

**File ID Number:** HWCB2016442

DEQ/DWM/Hazardous Waste Section

**NCD/NCR (other) Number:** NCD074503129

**Facility Name:** Lawson Mardon USA, Inc.

**Address:** 1600 Westinghouse Blvd.

**City:** Charlotte

**County:** Mecklenburg

**File Date Range:** 8/16/89—3/17/97

**Document Type (s)**

- Inspection Reports
- \*NOV (See Comments)
- \* Compliance Orders/Settlement Agreement (See Comments)
- \*(Provide NOV Type, Docket Number and Date of NOV in Comment Section)
- Correspondence/Letters
- Pictures (Tape to a full sheet of paper)
- \*\* Name Change and Date of Change
- \*\* (Write Name Change Information in Comment Section)
- Sampling Data
- Other Information (See Comments)

**Comments:**

**Box ID Number:**

Is your RETURN ADDRESS completed on the reverse side?

**SENDER:**

- Complete items 1 and/or 2 for additional services.
- Complete items 3, 4a, and 4b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

I also wish to receive the following services (for an extra fee):

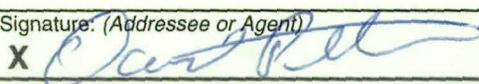
- 1.  Addressee's Address
- 2.  Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:

MR DAVID GRAHAM  
 SEALRIGHT FLEXIBLE PACKAGING GROUP  
 POST OFFICE BOX 7148  
 CHARLOTTE NC 28241-7148

5. Received By: (Print Name)

6. Signature: (Addressee or Agent)  
 X 

4a. Article Number  
 P 431 483 957 (03/13/97)

4b. Service Type  
 Registered  Certified  
 Express Mail  Insured  
 Return Receipt for Merchandise  COD

7. Date of Delivery MAR 17 1997

8. Addressee's Address (Only if requested and fee is paid)

Thank you for using Return Receipt Service.

PS Form 3811, December 1994

Domestic Return Receipt

P 431 483 957 (03/13/97)

US Postal Service

**Receipt for Certified Mail**

No Insurance Coverage Provided.

Do not use for International Mail (See reverse)

Sent to	
Mr. David Graham	
Street & Number	
Sealright Flexible Packaging	
Post Office, State, & ZIP Code Group	
P.O. Box 7148	
Postage	Charlotte, NC \$ 28241-7148
Certified Fee	NCD074503129 (JSP)
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	

PS Form 3800, April 1995

Is your RETURN ADDRESS completed on the reverse side?

**SENDER:**

- Complete items 1 and/or 2 for additional services.
- Complete items 3, 4a, and 4b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

I also wish to receive the following services (for an extra fee):

- 1.  Addressee's Address
- 2.  Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:

MR ART FREIDMAN  
 SEALRIGHT-AKRON  
 1972 AKRON PENINSULA ROAD  
 AKRON OHIO 44313

4a. Article Number

P 431 483 956 (03/13/97)

4b. Service Type

- Registered  Certified
- Express Mail  Insured
- Return Receipt for Merchandise  COD

7. Date of Delivery

3/16

5. Received By: (Print Name)

8. Addressee's Address (Only if requested and fee is paid)

6. Signature: (Addressee or Agent)

X *William C. Cordero*

PS Form 3811, December 1994

Domestic Return Receipt

Thank you for using Return Receipt Service.

P 431 483 956 (03/13/97)

US Postal Service

**Receipt for Certified Mail**

No Insurance Coverage Provided.

Do not use for International Mail (See reverse)

Sent to	
Mr. Art Freidman	
Street & Number	
Sealright-Akron	
Post Office, State, & ZIP Code	
1972 Akron Peninsula Road	
Postage	Akron, Ohio \$ 44313
Certified Fee	NCD074503129 (JSP)
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Addressee's Address	
<b>TOTAL Postage &amp; Fees</b>	<b>\$</b>
Postmark or Date	

PS Form 3800, April 1995

RCRIS

EPA ID#: NCD 074503129  
Facility name: Sealright Flexible Packaging Group City:  
Charlotte, N.C.

**Evaluation data:**

New:  Change: Delete:

Person: 029 Branch: 01  
Agency: s Reason:

**Supervisor NOV Tracking Info**

Type: CEI

Initial Inspection Date: 11 Mar 1997

Docket Number:

Reinsptdate:

COMMENTS: NO VIOLATIONS

**GENERATORS**

GER:  GRR:  GLB:  GMR:  GOR:  GPT:  GSQ:

**TRANSPORTERS**

TGR: TMR: TOR: TRR: TWD:

**USED OIL**

TUO: TFO: BUO: MUO: PUO:  
RUO:

**TSD'S**

DBF: DCH: DCL: DCP: DFR: DGS: DGW: DIN: DLB: DLF:  
DLT: DMC: DMR: DOR: DOT: DPB: DPP:  
DSI: DTR: DTT: DWP:

**VIOLATION DATA:** New:  Change: Delete:

- Agency: s Type: date determined: 11 Mar 1997  
class: Priority: \_\_\_\_\_ Seq.# \_\_\_\_\_  
Return to compliance:  
Actual date:  
Reg Description:  
Comment:
- Agency: s Type: date determined: 11 Mar 1997  
class: Priority: \_\_\_\_\_ Seq.# \_\_\_\_\_  
Return to compliance:  
Actual date:  
Reg Description:  
Comment:

**RCRA INSPECTION REPORT**

1. FACILITY INFORMATION Sealright Flexible Packaging Group  
1600 Westinghouse Blvd.  
Charlotte, N.C. 28241-7148  
NCD 074503129 Generator
2. FACILITY CONTACT  
David Graham - Hazardous Waste Trainer  
Darryl Kadar - Supervisor  
704-588-0220
3. SURVEY PARTICIPANTS  
Joseph Parker - N.C. Hazardous Waste Section  
Darryl Kadar - Sealright Flex. Pack. Group
4. DATE OF INSPECTION 11 Mar 1997
5. PURPOSE OF INSPECTION To determine compliance with 40 CFR 262,  
265, & 268.
6. FACILITY DESCRIPTION

The facility known as Sealright Flexible Packaging Group is listed with the State of North Carolina as a Large Quantity Generator of Hazardous Waste. The facility operates in the flexographic printing business. During the inspection, it came to my attention that the facility will be shutting down its operation next month. They will no longer be generating any hazardous waste at the facility, thus, their Large Quantity Generator status will be dropped.

7. TYPE WASTE

D001 - Waste ink from the printing operation

8. AREAS OF INSPECTION

(Yes = compliance, no = violation, na = not applicable)

- Emergency Preparedness: yes
- Inspection Records: yes
- Contingency Plan: yes
- Training Records: yes
- Manifests/LDR: yes

- 90/180 day storage areas: The facility's hazardous waste storage area is located near their shipping department. During the inspection, 36 - 55 gallon containers were observed to be in storage during the inspection. All storage requirements for hazardous waste containers were met.

- Satellite Accumulation Area: The facility has one satellite

accumulation area, located in the "Wash Room". All satellite accumulation container requirements were met during the inspection.

- External facility condition: Good
- Other HW units: NA
- Recommendations: None

9. Waste Minimization

- 1) Removal of solvent-based adhesives, and;
- 2) Facility is shutting down its operation

10. SITE DEFICIENCIES:

In Compliance

  
INSPECTOR

March 13, 1989  
DATE

(CERTIFIED MAIL)  
FACILITY CONTACT

**RCRA INSPECTION REPORT**

(x= violation, na= not applicable)

**General Information:**

Facility Name SEARIGHT FLEXIBLE PACKAGING GROUP  
Location 1600 WESTINGHOUSE BLVD., CHARLOTTE, N.C. 28273  
Mailing Address SAME - P.O. BOX 7148, CHARLOTTE, N.C. 28241-7148  
EPA I.D.# NCD 074503 129 Phone # 704-588-0220  
Contact/ Title ANNE PODDS DARRYL KAOR, DAVID GARDNER  
Inspection Date MARCH 11, 1997 Last Inspection MAY 13 1996  
Status LARGE QUANTITY GENERATOR Type of Inspection CSE  
Waste Management Specialist(s) JOSEPH S. PARKER - WMS  
Present at Inspection JOSEPH S. PARKER - HAZ. WASTE SEC., DARRYL KAOR  
Type of Business PRINTING - FLEXOGRAPHIC  
Waste Generated 0001

**Manifests:**

Approved Transporters? YES Approved TSD's? YES  
Signed Copies? YES Filled Out Correctly? YES  
LDR Notification Attached? YES - Manifests looked good.

Waste Minimization? YES How? ① shutting down the facility ② removal of solvent-based adhesives

**Hazardous Waste Inspection Records:**

Inspections On Storage Area YES  
Inspections On H.W. Tanks N/A  
Inspection On Ancillary Equipment N/A

**\* Contingency Plan:**

On Site? YES  
Any changes to facility/ processes or Emergency Coordinators since last review? YES / EMERGENCY COORD.  
Contingency Plan used? NO (if yes, was it adequate?)  
Agreements with Emergency Responders? YES

**Training Records:**

Certified Training Documents Available? YES  
Any New Employees Since Last Review? NO - 4 employees have left  
Evidence Of Improper/ Inadequate Training? NO

Transcenter

M+M CHEMICAL ALD 070 513 767

TSD

m+m chemical + Equipment Co., Inc.  
ALD 070 513 767

Facility Name SEARIGHT Flexible Packaging EPA I.D.# NC0 074 503 129  
Inspection Date MARCH 11, 1997

**Employee Interview:**

Names(s) \_\_\_\_\_ Trained \_\_\_\_\_

Annual Report Submitted? YES 1996 Copy At Facility? YES

**Emergency Preparedness:**

Facility Maintained And Operated To Prevent Releases? YES

Internal Communications Or Alarm Present? ALARM

Device In Area Of Operation To Summon Outside Help? YES Phone

Portable Fire Extinguishers And/ Or Fire Control Equipment? YES

Spill Control Equipment? YES

Adequate Water Volume, Foam, Equipment, Or Auto Sprinkler? SPRINKLER

All Equipment/ Alarms Tested And Maintained? ROUTINELY - Yearly Mains

All Personnel Handling H.W. Have Access To Alarm/ Device? YES

Aisle Space In Area Of Facility Operations? YES

Satellite Accumulation Area(s) 1 Location(s) Wash Room 1 - 55 gallon  
CONTAINER used for satellite Accumulation -

Containers: Closed?  Labeled?  <55 gal.  Stored <3 days if full? N/A

Storage Area(s): 1 Description Storage Area - Raw Materials / H.W. Storage  
36 containers and storage

Containers: Closed?  Aisle space?  Labeled?  Releases? NO

Dated?  <90 days?  Good condition?

**Other H.W. Units: (Applicable Regulations)**

Description of Unit NONE

External Facility Condition GOOD

Facility Name SEARIGHT Flexible Packaging EPA ID.# NCD 074 503 129  
Inspection Date March 11, 1997

**Site Deficiencies:**

- 1.) 40 CFR \_\_\_\_\_
- 2.) 40 CFR \_\_\_\_\_
- 3.) 40 CFR \_\_\_\_\_
- 4.) 40 CFR \_\_\_\_\_
- 5.) 40 CFR \_\_\_\_\_
- 6.) 40 CFR \_\_\_\_\_

Recommendations/ Violations Continued: \* Facility in Compliance

[Signature] - WMS - 3-11-97  
RCRA Inspector (date)

Darryl Kula 3/11/97  
Facility Contact (date)

**Follow Up Inspection:**

Comments \_\_\_\_\_

\_\_\_\_\_  
RCRA Inspector (date)

\_\_\_\_\_  
Facility Contact (date)

ART FREIDMAN  
SEARIGHT AKRON  
1972 AKRON Peninsula Rd.  
AKRON OH 44313 330-823-5281

State of North Carolina  
 Department of Environment, Health and Natural Resources  
 Division of Waste Management  
 Hazardous Waste Section

**SITE SAFETY PLAN  
 (HWS-SSP)**

Facility Name: SeaRight Flexible Packaging Group EPA#: NC D 074 503 129  
 Address: 1600 Westinghouse Blvd. Phone# 704-588-0220  
Charlotte, N.C. 28273  
 Client Name: \_\_\_\_\_  
 Facility Contact: ANNE DODDS Phone# \_\_\_\_\_  
 Health/Safety Contact: \_\_\_\_\_ Phone# \_\_\_\_\_  
 SSP Prepared/Reviewed By: J. Parker - DMS Date(s): \_\_\_\_\_

**B. PROJECT DESCRIPTION**

X	TYPE	DATE	X	ACTIVITY	DATE
	CME		X	INSPECTION	
X	CEI			DRUM/SLUDGE SAMPLING	
	CDI			SOIL/SEDIMENT SAMPLING	
	RFI			GROUNDWATER SAMPLING	
	RFA			SURFACE WATER SAMPLING	
	O & M			AIR SAMPLING	
	SITE INVESTIGATION/ VISIT			OTHER:	
	TECHNICAL ASSISTANCE				

Project Activity Summary: Compliance Evaluation Inspection

**(C) EMERGENCY INFORMATION**

Ambulance: All Emergency Services - 911 Telephone# 911  
 Hospital: \_\_\_\_\_ Telephone# 911  
 Police: LHM. Meck Police Telephone# 911  
 Fire Department: LHM. Meck Fire Dept Telephone# 911  
 Fire and Emergency Signals reviewed: ✓  
 Site Evacuation plan reviewed: ✓

**(D) FACILITY DESCRIPTION**

Manufacturing Process Description: Printing operation - 0001

**Site Topography:**

Mountains \_\_\_\_\_ Rivers \_\_\_\_\_ Valley \_\_\_\_\_ Level \_\_\_\_\_ Slopes X Urban X Facility X Other \_\_\_\_\_  
 Special Access Requirements: None



**Possible Physical Hazards:**

Hazard	Yes	No	Hazard	Yes	No
Electrical Hazards: _____			Confined Space		
Uneven/Slippery Ground: _____			Noise: _____		
Trips/Falls			Drums/Containers		
Structural Hazards: _____			Other: _____		
Heavy Equipment: _____					
Biologic: _____					
Heat/Cold					

**Hazard summary (also discuss known concentrations):**

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**Hazard Information Source(s):** *ie. NIOSH Pocket Guide to Chemical Hazards*

**Previous Releases, Accidents or Complaints**

(describe whether air, soil, water or industrial and if corrected): \_\_\_\_\_

**(G) PERSONAL PROTECTIVE EQUIPMENT**

Description	Level of Protection			Description	Level of Protection		
	B	C	D		B	C	D
<b>CLOTHING</b>			(D)	<b>RESPIRATORY PROTECTION</b>			(D)
Coveralls				Cloth Respirator			
Tyvek				Full-face Air-purifying Respirator			
Coated Tyvek				Self-contained Breathing Apparatus			
Saranex				<b>HANDS/ARMS</b>			
<b>HEAD, FACE AND EYES</b>				Vinyl Gloves			
Hardhat				Latex Gloves			
Safety Glasses				Nitrile Gloves			
Goggles				PVC Gloves			
Splash Guard				Duct Tape			
<b>FOOT PROTECTION</b>				<b>OTHER:</b>			
Steel-toed Safety Boots							
Chemical-resistant Boot Covers							

**NOTE:** During normal daily work activities, HWS employees are required to always have in their possession a First Aid kit and fire extinguisher as well as any other of the above listed equipment.

**(H) DECONTAMINATION PROCEDURES**

Most equipment used by HWS personnel is disposable; and thus, should be discarded upon concluding the project, inspection, etc. Equipment such as respirators, augers, shovels, etc. which are re-usable shall be decontaminated according to EPA and HWS protocols.

**NOTE:** CONTAMINATED DISPOSABLE EQUIPMENT SHOULD REMAIN AT THE SITE OF ORIGIN.

**(I) AIR/ENVIRONMENTAL MONITORING**

This section lists the monitoring equipment which may be used by HWS personnel while on site and the action levels which may facilitate upgrading to higher levels of PPE.

Action Level

Monitoring Instrument	YES	NO	Monitoring Interval	D→C (ppm)	C→B (ppm)	Stop Work (ppm)
PID (PhotoVac Microtip)						
FID (Organic Vapor Analyzer)						
Infrared Spectrophotometer						
Combustible Gas Indicator						
Colormetric Detector Tubes						
Other:						

Party Conducting Monitoring: \_\_\_\_\_

COMMENTS: \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

**(J) COMMUNICATION PROCEDURES (If applicable)**

HWS Personnel, in the process of conducting operations beyond routine inspections, shall employ the buddy system and remain in communication or in sight of their partner (a HWS employee). All accidents, injuries and emergencies shall be reported to the HWS Health and Safety Coordinator. The HWS-H&S Coordinator will indicate the need to evacuate the site by verbal command. A telephone on site will be used for contacting emergency personnel and other reporting.

Telephone location: \_\_\_\_\_

It's telephone #: \_\_\_\_\_

**Emergency Communication**

ACTION	MEANING
Hand gripping throat	Out of air, cannot breath, choking
Grip partner's wrist or place both arms around waist	Leave the area quickly, no debate
Hands on top of head	Need assistance
Thumbs up	Ok, all right, I understand
Thumbs down	No negative

**(K) SITE SAFETY PLAN REVIEW VERIFICATION**

verifying that participant has reviewed site contingency plan or HWS-SSP.

Site Activity Participants:

NAME: Joseph A. Parkson

TITLE: WASTE MANAGEMENT SPEC

SIGNATURE: [Signature]

DATE: 3-10-77

\_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

RCRIS

EPA ID#: NCD074503129  
Facility name: Sealright Co., Inc. City: Charlotte, NC

Evaulation data:

New: Change:  Delete:

Person: 010 Branch: 01  
Agency: S Reason:

Supervisor NOV Tracking Info

Type: ~~CSE~~ CSE  
Initial Inspection Date: 2 Apr 1996  
Docket Number: 96-143  
Reinsptdate: 13 May 1996  
COMMENTS: One (1) violation for training. NOV satisfied on 13-5-96.

