

## DEPARTMENT OF ENVIRONMENTAL REGULATION



## NORTHWEST DISTRICT

160 GOVERNMENTAL CENTER  
PENSACOLA, FLORIDA 32501-5794

BOB GRAHAM  
GOVERNOR

VICTORIA J. TSCHINKEL  
SECRETARY

ROBERT V. KRIEGL  
DISTRICT MANAGER

## HAZARDOUS WASTE INSPECTION REPORT

1. INSPECTION REPORT        COMPLAINT  ROUTINE        FOLLOW-UP        PERMITTING  
FACILITY NAME Champion International Corp. DER/EPA ID FL D055279715  
ADDRESS Post Office Box 87, Cantonment, Florida 32533  
COUNTY Escambia Phone (904) 968-2121 DATE 1/30/85 TIME 9:00a.m.

## TYPE OF FACILITY:

Generator	Storage	Treatment
<u>      </u> Small Quantity	<u>      </u> Container	<u>      </u> Tank
<input checked="" type="checkbox"/> Generator	<u>      </u> Tank	<u>      </u> Land Treatment
	<u>      </u> Waste Pile	<u>      </u> Thermal
Transporter	<u>      </u> Surface Impoundment	<u>      </u> Chem/Phys/Bio.
<u>      </u> Transporter		<u>      </u> Incinerator
	Disposal	<u>      </u> Surface Impoundment
<u>      </u> Non-Handler	<u>      </u> Landfill	
	<u>      </u> Surface Impoundment	
	<u>      </u> Waste Pile	

2. Applicable Regulations:

40 CFR 261  40 CFR 262        40 CFR 263        40 CFR 264        40 CRF 265

3. Responsible Official: (Name & Title)

Steve Oldham, Plant Manager

4. Survey Participants & Principal Inspector:

Bobby Tyree, Stock Room Manager, Champion International Corp.  
Rick Singer, Environmental Specialist, DER, Pensacola

5. Facility Latitude: 30°36'16" Longitude: 87°19'24"

6. Type of Ownership: FEDERAL STATE COUNTY MUNICIPAL (PRIVATE)

7. Permit Number: N/A Date Issued: N/A Expiration Date: N/A

## Process Description

8.

Champion International purchased St. Regis Paper Company in October of 1984. The Bag Plant is a generator of hazardous waste.

Champion Bag Plant manufactures finished printed, non-printed and insecticide coated paper bags. Their process involves purchasing rolls of Kraft paper, either from the adjoining Champion Mill or from another source, and running it through a converting process. During the converting process, the paper is trimmed to size and shape (slitting) and then adhered in such a manner as to form a bag. Champion uses latex and dextrin glues and hot melts in their adhering process.

Bag printing is performed with large, mimeograph-type printers. Water soluble inks are used in the printing of paper bags. A continuously circulated stream of water is passed over the stencil of each printer as an ink washup. The washup, containing water and ink solids, is drained into a 5 gallon container and is recirculated. When the ink solids within the washup reach a concentration of 3 to 10%, the washup water is replaced with clean water. The ink-saturated washup water is discarded into the plant's wastewater treatment works. Occasionally, the bag plant receives an order for printed plastic bags. Alcohol soluble inks are used in the printing of plastic bags. An ethanol washup, anhydrol, replaces the water washup used during the printing of paper bags. The waste washup, containing ethanol and ink solids, is stored in 55 gallon drums for disposal purposes.

Champion's Bag Plant utilizes a process of treating bag paper with the insecticide, pyrethrin. Bags constructed of pyrethrin-treated paper are used to package food shipped overseas. The insecticide is received by Champion in a wettable powder form. The powder contains 1.67% pyrethrin and 19.0% piperonyl butoxide. The pyrethrin-piperonyl butoxide powder is mixed with water and a binder and then applied to the bag paper during the converting process. The waste pyrethrin-piperonyl butoxide mixture is not presently a hazardous waste. Champion Bag Plant handles this mixture as a hazardous waste, however. The pyrethrin insecticide washup, waste coating material and scrap paper are containerized in 55 gallon drums and stored for disposal.

