

P. O. Box 87
Cantonment, FL 32533

RECEIVED

APR 12 1985

NORTHWEST FLORIDA
DER



April 10, 1985

CERTIFIED MAIL -
RETURN RECEIPT REQUESTED

Mr. Charles Goddard
Department of Environmental Regulations
Northwest District
160 Governmental Center
Pensacola, Florida 32501-5794

SUBJECT: WARNING NOTICE NWHW 17-1048
Champion International Corporation
Cantonment, Florida

Dear Mr. Goddard:

In response to the February 12, 1985 warning notice cited above, we have taken the following actions:

Alleged Violations

Champion has not performed a hazardous waste determination of its wastes.

Action Taken

Champion had the inks and ink wastes from our printing department analyzed by Pioneer Laboratory and received the results on March 5, 1985. Our Environmental Specialist, J. Brad Peebles, then sent to your attention a letter requesting an extension due to these results. We then had Environmental Protection Systems, Inc. analyze these same inks and ink wastes. A copy of both these results are enclosed.

Alleged Violation

Champion's management does not receive an annual training review.

Action Taken

Champion International has a yearly training program designed to keep its employees informed. Due to the St. Regis Corporation/Champion International merger in 1984, training was postponed until the scope of the new operations could be decided. This training will resume before the end of 1985.

Mr. Charles Goddard
Department of Environmental Regulations

Page 2
April 10, 1985

Alledged Violation

Champion's training records do not include written job descriptions.

Action Taken

This error is now being taken care of and written job descriptions are now being used, and a copy of these are being placed in the employee's personnel folder.

Alledged Violation

Champion's contingency plan does not include a list of emergency equipment available.

Action Taken

A list of emergency equipment in the vicinity of our storage area has now been added to our contingency plan.

In addition to the above steps taken, we have initiated the installation of a solids removal device called an Alar unit, which we think will render the ink solids non-hazardous by encapsulation. This unit should be in operation by the end of May.

Also, we have taken steps to insure that only low lead and chromium inks shall be purchased at this plant.

If we may be of further help, please don't hesitate to call.

Sincerely,



Steve A. Oldham
Resident Manager
Bag Packaging Division

SAO/rbb

cc: Messrs.

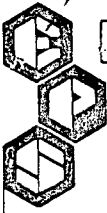
G. E. Hoffman - DER

R. A. Singer - DER

H. Judd

B. Tyree

Enclosures



ENVIRONMENTAL PROTECTION SYSTEMS, INC.

P. O. Box 20382/106 Upton Dr./Jackson, Ms. 39209/601-922-8242
7215 Pine Forest Rd./Pensacola, Fl. 32506/904-944-0301

March 21, 1985
File No. 3.85.3.116

Mr. Bobby Tyree
Champion Paper Company
U.S. Highway 29
Cantonment, FL 32533

Dear Mr. Tyree:

Subject: EPS Project No. 3.85.815.01
Analytical Report No. 3.85.197
Analysis of Ink and Waste Solution

Enclosed are the results of the EP Toxicity and Flash Point test on your samples submitted on March 12, 1985. Please note that the flash points had to be reported as less than 75°C or as greater than 230°C if the sample did not flash within the range of the instrument.

The EP Toxicity test was conducted on the ink samples by assuming that they were solid or oil samples and subjecting 100 grams to the test. This was done because the sample could not be filtered or separated into solid and liquid portions. This most probably worked in your favor since the dilution of 20 fold could be used in this procedure; whereas, no dilution is allowed if the liquid can be separated.

The wash samples were separated and analyzed independently. The solid portion was separated by settling. The solid content was assumed to be no more than 10 percent in Sample 85-212, and 5 percent in Sample 85-210 and 85-211. The exact quantity of solid was difficult to ascertain since these solids could not be dried by filtration. The wet solids were subjected to the extraction, and the liquid was analyzed directly after filtration. The results were then combined in a percentage reflecting the original composition.





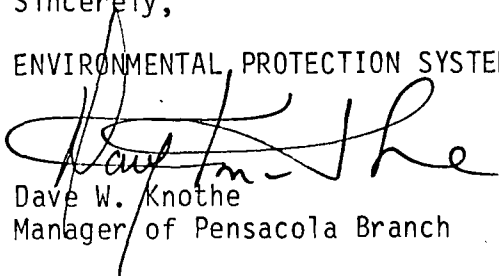
ENVIRONMENTAL PROTECTION SYSTEMS, INC.

Mr. Bobby Tyree
March 21, 1985
Page 2

If you have any questions regarding these results please feel free to contact me at 944-0301. I would like to take this opportunity to thank you for this business and express our desire to offer you excellent analytical service on all of your future projects. I have taken the liberty to enclose some of our company brochures for your information.