GENERATORS

GER: GRR: GLB: GMR: GOR: GPT: GSQ:

TRANSPORTERS

TGR: TMR: TOR: TRR: TWD:

USED OIL

TUO: TFO: BUO: MUO: PUO:  
RUO:

TSD'S

DBF: DCH: DCL: DCP: DFR: DGS: DGW: DIN: DLB: DLF:  
DLT: DMC: DMR: DOR: DOT: DPB: DPP:  
DSI: DTR: DTT: DWP:

VIOLATION DATA: New: Change:  Delete:

- Agency: S Type: GGR date determined: 2 Apr 1996  
class: 2 Priority: \_\_\_\_\_ Seq.# \_\_\_\_\_  
Return to compliance: 13 May 1996  
Actual date: 25 Apr 1996  
Reg Description: 40 CFR 262.34(a)(4) ref. 265.16(c)  
Comment: Facility did not accomplish H.W. training for 1996 by the due date of 19 Jan 1996. Facility in compliance with NOV 96-143.
- Agency: S Type: \_\_\_\_\_ date determined: 2 Apr 1996  
class: \_\_\_\_\_ Priority: \_\_\_\_\_ Seq.# \_\_\_\_\_  
Return to compliance: \_\_\_\_\_  
Actual date: \_\_\_\_\_  
Reg Description: \_\_\_\_\_

RCRIS

EPA ID#: NCD074503129

Facility name: Sealright Co., Inc. City: Charlotte, NC

Evaluation data:

New:  Change: Delete:

Person: 010 Branch: 01

Agency: S Reason:

Supervisor NOV Tracking Info

Type: CEI

Initial Inspection Date: 2 Apr 1996

Docket Number: 96-143

Reinsptdate: 13 May 1996

COMMENTS: One (1) violation for training.

GENERATORS

GER:  GRR:  GLB:  GMR:  GOR:

GPT:  GSQ:

TRANSPORTERS

TGR: TMR: TOR: TRR: TWD:

USED OIL

TUO: TFO: BUO: MUO: PUO:

RUO:

TSD'S

DBF: DCH: DCL: DCP: DFR: DGS: DGW: DIN: DLB: DLF:

DLT: DMC: DMR: DOR: DOT: DPB: DPP:

DSI: DTR: DTT: DWP:

VIOLATION DATA: New:  Change: Delete:

- Agency: S Type: GGR date determined: 2 Apr 1996  
class: 2 Priority: \_\_\_\_\_ Seq.# \_\_\_\_\_  
Return to compliance: 13 May 1996  
Actual date:  
Reg Description: 40 CFR 262.34(a)(4) ref. 265.16(c)  
Comment: Facility did not accomplish H.W. training for 1996 by the due date of 19 Jan 1996.

- Agency: S Type: \_\_\_\_\_ date determined: 2 Apr 1996  
class: \_\_\_\_\_ Priority: \_\_\_\_\_ Seq.# \_\_\_\_\_  
Return to compliance:  
Actual date:  
Reg Description:  
Comment:



**RCRA INSPECTION REPORT**

(x= violation, na= not applicable)

**General Information:**

Facility Name Venture Packaging Sealright  
Location 1600 Westinghouse Blvd. Charlotte, N.C. 28273  
Mailing Address P.O. Bx 7148 Charlotte, N.C. 28241-7148  
EPA I.D.# NCD 074 503 129 Phone # (704) 588-0220  
Contact/ Title Anne Dodds  
Inspection Date 2 April 96 / 13 MAY 96 Last Inspection 25 July 1994  
Status Large Quantity Generator Type of Inspection CEI  
Waste Management Specialist(s) Mr. Robin B. Hedden, CHMM, Denise Davila, Chem. Eng. (U.S. EPA)  
Present at Inspection \_\_\_\_\_  
Type of Business Printing  
Waste Generated D001, D035, F001, F003, Feos

**Manifests:**

Approved Transporters? Yes Approved TSD's? Yes  
Signed Copies? Yes; except for # 00291 (7 Nov 95) Filled Out Correctly? Yes  
LDR Notification Attached? Yes  
Manifest # 00291 (7 Nov 95) did not have signed copy: Corrected error of inspection

Waste Minimization? Yes How? Remove solvent based adhesives.

**Hazardous Waste Inspection Records:**

Inspections On Storage Area Daily inspections are still being done.  
Inspections On H.W. Tanks 300 gal. tank (daily inspections): Taken out of service / Gen closure <sup>mid-1995</sup>  
Inspection On Ancillary Equipment N/A

**Contingency Plan:**

On Site? Yes, under revision  
Any changes to facility/ processes or Emergency Coordinators since last review? Yes; one det. left  
Contingency Plan used? No (if yes, was it adequate?) N/A  
Agreements with Emergency Responders? OK

**Training Records:**

1-19-95 (13 MAY 96: In compliance)  
Certified Training Documents Available? Yes  
Any New Employees Since Last Review? No  
Evidence Of Improper/ Inadequate Training? Not trained in 1996

265.16(c)

Facility Name Venture Packaging EPA ID.# NCD 074 503 129  
Inspection Date 2 April 96

**Employee Interview:**

Names(s) \_\_\_\_\_ Trained \_\_\_\_\_

Annual Report Submitted? yes Copy At Facility? yes

**Emergency Preparedness:**

Facility Maintained And Operated To Prevent Releases? yes

Internal Communications Or Alarm Present? yes, siren signal.

Device In Area Of Operation To Summon Outside Help? yes, radio

Portable Fire Extinguishers And/ Or Fire Control Equipment? yes

Spill Control Equipment? yes

Adequate Water Volume, Foam, Equipment, Or Auto Sprinkler? yes

All Equipment/ Alarms Tested And Maintained? monthly on Cont. Plan.

All Personnel Handling H.W. Have Access To Alarm/ Device? yes

Aisle Space In Area Of Facility Operations? yes

Satellite Accumulation Area(s) 1 Location(s) Wash up room

Containers: Closed? 1 Labeled?  <55 gal.  Stored <3 days if full?

Storage Area(s): 1 Description 15-55 gal drums

Containers: Closed?  Aisle space?  Labeled?  Releases? No

Dated? yes <90 days? yes Good condition? yes

**Other H.W. Units: (Applicable Regulations)**

Description of Unit None, removed still from use!

External Facility Condition Good

Facility Name Venture Packaging  
Inspection Date 2 April 96

EPA I.D.# NCD 074 503129

**Site Deficiencies:**

- 1.) 40 CFR 262.34(a)(4) ref 265.16(c): No H.W. Training for 1996
- 2.) 40 CFR \_\_\_\_\_
- 3.) 40 CFR \_\_\_\_\_
- 4.) 40 CFR \_\_\_\_\_
- 5.) 40 CFR \_\_\_\_\_
- 6.) 40 CFR \_\_\_\_\_

**Recommendations/ Violations Continued:** <sup>Rec.</sup> 1) Wash-up Room: fix ground clamp to let drum stay closed.

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

Rolin B. Hedden 2 April 96  
RCRA Inspector (date)

Anne Dodds 4-2-96  
Facility Contact (date)

**Follow Up Inspection:**

Comments Facility in compliance w/ N.O.C. # 96-143.

\_\_\_\_\_

\_\_\_\_\_

Rolin B. Hedden 13 MAY 96  
RCRA Inspector (date)

Anne Dodds 5-13-96  
Facility Contact (date)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4  
ATLANTA FEDERAL CENTER  
100 ALABAMA STREET, S.W.  
ATLANTA, GEORGIA 30303-3104

OCT 24 1996

4WD-RCRA

Ms. Ann Dodds  
Director of Technical and  
Environmental services  
Sealright, Inc.  
1600 Westinghouse Boulevard  
Charlotte, North Carolina 28273



SUBJ: RCRA Compliance Evaluation Inspection  
Sealright, Inc., Charlotte, NC  
EPA ID No. NCD 074 503 129

Dear Ms. Dodds:

Enclosed is a copy of the Environmental Protection Agency (EPA) inspection report documenting the results of the April 2, 1996, inspection of the subject facility. This was a Compliance Evaluation Inspection (CEI) and a State Lead Inspection for the purpose of evaluating the facility's compliance with the applicable Resource Conservation and Recovery Act (RCRA) regulations.

Two RCRA violations were identified during the inspection. The state of North Carolina has the lead responsibility for addressing the violations identified. If you have any questions concerning this matter, please contact Denisse Davila, of my staff, at (404) 562-8610.

Sincerely yours,

Jeanne M. Gettle, Chief  
North Enforcement and Compliance  
Section  
Enforcement and Compliance Branch

Enclosure

cc: Joseph Parker - NCDEHNR, Mooresville Regional Office,  
w/encl.

RCRA INSPECTION REPORT

1) Inspector and author of Report

Denisse Davila  
Environmental Engineer

2) Facility Information

Sealright, Inc.  
1600 Westinghouse Boulevard  
Charlotte, North Carolina 28273  
EPA ID# NCD 074 503 129

3) Responsible Official

Ann Dodds  
Director of Technical and  
Environmental Services

4) Inspection Participants

Denisse Davila, US EPA  
Robin Hedden, NCDEHNR  
Ann Dodds, Sealright  
Ron M. Griffin, Sealright

5) Date and Time of Inspection

April 2, 1996

6) Applicable Regulations

40 Code of Federal Regulations (C.F.R.) Parts 260 - 265,  
268, and 270; Rules Governing Hazardous Waste Management in  
North Carolina.

7) Purpose of Inspection

To conduct an unannounced State lead with oversight from EPA  
comprehensive Compliance Evaluation Inspection (CEI) and  
determine the facility's compliance status with the  
applicable regulations.

8) Facility Description

Sealright, Inc., is located in Mecklenburg County on  
Westinghouse Boulevard, Charlotte, North Carolina. The  
company is a flexographic printer for the garment industry,  
industrial materials, wood and others. The four (4) acre  
facility, formerly named Venture Packaging, has been  
operating under the new name for two years.

Hazardous waste routinely generated at the facility can be classified as ignitable (D001). The waste is mainly generated during equipment cleaning. The company has reduced their hazardous waste generation to only one waste stream by substituting regulated inks and adhesives with non-RCRA regulated types. Additionally, a still that generated D001 still bottoms has been disabled and the still tank taken out of service. Generator closure was completed in June 1995.

9) Findings

The facility operates one less-than-90-day storage area and one satellite accumulation area. The last RCRA inspection conducted here was on July 25, 1994.

The less-than-90-day storage area is located adjacent to the shipping area and the warehouse on the north side of the facility (see illustration #1). At the time of the inspection, fifteen 55-gallon drums containing D001 hazardous waste were located here. All containers were properly marked with an accumulation date of less than 90 days and the words "Hazardous Waste". Signs, telephone, emergency numbers, fire extinguisher, and spill equipment were located in the area. The storage area was well maintained with no evidence of spills.

At the time of the inspection one satellite accumulation area was observed in the wash-up room. The satellite accumulation drum was labeled with the words "Hazardous Waste." However, it was not completely closed because the clamp utilized to maintain ground was not properly situated. The area was well maintained with no evidence of spills. No more than 55-gallons of hazardous waste were located at the satellite accumulation points.

**Sealright, Inc., is in violation of 40 C.F.R. § 262.34 (c) (1) (i), referenced at 40 C.F.R. §265.173 (a), for failing to maintain a container holding hazardous waste always closed during storage.**

The following records were reviewed and appeared adequate: Spill Prevention and Countermeasure Plan, letters of registration with emergency responders, daily inspection logs to the hazardous waste storage area, and a copy of the

annual report. All manifests reviewed had proper signatures and land ban certification form attached.

Documents demonstrating that eleven people were trained in hazardous waste management on January 19, 1995, were provided. The 1996 yearly training had not been conducted at the time of the inspection.

Sealright, Inc., is in violation of 40 C.F.R. § 262.34(c)(4), referenced at 40 C.F.R. §265.16(c), for failing to provide facility personnel with an annual review of the hazardous waste training.

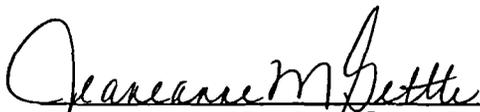
10) Signed



Denisse Davila  
Environmental Engineer  
North Enforcement and Compliance Section

10/22/96  
Date

11) Approval



Jeaneanne M. Gettle, Chief  
North Enforcement and Compliance Section  
Enforcement and Compliance Branch  
Waste Management Division

10/22/96  
Date



(COPY)

**NOTICE OF VIOLATION**  
Inspection date: 2 Apr 1996

Sealright Co., Inc.  
1600 Westinghouse Blvd.  
Charlotte, NC  
28273

Facility Type: Generator  
Docket #: 96-143

NCD074503129

On December 18, 1980, the State of North Carolina, Hazardous Waste Section (State) was authorized to operate the State RCRA hazardous waste program under the Solid Waste Management Act (ACT), N.C.G.S. 130A, Article 9 and rules promulgated thereto at 15A NCAC 13A (Rules) in lieu of the federal RCRA program.

On 2 Apr 1996, Robin B. Hedden, representing the N.C. Hazardous Waste Section, inspected your facility for compliance with North Carolina Hazardous Waste Management Rules. During that inspection, the following violations were noted:

**Specifics**

- 1) 40 CFR 262.34(a)(4) ref. 265.16(c) - Facility did not accomplish H.W. training for 1996 by the due date of 19 Jan 1996.
- 2) -
- 3) -
- 4) -
- 5) -
- 6) -
- 7) -
- 8) -

You are hereby required to correct the noted violation(s) by 13 May 1996, at which time a reinspection will be performed. If compliance with the violation(s) noted above are not met, pursuant to N.C.G.S. 130A - 22(a) and 15A NCAC 13B .0701 - .0707, an administrative penalty of up to \$25,000.00 per day may be assessed for violation of the hazardous waste law or regulations.

\_\_\_\_\_  
(Date)

\_\_\_\_\_  
N.C. Hazardous Waste Section

DGW:

Region IV CM&E Form - Side A

EPA ID: 

N	C	D	0	7	4	5	0	3	1	2	9
---	---	---	---	---	---	---	---	---	---	---	---

DATA ENTRY PERSONNEL  
Submitted by: \_\_\_\_\_ Date: \_\_\_\_\_  
Entered by: \_\_\_\_\_ Date: \_\_\_\_\_

Facility Name: Venture Packaging City: Charlotte, N.C.

EVALUATION DATA: New:      Change:      Delete:      (      : Required)

Agency: S Date: 07 / 25 / 94 Type: CEI Control Number Data Entry Personnel  
Person: 010 BRANCH 01 REASON     

Coverage Areas: (E: Evaluated NE: Not Evaluated NA: Not Applic. D:Del.)

<b>Generators</b> GBF GER GGR GLB GMR GOR GPT GRR GSC GSO	<table border="1"><tr><td>E</td><td></td></tr><tr><td>E</td><td></td></tr><tr><td>E</td><td></td></tr><tr><td>E</td><td></td></tr><tr><td>E</td><td></td></tr><tr><td>E</td><td></td></tr><tr><td>E</td><td></td></tr><tr><td>E</td><td></td></tr><tr><td>E</td><td></td></tr><tr><td>E</td><td></td></tr></table>	E		E		E		E		E		E		E		E		E		E		<b>Transporters</b> TGR TMR TOR TAR TWD	<table border="1"><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr></table>																					<b>USED OIL</b> TUO TFO BUO MUO PUO RUO	<table border="1"><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr></table>																					<b>TSD's</b> DBF DCH DCL DCP DFR DGS DGH DIN	<table border="1"><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr></table>																					DLB DLF DLT DHC DMR DOR DOT	<table border="1"><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr></table>																					DPB DPP DSI DTR DTT DWP	<table border="1"><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr></table>																				
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COMPLIANCE SCHEDULE (TSD, GEN, TRANS.)  
FEA      CAS     

Evaluation Comments: (72) 1:

2: No violations noted @ time of the inspection!

VIOLATION DATA: New:      Change:      Delete:     

# Agency:      Type:      Date (mdy) Determined:      /      /      Class:       
 Priority:      Branch:      Persons:      Seq. Number (Data Entry)       
 Return to Compliance:      /      /      Scheduled      /      /      Actual      /       
 Reg. Type:      Reg. Description (30): \_\_\_\_\_  
 Comment (72): \_\_\_\_\_

# Agency:      Type:      Date (mdy) Determined:      /      /      Class:       
 Priority:      Branch:      Persons:      Seq. Number (Data Entry)       
 Return to Compliance:      /      /      Scheduled      /      /      Actual      /       
 Reg. Type:      Reg. Description (30): \_\_\_\_\_  
 Comment (72): \_\_\_\_\_

# Agency:      Type:      Date (mdy) Determined:      /      /      Class:       
 Priority:      Branch:      Persons:      Seq. Number (Data Entry)       
 Return to Compliance:      /      /      Scheduled      /      /      Actual      /       
 Reg. Type:      Reg. Description (30): \_\_\_\_\_  
 Comment (72): \_\_\_\_\_

Continue violation data if necessary -

## RCRA INSPECTION REPORT

X=violation noted; NA=not applicable

Facility Name: Venture Packaging  
Location: 1600 Westinghouse Blvd. Charlotte, N.C. 28273  
Mailing Address: P.O. Bx 7148 Charlotte, N.C. 28241-7148  
ID#: NCD 074 503 129 Phone Number: (704) 588-0220  
Contact/Title: Anne Dodds  
Inspection Date: 25 July 1994 Last Inspection: 17 June 1993  
Status: LOG Type of Inspection: CEI  
Inspector(s): Robin B. Hedden -WMS  
Present at Inspection: Anne Dodds  
Type of Business: Printing  
Waste Generated: D001, D015, F001, F003

### Manifests:

Approved Transporters? yes Approved TSD's? yes  
Signed Copies? yes Filled Out Correctly? yes  
LDR Notification Attached? yes

Waste Minimization: Distillation

Inspection Records: OK

Evidence That Inspections Are Conducted: yes daily on Subject J Tank, and weekly on 900g area

### Contingency Plan:

On Site? yes  
Any Changes To Facility/Processes Or Emergency Coordinator Since Last Review? June 1994  
Contingency Plan used? No (if yes, was it adequate?)