Champion informed the inspectors during their December 12, 1983 inspection that they intended to construct a permanent short term storage facility. To date they have not gone ahead with these plans. They have, however, constructed metal holders for the drums. The holders are square, approximately 2'x2'x3', and each individual drum is placed in one.

9. Summary of Violations

Regulation	Description
262.11	Hazardous Waste Determination Champion has not performed the hazardous waste determination as required by 262.11 on their wastes.
265.16	Personnel Training  Champion Management does not receive an annual training review as required by 265.16(c)
265.16	Personnel Training  Champion's training records do not include written job descriptions as required by 265.16(d)(2)
265.52	Contingency Plan  Champion's contingency plan does not include a list of emergency equipment available as required by 265.52(e)

10. Recommended action

Regulation	Corrective Action
262.11	Champion must analyze the following ink or ink waste for lead, chromium and cadmium using the EP Toxicity Test Procedures:

1. Solvent Flexon Ink containing lead, ref.# SVM-4362-J
2. Meteor Ink containing lead ref.#SVM4362-L
3. Aquaflex Ink containing lead ref.#SVM4362-H


Champion must test the flashpoint of wastes containing the following inks and laquers using the Pensky-Martens Closed Cup Tester:

1. Solvent Flexo Ink containing lead ref.#SVM4362-J
2. Solvent Flexo Ink unleaded ref.#SVM4362-I
3. Aquaflex Ink containing lead ref.#SVM4362-H
4. Aquaflex Ink unleaded ref.#SVM4362-G
5. 2053 A/F overlacquer ref.#SVM-4362-F
6. 2055 A/F overlacquer ref.#SVM-4362-E
7. 2016V Flexo overlacquer ref.#SVM-4362-D
8. 2056 Non-skid Flexo lacquer ref.#SVM-4362-C
9. 2031 Flexo overlacquer ref.#SVM-4362-B
10. 2041 A/F overlacquer ref.#SVM-4362-A

The above analyses must be performed within 30 days and copies of the results provided to the Department 7 days after their receipt by Champion.

- 265.16 Champion must provide management with annual review of required training
- 265.16 Champion must include job descriptions in training records within 60 days
- 265.52 Champion must include a list of available emergency equipment in their contingency plan within 60 days

Champion International must notify the Department in writing that they have purchased St. Regis Paper Company and request that St. Regis' EPA I.D. number be transferred to them. This may be done by contacting Melinda Bergeson, Florida Department of Environmental Regulation, Hazardous Waste Section, 2600 Blairstone Road, Tallahassee, Florida 32301.

  
Richard A. Singer  
Environmental Specialist

RAS/rsf

Date 1-30-85  
Inspector R.A. Singer  
Facility ID# EL008527975

RCRA INSPECTION REPORT  
GENERATOR'S CHECKLIST

Note: On multiple part questions, check those not in compliance.

Section A - Site Identification No.

1. Site Name: Champions International

Section B - Hazardous Waste Determination (262.11)

1. Does generator generate hazardous waste(s) listed in Subpart D (261.30 - 261.33 - List of Hazardous Waste)?  Yes  No

a. If yes, list wastes, EPA numbers & quantities.

2. Does generator generate solid waste(s) that exhibit hazardous characteristics? (corrosivity, ignitability, reactivity, EP toxicity) (261.20 - 261.24 - Characteristics of Hazardous Waste.)  Yes  No

a. If yes, list wastes, EPA numbers, and quantities.

b. Does generator determine characteristics by testing, by product knowledge or by applying process knowledge? \_\_\_\_\_

(1) If determined by testing, did generator use test methods in Part 261, Subpart C (or Equivalent)?  Yes  No

(2) If equivalent test methods used, attach copy of equivalent methods used.