Sincerely,

ENVIRONMENTAL PROTECTION SYSTEMS, INC.


Dave W. Knothe
Manager of Pensacola Branch

DWK/ch

Enclosure





ENVIRONMENTAL PROTECTION SYSTEMS, INC.

P.O. Box 20382 • 160 Upton Drive • Jackson, MS 39209
Telephone: (601) 922-8242

7215 Pine Forest Road • Pensacola, FL 32506
Telephone: (904) 944-0301

LABORATORY REPORT

3.85.197

1/5

CLIENT: Champion Paper Company
LOCATION: Cantonment, FL
DATE: 03/21/85
INVOICE NO.: 04888/ch

COLLECTED BY: Client (3.85.815.01)
DATE COLLECTED: NA
DATE RECEIVED: 03/12/85
DATE ANALYZED: 03/12-20/85

LABORATORY SAMPLE IDENTIFICATION

85-197 - Champion #SMM4362-A
85-198 - Champion #SMM4362-B
85-199 - Champion #SMM4362-C
85-200 - Champion #SMM4362-D

ANALYSES	IDENTIFICATION NUMBER			
	197	198	199	200
Flash Point (°F)	>230	<75	<75	<75

COMMENT

Note: Method could not measure flash point lower than room temperature (75°F) or over 230°F.

CERTIFICATION

Frank R. Helges
MANAGER, CHEMICAL LABORATORY



Ray J. De
DIRECTOR, ANALYTICAL SERVICES



ENVIRONMENTAL PROTECTION SYSTEMS, INC.

P.O. Box 20382 • 160 Upton Drive • Jackson, MS 39209
Telephone: (601) 922-8242

7215 Pine Forest Road • Pensacola, FL 32506
Telephone: (904) 944-0301

LABORATORY REPORT

3.85.197

2/5

CLIENT: Champion Paper Company
LOCATION: Cantonment, FL
DATE: 03/21/85
INVOICE NO.: 04888/ch

COLLECTED BY: Client (3.85.815.01)
DATE COLLECTED: NA
DATE RECEIVED: 03/12/85
DATE ANALYZED: 03/12-20/85

LABORATORY SAMPLE IDENTIFICATION

85-201 - Champion #SVM4362-E
85-202 - Champion #SVM4362-F
85-203 - Champion #SVM4362-G
85-204 - Champion #SVM4362-H

ANALYSES

IDENTIFICATION NUMBER

201

202

203

204

Flash Point (°F)

>230

>230

>230

>230

COMMENT

Note: Method could not measure flash point lower than room temperature (75°F) or over 230°F.

CERTIFICATION


MANAGER, CHEMICAL LABORATORY




DIRECTOR, ANALYTICAL SERVICES



ENVIRONMENTAL PROTECTION SYSTEMS, INC.

P.O. Box 20382 • 160 Upton Drive • Jackson, MS 39209
Telephone: (601) 922-8242

7215 Pine Forest Road • Pensacola, FL 32506
Telephone: (904) 944-0301

LABORATORY REPORT

3.85.197

4/5

CLIENT: Champion Paper Company
LOCATION: Cantonment, FL
DATE: 03/21/85
INVOICE NO.: 04888/ch

COLLECTED BY: Client (3.85.815.01)
DATE COLLECTED: NA
DATE RECEIVED: 03/12/85
DATE ANALYZED: 03/12-20/85

LABORATORY SAMPLE IDENTIFICATION

85-207 - Champion #SVM4362-H (Ink)
85-208 - Champion #SVM4362-J (Ink)
85-209 - Champion #SVM4362-L (Ink)
85-210 - Champion #SVM4362-H (Wash)

ANALYSES	IDENTIFICATION NUMBER			
	207	208	209	210
EP TOX Chromium, mg/l	.06	.57	.32	15.3
EP TOX Lead, mg/l	75.7	13.0	19.4	224
EP TOX Cadmium, mg/l	.02	<.01	<.01	.06

COMMENT

Analyses conducted in accordance with Federal Register, Volume 45, No. 98, May 19, 1980, Hazardous Waste and Consolidated Permit Regulations. Book 2, pp. 33063-33285.

CERTIFICATION


MANAGER, CHEMICAL LABORATORY




DIRECTOR, ANALYTICAL SERVICES



ENVIRONMENTAL PROTECTION SYSTEMS, INC.