### Training Records:

Certified Training Documents Available? yes  
Any New Employees Since Last Review? yes  
Evidence Of Improper/Inadequate Training? No

Facility Name: Venture Packaging  
ID #: NCD 074 503129 Inspection Date: 25 July 1994

Employee interviews:  
Name(s): \_\_\_\_\_ Trained? \_\_\_\_\_

Annual Report Submitted? yes

Emergency Preparedness:  
Facility Maintained And Operated To Prevent Releases? yes  
Internal Communications Or Alarm Present? yes radio  
Device In Area Of Operation To Summon Outside Aid? yes  
Portable Fire Extinguishers And/Or Fire Control Equipment? yes  
Spill Control Equipment? yes  
Adequate Water Volume, Foam, Equipment, Or Auto Sprinklers? OK  
All Equipment/Alarms Tested And Maintained? yes  
All Personnel Handling HW Have Access To Alarm/Device? yes  
Aisle Space In Areas Of Facility Operations? yes  
Agreements With Emergency Responders? yes

Satellite Accumulation Area(s): 3 Location(s): OK  
Adhesive, Ink, Sticker

Containers: Closed?   
Labeled?   
< 55 gallons?

Storage Areas: Description:

Containers: Closed?  Aisle Space?   
Labeled?  Evidence Of Release?   
Dated?  < 90 Days?   
Good Condition?

Other HW Units: (Applicable Regulations)  
Description Of Unit: 1 - 300 gal Tank Subpart J.

External Facility Condition: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Facility Name: Venture Packaging  
ID #: NCD 074503129 Inspection Date: 25 July 94

Site Deficiencies: No violations noted!

- 1) .40 CFR \_\_\_\_\_
- 2) .40 CFR \_\_\_\_\_
- 3) .40 CFR \_\_\_\_\_
- 4) .40 CFR \_\_\_\_\_
- 5) .40 CFR \_\_\_\_\_
- 6) .40 CFR \_\_\_\_\_
- 7) .40 CFR \_\_\_\_\_

25 July 94



CONTACT:

X Anne Dodds  
Anne Dodds

RCRA INSPECTION FIELD NOTES- GENERATOR

C = copies made; \* = violation; P = photo taken

Facility Name: Venture Packaging  
Address: 1600 Westinghouse Blvd Charlotte  
ID #: NC0 074503129  
Inspection Date: 25 July 94 Last Inspection 17 June 93  
Contact: Anne Dorris Type of Inspection \_\_\_\_\_  
Present at Inspection: \_\_\_\_\_

Type of business: \_\_\_\_\_  
Processes: \_\_\_\_\_  
Wastes Generated: \_\_\_\_\_

Transporters: \_\_\_\_\_ TSD's \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Manifests: OK  
Signed Copies? OK Filled out correctly? OK  
Treatment Standards? OK

Inspection Records: OK

Contingency Plan: OK  
Actions for spills/fires?  Agreements with emergency contacts? OK  
Em. coords updated?  Name, address, phone for em. coords?   
Emerg equip/location/alarm?  Report on use of conting. plan?  
Evacuation plan/signals/primary/secondary?

Training Records: OK  
Last training? Sept 93 Em coord.s and appropriate people trained? OK  
Job Title? OK Job description? OK  
Content? OK Sign off? OK  
April 93 + Sept 93

Annual Report: OK  
Waste analysis (TCLP): OK  
Accumulation Areas: Description: \_\_\_\_\_

Closed/labeled/dated/< 55 gallons?  
Storage Areas: Description: 2 drums

Closed/labeled/dated/< 90 days/good condition?

Violations are:  
Class II \_\_\_\_\_ (NOV)  
Class I \_\_\_\_\_ (FILL OUT COMPLIANCE ORDER FORM).

# MEMO

DATE: 30 Sept 93

TO: Rateng

SUBJECT: \_\_\_\_\_

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II

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II

II

From: \_\_\_\_\_



North Carolina Department of Environment,  
Health, and Natural Resources



Printed on Recycled Paper

# LOCAL

Wednesday  
June 16, 1993

## Couples win suit over homes

### Case centered on landfill plans

By GAIL SMITH  
Staff Writer

CONCORD — Two couples won a Cabarrus County Superior Court suit after a jury found that as prospective home buyers, they should have been told that the landfill at Charlotte Motor Speedway was expanding to property across the street.

Alex and Melinda Bastedo were awarded \$46,134 and Joseph and Euphenia Quakenbush were awarded \$39,720, in a verdict handed down Friday. In 1989, both couples bought homes in the Morris Glen subdivision, directly across Pitts School Road from the speedway landfill in southwest Cabarrus.

In the suit, both couples said they should have been told that the landfill was about to expand east of the Rocky River, toward their subdivision. The landfill announcement was made later in 1989.

The defendants in the suit were Allen Craven, developer of Morris Glen and owner of Craven & Co., a real estate firm, and Niblock Development Corp., which built homes in Morris Glen.

Jim Conner, an attorney for the plaintiffs, said the verdict should serve as a clear message to real estate agents. In North Carolina, agents are required by law to disclose "material facts" about property for sale.

"I think most real estate agents and developers are aware of the requirement . . . It sends a signal to those who haven't paid attention that it's an important thing to do," Conner said.

But Allen Craven and his attorney, Wesley Grant, said they might appeal the jury's verdict.

Craven said he is innocent of the concealment charges. He also said he is in favor of disclosing facts about property, but it can be a very subjective issue.

"Does something announced that may or may not take place have an immediate effect on somebody's property value?" he asked.

Craven said he doesn't believe the damages were proven in the case.

The speedway landfill has been a sore issue with many homeowners in the area, including the Carolando and Shenandoah Estates subdivisions.

Some homeowners accepted settlement offers from the speedway's landfill subsidiary and BFI, which operates the landfill. Offers

## Cabarrus

### Couples win lawsuit over homes, landfill

Continued from page 1C

Included cash, property value guarantees, speedway club memberships or other perks for their neighborhoods.

The damages awarded to the two couples last week were based on the difference between what they paid for their houses, and the value based on a landfill planned across the street.

The damages — assessed at \$15,378 for the Bastedos and

\$13,240 for the Quakenbushes — were then tripled by the court because the court found the defendants were negligent in not informing buyers of the landfill.

The Bastedos have sold their home and moved.

Joseph Quakenbush said Tuesday his home has been for sale since 1989, with no offers. It's 1,972 square feet, listed at \$139,900, he said.

"We were the only two (homeowners) bullheaded enough to fight the system," Quakenbush said.

But Craven said he has continued to sell homes in the neighborhood, even with the landfill operating.

"People want to live there," he said.

EPA ID: NC0074503129

Submitted by: \_\_\_\_\_ Date: \_\_\_\_\_  
Entered by: \_\_\_\_\_ Date: \_\_\_\_\_

Facility Name: Venture Packaging City: Charlotte

EVALUATION DATA: New:  Change: \_\_\_\_\_ Delete: \_\_\_\_\_ ( \_\_\_\_\_ : Required)

Agency: S Date: Mo. 06 / Day 17 / Year 93

Type: CEI

Control Number Data Entry Personnel  
[ ] [ ]

Person: 027 Reason: [ ] [ ]

Coverage Areas: (E: Evaluated NE: Not Evaluated NA: Not Applic. D:Del.)

Generators	
GER	<input checked="" type="checkbox"/>
GGR	<input checked="" type="checkbox"/>
GLB	<input checked="" type="checkbox"/>
GSQ	<input type="checkbox"/>
GMR	<input checked="" type="checkbox"/>
GOR	<input type="checkbox"/>
GPT	<input checked="" type="checkbox"/>
GRR	<input type="checkbox"/>
GSC	<input checked="" type="checkbox"/>

Transporters	
TGR	<input type="checkbox"/>
TMR	<input type="checkbox"/>
TOR	<input type="checkbox"/>
TRR	<input type="checkbox"/>
TWD	<input type="checkbox"/>

TSD's					
DCH	<input type="checkbox"/>	DLB	<input type="checkbox"/>	DPB	<input type="checkbox"/>
DCL	<input type="checkbox"/>	DLF	<input type="checkbox"/>	DPP	<input type="checkbox"/>
DCP	<input type="checkbox"/>	DLT	<input type="checkbox"/>	DSI	<input type="checkbox"/>
DFR	<input type="checkbox"/>	DMC	<input type="checkbox"/>	DTR	<input type="checkbox"/>
DGS	<input type="checkbox"/>	DMR	<input type="checkbox"/>	DTT	<input type="checkbox"/>
DGW	<input type="checkbox"/>	DOR	<input type="checkbox"/>	DWP	<input type="checkbox"/>
DIN	<input type="checkbox"/>	DOT	<input type="checkbox"/>		

Compliance Schedule (TSD, Gen., Trans.)  
FEA  CAS

Evaluation Comments:

(72) 1 : Unannounced inspection - No violations noted  
2 :

VIOLATION DATA: New: \_\_\_\_\_ Change: \_\_\_\_\_ Delete: \_\_\_\_\_

# Agency: [ ] Type: [ ] [ ] [ ] Date (mdy) Determined: [ ]/[ ]/[ ] Class: [ ]  
 Priority: [ ] Branch: [ ] [ ] Person: [ ] [ ] [ ] Seq. Number (Data Entry) [ ] [ ] [ ] [ ] [ ]  
 Return to Compliance: -- Scheduled -- [ ]/[ ]/[ ] Actual [ ]/[ ]/[ ]  
 Reg. Type: [ ] [ ] Reg. Description (30): \_\_\_\_\_  
 Comment (72): \_\_\_\_\_

# Agency: [ ] Type: [ ] [ ] [ ] Date (mdy) Determined: [ ]/[ ]/[ ] Class: [ ]  
 Priority: [ ] Branch: [ ] [ ] Person: [ ] [ ] [ ] Seq. Number (Data Entry) [ ] [ ] [ ] [ ] [ ]  
 Return to Compliance: -- Scheduled -- [ ]/[ ]/[ ] Actual [ ]/[ ]/[ ]  
 Reg. Type: [ ] [ ] Reg. Description (30): \_\_\_\_\_  
 Comment (72): \_\_\_\_\_

# Agency: [ ] Type: [ ] [ ] [ ] Date (mdy) Determined: [ ]/[ ]/[ ] Class: [ ]  
 Priority: [ ] Branch: [ ] [ ] Person: [ ] [ ] [ ] Seq. Number (Data Entry) [ ] [ ] [ ] [ ] [ ]  
 Return to Compliance: -- Scheduled -- [ ]/[ ]/[ ] Actual [ ]/[ ]/[ ]  
 Reg. Type: [ ] [ ] Reg. Description (30): \_\_\_\_\_  
 Comment (72): \_\_\_\_\_

Continue violation data on Side B if necessary -

## RCRA INSPECTION REPORT

1) Facility Name:

ID Number: NCD 074 503 129

Type of facility: LAG

Ownership: Venture Packaging

Contact: Ms. Anne Oadds

Phone number: (704) 588-0220

Facility location (address): 1600 Westinghouse Blvd.

City, state, zip: Charlotte, N.C. 28223

2) Survey Participants: Mr. Phillip Ody

3) Date of Inspection: 6/17/93

4) Purpose of Inspection: Unannounced inspection to determine compliance with

5) Facility Description: 40 CFR 262, 265, and 268.

Processes: This facility is a flexographic printer for garment, industrial, and food industries. Waste mostly come from cleanup of ~~press~~ printing machines.

Type Waste:

- ① Waste Ink (D001)
- ② Waste Adhesive (D001, D035, F003, F005)

Transporters:

- ① M & M Chemical Co. (ALD070513767)
- ② Chem's Trans (MO0981739667)

TSD's:

- ① M & M Chemical (ALD070513767)
- ② North East Chemical Corp. (OHA980681571)

Accumulation areas:

- ① 3 accumulation areas

Storage areas:

- ① 35 drum storage
- ② one storage tank

Facility Name: Ventura Packaging  
ID #: NC0074503129

6) Waste Minimization:

- 1) Facility tries to reuse ~~one~~ <sup>one</sup> inks - work-off ink.
- 2) Facility uses distillation unit to distill solvents for reuse.

7) Site Deficiencies:

No violations noted.

8) Recommendations:

Signed:

Philip De  
Inspector/Reviewer

Anne Dodds  
Facility Contact

6/17/93  
Date

Generator

RCRA INSPECTION FIELD NOTES - TSD

C = copies made; \* = violation; P = photo taken

Facility Name: Venture Packaging  
Address: 1600 Wellhouse Blvd. Charlotte, N.C. 28223  
ID #: NCO 074503129 Permit ? \_\_\_\_\_  
Inspection Date: 6/17/93 Last Inspection 9/10/92  
Contact: Ms. Anne Dodds Type of Inspection CBE  
Present at Inspection: Mr. Phillip Relf, Ms. Anne Dodds  
Type of business: Printing  
Processes: \_\_\_\_\_  
Wastes Generated: see back

~~Waste Analysis:  
Written? \_\_\_\_\_ Repeated? \_\_\_\_\_ Land ban? \_\_\_\_\_  
Frequency/tests/sampling/parameters for haz and non haz? \_\_\_\_\_~~

Manifests:  
Signed Copies? OK Filled out correctly? OK  
Treatment Standards? OK

~~Security: NA  
Transporters: see back TSD's see back~~

~~Inspection Records:  
Written schedule? \_\_\_\_\_ Types of problems? \_\_\_\_\_  
Frequency? \_\_\_\_\_ Log? \_\_\_\_\_ Inspection of containers? \_\_\_\_\_~~

Contingency Plan:  
Actions for spills/fires? OK Agreements with emergency contacts? OK  
Em. coords updated? OK Name, address, phone for em. coords? OK  
Emerg equip/location/alarms? OK Report on use of conting. plan? OK  
Evacuation plan/signals/primary/secondary? OK  
OK

~~Prevention:  
Alarms/Emergency equipment? \_\_\_\_\_~~  
Training Records:  
Last training? 8/18, 19, 20/1992 Em coord.s and appropriate people trained? OK  
Job Title? OK Job description? OK  
Content? OK Sign off? OK  
OK

~~Operating record:  
Quantity of waste? \_\_\_\_\_ Method/date of treat, store or disp.? \_\_\_\_\_  
Annual Report: OK~~

Waste

- ① Waste Ink (D001)
- ② Waste Adhesive (D001, F003, F005, D035)

Transgo Chem

- ① M & M Chemical Co. (AL0070513767)
- ② Chem's Trans (MOD 981739667)

TSDF

- ① M & M Chemical (AL0070513767)
- ② North East Chemical Corp. (OH0980681571)

- Adde Potts ✓
- William Luge ✓
- Kirkby ✓
- Harkin ✓
- Rouglas ✓
- Leopard ✓
- Sutton ✓
- Elliot ✓
- Wheeler ✓
- Griffan ✓
- Williams ✓

- Atkinson ✓
- Strickland ✓
- Campbell ✓
- Ivester ✓
- Loyner ✓
- Fraser ✓
- Worthing ✓
- Haggins ✓
- Morgan ✓
- Wilson ✓

- Harvey ✓
- Kirkert ✓
- Baird ✓
- Ballard ✓

Groundwater: Quarterly reports? Annual report?

Closure Plan: On site? Cost estimate  
financial assurance

Post-Closure? cost estimate  
financial assurance

Insurance \_\_\_\_\_

Accumulation Areas: Description: OK 3 drums

Closed/labeled/dated/< 55 gallons?

Storage Areas: Description: OK 35 drums, One storage tank

Closed/labeled/dated/< 90 days/good condition?

Other units: \_\_\_\_\_

Notes: \_\_\_\_\_

Violations are:

- Class II      (NOV)
- Class I      (FILL OUT COMPLIANCE ORDER FORM).

EPA ID: NC0074503129

Submitted by: \_\_\_\_\_ Date: \_\_\_\_\_  
Entered by: \_\_\_\_\_ Date: \_\_\_\_\_

Facility Name: Venture Packaging City: Charlotte

EVALUATION DATA: New:  Change: \_\_\_\_\_ Delete: \_\_\_\_\_ ( \_\_\_\_\_ : Required)

Agency: S Date: Mo. 06 / Day 17 / Year 93 Type: CSE Control Number Data Entry Personnel

Person: 027 Reason: for LBN

Coverage Areas: (E: Evaluated NE: Not Evaluated NA: Not Applic. D:Del.)

Generators

GER	
GGR	
GLB	<input checked="" type="checkbox"/>
GSQ	
GMR	
GOR	
GPT	
GRR	
GSC	

Transporters

TGR	
TMR	
TOR	
TRR	
TWD	

TSD's

DCH		DLB		DPB	
DCL		DLF		DPP	
DCP		DLT		DSI	
DGR		DMC		DTR	
DGS		DMR		DTT	
DGW		DOR		DWP	
DIN		DOT			

Compliance Schedule (TSD, Gen., Trans.)  
FEA  CAS

Evaluation Comments:  
(72) 1: Facility is in compliance with Packet # 93-278  
2: \_\_\_\_\_

VIOLATION DATA: New:  Change: \_\_\_\_\_ Delete: \_\_\_\_\_

# 1 Agency: S Type: GLB Date (mdy): 05 / 24 / 93 Class: 2  
Determined: \_\_\_\_\_  
Priority:  Branch: 01 Person: 027 Seq. Number (Data Entry) \_\_\_\_\_  
Return to Compliance: 06 / 09 / 93 Actual: 06 / 17 / 93  
Reg. Type: SR Reg. Description (30): 268.7(a)(1)(C.)  
Comment (72): Facility is in compliance with violation

# \_\_\_\_\_ Agency:  Type:  Date (mdy):  /  /  Class:   
Determined: \_\_\_\_\_  
Priority:  Branch:  Person:  Seq. Number (Data Entry) \_\_\_\_\_  
Return to Compliance:  /  /  Actual:  /  /   
Reg. Type:  Reg. Description (30): \_\_\_\_\_  
Comment (72): \_\_\_\_\_

# \_\_\_\_\_ Agency:  Type:  Date (mdy):  /  /  Class:   
Determined: \_\_\_\_\_  
Priority:  Branch:  Person:  Seq. Number (Data Entry) \_\_\_\_\_  
Return to Compliance:  /  /  Actual:  /  /   
Reg. Type:  Reg. Description (30): \_\_\_\_\_  
Comment (72): \_\_\_\_\_

Continue violation data on Side B if necessary -

## RCRA INSPECTION REPORT

1) Facility Name:

ID Number: NC0074503129

Type of facility: LAG

Ownership: Venture Packaging

Contact: Ms. Anne Dadds

Phone number: (704) 588-0220

Facility location (address): 1600 Westinghouse Blvd.

