW) routinely generated include paint waste, aerosol cans and lab wastes. Manifests are maintained on-site for at least three years and show HW being picked up by Veolia ES Technical Solutions, LLC. (VES)(NJD080631369) and delivered to VES (TXD000838896). IP routinely has five to six drums of HW picked up twice per year. The majority of IP's HW is paint waste. IP's records show a total of 2,430 gallons of hazardous waste being picked up by VES on June 11, 2012.

Used oil, used oil filters and oily absorbents are picked up by The McPherson Company, Inc. (ALD079119558). Universal waste lamps and batteries are picked up by Pensacola Recycling, Inc. (FLR000136861).

Production Area:
There are two paper machine lines in the Production Area, P4 (fluff pulp) and P5 (liner board). Aerosol cans are the only waste stream routinely managed as hazardous waste in this area. We visually inspected the aerosol can satellite accumulation area (SAA) for P4, located in the P4 basement. The SAA was a 30-gallon drum with a can puncturing device screwed into the bung hole and a carbon filter screwed into the vent hole. The drum was labeled and closed. The filter had instructions printed on it that said to replace every 90 to 120 days, but was not dated. Hydraulic oil had leaked from the machinery above and was pooled on the floor in this area (less than 25 gallons). The oil appeared to be contained within the building. IP employees put down absorbent pads during the inspection to soak up the oil.

Vehicle Maintenance Shop:
Used oil, used antifreeze and waste gas generated in the vehicle maintenance area are collected in separate tanks located within secondary containment just outside the shop area. Used oil filters and absorbents are stored inside in 55-gallon drums. Aerosol cans are punctured in this area and residue is collected in a closed container labeled "Hazardous Waste". The carbon filter was dated 6-8-12 and scheduled to be changed on 7-8-12. Instructions written on the filter said it should be changed each 45 days or 1,000 cans. There is a System One parts washer in this area that uses Premium Gold solvent (> 145 degree, Flash Point). Residue from the System One is put into the used oil.

Electrical and Instrumentation Shop (E&I Shop):
Aerosol cans are punctured in this area and residue is collected in a closed container labeled "Hazardous Waste". The puncturing device was in the open position rendering the drum open. Air compressor oil is accumulated in a 55-gallon drum labeled HW. The drum was open with a funnel resting in the open bung hole. Both drums were closed during the inspection.

Wood Yard:
Two tanks and two 55-gallon drums labeled "Wood Yard Used Oil" were staged outside the Wood Yard Maintenance Shop without secondary containment. Aerosol cans are punctured in this area and residue is collected in a 30-gallon container labeled "Hazardous Waste." The drum had a funnel in the bung hole that did not seal the drum and the filter was broken. Mr. Taylor called maintenance to have the drum replaced.

The aerosol can puncturing SAA for the Wood Yard Crane was observed to be open (puncturing device in open position). This was corrected during the inspection.

Reed Maintenance Service, Inc. (Reed):
Reed is contracted by IP for dredging and hauling of various wastes including boiler ash, wastewater sludge, and lime. Reed took over the contract in January 2012 and has an on-site office, maintenance shop and staging area. Used oil was being stored in a 110-gallon tank and 55-gallon drums without secondary containment. One parts washer, installed 30 days prior to this inspection (fluid unknown), will be serviced by Safety Kleen.

Mansfield Industrial Coatings, Inc. (MIC):
MIC is IP's paint contractor and has an on-site office, storage, and yard area (Paint Yard). Hazardous waste is satellite accumulated in a three sided shed with curbed concrete floor. Three SAA drums were observed: one 55-gallon drum marked " HW Thinners/ Liquids," one 55-gallon drum marked "HW Paint Solids," and one 30-gallon drum marked "HW Paint Chips Lead." The drum marked "Thinners/Liquids" was a closed top drum. A funnel was screwed into the bung hole, but did not adequately seal the drum. It also had a large dent in the side. The drum labeled "HW Paint Chips Lead" had an unsecured lid and significant rusting.

Two 55-gallon drums with MEK product labels were marked "30-Weight Oil" and had stained soil beneath them. They were on a wooden pallet between two trailers in the Paint Yard.