3. Is generator subject to full regulation under Part 262?  Yes  No  
(If no, check appropriate exemptions)

Small quantity generator (261.5 - Special requirements) \_\_\_\_\_  
(Describe small quantity disposal practices & checklist)

OR  
Produces non-hazardous waste at this time (261.4 - Exclusions) \_\_\_\_\_

OR  
Recycles, reclaims, uses or reuses hazardous waste at this time (261.6 - Exclusions) (Describe how this is achieved.) \_\_\_\_\_

OR  
Being a farmer disposing of waste pesticides for his own use on his own property (262.51 - Farmers) \_\_\_\_\_

OR  
Burns hazardous waste as a fuel for the purpose of recovering usable energy (261.1(c)(2)) \_\_\_\_\_

Section C - Manifest (262.20-.23)

1. Has generator shipped hazardous waste off-site since Nov. 19, 1980?  
(Subpart B - The Manifest)  Yes  No

- a. If no, do not fill out Section C and D.
- b. If yes, identify primary off-site facilities.  
List facilities in narrative report.

2. Does generator use manifest? (262.20 - General requirements)  Yes  No

If yes, inspect manifests at random. Do all manifests reviewed include the following information?  
(262.21 - Required information) (Check items not on manifest.)

- a. Manifest Document No.  Yes  No
- b. Generator's Name, Mailing Address, Tel. No.  Yes  No
- c. Generator EPA I.D. No.  Yes  No
- d. Transporter(s) Name and EPA I.D. No.  Yes  No
- e. Facility Name, Address and EPA I.D. No.  Yes  No
- f. DOT description of the waste  Yes  No
- g. (1) Quantity (weight or volume)  Yes  No  
(2) Containers (type and number)  Yes  No
- h. Emergency Information (optional)  
(special handling instructions, Phone No.)  Yes  No
- i. Is the following certification on each manifest form?  Yes  No

This is to certify that the above named materials are properly classified, described, packaged, marked and labeled and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the EPA.

- j. Signatures and dates
  - (1) Generator  Yes  No
  - (2) Transporter  Yes  No
  - (3) Disposer (returned copy)  Yes  No

k. Indicate number of manifests inspected and number of violations. 2  
Note type of violation in report. 0

1. If copy of manifest from facility was not returned within 45 days, did generator file an exception report? (262.42 - Exception reporting)

Yes  No

If yes, did it contain the following information?

Legible copy of manifest

Yes  No

AND

Cover letter explaining generators efforts to locate waste.

Yes  No

m. Does (will) generator retain copies for 3 years?

Yes  No

Section D - Pre-Transport Requirements(262.30-34)

N/A

1. Does generator package waste for transport?

Yes  No

If no, skip to question 8.

If yes, complete the following questions.

2. Does generator package waste in accordance with 49 CFR 173, 178, and 179 (DOT requirements)? (262.30 - Packaging)

Yes  No

3. Inspect containers to be shipped.

a. Are containers to be shipped in good condition? (Describe containers and condition; i.e., leaking or corroding or bulging.)

Yes  No

b. Is there evidence of heat generation from incompatible wastes in the containers?

No  Yes

4. Before shipping, does the generator use DOT labeling requirements in accordance with 49 CFR 172? (263.31 - Labeling)

Yes  No

5. Does the generator mark each package in accordance with 49 CFR 172? (262.32 - Marking)

Yes  No

6. Is each container of 110 gallons or less marked with the following label? (262.32 - Marking)

Yes  No

Label saying: HAZARDOUS WASTE - Federal Law Prohibits Improper Disposal. If found, contact the nearest police or public safety authority or the U.S. Environmental Protection Agency.

Generator's Name and Address \_\_\_\_\_

Manifest Document Number \_\_\_\_\_



7. If there are any vehicles present on site loading or unloading hazardous waste, inspect for presence of placards. Note this instance on narrative explanation sheet. (262.33 - Placarding)

a. Does the generator have the appropriate placards to offer the initial transporter?

