

STATE OF FLORIDA

file

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

December 28, 1983

Mr. Bobby Tyree
Purchasing Coordinator
St. Regis Paper Company Bag Plant
P. O. Box 87
Cantonment, Florida 32533

Dear Mr. Tyree,

Enclosed is a report of the RCRA Interim Status Compliance Inspection which was conducted at your facility on December 12, 1983. If you have any questions concerning this program or the enclosed report, please contact Rick Singer at 904/436-8363.

Sincerely,

Thomas W. Moody, P.E.
Special Programs Supervisor

TWM:gsd
Encl: Inspection

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301



BOB GRAHAM
GOVERNOR

VICTORIA J. TSCHINKEL
SECRETARY

HAZARDOUS WASTE COMPLIANCE REPORT

1. FLORIDA DEPARTMENT OF ENVIRONMENTAL REGULATION
HAZARDOUS WASTE [GENERATOR/TSD/TRANSPORTER]
COMPLIANCE REPORT _____ COMPLAINT xxx ROUTINE _____ FOLLOW-UP _____ PERMITTING _____
FACILITY NAME St. Regis Paper Co. Bag Plant DER/EPA ID FL D055279715 _____
ADDRESS P.O. Box 87, Cantonment, Florida, 32533
COUNTY Escambia Phone (904) 968-2121 DATE 12/12/83 TIME 10:00 a.m.
PARENT COMPANY & MAILING ADDRESS (IF DIFFERENT) _____

TYPE OF FACILITY: _____ CONTAINER STORAGE _____ LANDFILL _____ LAND TREATMENT
_____ TANK STORAGE _____ WASTE PILE _____ THERMAL TREATMENT
_____ TRANSPORTER _____ INCINERATOR _____ CHEM/PHYS/BIO TRT.

2. Applicable Regulations:
Chapter 17-30.03, Part 261, Florida Administrative Code (F.A.C.)
Chapter 17-30.16, Part 262, F.A.C.

3. Responsible Official: (Name & Title)
Mr. Bobby Tyree, Purchasing Coordinator

4. Survey Participants & Principal Inspector

Mr. Bobby Tyree, St. Regis
Mr. Don Tompkins, St. Regis
Mr. Rick Singer, DER
Mr. Grady Swann, DER

5. Facility Latitude:

30° 36' 16"

Longitude:

87° 19' 24"

6. Type of Ownership: FEDERAL STATE COUNTY MUNICIPAL PRIVATE

7. Process Description:

St. Regis Paper Company Bag Plant has reported to the U.S. Environmental Protection Agency to be a generator of hazardous waste.

St. Regis Bag Plant manufactures finished printed, non-printed and insecticide coated paper bags. Their process involves purchasing rolls of Kraft paper, either from the adjoining St. Regis 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. St. Regis 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 plants 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.

St. Regis 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 St. Regis 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. St. Regis 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.

At the present time, St. Regis Bag Plant stores its hazardous waste in DOT approved, 17-E, 55-gallon, bung-type drums. Each drum is properly labeled and dated for storage, transport and disposal. A separate area inside the plant is set aside for short term storage of the drums. The amount of waste generated at the plant varies from 1 to 12 drums per month, depending upon the work order. The waste accumulation time at the plant never exceeds the 90 day limit. Chemical Waste Management, Inc. is contracted to transport and dispose of the ethanol ink washup and pyrethrin waste at their Emelle, AL site.

St. Regis Bag Plant is planning to construct an outside, short term storage area for its hazardous waste. The storage area will be completely enclosed by a dike and will contain a sump capable of holding 55 gallons.

The only hazardous waste stream identified during this inspection was the ethanol-ink washup. The ethanol washup contains more than 24% alcohol by volume and has a flash point of 55°F. Based on this determination, the ethanol washup exhibits the characteristic of ignitability, as stated in Section 17-30.03 FAC Part 261.21. It has been reported that the pigments used in the printing inks may contain lead, chromium and barium. Section 17-30.16 FAC Part 262.11 denotes a person who generates a solid waste must determine if that waste is a hazardous waste. St. Regis Paper Company Bag Plant must determine if the water-ink washup is a hazardous waste. In addition, it must be determined if the ethanol-ink washup contains heavy metals in excess of the limits specified in Section 17-30.03 FAC or 40 CFR 261.24.



Walter G. Swann
Environmental Specialist
Florida Department of Environmental
Regulation

Brad Pebbles, Jacksonville, 396-5741

Date 12-12-83

Inspector GRADY SWANN

RCRA COMPLIANCE INSPECTION REPORT
GENERATOR'S CHECKLIST

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

Section A - Site Identification No.

1. Site Name: ST-Regis-Bug

a. DER/EPA I.D. No. E C D O 5 5 2 2 9 7 1 5

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 methanol 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? product 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? (If no, check appropriate exemptions) Yes No

Small quantity generator (261.5 - Special requirements) (Describe small quantity disposal practices) _____

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 facility(s).
List facility 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) (Circle items not on manifest.) ___ Yes ___ No

- 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. 8
Note type of violation in report.

l. 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? _____

8. Accumulation Time (262.34 - Accumulation Time)

a. Is facility a permitted storage facility? Yes No
If yes, skip to question #9.

If no, answer rest of question #8.

b. Does the facility comply with the 90-day accumulation time limit? (262.34(a)) Yes No
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.

c. Are containers used to store wastes? (262.34(a)(1)) Yes No

If yes, complete Containers Storage Checklist (Subpart I - Use and Management of Containers)

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 (Subpart J - Tanks, 265.190)

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 *N/A*

2. Where are records kept (at facility or elsewhere)? Facility (manifests) Originals of other reports West Nyack N.Y.
3. Who is in charge of keeping the records?

Name Bobby Tance Title Purchasing Coordinator

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 _____
Inspector _____
Facility ID# _____

-6g-

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 ^{yes} 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? WEEKLY

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? INTERNAL - Containment Volunteer

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) 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) Yes No