Universal Waste Collection Point:
UW batteries are accumulated in 55-gallon drums and UW Lamps are accumulated in a wooded box. The drums and box were labeled and dated. The oldest date was within one year.

New Potential Violations and Areas of Concern:

Violations

Type:	Violation
Rule:	262.34(d)(5)(iii)
Explanation:	IP had six hazardous waste drums that were not closed. Used oil was being stored in MEK drums that were not within secondary containment and soil beneath the drums was stained.
Corrective Action:	IP needs to ensure that all employees are thoroughly familiar with proper waste handling and emergency procedures, relevant to their responsibilities during normal facility operations and emergencies.

Type:	Violation
Rule:	265.173(a)
Explanation:	IP had six open HW drums (four aerosol can puncturing drums, one liquid paint waste drum and one waste air compressor oil drum).
Corrective Action:	Four of the drums were closed during the on-site inspection. Documentation was submitted to demonstrate closure of the remaining drums the following day. IP plans to emphasize container closure during annual hazardous waste training.

Type:	Violation
Rule:	62-710.401(6)
Explanation:	In Reed's Maintenance Shop, one 110-gallon tank and one 55-gallon drum of used oil were being stored without secondary containment. In Mansfield's Paint Yard, two 55-gallon drums (MEK product drums) of used oil were being stored without secondary containment and had stained soils beneath them. Two tanks and two 55-gallon drums labeled "Wood Yard Used Oil" were staged outside the Wood Yard Maintenance Shop without secondary containment, see pictures.
Corrective Action:	IP and Reed agreed to move the used oil drum into the building and have it pumped by McPherson. It will not be used for storage of used oil after pumping. The used oil tank was put into a concrete containment unit. The containment appeared to meet the requirement to hold at least 110% of the largest container within the containment. IP moved the MEK drums to the 180-Day HW Storage Building to await pick-up by McPherson. The stained soils were removed and placed in closed 55-gallon drums. The stained soil was sampled and analysis by Test America for MEK was non-detect. IP has removed the single-walled (red) tank from service and placed the single-walled black tank into secondary containment along with the drums.

PHOTO ATTACHMENTS:

P4 - Aerosol Can Puncturing SAA



E&I Shop - Aerosol Can Puncturing SAA



E&I Shop - Air Compressor Oil SAA



Paint Yard - Paint Waste SAAs



Paint Yard - Used oil drums & stained soil



Wood Yard Crane Aerosol Can Puncturing SAA



Wood Yard Aerosol Can Puncturing SAA



Wood Yard Used Oil Tank (black)



Wood Yard Used Oil Tank (red)



Wood Yard Used Oil 55-gallon drums



Conclusion:

IP appeared to be compliant with hazardous waste and used oil regulations at the conclusion of this inspection.

Recommend IP review Mill procedures to ensure that all "Used Oil" including "Wood Yard Used Oil" is stored within required secondary containment.
Recommend IP include used oil requirements when conducting HW training and provide additional training to address hazardous waste container management.
Recommend IP consider centralizing aerosol can accumulation and puncturing to reduce the number of aerosol can puncturing SAAs and institute a system to routinely inspect SAAs for compliance.

Signed:

A hazardous waste compliance inspection was conducted on this date, to determine your facility's compliance with applicable portions of Chapters 403 & 376, F.S., and Chapters 62-710, 62-730, 62-737, & 62 -740 Florida Administrative Code (F.A.C.). Portions of the United States Environmental Protection Agency's Title 40 Code of Federal Regulations (C.F.R.) 260 - 279 have been adopted by reference in the state rules under Chapters 62-730 and 62-710, F.A.C. The above noted potential items of non-compliance were identified by the inspector(s).

This is not a formal enforcement action and may not be a complete listing of all items of non-compliance discovered during the inspection.

Melissa D. Woehle	Environmental Specialist	
PRINCIPAL INSPECTOR NAME	**PRINCIPAL INSPECTOR TITLE**	
Melissa Woehle	FDEP	7/12/2012
PRINCIPAL INSPECTOR SIGNATURE	**ORGANIZATION**	**DATE**

Supervisor: **James Byer**

NOTE: By signing this document, the Site Representative only acknowledges receipt of this Inspection Report and is not admitting to the accuracy of any of the items identified by the Department as "Potential Violations" or areas of concern.