P.O. Box 20382 • 160 Upton Drive • Jackson, MS 39209
Telephone: (601) 922-8242

7215 Pine Forest Road • Pensacola, FL 32506
Telephone: (904) 944-0301

LABORATORY REPORT

3.85.197

5/5

CLIENT: Champion Paper Company
LOCATION: Cantonment, FL
DATE: 03/21/85
INVOICE NO.: 04888/ch

COLLECTED BY: Client (3.85.815.01)
DATE COLLECTED: NA
DATE RECEIVED: 03/12/85
DATE ANALYZED: 03/12-20/85

LABORATORY SAMPLE IDENTIFICATION

85-211 - Champion #SVM4362-J (Wash)
85-212 - Champion #SVM4362-L (Wash)
Limit - EPA Limit

ANALYSES	IDENTIFICATION NUMBER		
	211	212	Limit
EP TOX Chromium, mg/l	1.2	8.8	5
EP TOX Lead, mg/l	17.2	68.2	5
EP TOX Cadmium, mg/l	.02	<.02	1

COMMENT

Analyses conducted in accordance with Federal Register, Volume 45, No. 98, May 19, 1980, Hazardous Waste and Consolidated Permit Regulations. Book 2, pp. 33063-33285.

CERTIFICATION

Frank R. Hedges
MANAGER, CHEMICAL LABORATORY



[Signature]
DIRECTOR, ANALYTICAL SERVICES

EXPRESS MAIL

RECEIVED

MAR 14 1985



NORTHW

March 8, 1985

Mr. Charles Goddard
Department of Environmental Regulations
Northwest District
160 Governmental Center
Pensacola, Florida 32501-5794

Subject: Warning Notice NWHW 17-1048
Champion International Corporation
Cantonment, Florida

Dear Mr. Goddard:

The February 12, 1985 warning letter issued by your office cited four violations to the Department of Environmental Regulations' rules and statutes relative to hazardous waste management. The corporation has addressed each one of the violations; however, one corrective action, analysis of ink waste using the EP toxicity procedure, was not undertaken according to test protocol.

I received the test results today and immediately contacted you by phone to report my disappointment. It appears as if it takes three weeks from the date on which the order was presented to the laboratory until the analysis is complete based upon the dates in the lab report. Therefore, as I indicated to you in my phone conversation we will not be able to submit our response to the Department of Environmental Regulations' February 12, 1985 letter as we had planned.

We will be able to provide a complete response by April 15, 1985. I apologize for any inconvenience this may cause you and will keep you informed as to our progress.

Sincerely,

J. Brad Peebles, pw

J. Brad Peebles
Environmental Specialist

/pw

cc E. O. Clem
G. E. Hoffman - DER
S. A. Oldham - Cantonment
~~R. A. Singer~~ - DER
T. Tyree - Cantonment



To: Champion Paper
P.O. Box 87
Cantonment, Florida 32533

Reports To Be Mailed To: Bobby Tyree

Lab I.D. # 85-309
Date of Order: February 11, 1985
Date Completed: March 1, 1985
Sample Identification: Ink

<u>Analysis</u>	<u>AF Green</u> <u>8047</u>	<u>AF Green</u> <u>8253</u>	<u>AF Green</u> <u>8254</u>	<u>AF Green</u> <u>8298</u>	<u>AF Orange</u> <u>10021</u>	<u>AF Yellow</u> <u>1104</u>
Arsenic, ppm	0.128	0.128	0.032	0.251	0.213	0.052
Barium, ppm	188	55	19.9	87	1016	72
Cadmium, ppm	1.3	0.50	1.2	1.9	0.7	1.1
Chromium, ppm	4891	390	14,170	12,323	11,067	13,140
Lead, ppm	60,863	24.5	162,053	92,848	137,197	115,380
Mercury, ppm	0.74	0.59	0.45	4.91	8.3	10.1
Selenium, ppm	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01
Silver, ppm	2.7	0.84	1.5	1.9	1.4	0.96
Iron, ppm	31.6	7334	200	49.3	185	41.3
Maganese, ppm	<1	14	1.3	1.8	0.85	<1
Zinc, ppm	6.3	42	11	14	26	19.6
Nickel, ppm	3.7	8.7	4.1	8.8	4.2	6.1

Note: All results are reported in ppm.
ppm - mg/kg
< - Less Than

Approved by W. F. Bowers
W. F. Bowers
Laboratory Director



LABORATORY, INC.

11 EAST OLIVE ROAD
PENSACOLA, FLORIDA 32514
PHONE (904) 474-1001

To: Champion Paper Co.