City, state, zip: Charlotte, N.C. 28223

2) Survey Participants: Mr. Phillip Dab

3) Date of Inspection: 6/17/03

4) Purpose of Inspection: To determine compliance with new Docket # 93-278.

5) Facility Description:

Processes: No change from last inspection.

Type Waste: -

Transporters: -

TSD's: -

Accumulation areas: -

Storage areas: -

Facility Name: Venture Packaging  
ID #: NC0074503124

6) Waste Minimization:  
NA

7) Site Deficiencies:

1) 268.7 (a)(1)(ii) - Facility is in compliance with violation.

8) Recommendations:

Signed:

Priscilla Ody  
Inspector/Reviewer

6/17/93  
Date

Anne Dodds  
Facility Contact





RCRA INSPECTION REPORT

1) Facility Name:

ID Number: NCD074503129

Type of facility: LAG

Ownership: Venture Packaging Inc

Contact: Anne Dadds

Phone number: (704) 588-0220

Facility location (address): 1600 Westinghouse Blvd.

City, state, zip: Charlotte, N.C. 28223

2) Survey Participants:

Mr. Phillip Dab  
Mr. Anne Dadds

3) Date of Inspection: 5/24/93

4) Purpose of Inspection: Unannounced inspection to determine compliance with 40 CFR 268.

5) Facility Description:

Processes:

Venture is a flexographic printer for garment, industrial, and food industries.  
(Land Ban Inspection)

Type Waste: —

Transporters: —

TSD's: —

Accumulation areas: —

Storage areas: —

Facility Name: Venture Packaging  
ID #: Nc0074503129

6) Waste Minimization:

7) Site Deficiencies:

1) 268.7(a)(1)(ii) - Land bans for manifests 00278 and 00271 # had wastewater marked when non-wastewater should have been marked.

8) Recommendations:

Signed:

Philip Dady  
Inspector/Reviewer

5/24/93  
Date

Anna Dodds  
Facility Contact

EPA ID: NC0074503129

Submitted by: \_\_\_\_\_ Date: \_\_\_\_\_  
Entered by: \_\_\_\_\_ Date: \_\_\_\_\_

Facility Name: Venture Packaging Inc. City: \_\_\_\_\_

EVALUATION DATA: New: \_\_\_\_\_ Change: \_\_\_\_\_ Delete: \_\_\_\_\_ ( \_\_\_\_\_ : Required)

Agency: 5 Date: 09 / 10 / 92 Type: CEC Control Number Data Entry Personnel  
Person: 033 Reason:   

Coverage Areas: (E: Evaluated NE: Not Evaluated NA: Not Applic. D:Del.)

<b>Generators</b> GER <input checked="" type="checkbox"/> GGR <input checked="" type="checkbox"/> GLB <input checked="" type="checkbox"/> GSQ <input checked="" type="checkbox"/> GMR <input checked="" type="checkbox"/> GOR <input checked="" type="checkbox"/> GPT <input checked="" type="checkbox"/> GRR <input checked="" type="checkbox"/> GSC <input checked="" type="checkbox"/>	<b>Transporters</b> TGR <input type="checkbox"/> TMR <input type="checkbox"/> TOR <input type="checkbox"/> TRR <input type="checkbox"/> TWD <input type="checkbox"/>	<b>TSD's</b>		
		DCH <input type="checkbox"/> DCL <input type="checkbox"/> DCP <input type="checkbox"/> DFR <input type="checkbox"/> DGS <input type="checkbox"/> DGW <input type="checkbox"/> DIN <input type="checkbox"/>	DLB <input type="checkbox"/> DLF <input type="checkbox"/> DLT <input type="checkbox"/> DMC <input type="checkbox"/> DMR <input type="checkbox"/> DOR <input type="checkbox"/> DOT <input type="checkbox"/>	DPB <input type="checkbox"/> DPP <input type="checkbox"/> DSI <input type="checkbox"/> DTR <input type="checkbox"/> DTT <input type="checkbox"/> DWP <input type="checkbox"/>

Compliance Schedule (TSD, Gen., Trans.)  
FEA  CAS

Evaluation Comments:  
(72) 1 : no violation  
2 : \_\_\_\_\_

VIOLATION DATA: New: \_\_\_\_\_ Change: \_\_\_\_\_ Delete: \_\_\_\_\_

# Agency:  Type:  Date (mdy) Determined:  /  /  Class:

Priority:  Branch:  Person:  Seq. Number (Data Entry)

Return to Compliance:  Scheduled  Actual

Reg. Type:  Reg. Description (30): \_\_\_\_\_

Comment (72): \_\_\_\_\_

# Agency:  Type:  Date (mdy) Determined:  /  /  Class:

Priority:  Branch:  Person:  Seq. Number (Data Entry)

Return to Compliance:  Scheduled  Actual

Reg. Type:  Reg. Description (30): \_\_\_\_\_

Comment (72): \_\_\_\_\_

# Agency:  Type:  Date (mdy) Determined:  /  /  Class:

Priority:  Branch:  Person:  Seq. Number (Data Entry)

Return to Compliance:  Scheduled  Actual

Reg. Type:  Reg. Description (30): \_\_\_\_\_

Comment (72): \_\_\_\_\_

Continue violation data on Side B if necessary -

## RCRA INSPECTION REPORT

1) Facility Information

Venture Packaging, Inc.  
1600 Westinghouse Blvd  
Charlotte, N.C. 28223  
NCD 074503129

2) Facility Contact

Anne Dodds

3) Survey Participants

Terry W. Waddell

4) Date of Inspection

9/10/92

5) Purpose of Survey

Unannounced inspection to determine compliance with  
40 CFR PART 261, 262, 265 + 268

6) Facility Description

The facility is listed as a Large Quantity generator of haz. waste.  
The facility is a flexographic printer for garment, industrial & food  
industries

WASTE STREAMS include DOD- waste ink, FOOS/FOOS - waste adhesives  
WASTE vendors include M+M Chemical - Fuel Blending.

The facility has a H.W. Storage Tank and a distillation unit for  
solvents. All Dirty Containers are cleaned prior to reuse or sale, Have  
A drum washer for the process.

Manifest + LDR current; Inspection logs - Current; Personnel Training  
current. Contingency Plan revised 8/92.

LAST CEI 7-10-92

7) Waste Minimization

Facility has a program for ink recycling

8) Site Deficiencies

NONE

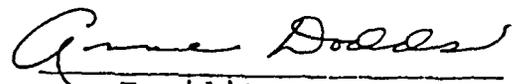
9) Recommendations

① check Tax Credit for solvent distillation unit build.

10) Signed

  
Inspector/Reviewer

9-10-92  
Date

  
Facility Contact



VENTURE PACKAGING, INC.  
P.O. Box 7148  
Charlotte, North Carolina 28241  
704 • 588-0220

May 27, 1993

Mr. Robert Blum  
M & M Chemical Co.  
1229 Valley Drive  
Attalla, AL 35954

Subject: Land Disposal Restriction Notification

Dear Mr. Blum:

On May 24, 1993, Venture Packaging received an unannounced inspection from the Hazardous Waste Section of the North Carolina Solid Waste Management Division, for the purpose of reviewing our compliance with rule 268.7, "Waste analysis and record keeping." During this inspection, we were found to be in violation of subsection 268.7(a) (1) (ii), where applicable treatment standards are specified. As quoted from the Notice of Violation, "Facility marked wastewater instead of non-wastewater for land bans for manifests 00273 and 00271." In order to rectify these violations, we are required to send you amended copies of the Land Ban Restriction Notifications for these two manifests. A re-inspection will take place by June 9, 1993 to confirm our compliance actions.

Although this is not intended as an avoidance of responsibility in this matter, I feel I should inform you the Land Ban Forms sent with your driver were filled out incorrectly. The change in the format of the form may have been the source of the confusion.

May 27, 1993  
Page 2

I would appreciate a written response, acknowledging your receipt of the corrected forms. Thank you for your attention to this matter, and for all your past assistance.

Sincerely,



Anne Dodds  
Technical Manager

AD/jh

cc: Patrick Baines - Director of Technical and Engineering Services, Venture Packaging

Michael Hayes - Vice President and General Manager, Venture Packaging

Mr. Phillip Delp - Waste Management Specialist, Hazardous Waste Section ✓

Enclosures

# Land Disposal Restriction Notification

1600 Westinghouse Blvd.

GENERATOR NAME: Venture Packaging, Inc.

CITY/STATE: Charlotte, NC 28273

GENERATOR EPA ID NUMBER: NCD074503129

MANIFEST DOCUMENT NUMBER: 00271

This form is submitted to M&M Chemical & Equipment Co. in accordance with the regulations published by EPA in 40 CFR 268, which govern the land disposal of certain untreated hazardous wastes. I have indicated how my waste must be managed to conform to the land disposal restrictions. "F" Solvent and California List Wastes are shown on the back of this form.

**INSTRUCTIONS:** Indicate the appropriate treatment standard(s) for the waste by checking the box beside all EPA waste codes that apply. For additional restricted waste codes or wastewaters not shown below, write in the waste code; description, subcategory, or constituent; and treatment standard. Determine which of the three treatment standard columns to complete by referring to the indicated tables in 40 CFR 268 Subpart D.

**NOTE:** If the waste is hazardous debris as defined by 40 CFR 268.2, a different form must be used which can be obtained from the TSDF.

**THIS IS A NON-WASTEWATER UNLESS THIS BOX IS CHECKED  INDICATING WASTEWATER.**

	EPA WASTE CODE	WASTE DESCRIPTION, TREATMENT SUBCATEGORY, OR CONSTITUENT	TREATMENT STANDARDS		
			CONCENTRATION-BASED		TECHNOLOGY-BASED
			IN WASTE EXTRACT 268.41 mg/l	IN WASTE 268.43 mg/kg	TECHNOLOGY CODE 268.42
<input checked="" type="checkbox"/>	DOO1	High TOC ignitable liquids ≥ 10% organic carbon			FSUBS, RORGS, INCIN
	D004	Arsenic	5.0		
	D005	Barium	100.0		
	D006	Cadmium	1.0		
	D007	Chromium	5.0		
	D008	Lead	5.0		
	D010	Selenium	5.7		
	D011	Silver	5.0		

I am the generator of an untreated waste identified either above or on the back of this form which must be treated to the appropriate treatment standard set forth in 40 CFR 268. This information is based upon (check appropriate box)  an analysis of the waste (attach if available); or  knowledge of the waste stream or generating process.

Signature Anna Dodde Title Technical Manager Date 1-18-93  
(5-27-93)

## (F001 — F005) Spent Solvent Wastes Treatment Standards

INSTRUCTIONS: Indicate all "F" solvent constituents present in the waste by checking the appropriate box in the Wastewaters or Non-Wastewaters column. At least one constituent should be checked for each waste code that appears on the manifest.

Waste Codes:           F005, F003          

EPA WASTE CODE	CONSTITUENTS OF CONCERN	✓	WASTEWATERS (mg/l)	✓	NON-WASTEWATERS TOTAL COMPOSITION (mg/kg)
F001-Spent halogenated solvents used in degreasing	Carbon tetrachloride		0.057		5.6
	Methylene chloride		0.089		33
	Tetrachloroethylene		0.056		5.6
	1, 1, 1-Trichloroethane		0.054		5.6
	Trichloroethylene		0.054		5.6
	1, 1, 2-Trichloro-1, 2, 2-trifluoroethane		0.057		28
	Trichlorofluoromethane		0.02		33
F002-Spent halogenated solvents	Chlorobenzene		0.057		5.7
	1, 2-Dichlorobenzene		0.088		6.2
	Methylene chloride		0.089		33
	Methylene chloride (pharmaceutical)		0.44		N/A
	Tetrachloroethylene		0.056		5.6
	1, 1, 1-Trichloroethane		0.054		5.6
	1, 1, 2-Trichloroethane		0.030		7.6
	Trichloroethylene		0.054		5.6
	1, 1, 2-Trichloro-1, 2, 2-trifluoroethane		0.057		28
Trichlorofluoromethane		0.02		33	
F003-Spent non-halogenated solvents	Acetone		0.28		160
	n-Butyl alcohol		5.6		2.6
	Cyclohexanone		0.36		.75*
	Ethyl acetate		0.34	XX	33
	Ethyl benzene		0.057		6.0
	Ethyl ether		0.12		160
	Methanol		5.6		.75*
	Methyl isobutyl ketone		0.14		33
	Xylene (total)		0.32		28
F004-Spent non-halogenated solvents	m-p-Cresol		0.77		3.2
	o-Cresol		0.11		5.6
	Nitrobenzene		0.068		14
F005-Spent non-halogenated solvents	Benzene		0.070		3.7
	Carbon disulfide		0.014		4.8*
	2-Ethoxyethanol		**		**
	Isobutanol		5.6		170
	Methyl ethyl ketone		0.28	XX	36
	2-Nitropropane		**		**
	Pyridine		0.014		16
Toluene		0.08		28	

\*Standards based on TCLP, not total composition.    \*\*Technology Standard

### California List Treatment Standards

INSTRUCTIONS: Check the appropriate boxes to indicate all applicable categories and corresponding treatment standards.

- |   |  |
|---|--|
| <input type="checkbox"/> PCB'S > 50 ppm<br><input type="checkbox"/> Nickel > 134 mg/l (liquid waste)<br><input type="checkbox"/> Thallium > 130 mg/l (liquid waste)<br><input type="checkbox"/> Liquid or solid hazardous waste containing halogenated organic compounds (HOC's) listed in 40 CFR 268.32 Appendix III in total concentration ≥ 1000 mg/kg or 1000 ppm | Incineration<br>Removal of compounds and/or solidification to pass PFT<br>Removal of compounds and/or solidification to pass PFT<br>Incineration |
|---|--|

# Land Disposal Restriction Notification

1600 Westinghouse Blvd.

GENERATOR NAME: Venture Packaging, Inc CITY/STATE: Charlotte, NC 28273

GENERATOR EPA ID NUMBER: NCD074503129 MANIFEST DOCUMENT NUMBER: 00273

This form is submitted to M&M Chemical & Equipment Co. in accordance with the regulations published by EPA in 40 CFR 268, which govern the land disposal of certain untreated hazardous wastes. I have indicated how my waste must be managed to conform to the land disposal restrictions. "F" Solvent and California List Wastes are shown on the back of this form.

**INSTRUCTIONS:** Indicate the appropriate treatment standard(s) for the waste by checking the box beside all EPA waste codes that apply. For additional restricted waste codes or wastewaters not shown below, write in the waste code; description, subcategory, or constituent; and treatment standard. Determine which of the three treatment standard columns to complete by referring to the indicated tables in 40 CFR 268 Subpart D.

**NOTE:** If the waste is hazardous debris as defined by 40 CFR 268.2, a different form must be used which can be obtained from the TSDF.

**THIS IS A NON-WASTEWATER UNLESS THIS BOX IS CHECKED  INDICATING WASTEWATER.**

	EPA WASTE CODE	WASTE DESCRIPTION, TREATMENT SUBCATEGORY, OR CONSTITUENT	TREATMENT STANDARDS		
			CONCENTRATION-BASED		TECHNOLOGY-BASED
			IN WASTE EXTRACT 268.41 mg/l	IN WASTE 268.43 mg/kg	TECHNOLOGY CODE 268.42
<input checked="" type="checkbox"/>	D001	High TOC ignitable liquids ≥10% organic carbon			FSUBS, RORGS, INCIN
	D004	Arsenic	5.0		
	D005	Barium	100.0		
	D006	Cadmium	1.0		
	D007	Chromium	5.0		
	D008	Lead	5.0		
	D010	Selenium	5.7		
	D011	Silver	5.0		

I am the generator of an untreated waste identified either above or on the back of this form which must be treated to the appropriate treatment standard set forth in 40 CFR 268. This information is based upon (check appropriate box)  an analysis of the waste (attach if available); or  knowledge of the waste stream or generating process.

Signature *Gene Dobb* Title Technical Manager Date 5-20-93  
(5-27-93)

## (F001 — F005) Spent Solvent Wastes Treatment Standards

INSTRUCTIONS: Indicate all "F" solvent constituents present in the waste by checking the appropriate box in the Wastewaters or Non-Wastewaters column. At least one constituent should be checked for each waste code that appears on the manifest.