Yes  No

b. If no, who provides placards?

Transporter

8. Accumulation Time (262.34 - Accumulation Time)

a. Is facility a permitted storage facility?  
If yes, skip to question #9.

Yes  No

If no, answer rest of question #8.

b. Does the facility comply with the 90-day accumulation time limit? (262.34(a))  
If no, has the generator been granted a 30-day extension? (262.34(b))

Yes  No

If yes, explain the unforeseen/uncontrollable circumstances in the narrative.

Yes  No

c. Are containers used to store wastes? (262.34(a)(1))

Yes  No

If yes, complete Containers Storage Checklist for Generators.

Is the beginning date of accumulation time clearly indicated? (262.34(a)(2))

Yes  No

d. Are tanks used to store wastes? (262.34(a)(1))

Yes  No

If yes, complete Tanks Checklist for Generators

e. While being accumulated, is each container or tank clearly marked "Hazardous Waste"? (262.34(a)(3))

Yes  No

NOTE: If generator accumulates waste on site but is not a storage facility, fill out Appendix A to Generators Checklist.

9. Describe storage area. Use photos and narrative.

Section E - Recordkeeping and Records (262.40-43) N/A Explain

1. Is generator keeping the following reports? (262.40 - Record keeping)  
(Note: The following must be kept for a minimum of three years.)

a. Annual reports (not applicable until January 1983).

Yes  No

b. Test results where applicable.

Yes  No

2. Where are records kept (at facility or elsewhere)? facility

3. Who is in charge of keeping the records?

Name Bobby Tyree Title stock room supervisor

4. Any additional reporting? (262.43 - Additional Reporting)  Yes  No

Section F - Special Condition (262.50 - International Shipments)  N/A

Explain \_\_\_\_\_

1. Has generator received from, or transported to a foreign source any hazardous waste?  No  Yes

a. If yes, has he filed a notice with the Regional Administrator?  Yes  No

b. Is this waste manifested and signed by Foreign consignee?  Yes  No

c. If generator transported wastes out of the country, has he received confirmation of delivered shipment?  Yes  No

Date 1-30-85  
Inspector R.A. Singer  
Facility ID# PLD055279215

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Appendix A  
To Generator Checklist

Section A - Personnel Training (265.16)

1. Do management personnel complete hazardous waste training?  Yes  No  
a. Is training on-the-job?  Yes  No  
b. Is training in the classroom?  Yes  No
2. Do laborers who handle hazardous waste complete training?  Yes  No  
a. Is training on-the job?  Yes  No  
b. Is training in the classroom?  Yes  No
3. Does training include:  
a. Emergency response procedures?  Yes  No  
b. Inspection procedures?  Yes  No  
c. Operation of hazardous waste handling equipment?  Yes  No
4. How often is training reviewed? 6 months
5. Does the facility have personnel training records including  
a. Job title and description of position?  Yes  No  
b. Description of employee's training?  Yes  No
6. Are records maintained for three years?  Yes  No

Section B - Preparedness and Prevention (265.30-37)

1. Is there evidence of fire, explosion or contamination of the environment? (265.31 - Maintenance and Operation of Facility)  No  Yes  
If yes, use narrative explanation.
2. Is the facility equipped with (265.32 - Required equipment)  
a. Internal communications or alarm system?  Yes  No  
Is it easily accessible in case of emergency?  Yes  No  
b. Telephone or two-way radio to call emergency response personnel?  Yes  No  
c. Portable fire extinguishers, fire control equipment, spill control equipment and decontamination equipment?  Yes  No  
Is this equipment tested to assure its proper operation?  Yes  No

How frequently? monthly

d. Water of adequate volume for hoses, sprinklers or water spray system?  Yes  No