P.O. Box 87

Cantonment, Fla. 32533

Reports To Be Mailed To: |

Bobby Tyree

Lab I.D. # 85-487

Date of Order: February 26, 1985

Date Completed: March 5, 1985

Sample Identification: _____

Ink Samples

<u>Analysis</u>	<u>METEOR LEADED 10038 Orange B5352</u>	<u>METEOR LOW LEAD 1048 Orange B6008</u>	<u>FLEXYO LEADED 9387 Blue B4977</u>	<u>FLEXYO LEADED 862 Green B5020</u>
Arsenic, ppm	<0.05	<0.05	<0.05	<0.05
Barium, ppm	115	10	354	83
Cadmium, ppm	93	47	53	20
Chromium, ppm	27,886	19,614	6,874	2,147
Lead, ppm	145,047	120,465	34,326	118,395
Mercury, ppm	0.84	3.5	15.6	13.4
Selenium, ppm	<0.010	0.014	<0.010	<0.010
Silver, ppm	105	95	55	56
Iron, ppm	99.8	69	45	179
Maganese, ppm	6,906	5,212	4,650	6,779
Zinc, ppm	130	123	117	106
Nickel, ppm	867	777	559	568

Note: All results are reported in ppm.
ppm - mg/kg
< - Less Than

Approved by

W. F. Bowers

W. F. Bowers
Laboratory Director



I.D. # 85-487

11 EAST OLIVE ROAD PHONE (904) 474-1001
PENSACOLA, FLORIDA 32514

TO Champion Paper Co.
P.O. Box 87
Cantonment, Fla. 32533

February 26, 1985
Date of Order
13376-B
Customer's Order Number

Job Name/Number Ink Samples

Sample Identification/Location _____

REPORTS TO BE MAILED TO:
Bobby Tyree

Job Phone _____ Starting Date March 5, 1985
Date Completed _____ Date Report Mailed

Flashpoint Analysis

<u>Pioneer I.D.</u>	<u>St. Regis I.D.</u>	<u>Results</u>
85-487-1	9 2031-WU	<5°C
85-487-2	5 2053-WU	>100°C
85-487-3	10 2041-WU	>100°C
85-487-4	6 2055-WU	>100°C
85-487-5	2 9457-Flexco	<5°C
85-487-6	4 10088-AFWU	>100°C
85-487-7	3 1823-AFWU	>100°C
85-487-8	1 Flexco-WU	<5°C
85-487-9	7 2016-WU	<5°C
85-487-10	8 2056-WU	<5°C

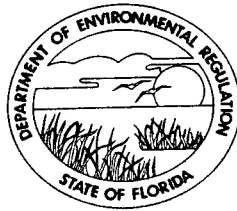
Note: < - Less Than
> - Greater Than

Approved by W. F. Bowers
W. F. Bowers
Laboratory Director

Notes: _____

Analysis by _____
Work Authorized by _____ Technician _____

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION



NORTHWEST DISTRICT

160 GOVERNMENTAL CENTER
PENSACOLA, FLORIDA 32501-5794

BOB GRAHAM
GOVERNOR

VICTORIA J. TSCHINKEL
SECRETARY

ROBERT V. KRIEDEL
DISTRICT MANAGER

February 12, 1985

WARNING NOTICE
NWHW 17-1048

CERTIFIED RETURN
RECEIPT REQUESTED

Mr. Steve Oldham
Plant Manager
Champion International Corporation
P. O. Box 87
Cantonment, Florida 32533

Dear Mr. Oldham:

On January 30, 1985, the Department conducted a RCRA hazardous waste compliance inspection at the Champion bag plant, a function of the Champion International Corporation situated in Escambia County. A copy of the hazardous waste inspection report is attached.

The inspection revealed several noncompliance and/or violations of the 40 CFR 262 and 265 standards which are adopted by reference in Florida Administrative Code Rule 17-30 and Chapter 403, Florida Statutes. Specific violations are referenced below for your review and action:

<u>Violation</u>	<u>Rule/Statute</u>
Champion has not performed a hazardous waste determination of its wastes	40 CFR 262.11 adopted by FAC Rule 17-30.16
Champion's management does not receive an annual training review	40 CFR 265.16(c) FAC Rule 17-30.18
Champion's training records do not include written job descriptions	40 CFR 265.16(d)(2) FAC Rule 17-30.18
Champion's contingency plan does not include a list of emergency equipment available	40 CFR 265.52(e) FAC Rule 17-30.18

It is requested that you review the attached inspection report and comply with the provisions of paragraph 10 within thirty (30) days of receipt of this letter. Failure to comply as requested may subject you to the enforcement provisions of Chapter 403, Florida Statutes including the judicial imposition of fines and/or penalties.

In the event you should have any questions regarding this matter, please feel free to contact Mr. Charles Goddard of this office at 436-8320.

Sincerely,



for
George E. Hoffman, Jr.
District Enforcement Officer

GEH:cgd

Attach: Inspection Report