Waste Codes:     F005, F003    

EPA WASTE CODE	CONSTITUENTS OF CONCERN	✓	WASTEWATERS (mg/l)	✓	NON-WASTEWATERS TOTAL COMPOSITION (mg/kg)
F001-Spent halogenated solvents used in degreasing	Carbon tetrachloride		0.057		5.6
	Methylene chloride		0.089		33
	Tetrachloroethylene		0.056		5.6
	1, 1, 1-Trichloroethane		0.054		5.6
	Trichloroethylene		0.054		5.6
	1, 1, 2-Trichloro-1, 2, 2-trifluoroethane		0.057		28
	Trichlorofluoromethane		0.02		33
F002-Spent halogenated solvents	Chlorobenzene		0.057		5.7
	1, 2-Dichlorobenzene		0.088		6.2
	Methylene chloride		0.089		33
	Methylene chloride (pharmaceutical)		0.44		N/A
	Tetrachloroethylene		0.056		5.6
	1, 1, 1-Trichloroethane		0.054		5.6
	1, 1, 2-Trichloroethane		0.030		7.6
	Trichloroethylene		0.054		5.6
	1, 1, 2-Trichloro-1, 2, 2-trifluoroethane		0.057		28
Trichlorofluoromethane		0.02		33	
F003-Spent non-halogenated solvents	Acetone		0.28		160
	n-Butyl alcohol		5.6		2.6
	Cyclohexanone		0.36		.75*
	Ethyl acetate		0.34	XX	33
	Ethyl benzene		0.057		6.0
	Ethyl ether		0.12		160
	Methanol		5.6		.75*
	Methyl isobutyl ketone		0.14		33
	Xylene (total)		0.32		28
F004-Spent non-halogenated solvents	m-p-Cresol		0.77		3.2
	o-Cresol		0.11		5.6
	Nitrobenzene		0.068		14
F005-Spent non-halogenated solvents	Benzene		0.070		3.7
	Carbon disulfide		0.014		4.8*
	2-Ethoxyethanol		**		**
	Isobutanol		5.6		170
	Methyl ethyl ketone		0.28	XX	36
	2-Nitropropane		**		**
	Pyridine		0.014		16
Toluene		0.08		28	

\*Standards based on TCLP, not total composition.    \*\*Technology Standard

### California List Treatment Standards

INSTRUCTIONS: Check the appropriate boxes to indicate all applicable categories and corresponding treatment standards.

- PCB'S > 50 ppm
- Nickel > 134 mg/l (liquid waste)
- Thallium > 130 mg/l (liquid waste)
- Liquid or solid hazardous waste containing halogenated organic compounds (HOC's) listed in 40 CFR 268.32 Appendix III in total concentration  $\geq$  1000 mg/kg or 1000 mg/l

- Incineration
- Removal of compounds and/or solidification to pass PFT
- Removal of compounds and/or solidification to pass PFT
- Incineration

Région IV CM&E Form - Side B

Submitted by: \_\_\_\_\_ Date: \_\_\_\_\_

EPA ID: NC0074503129

Entered by: \_\_\_\_\_ Date: \_\_\_\_\_

Facility Name: Venture Packaging Inc Stylcraft City: Charlotte

ENFORCEMENT DATA: New:  Change:  Delete:  (  : Required)

Agency:  Type: 120 Date: 17/10/91 Number (Data Entry) 

--	--	--	--	--	--	--	--	--	--

Person: 

--	--	--	--

 Branch: 

--	--	--	--

 Comment (72): original insp reinspection 11-20-91

Penalty Data Assessed: \$ 

--	--	--	--	--	--	--	--	--	--

 Settled: \$ 

--	--	--	--	--	--	--	--	--	--

 Paid: \$ 

--	--	--	--	--	--	--	--	--	--

 Date Paid: 

--	--	--	--	--	--	--	--	--	--

Enforcement Comments (74): 1: Facility is in compliance with NDJ  
2: docket # 93-343

Cite violations for this enforcement action below -

VIOLATION DATA: New:  Change:  Delete:

#1 Agency:  Type: 6PT Date (mdy) Determined: 17/10/91 Class:   
Priority:  Branch: 011 Person: 0611 Seq. Number (Data Entry) 

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Return to Compliance: 9/16/91 Scheduled 11/20/91 Actual  
Reg. Type: FIR Reg. Description (30): 265.34(a) emergency  
Comment (72): communicator installed in ~~area~~ storage areas

#2 Agency:  Type: 6PT Date (mdy) Determined: 17/10/91 Class:   
Priority:  Branch: 011 Person: 0611 Seq. Number (Data Entry) 

--	--	--	--

  
Return to Compliance: 9/16/91 Scheduled 11/20/91 Actual  
Reg. Type: FIR Reg. Description (30): 265.52(e) contingency plan communication  
Comment (72): revised to include equip capabilities & locations

#3 Agency:  Type: 6PT Date (mdy) Determined: 17/10/91 Class:   
Priority:  Branch: 011 Person: 0611 Seq. Number (Data Entry) 

--	--	--	--

  
Return to Compliance: 9/16/91 Scheduled 11/20/91 Actual  
Reg. Type: FIR Reg. Description (30): 265.52(f) excavation plan  
Comment (72): added to contingency plan

Continue violation data on Side A if necessary -





9) Waste Minimization - used printing inks are checked for quality and reused when possible. Distillation of used solvents, polyethylene waste is segregated and sold for recycling. Packaging materials are sent back to suppliers for reuse, pallets are refurbished by a vendor and for reuse. Cardboard is recycled. Scrap metals are collected and sold for metal recovery. Company is moving toward use of water based adhesive replacement of ethyl acetate.

9) Site Deficiencies

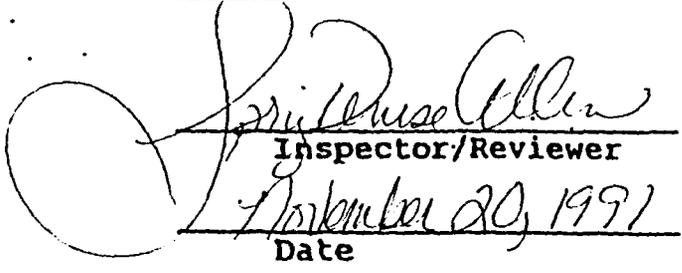
A 1 265.34(a) Hand held radios have been placed in each hazardous waste storage area and in the containment room (distillation room) holding the 300 gallon tank, to provide constant contact/communication with <sup>supervisors</sup>.

A 2 265.52(e) The contingency plan has been amended to include a list of all emergency equipment with its capabilities & location.

A 3 265.52(f) The contingency plan has been amended to include an ~~exit~~ evacuation plan with signals, primary, and secondary evacuation routes. Venture Packaging is in compliance with NVDocket # 91-343

10) Recommendations

11) Signed

  
 Inspector/Reviewer  
 November 20, 1991  
 Date

x   
 Facility Contact

EPA ID: **NCD074503129**

Submitted by: \_\_\_\_\_ Date: \_\_\_\_\_

Entered by: \_\_\_\_\_ Date: \_\_\_\_\_

Facility Name: Venture Packaging Inc Stylac City: Charlotte NC

EVALUATION DATA: New:  Change:  Delete:  (  : Required)

Agency: **S** Date: **07/10/91** Type: **CEI**

Control Number									
Data Entry Personnel									

Person: **0611** Reason:

Coverage Areas: (E: Evaluated NE: Not Evaluated NA: Not Applic. D:Del.)

Generators

GER	<input checked="" type="checkbox"/>
GGR	<input type="checkbox"/>
GLB	<input type="checkbox"/>
GLO	<input type="checkbox"/>
GMR	<input type="checkbox"/>
GOR	<input type="checkbox"/>
GPT	<input type="checkbox"/>
GRR	<input type="checkbox"/>
GSC	<input type="checkbox"/>

Transporters

TGR	<input type="checkbox"/>
TMR	<input type="checkbox"/>
TOR	<input type="checkbox"/>
TRR	<input type="checkbox"/>
TWD	<input type="checkbox"/>

TSD's

DCH	<input type="checkbox"/>	DLB	<input type="checkbox"/>	DPB	<input type="checkbox"/>
DCL	<input type="checkbox"/>	DLF	<input type="checkbox"/>	DPP	<input type="checkbox"/>
DCL	<input type="checkbox"/>	DLT	<input type="checkbox"/>	DSI	<input type="checkbox"/>
DCP	<input type="checkbox"/>	DMC	<input type="checkbox"/>	DTR	<input type="checkbox"/>
DFR	<input type="checkbox"/>	DMR	<input type="checkbox"/>	DTT	<input type="checkbox"/>
DGS	<input type="checkbox"/>	DOR	<input type="checkbox"/>	DWP	<input type="checkbox"/>
DGW	<input type="checkbox"/>	DOT	<input type="checkbox"/>		
DIN	<input type="checkbox"/>				

Compliance Schedule (TSD, Gen., Trans.)

FEA  CAS

VIOLATION DATA: New:  Change:  Delete:

#1 Agency: **S** Type: **GGR** Date (mdy): **07/10/91** Class: **IP**

Priority:  Branch: **01** Person: **0611** Seq. Number (Data Entry)

Return to Compliance:  Scheduled  Actual

Reg. Description (30): 262.34(a)(4), 265.34(a) - no immediate

Comment (72): access to alarm in AW storage area

#2 Agency:  Type: **GGR** Date (mdy): **07/10/91** Class: **IP**

Priority:  Branch: **011** Person: **0611** Seq. Number (Data Entry)

Return to Compliance:  Scheduled  Actual

Reg. Description (30): 262.34(a)(4), 265.52(e) contingency plan

Comment (72): does not describe or outline capabilities of comm. equip.

#3 Agency:  Type: **GGR** Date (mdy): **07/10/91** Class: **IP**

Priority:  Branch: **011** Person: **0611** Seq. Number (Data Entry)

Return to Compliance:  Scheduled  Actual

Reg. Description (30): 262.34(a)(4), 265.52(f) c plan

Comment (72): does not describe evaluation signal

Continue violation data on Side B if necessary -

EPA ID: NC 0074503129

Entered by: \_\_\_\_\_ Date: \_\_\_\_\_

Facility Name: Venture Packaging Inc. Styles City: Charlotte NC

ENFORCEMENT DATA: New:  Change:  Delete:  (  : Required)

Agency: 5 Type: 720 Date:      /      /      Number (Data Entry)     

Person: 066 Branch: 011 Comment (72): NOV Drafted and sent w/ inspection report

Penalty Data Assessed: \$      /      /      Paid: \$      /      /       
Settled: \$      /      /      Date Paid:      /      /     

Cite violations for this enforcement action below -

VIOLATION DATA: New:  Change:  Delete:

#      Agency:      Type:      Date (mdy) Determined:      /      /      Class:       
Priority:      Branch:      Person:      Seq. Number (Data Entry)       
Return to Compliance:      /      /      -- Scheduled --      /      /      Actual  
Reg. Type:      Reg. Description (30): \_\_\_\_\_  
Comment (72): \_\_\_\_\_

#      Agency:      Type:      Date (mdy) Determined:      /      /      Class:       
Priority:      Branch:      Person:      Seq. Number (Data Entry)       
Return to Compliance:      /      /      -- Scheduled --      /      /      Actual  
Reg. Type:      Reg. Description (30): \_\_\_\_\_  
Comment (72): \_\_\_\_\_

#      Agency:      Type:      Date (mdy) Determined:      /      /      Class:       
Priority:      Branch:      Person:      Seq. Number (Data Entry)       
Return to Compliance:      /      /      -- Scheduled --      /      /      Actual  
Reg. Type:      Reg. Description (30): \_\_\_\_\_  
Comment (72): \_\_\_\_\_

#      Agency:      Type:      Date (mdy) Determined:      /      /      Class:       
Priority:      Branch:      Person:      Seq. Number (Data Entry)       
Return to Compliance:      /      /      -- Scheduled --      /      /      Actual  
Reg. Type:      Reg. Description (30): \_\_\_\_\_  
Comment (72): \_\_\_\_\_

Continue violation data on Side A if necessary -

RCRA INSPECTION REPORT

1) Facility Information

Venture Packaging Inc., Stylec  
1600 Westinghouse Blvd  
Charlotte NC 28273  
NCD 074 503 129

2) Facility Contact

Anne Dodds.

3) Survey Participants

Anne Dodds  
Patrick Baines  
Robert Kulkert  
Spring Allen

4) Date of Inspection

July 10, 1991

6) Purpose of Survey

Records Review and facility inspection to determine compliance with 40CFR 262

7) Facility Description

Venture Packaging is a flexographic printer for the garment, industrial, and food industries.

DO01 Waste ink liquids

DO01, FO03, FO05 waste adhesive (DO35) recently added due to TCLP

FO03 waste ink

FO03, FO05 HW Solid Adhesive

HW is manifested to M & M Chemical ALD070513767 for fuels blending. transp by M & M.

Formerly manifested to HES. NCD 121 700 777 transp by HES or Oldover Corp. UAD098443443. by Oldover

DH324 In June 1990 the facility installed a HW storage tank which holds HW prior to distillation. A tank integrity test and "riser" installation are planned for the end of July during facility shutdown.



CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

NOTICE OF VIOLATION  
Docket # 91

Ms Anne Dodds  
Venture Packaging Inc Stylecraft  
1600 Westinghouse Blvd.  
Charlotte, North Carolina 28273

NCD 074 503 129

Dear Ms Dodds.

On December 18, 1980, the State of North Carolina, Hazardous Waste Section (State) was authorized to operate the State RCRA hazardous waste program under the Solid Waste Management Act (Act), N.C.G.S. 130A, Article 9 and rules promulgated thereto at 15A NCAC 13A, (Rules) in lieu of the federal RCRA program. Fame Plastics, Incorporated, Statesville, North Carolina is classified as a generator of hazardous waste and is subject to the requirements of 40 CFR 262, codified at 15A NCAC 13A .0007.

On July 10, 1991, Ms Spring Allen, Waste Management Specialist with this office inspected your facility for compliance with North Carolina Hazardous Waste Management Rules. During that inspection the following violations were noted:

A

40 CFR 262.34(a)(4), codified at 15A NCAC 13A .0007, states that a generator may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status, provided that the generator complies with the requirements for owners or operators in Subparts C and D in 40 CFR Part 265 and with Section 265.16.

40 CFR 265.34(a), codified at 15A NCAC 15A .0010, states that whenever hazardous waste is being poured, mixed, spread, or otherwise handled; all personnel involved in the operation must have immediate access to an internal alarm or emergency communication device, either directly or through visual or voice contact with another employee, unless such a device is not required under Section 265.32.

Venture Packaging Inc Stylecraft<sup>alt</sup> is in violation of 40 CFR 262.34(a)(4), codified at 15A NCAC 13A .0007; referenced at 40 CFR 265.34(a), codified at 15A NCAC 13A .0010; in that whenever hazardous waste was being poured, mixed, spread or otherwise handled, all personnel involved in the operation did not have immediate access to an internal alarm or emergency communication device, either directly or through visual or voice contact with another employee.

2 40 CFR 265.52(e), codified at 15A NCAC 13A .0010, states that the contingency plan must include a list of all emergency equipment at the facility (such as fire extinguishing systems, spill control equipment, communications and alarms systems (internal and external), and decontamination equipment), where this equipment is required. This list must be kept up to date. In addition, the contingency plan must include the location and a physical description of each item on the list, and a brief outline of its capabilities.

Venture Packaging Inc Stylecraft is in violation of 40 CFR 262.34(a)(4), codified at 15A NCAC 13A .0007, referenced at 40 CFR 265.52(e), codified at 15A NCAC 13A .0010, in that the

contingency plan did not include a list of all emergency equipment at the facility. The contingency plan also did not include a physical description of each item on the list, and a brief outline of its capabilities.

3 40 CFR 265.52(f), codified at 15A NCAC 13A .0010, states that the contingency plan must include an evacuation plan for facility personnel where there is a possibility that evacuation could be necessary. This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes (in cases where the primary routes could be blocked by releases of hazardous waste or fires).

Venture Packaging Inc Stylecraft is in violation of 40 CFR 262.34(a)(4), codified at 15A NCAC 13A .0007, referenced at 40 CFR 265.52(f), codified at 15A NCAC 13A .0010, in that the contingency plan did not include an evacuation plan for facility personnel where there is a possibility that evacuation could be necessary.

COMPLIANCE SCHEDULE

By \_\_\_\_\_, 1991, you shall comply with the following requirements.

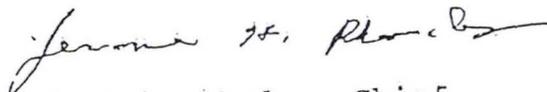
A Comply with 40 CFR 262.34(a)(4), codified at 15A NCAC 13A .0007, specifically by:

1 Ensuring that whenever hazardous waste is being poured, mixed, spread or otherwise handled, all personnel involved in the operation must have immediate access to an internal alarm or emergency communication device, either directly or through visual or voice contact with another employee as required in 40 CFR 265.34(a).

- 2 By amending the contingency plan to include all emergency equipment at the facility (such as fire extinguishing systems, spill control equipment, communications, and alarm systems (internal and external) and decontamination equipment). The contingency plan must also include the location and a physical description of each item on the list and a brief outline of its capabilities as described in 40 CFR 265.52(e).
- 3 By amending the contingency plan to include an evacuation plan for facility personnel where there is a possibility that evacuation could be necessary. The evacuation plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes (in cases where the primary routes could be blocked by releases of hazardous waste or fires) as required in 40 CFR 265.52(f).

If the requirements above are not met, pursuant to N.C.G.S. 130A-22(a) and 15A NCAC 13B .0701 - .0707, an administrative penalty of up to \$25,000.000 per day may be assessed for violation of the hazardous waste law or regulations.