(1) Describe source of water OWN WELLS

(2) Indicate flow rate and/or pressure and storage capacity, if applicable. \_\_\_\_\_

3. Is there sufficient aisle space to allow unobstructed movement of personnel and equipment? (e.g., adequate aisle space in between barrels to check for leakage, corrosion and proper labeling, etc.) (265.35 - Required Aisle Space)  Yes  No

4. Has the owner/operator made arrangements with the local authorities to familiarize them with characteristics of the facility? (Layout of facility, properties of hazardous waste handled and associated hazards, places where facility personnel would normally be working, entrances to roads inside facility, possible evacuation routes.) (265.37 - Arrangements With Local Authorities)  N/A  Yes  No

If N/A, explain \_\_\_\_\_

5. In the case that more than one police or fire department might respond, is there a designated primary authority? (265.37 - Arrangements With Local Authorities)  N/A  Yes  No

If yes, indicate primary authority \_\_\_\_\_

Is the fire department a city or volunteer fire department? \_\_\_\_\_

6. Does the owner/operator have phone numbers of and agreements with state emergency response teams, emergency response contractors and equipment suppliers? (265.37 - Arrangements With Local Authorities)  N/A Yes  No

Are they readily available to the emergency coordinator?  Yes  No

7. Has the owner/operator arranged to familiarize local hospitals with the properties of hazardous waste handled and types of injuries that could result from fires, explosions, or releases at the facility? (265.37 - Arrangements With Local Authorities)  Yes  No

If no, has the owner/operator attempted to do this?  Yes  No

8. If the State, or local authorities decline to enter into the above referenced agreements, has this been documented in the operating record? (265.37 - Arrangements With Local Authorities)  N/A Yes  No

Section C - Contingency Plan and Emergency Procedures (265.50-56)

1. Does the facility have a contingency plan?  
(265.51 - Purpose and Implementation of Contingency Plan)  Yes  No
2. Is it maintained at the facility?  
(265.53 - Copies of Contingency Plan.)  Yes  No
3. Is the contingency plan a revised SPCC Plan?  
(265.52 - Content of Contingency Plan)  Yes  No
  - a. Does the plan include:
    - (1) Action personnel will take?  Yes  No
    - (2) Evacuation routes?  Yes  No
    - (3) Emergency equipment?  Yes  No
    - (4) Is the emergency equipment properly inspected and maintained?  Yes  No
4. Is there an emergency coordinator on site or within short driving distance of the plant at all times?  
(265.55 - Emergency Coordinator)  Yes  No
5. Who is the emergency coordinator? BR. Tyree
6. Has the facility supplied local police and fire departments with a copy of the contingency plan?  
(265.52 - Content of Contingency Plan.)  Yes  No

Date 1-30-85  
Inspector RASINGER  
Facility ID# FLD055229715

CONTAINERS STORAGE CHECKLIST FOR GENERATORS

(Subpart I - Use and Management of Containers 265.170)

1. Are the containers in good condition (265.171)? (check for leaks, corrosion, bulges, etc.)  Yes  No
2. If a container is found to be leaking, does the operator transfer the hazardous waste from the leaking container?  Yes  No
3. Is the waste compatible with the containers and/or its liner (265.172)?  Yes  No
4. Are containers holding hazardous waste opened, handled or stored in such a manner as to cause the container to rupture or leak? (265.173)?  No  Yes  
If yes, explain using narrative.
5. Are each of the containers inspected at least weekly (265.174)?  Yes  No  
If no, explain using narrative concerning the frequency of inspection.
6. Are containers holding ignitable or reactive wastes located at least 15 meters (50 feet) from the facility property line (265.176)?  N/A  Yes  No  
If no, explain using narrative and document with photograph.
7. Are incompatible wastes stored in the same containers?  No  Yes  
If yes, explain using narrative.
8. Are containers holding incompatible wastes kept apart by physical barrier or sufficient distance?  Yes  No  
If no, explain using narrative.