Sincerely,



Jerome H. Rhodes, Chief  
Hazardous Waste Section

JHR/dd/KM156

cc: Keith Masters  
Central Files

Spring Allen  
Doug Holyfield  
AL Hilton

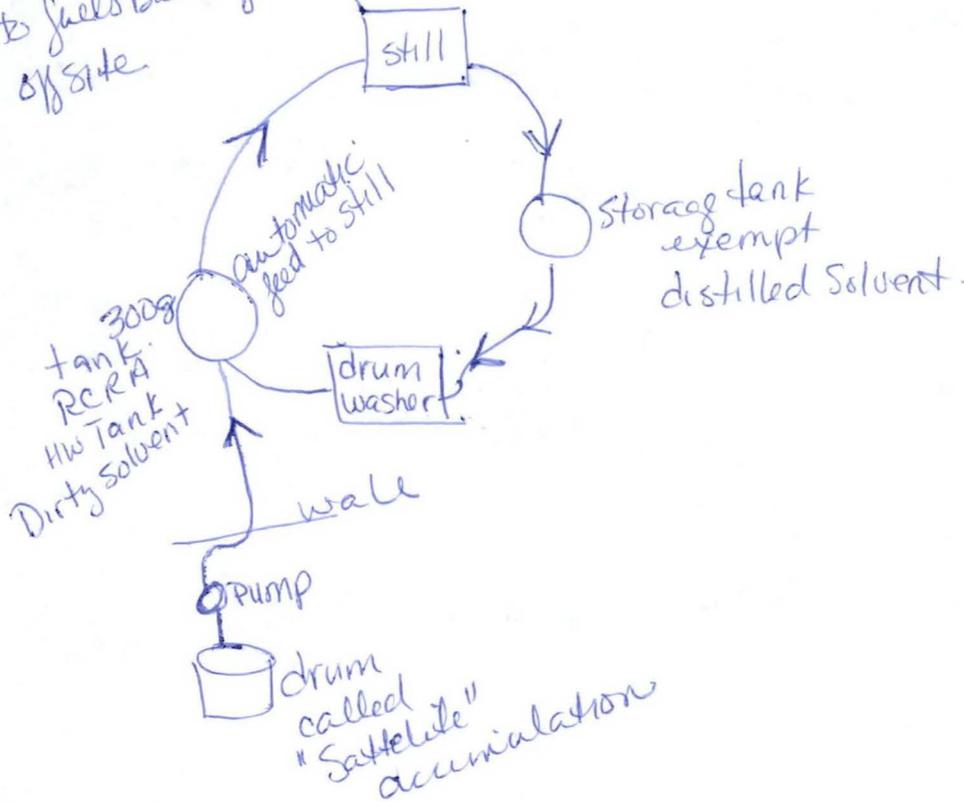
NOTE Now Format to allow reinspection after completion & certification of tank used prior to distillation

# Venture packaging Inc Stylecraft

Charlotte

Facility is installing leak detection system for 300g tank  
asper 265.193 @ (X3) Mid. July. ETO of completion  
w/ w 24 hours

Liquid  
Bottoms  
to fuels blending  
off site



Solid Waste Management Division  
Hazardous Waste Section

NOTICE OF VIOLATION

TO: \_\_\_\_\_

Docket # \_\_\_\_\_

Address: \_\_\_\_\_  
\_\_\_\_\_

Inspection Date \_\_\_\_\_

EPA ID# \_\_\_\_\_

Facility Type \_\_\_\_\_

On December 18, 1980, the State of North Carolina, Hazardous Waste Section (State) was authorized to operate the State RCRA hazardous waste program under the Solid Waste Management Act (ACT), N.C.G.S. 130A, Article 9 and rules promulgated thereto at 15A NCAC 13A (Rules) in lieu of the federal RCRA program.

On \_\_\_\_\_, \_\_\_\_\_ representing the N.C. Hazardous Waste Section, inspected your facility for compliance with North Carolina Hazardous Waste Management Rules. During that inspection, the following violations were noted:

Specifics

\_\_\_\_\_  
\_\_\_\_\_



VENTURE PACKAGING, INC.  
P. O. Box 7148  
Charlotte, North Carolina 28241

PLANT LOCATIONS:

Cleveland, Ohio  
216 • 521-6570

Charlotte, North Carolina  
704 • 588-0220

August 5, 1992

Mr. Jesse W. Wells  
Waste Management Specialist  
Hazardous Waste Section  
DEM, Mooresville Regional Office  
919 N. Main Street  
Mooresville, NC 28115

Dear Mr. Wells:

In accordance with Federal and State regulations, Venture Packaging has implemented a contingency plan, to cover emergencies from handling hazardous materials. This plan is on file with local authorities.

Please find enclosed a copy of revisions to the contingency plan, which includes the following:

- 1) A revised index to the contingency plan.
- 2) Addition of our regional Waste Management Specialist to the distribution list.
- 3) An updated Section IV, which has been restructured to designate two co-captains per eight hour shift, plus reassigned First Responders.
- 4) Amendments to Section V Training Procedure for Hazardous Waste Handlers, which designate reassignments for both supervisors and Waste Handlers.

Please replace these pages in your copy of the Venture Packaging Contingency Plan, and discard the obsolete pages. Please feel free to contact me if you require any additional information.

Respectfully,

Anne Dodds  
Technical Manager

AD/jh

cc: Mr. Pat Baines, Director of Operations  
Mr. Bob Kikkert, Manufacturing Manager  
Mr. William Laye, Printing Superintendent  
Enclosure

Venture Packaging Contingency Plan  
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Venture Packaging Contingency Plan  
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A. Flexographic Ink	Ink-001
B. NP Alcohol	Solv-001
C. Duplicating Fluid #5	Solv-002
D. NP Acetate	Solv-004

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1) Diagram A - Fire and Spill Control Materials	I/17
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3) Diagram B - Location of Hazardous Materials	II/10
4) Diagram C - Emergency Exits and Assembly Areas	III/2
5) Diagram D - Fencing and Topography	II/11

D. Building Construction:

1. Columns, beams, and bar joist roof supports.
2. Type "A" steel roof deck; 1" rigid insulation and 5 ply tar and gravel roof.
3. Plant exterior and interior walls are 4 hour, 12" utility brick.
4. Office exteriors walls are 12" regular brick.
5. Office interior walls are wood panel over wood studs up to suspended acoustic tile ceiling.

E. Copies of this plan have been filed with:

1. N.C. Division of Emergency Management
2. City of Charlotte Fire Prevention Bureau
3. Charlotte-Mecklenburg Emergency Management Office
4. V.P. Ambulatory Services, Carolinas Medical Center
5. Manufacturing Manager
6. Director of Operations
7. Technical Manager
8. Pressroom supervisor's office
9. Printing Superintendent's office
10. Spectrum Environmental
11. Regional Inspector - N.C. Dept. of Environment, Health, and Natural Resources

Section IV - FIRST RESPONSE TEAM ORGANIZATIONAL STRUCTURE

PURPOSE & SCOPE: THE FIRST RESPONSE TEAM HAS BEEN FORMED TO PROVIDE DESIGNATED, TRAINED EMPLOYEES TO REACT, IN A SAFE & TIMELY MANNER, TO INCIPIENT FIRES AND HAZARDOUS MATERIALS SPILLS OF 55 GALLONS OR LESS.

A. RED LAYE: PRINTING SUPERINTENDENT - FIRST RESPONSE TEAM CHIEF JOB DESCRIPTION:

- 1) APPROVAL OF ALL PROPOSED FIRST RESPONSE TEAM ACTIVITIES
- 2) SELECTION OF FIRST RESPONSE TEAM PERSONNEL
- 3) EVALUATION OF FIRST RESPONSE TEAM PROFICIENCY
- 4) CONDUCT TRAINING OF FIRST RESPONSE TEAM PERSONNEL
- 5) DRAFTING FIRE SAFETY REGULATION AMENDMENTS
- 6) CONDUCTING EMERGENCY EVACUATION DRILLS
- 7) DRAFTING REPORTS OF EMERGENCY OCCURRENCES
- 8) CONDUCTING MONTHLY INSPECTION OF PLANT

B. FIRST RESPONSE TEAM CAPTAINS: JOE KIRKLEY - 1st SHIFT

JACK HARDIN - 2nd SHIFT

DAVID DOUGLAS - 3rd SHIFT

CHARLENE MCLAUCHLAN - OFFICE

FIRST RESPONSE TEAM CAPTAIN - JOB DESCRIPTION

- 1) DIRECTING FIRST RESPONSE TEAM ACTIVITIES DURING EMERGENCY
- 2) NOTING POOR FIRE SAFETY PROCEDURES OF SHIFT
- 3) INSURING A PROPER CLEAN-UP AFTER AN EMERGENCY

C. FIRST RESPONSE TEAM CO-CAPTAINS

1st SHIFT (A) TOMMY WHEELER  
(B) CHUCK LEOPARD

2nd SHIFT (A) RON GRIFFIN  
(B) RICK SUTTON

3rd SHIFT (A) TONY WILLIAMS  
(B) JEAN ELLIOT

FIRST RESPONSE TEAM CO-CAPTAIN - JOB DESCRIPTION

CO-CAPTAIN (A)

- 1) TAKE EMPLOYEE HEAD COUNT, REPORT TO CAPTAIN.
- 2) ASSIST IN EMERGENCY.

CO-CAPTAIN (B)

- 1) MAKE SURE SOMEONE MEETS THE FIRE DEPARTMENT AND ADVISE THEM AS TO THE LOCATION OF THE EMERGENCY.
- 2) REPORT TO CAPTAIN TO ASSIST IN EMERGENCY.

D. FIRST RESPONSE TEAM

MEMBERS:	<u>1st</u>	<u>2nd</u>	<u>3rd</u>
Supervisors:	Joe Kirkley	Jack Hardin	David Douglas
Co-Captains:	Chuck Leopard	Rick Sutton	Jean Elliot
	Tommy Wheeler	Ron Griffin	Tony Williams
	Bill French	Hung Le	Charles Majesky
	Wayne Barber	Wayne Ivester	Richard Fraser
	Donnie Craig	Darryl Brewington	Clara Beaver
	Roger Ayers	Michael Worthy	Sandra Kennedy
	Ed Regula		Ben Gadson
	Thomas McNeil		Tim Mills
	Jerry Mosley		
	Richard Jones		

Office

Charlene McLauchlan, Jean Hunley

FIRST RESPONSE TEAM MEMBER - JOB DESCRIPTION

- 1) FOLLOWING COMMAND OF SHIFT FIRST RESPONSE TEAM CAPT. DURING EMERGENCY.
- 2) CLEAN-UP AFTER A EMERGENCY
- 3) NOTE POOR FIRE SAFETY PROCEDURES OF SHIFT AND BRING TO ATTENTION OF SHIFT FIRST RESPONSE TEAM CAPTAIN

E. First Response Procedure:

1. When the plant evacuation alarm\* sounds, all First Response Team Members should meet at the plant evacuation alarm switch. At this time, emergency location will be pointed out and plans for handling the emergency will be made.
2. One First Response Team member will be designated to go out to the plant entrance to meet the fire department and advise them as to the location of the emergency.
3. If the emergency becomes completely out of hand, all First Response Team members will leave the plant at once.
4. Under no circumstances should anyone re-enter the building unless the word has been given to do so by the First Response Team Captain or the fire department.

\*Activating the plant evacuation alarm automatically notifies ADT, who in turn notifies the fire department.

F. First Response Team Training:

1. First Response Team will receive training two times a year, approximately every six months.
2. Subjects of training:
  - a. Fire prevention
  - b. Fire fighting for First Response teams/incipient fires
  - c. Hazardous spill emergencies for spills of 55 gallons or less
  - d. Understanding utilities
  - e. Plant evacuation drills
3. Recordkeeping - all documentation pertaining to First Response Team Training will be kept on file in the Technical Manager's office.

G. Amendment Procedure for Current Emergency Procedures:

1. Proposals for amending emergency regulations should be presented in writing to the Printing Superintendent for review and drafting.
2. Amendments to emergency regulations will then be presented to the presiding safety committee for discussion and change/approval/disapproval.
3. Final drafts of the amendment will be presented to the Printing Superintendent or his appointed delegate for final company approval/disapproval.

TRAINING-HAZARDOUS WASTE HANDLERS

PURPOSE: To review basic safety and management procedures for hazardous waste.

TRAINERS: Anne Dodds  
William "Red" Laye

SUPERVISORS: Dave Ballard, Jack Hardin, Joe Kirkley, Chuck Leopard,  
Rick Sutton, David Douglas, Jean Elliot, Ron Griffin,  
Tommy Wheeler, Tony Williams

WASTE HANDLERS: 1st Shift: Marvin Atkinson-Sr. Inkman  
Wayne Ivester Inkman  
Paul Campbell Inkman  
John Haggins-Washup/Janitorial

2nd Shift: Johnnie Loynes-Inkman  
Michael Worthy-Inkman  
Claud Morgan-Washup/Janitorial

3rd Shift: Sam Strickland-Sr. Inkman  
Richard Fraser-Inkman  
John Wilson-Washup/Janitorial

I. SATELLITE WASTE COLLECTION:

- A. Pressroom & Sleeve Depts. - at the end of a job, machine operators and/or helpers are to cover with a lid and carry left over ink and washup solvents to the collection area. (See Illustration 1). Waste handlers will determine if material is reuseable or waste. Waste handlers will pour the waste from the kits into the 55 gallon Press Waste Transfer Drum.
- B. 20-3 Laminator Waste - at the end of a job, or at shutdown, the laminator assistant should stir one gallon of isopropyl alcohol into each 5 gallon kit of adhesive. This will keep the adhesive in a liquid state. The waste adhesive should then be poured up into a satellite storage drum designated for laminator waste only. Ethyl acetate used for washup should also be put in this drum. Laminator waste is to remain segregated from press waste. Laminator waste must not be run through the still.
- C. Still bottoms - Full drums of still bottom should be properly labeled and moved to the Hazardous Waste Containment Area (See Section V). A partial drum of still bottom should remain under the still as a satellite storage container.

TRAINING PROCEDURE

II. COLLECTION OF PRESS WASTE/COLLECTION OF STILL BOTTOMS

- A. Still bottoms collected after distillation must be weighed before taking to the Hazardous Waste Containment Area (Illustration 1). Mark the weight on the top of the drum using a permanent marker. Do not put more than 500 pounds in one drum. Leave 3-4 inches in top of drum for expansion of contents. Record the date and weight on the Press Waste Tracking Form. (Illustration 2).
- B. Use cleaned drums and lids for still bottoms. Use a new gasket to seal the drum. Notify Marvin Atkinson or Paul Campbell when gaskets need to be reordered. Secure the drum rings firmly to prevent leaks.
- C. See inkroom personnel for labels , drum numbers and drum inspection before moving drums to the Hazardous Waste Containment area. Inkroom personnel should note the following on the Press Waste Tracking Form:
  - 1) Still bottom weight written on drum?
  - 2) Proper labels on drum?
  - 3) Drum exterior clean?
  - 4) Drum lid secure?
  - 5) Inkman's initials.

III. LABELING BY INKROOM PERSONNEL:

- A. Drums to be used for satellite storage must be clearly marked with the words "HAZARDOUS WASTE." (See Illustration 3A for press waste, 3B for laminator waste, and 3C for still bottoms).
- B. All full drums of waste ink still bottoms must be numbered and properly marked with an accumulation start date and the words "Hazardous Waste" before moving to the Hazardous Waste Containment area. (See Illustration 4A).
- C. All drums of laminator waste must be properly marked with an accumulation start date and the words "Hazardous Waste" before moving to the Hazardous Waste Containment area. (See Illustration 4B).
- D. Drums of waste trisodium phosphate (TSP) wash from the still must be labeled according to Illustration 4C.
- E. All drums of waste must be labeled "Flammable Liquid." (See Illustration 4D).

IV. MOVING WASTE DRUMS

- A. Only a trained waste handler can move drummed waste.
- B. Drums going to the containment area should be transferred with a hand truck to avoid puncturing the drum or defacing the labels.

V. HAZARDOUS WASTE STORAGE:

- A. After labeling and inspection, full drums of waste should be moved to the Hazardous Waste Containment area (Illustration 1).
- B. Hazardous waste can be stored on site for a maximum of 90 days.
- C. Drums must be stored with sufficient aisle space to allow for clear inspection of each drum for leaks.
- D. The "Hazardous Waste" labels must be clearly visible at all times. Do not store drums with labels hidden from sight.
- E) "No Smoking" placards should be clearly visible in the Hazardous Waste containment area.

VI. WASTE PICKUPS:

- A. An inkroom WASTE HANDLER must be present to oversee all waste pickups.
- B. Use hand trucks to transport waste drums to truck, to avoid puncturing the drum or defacing labels.
- C. All manifests and attachments must be checked by either Anne Dodds or Marvin Atkinson for completeness and accuracy. (see illustration 5A & 5B for examples)

VII. SAFETY AND HOUSEKEEPING:

- A. Drums used for satellite storage should be properly grounded when pouring up waste. Keep drums covered when not in use.
- B. IMPORTANT - Spills and drips must not be allowed to accumulate on the outside of the satellite storage drums. Wipe up small spills immediately.
- C. Reclaimed solvents should be collected in clean 17H closed head drums.
- D. Still bottoms should be collected in clean 17H open head drums.

VII. (Cont'd)

E. SPILLS

1. In the case of a rupture of a waste drum, notify the supervisor immediately to initiate the spill control provision of the Emergency Response procedure.
2. In the case of a slow leak from a drum or bin, notify the supervisor for cleanup instructions.

F. WASTE HANDLERS must wear goggles and rubber gloves when handling open containers of hazardous waste.

G. EMERGENCY COMMUNICATIONS: Two-way radios are located in the following areas:

1. Distillation room
2. Washer room
3. Hazardous Waste containment area room

VIII. JOB DESCRIPTION

A. Trainers: Anne Dodds, Technical Manager  
William "Red" Laye, Printing Superintendent

- 1) The Trainer - is responsible for the administration, operation, and maintenance of the Hazardous Waste Management Program. Ensure that all hazardous waste is managed in accordance with rules and regulations promulgated by the North Carolina Department of Environment, Health and Natural Resources.
- 2) Supervise personnel that accumulate, transport, store, or otherwise handle hazardous waste to assure that the safety and health of all employees is maintained and the environment is suitably protected.
- 3) Provide for the initial and periodic training of all personnel who are associated with the generation, storage, offering for disposal, and management of hazardous waste.
- 4) Maintain all records of hazardous waste management as required by State regulations. Provide all reports to State agencies as required.
- 5) Serve as the facility's Emergency Coordinator and implement any and all emergency actions as may be necessary.
- 6) Serve as the primary contact and company representative with all local, state and federal EPA agencies relating to hazardous waste management.
- 7) Perform necessary site inspections as required.

TRAINING PROCEDURE

VIII. JOB DESCRIPTION (CONT'D)

B. Supervisors: Press Supervisors - Joe Kirkley  
Jack Hardin  
David Douglas

Sleeve Supervisors - Chuck Leopard  
Rick Sutton  
Jean Elliot

Slitting/Mounting Supervisors - Tommy Wheeler  
Ron Griffin  
Tony Williams

- 1) Supervise personnel that accumulate, transport, store or otherwise handle hazardous waste, to assure that the safety and health of all employees is maintained and the environment is suitably protected.
- 2) Participate in initial and annual refresher training.
- 3) Act as First Responder Team Captain in case of a fire, explosion or unplanned release of hazardous waste.
- 4) Perform necessary site inspections as required.

TRAINING PROCEDURE

VIII. JOB DESCRIPTION (CONT'D)

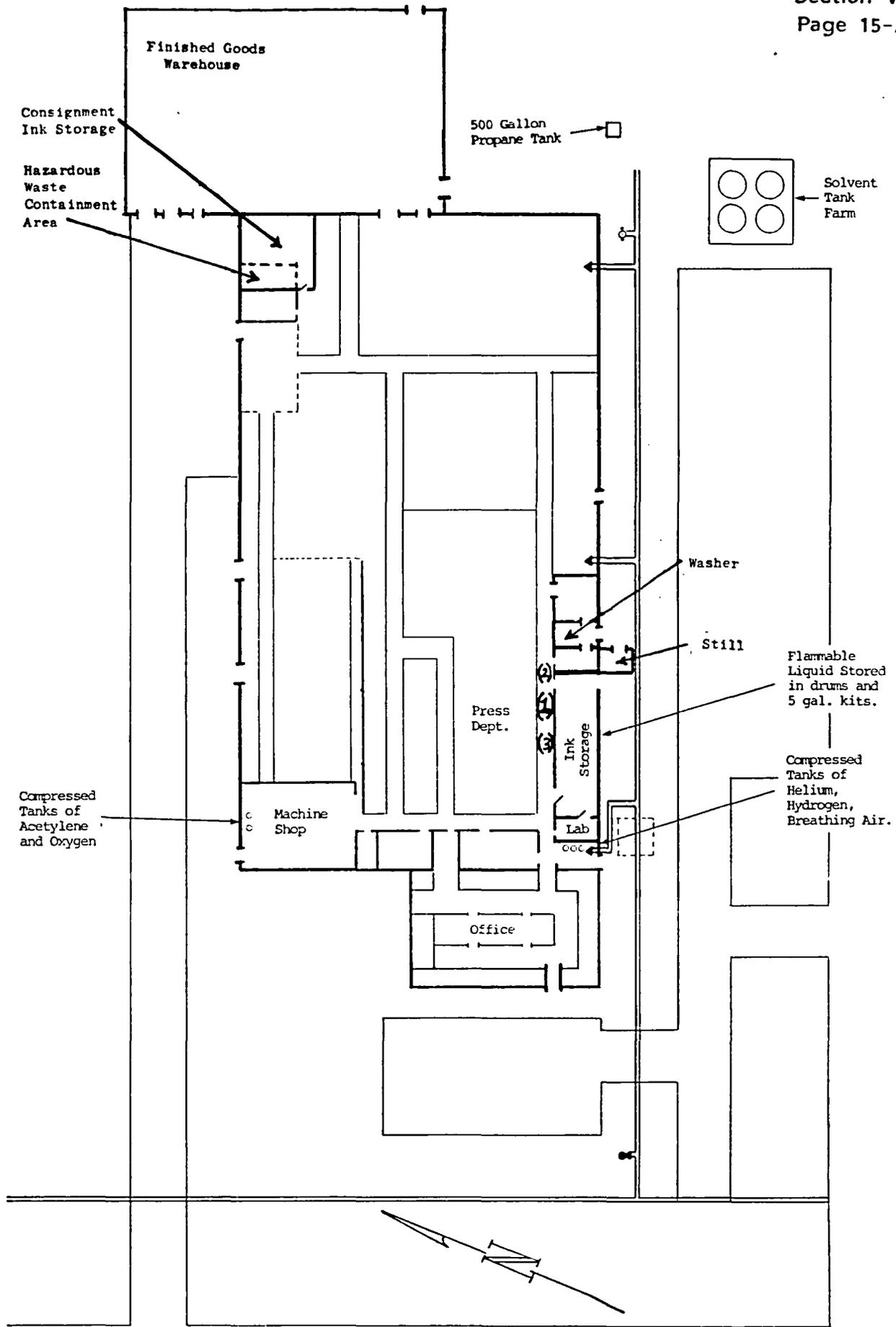
C. Hazardous Waste Handlers - Senior Inkmen - Marvin Atkinson  
Sam Strickland

Inkmen - Paul Campbell  
Wayne Ivester  
Johnny Loynes  
Richard Fraser  
Michael Worthy

Janitorial/  
Washup - John Haggins  
- Claud Morgan  
- John Wilson

- 1) Pick up drums of accumulated hazardous waste from the generating points within the plant and transfer to the Hazardous Waste Containment Area.
- 2) Determine if the waste is in a suitable container, is tightly sealed, and is affixed with a hazardous waste label suitably identifying the contents of the drum. Place diamond-shaped warning stickers on each drum as appropriate, enter material onto the hazardous waste log sheet and store drums in the Hazardous Waste Containment Area.
- 3) Maintain the Hazardous Waste Containment Area, assuring that suitable aisle space is maintained. Clean up any small spills if they occur, maintain a supply of absorbent material, perform and record daily inspections of the facility, as needed. Keep the facility in a neat and clean condition.
- 4) Upon request, obtain samples of waste material for analysis. Maintain an inventory of materials stored in the containment area and advise the Technical Manager on conditions and timing of disposal.
- 5) When enough material has been accumulated and is ready for shipment to a TSD facility, load drums of hazardous waste onto the transporter's truck and affix hazardous placards as required. Enter waste shipment information into the hazardous waste log.
- 6) Perform other duties not otherwise stated that may occur from time to time that are related to the storage or disposal of hazardous waste.
- 7) Maintain an inventory of empty drums in a segregated area that can be utilized for the accumulation and storage of hazardous waste.
- 8) Assist in the movement and disposal of non-hazardous materials as needed.

TRAINING PROCEDURE



TRAINING PROCEDURE

ILLUSTRATION 1

- (1) Collection Area
- (2) Press Waste Transfer Station
- (3) Laminator Waste

TRAINING PROCEDURE

Date

Drum  
Number

Still Bottom  
Weight  
Written on  
Drum

Labels  
on  
Drum

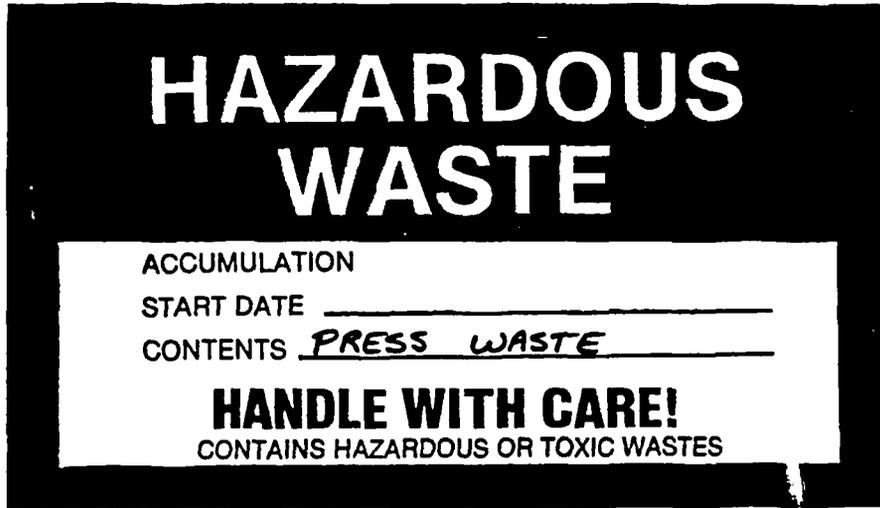
Drum  
Exterior  
Clean

Lid  
Secure

Reclaimed  
Solvent  
(Gallons)  
Initials

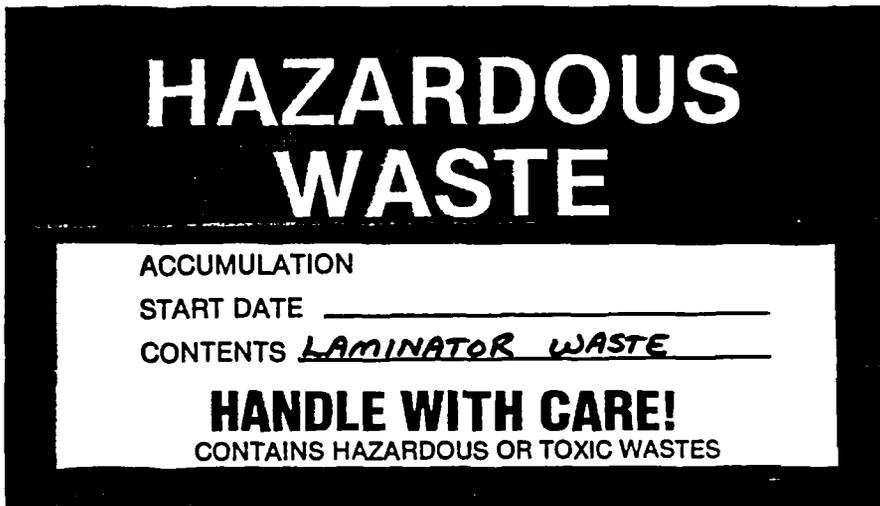
ILLUSTRATION 2

Page 9 of 14



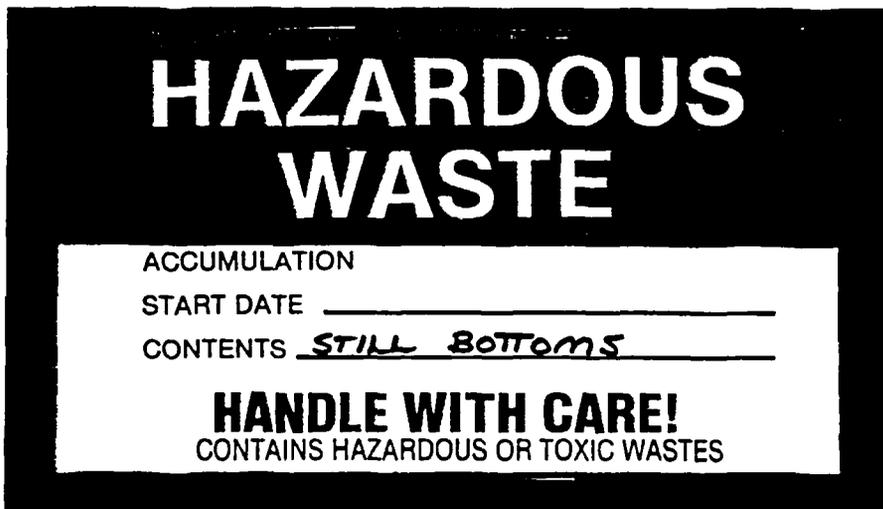
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ILLUSTRATION 3-A



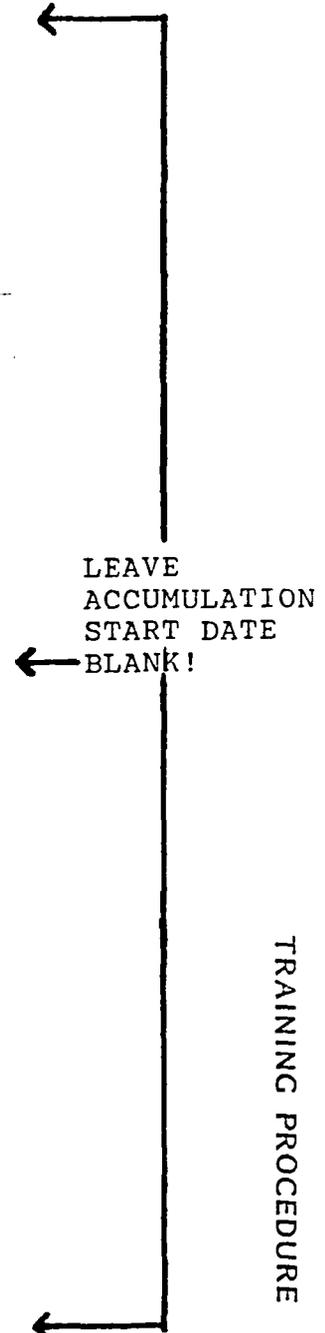
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ILLUSTRATION 3-B



© Copyright Lab Safety Supply, Janesville, WI 53546

ILLUSTRATION 3-C



TRAINING PROCEDURE

DRUM  
NUMBER

# HAZARDOUS WASTE

FEDERAL LAW PROHIBITS IMPROPER DISPOSAL.

IF FOUND CONTACT THE NEAREST POLICE  
PUBLIC SAFETY AUTHORITY OR THE  
U.S. ENVIRONMENTAL PROTECTION AGENCY.

GENERATOR INFORMATION:

NAME VENTURE PACKAGING, INC.

ADDRESS 1600 WESTINGHOUSE BLVD.

CITY CHARLOTTE STATE N.C. ZIP 28273

EPA ID NO. NCDO74503129 EPA WASTE NO. D001

ACCUMULATION START DATE \_\_\_\_\_ MANIFEST DOCUMENT NO. \_\_\_\_\_

[ RQ WASTE INK, FLAMMABLE  
LIQUID, UN1210 ]  
D.O.T. PROPER SHIPPING NAME AND UN OR NA NO. WITH PREFIX

## HANDLE WITH CARE!

VERY  
IMPORTANT!  
PUT DATE  
HERE!

TRAINING PROCEDURE

Printed By: Lab Safety Supply, Inc., Janesville, WI 53547

Reorder No. 433

ILLUSTRATION 4-A

# HAZARDOUS WASTE

FEDERAL LAW PROHIBITS IMPROPER DISPOSAL.

IF FOUND CONTACT THE NEAREST POLICE  
PUBLIC SAFETY AUTHORITY OR THE  
U.S. ENVIRONMENTAL PROTECTION AGENCY.

GENERATOR INFORMATION:

NAME VENTURE PACKAGING, INC.

ADDRESS 1600 WESTINGHOUSE BLVD.

CITY CHARLOTTE STATE NC ZIP 28273

EPA ID NO. NCD074503129 EPA WASTE NO. F005, F003, D035, D001

ACCUMULATION START DATE \_\_\_\_\_ MANIFEST DOCUMENT NO. \_\_\_\_\_

[ RQ WASTE ADHESIVE,  
FLAMMABLE LIQUID, UN1133 ]  
D.O.T. PROPER SHIPPING NAME AND UN OR NA NO. WITH PREFIX

## HANDLE WITH CARE!

VERY IMPORTANT!  
PUT DATE  
HERE!

Printed By: Lab Safety Supply, Inc., Janesville, WI 53547

Reorder No. 433

ILLUSTRATION 4-B

# HAZARDOUS WASTE

FEDERAL LAW PROHIBITS IMPROPER DISPOSAL.

IF FOUND CONTACT THE NEAREST POLICE  
PUBLIC SAFETY AUTHORITY OR THE  
U.S. ENVIRONMENTAL PROTECTION AGENCY.

GENERATOR INFORMATION:

NAME VENTURE PACKAGING, INC.

ADDRESS 1600 WESTINGHOUSE BLVD.

CITY CHARLOTTE STATE N.C. ZIP 28273

EPA ID NO. NCDO14503129 EPA WASTE NO. D001

ACCUMULATION START DATE \_\_\_\_\_ MANIFEST DOCUMENT NO. \_\_\_\_\_

[ RQ WASTE, FLAMMABLE LIQUID,  
n.o.s. (Normal Propyl Alcohol,  
Ethyl Alcohol), NA1993 ]  
D.O.T. PROPER SHIPPING NAME AND UN OR NA NO. WITH PREFIX

## HANDLE WITH CARE!

Printed By: Lab Safety Supply, Inc., Janesville, WI 53547

Reorder No. 433

VERY  
IMPORTANT!  
PUT DATE  
HERE!

ILLUSTRATION 4-C



TRAINING PROCEDURE

ILLUSTRATION 4-D



MAR 20 1991

State of North Carolina  
Department of Environment, Health, and Natural Resources  
Division of Solid Waste Management  
P.O. Box 27687 · Raleigh, North Carolina 27611-7687

James G. Martin, Governor  
William W. Cobey, Jr., Secretary

William L. Meyer  
Director

March 18, 1991

Mr. Patrick A. Baines  
Venture Packaging, Inc.  
P.O. Box 7148  
Charlotte, North Carolina 28241

RE: Tank Classification

Dear Mr. Baines:

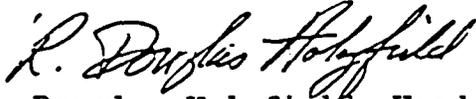
In response to your letter of February 28, 1991, to Mr. Bill Meyer, I have the following comments regarding your request.

It is our opinion that the container and tank in question should be regulated under Subparts I and J of RCRA. This is qualified in that the material is hazardous waste at the time of its entry into the 55 gallon container, and subsequent entry into the receiving tank. We have determined that the waste should be managed fully until it is introduced into the distillation unit. This would ensure that the waste is properly managed should the distillation unit be out of service (i.e., if the distillation unit is not in service, then the 90 day accumulation time will be implemented on the container/tank, properly labeled and dated, closed and subject to visual inspections, etc.). This will require the receiving tank to have, but not limited to, secondary containment, leak detection and overflow protection controls. If releases are to occur, it would most likely be from this area of transferring the hazardous waste to the distillation unit. The 55-gallon container may also be considered to be a tank if piping prevents it from being portable. By this determination, the receiving drum and receiving tank would be regulated under the Generator Standards of 40 CFR 262.34(a)(1) which reference Subparts I and J of 40 CFR Part 265. As long as the hazardous waste is being removed from these accumulation unit(s) then a storage permit will not be required.

To address the storage question, the storage clarification which was included in your submittal is primarily for facilities which receive waste from off-site sources. This provides an avenue for facilities to receive hazardous waste, with certain restrictions as a "designated facility" without having to obtain a storage permit to do so.

In conclusion, as noted in Margaret Babb's letter of October 17, 1990, we do commend Venture Packaging's efforts in utilizing waste reducing processes. Please call me if you should have any further questions or comments.

Sincerely,



R. Douglas Holyfield, Head  
Waste Management Branch  
Hazardous Waste Section

cc: Jerry Rhodes  
Bill Meyer

N.E.T. File



February 28, 1991

Mr. William Meyer  
Solid Waste Management Division  
North Carolina Department of Environment,  
Health and Natural Resources  
PO Box 27687  
Raleigh, NC 27611

Dear Mr. Meyer:

As you may be aware, Venture Packaging has implemented an ambitious program to reduce the volume of hazardous waste, consisting of ignitable waste inks and cleaning solutions, generated in connection with its production of packaging materials. A principal feature of this program is a distillation system which recovers alcohols and propyl acetate for reuse in the plant as a cleaning solution for machines used to print packaging materials. This system represents a significant capital investment by Venture Packaging which has already resulted in substantial reduction in the volume of D001 hazardous waste which is sent off-site for ultimate disposal.

In an effort to insure strict compliance with applicable federal and state regulations concerning these wastes, our attorney has previously written Doug Holyfield on October 9, 1990, to clarify which specific regulations apply to the distillation system. On October 17, 1990, Margaret Babb replied on behalf of Mr. Holyfield. For your convenient reference, I have enclosed copies of this correspondence.

Since an important issue in determining which regulations apply to this system has to do with whether the collection and accumulating of waste ink in connection with the distillation process must be regulated under Subparts I and J of 40 C.F.R. 265, we retained National Environmental Technologies, Inc. to specifically review the system in this regard. The results of this review are explained in the enclosed letter from Mr. John F. Kouba, P.E., of National Environmental Technologies which concludes that the distillation recovery system does not involve "containers" and "tanks" otherwise subject to regulation under 40 C.F.R. 265, Subparts I and J.

VENTURE PACKAGING, INC.  
P. O. Box 7148  
Charlotte, North Carolina 28241

PLANT LOCATIONS:

Cleveland, Ohio  
216 • 521-6570

Charlotte, North Carolina  
714 • 588-0220

Page 2  
February 27, 1991

We are anxious to conclude this aspect of our waste reduction program and would very much appreciate your consideration of this issue as soon as possible. Should any additional information be required, please do not hesitate to contact me.

Very truly yours,



Patrick A. Baines  
Director of Operations

PAB/jh

Enclosures

cc: Douglas A. Holyfield  
Margaret S. Babb  
J. Stephen Shi, Esq.

March 5, 1991

Project #044001

**SUBJECT: Classification of Waste Receiving Devices  
Prior to Recovery**

---

Mr. William Meyers, Director  
Solid Waste Management Division  
North Carolina Department of Environment,  
Health & Natural Resources  
P.O. Box 27687  
Raleigh, NC 27611

Dear Mr. Meyers:

We are asking for confirmation that two receiving devices used as part of an ignitable waste recovery system are not regulated as tanks or containers under Part 265 Subparts I and J. The ignitable wastes are waste inks and cleaning solutions from printing operations. None of the waste inks or cleaning solutions are listed wastes. Many of the waste inks contain normal propanol, ethanol, and normal propyl acetate that cause the waste inks to have the hazardous characteristic of ignitability (flash point < 140°F). These waste inks are processed through a recovery system where the alcohols and propyl acetate are removed from the waste inks through distillation. The recovered product (alcohols and propyl acetate) is then used as a cleaning solution for the printing machines. This cleaning solution is also processed in the same recovery system. The still bottoms from the distillation unit are placed in 55 gallon drums and sent off-site for disposal (as D001). This recovery system reduces the disposal of hazardous waste and provides a cleaning solution that replaces the use of a commercial cleaning product. Figure 1 shows the process flow diagram of the recovery system.

The recovery system consists of two parts: waste receiving and distillation. The first part of the recovery process system is the placement of waste inks and spent cleaning solutions into one of two receiving devices. The two receiving devices are a modified 55-gallon drum and a 300-gallon tank. Waste inks and spent cleaning solutions are placed in the 55-gallon receiving drum, which is in the printing machine area, and then transferred by an air-driven diaphragm pump to the 300-gallon tank each time waste

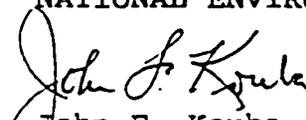
is placed in the drum. The 300-gallon tank receives waste from the 55-gallon drum receiver and from a drum washer in another room. The waste is pumped from the 300-gallon tank to the distillation unit on a continuous basis until the tank is empty. The feed rate from the 300-gallon receiving/feed tank to the distillation unit is approximately 10 gallons per hour. Approximately 60 gallons per day are sent to the 300-gallon receiving/feed tank from the 55-gallon receiving drum and drum washer. The processing rate of the distillation unit is 300 gallons per day; therefore, the receiving drum and receiving/feed tank are always being emptied and waste is not being stored. The recovered cleaning solution is placed in a 450-gallon recovered product tank.

We believe that the 55-gallon receiving drum and the 300-gallon receiving/feed tank are not storing wastes but simply receive the waste and convey the waste to the distillation unit. The receiving drum and receiving/feed tank are a part of the recovery system and, therefore, are only subject to regulation under 261.6(c)(2) and not under 265 Subparts I and J (as required under 262.34(a) if waste is stored). Section 261.6(c)(2) requires owner/operators of facilities that recycle recyclable materials without storing them before they are recycled to comply with the notification requirements under Section 3010 of RCRA and Sections 265.71 and 265.72 dealing with the use of the manifest and manifest discrepancies. This situation is similar to a RCRA Hotline question asked in April, 1987 which had the same conclusion (see attached question and response taken from RCRA Regulations and Keyword Index, 1990 Edition by McCoy and Associates, Inc.).

In summary, we believe that the 55-gallon receiving drum and 300-gallon receiving/feed tank are considered part of the recovery system and are not regulated as containers and tanks under 265 Subparts I and J. Your timely response is appreciated. If you have any questions or comments, please do not hesitate to contact me.

Very truly yours,

NATIONAL ENVIRONMENTAL TECHNOLOGIES, INC.

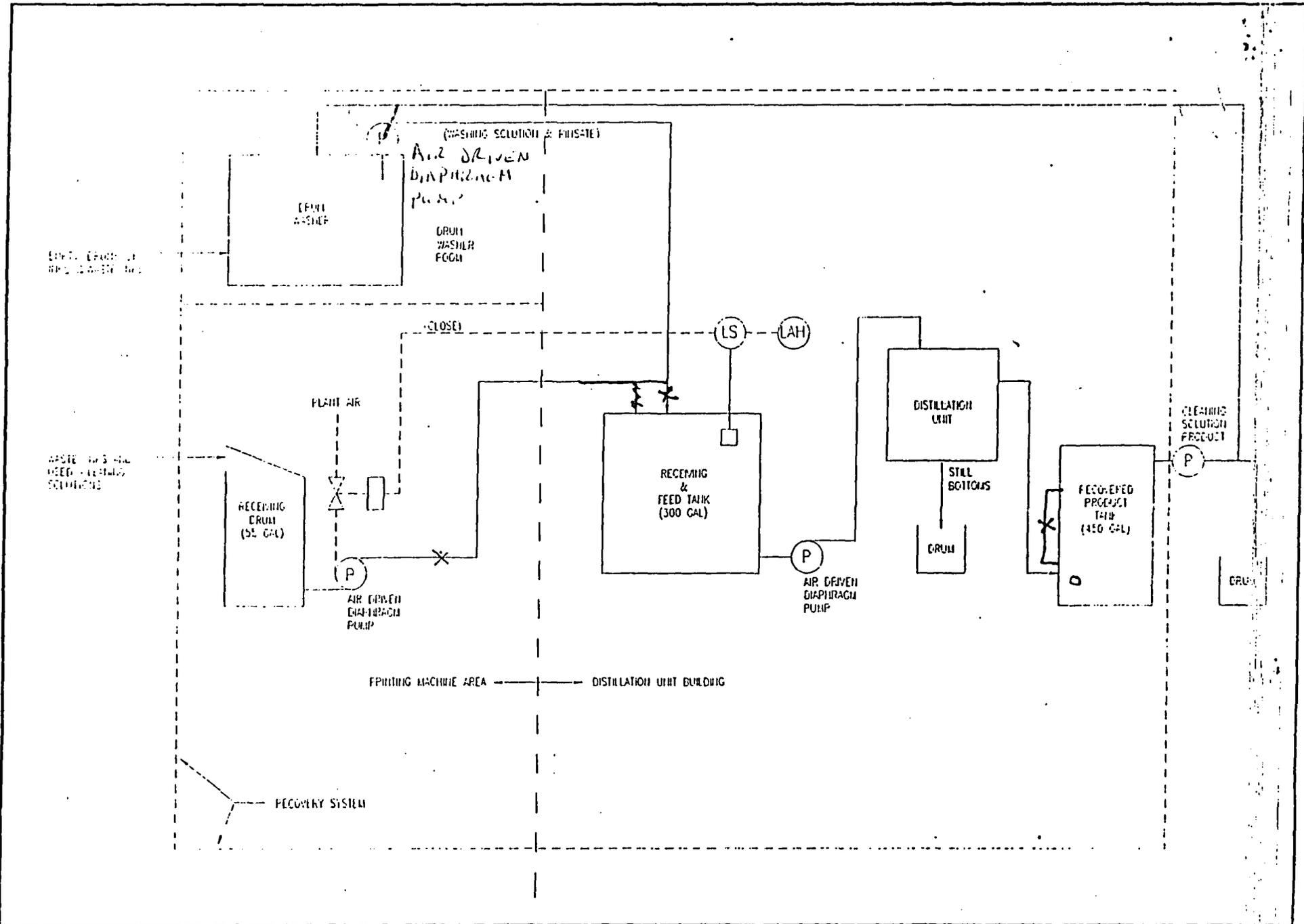


John F. Kouba, P.E.  
Senior Environmental Engineer

JFK/jjh

Attachments





## RCRA-110 Storage Prior to Recycling

According to the hazardous waste recycling regulations promulgated as part of the January 4, 1985 rule (50 FR 614), owners or operators of facilities that recycle materials without prior storage are subject only to Section 3010 notification requirements and § 265.71 and § 265.72 manifest regulations per § 261.6(c)(2). Do the two following recycling operations involve storage prior to recycling?

(a) Truck drivers with bulk shipments or drums of spent solvent pour the solvent into a receiving bin at a recycling facility. The receiving bin is directly hard-piped to the distillation unit, such that the receiving bin feeds the distillation unit. When the distiller is non-operational (at night), some waste solvents may remain in the feed tank.

(b) As in the first situation, bulk shipments or drums of spent solvent are poured into a receiving device at a second recycling facility. The receiving device is essentially a tank with a pump in the bottom which is connected to a large tube that directly feeds into the distillation unit. The pump is in operation whenever there is waste in the tank. Therefore, the tank never contains solvent when the distillation unit is not in operation.

(a) Although there is no time limit for storage, the two recycling facilities are fundamentally different. The first recycler uses the receiving bin to store waste when the distillation unit is not operating. Per § 261.6(c)(1), he is subject to the storage standards.

(b) In the case of the second recycler, he does not use the receiving bin for storage. His receiving bin is more

clearly used only for conveyance, not storage. The bin is more directly tied to the operation of the recycling unit and indeed, could be viewed as part of the recycling unit. Hence, the second recycler would only be subject to § 261.6(c)(2) (i.e., getting an EPA ID number and complying with the manifest standards).

[April 1987; Regulatory Cross Reference: 261.6(c)]

PETREE STOCKTON & ROBINSON  
ATTORNEYS AT LAW

1001 WEST FOURTH STREET  
WINSTON-SALEM, NORTH CAROLINA 27101-2400  
TELEPHONE (919) 723-2351  
TELECOPIER (919) 723-2610

CHARLOTTE OFFICE  
3500 ONE FIRST UNION CENTER  
CHARLOTTE, NORTH CAROLINA 28202-6001  
TELEPHONE (704) 372-9110  
TELECOPIER (704) 372-9110

RALEIGH OFFICE  
4101 LAKE BOONE TRAIL  
SUITE 400  
RALEIGH, NORTH CAROLINA 27607-6519  
TELEPHONE (919) 782-5092  
TELECOPIER (919) 781-3686

January 11, 1991

Ms. Anne Dodds  
Venture Packaging, Inc.  
1600 Westinghouse Blvd.  
P. O. Box 7148  
Charlotte, North Carolina 28241

Re: Venture Packaging, Inc. v. North Carolina  
Department of Environment, Health and  
Natural Resources, 90 EHR 0262

Dear Anne:

I was finally able to speak with Margaret Babb yesterday in an effort to clarify her letter of October 17, 1990, concerning the waste ink distillation process. Unfortunately, she did not provide any further clarification to her letter, other than to emphasize that if any of the waste ink is collected prior to being processed in the distillation unit, it will be subject to the storage requirements under 40 C.F.R. § 262.34 (a). Additionally, as she indicated in her letter, for purposes of reporting amounts of waste generated, only the still bottoms of the waste ink need to be included.

I recommend that if you have any continuing concerns as to the applicable regulations for the distillation process, you let me know and we can confer together with Margaret.

With continued best personal regards, I remain

Sincerely,

  
J. Stephen Shi

JSS:ec  
Enclosure  
cc: Mr. Charles H. May  
Mr. Patrick A. Baines  
295\18490



State of North Carolina  
Department of Environment, Health, and Natural Resources  
Division of Solid Waste Management  
P.O. Box 27687 · Raleigh, North Carolina 27611-7687

James G. Martin, Governor  
William W. Cobey, Jr., Secretary

William L. Meyer  
Director

October 17, 1990

Mr. J. Stephen Shi  
Petree Stockton & Robinson  
Attorneys at Law  
1001 West Fourth Street  
Winston Salem, NC 27101-2400

Re: Ventura Packaging  
Charlotte, NC

Dear Mr. Shi:

Ventura Packaging is to be commended for its waste reduction efforts through the distillation of its solvent-based waste inks and spent cleaning solutions. In answer to your letter of October 9, 1990, to Mr. R. Douglas Holyfield, I will review the regulations regarding this activity at Ventura Packaging.

The distillation process is not regulated. However, prior to reclamation, generator requirements apply. While the waste is being accumulated, the requirements of 40 CFR §262.34(a) apply. Required in this section is compliance with the requirements of Subparts I and J of 40 CFR §265. If the waste is stored for a period of time exceeding 90 days before distilling, a storage permit from the Hazardous Waste Section must be obtained.

With on-site distillation, the amount of waste ink and spent solvent is counted one time only each month; subsequently only the hazardous waste still bottoms are counted as hazardous waste generated that month. If the distillation unit is a continuous unit operating on line, directly connected to the manufacturing process, only the still bottoms may be considered a hazardous waste.

If there are any further questions, please do not hesitate to call me at (919) 733-2178.

Sincerely,



Margaret S. Babb  
Environmental Chemist  
Technical Assistance Unit  
Hazardous Waste Section

MSB/pcs

cc: Scott Reading  
Spring Allen

107 2 1990

PETREE STOCKTON & ROBINSON

ATTORNEYS AT LAW

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RALEIGH, NORTH CAROLINA 27607-6519  
TELEPHONE (919) 782-5092  
TELECOPIER (919) 781-3858

October 9, 1990

Mr. Douglas R. Holyfield  
Branch Head  
Waste Management Branch  
Hazardous Waste Section  
401 Oberlin Road  
Post Office Box 27687  
Raleigh, North Carolina 27611-7687

Re: Venture Packaging, Inc. - Compliance Order with  
Administrative Penalty/Docket No. 89-344

Dear Doug:

Since I have not heard anything from Bill Lopp in recent weeks, I thought I would follow up with you to ascertain whether the now-settled administrative penalty in above-referenced matter can be removed from the administrative docket and I understand that the facility was reinspected on August 23, 1990, by Scott Readling, who found no significant discrepancies. We certainly appreciate all you have done to facilitate the settlement in this matter.

I thought I would also respond to a suggestion made by Mr. Readling during his visit that two receiving devices incorporated in the recently installed recycling process and may be subject to regulation as storage containers and tanks under Subparts I and J of 40 C.F.R. § 265. As you may recall from our meeting at your office, my client is committed to responsible management of its hazardous waste, particularly with respect to reducing the volume of such waste through enhanced management practices and recycling. In this regard, we discussed with you the extensive investment which was then being undertaken by Venture Packaging to install a state of the art system to recover and recycle solvent-based waste inks through a distillation process in which the recovered product (alcohol and propyl acetate) is then used as a cleaning solution for the printing machines and thereafter recovered again through the same system. The net effect of the process is to substantially reduce the volume of hazardous wastes for which special handling and disposal would be required and to provide a cleaning solution which replaces commercial cleaning products which would otherwise be necessary. For your convenience, I have enclosed diagrams indicating the process flow

of the recovery system and the physical layout of the system and integral receiving devices.

The receiving devices which prompted Mr. Readling's suggestion are a 300-gallon tank and 55-gallon drum. Waste inks and spent cleaning solutions are placed in the 55-gallon drum, which is located in the printing machine area. The wastes are then immediately transferred by an air-driven diaphragm pump to the 300-gallon tank along with waste from a drum washer at a rate of ten gallons per hour. The waste from the tank is then pumped through fixed piping to the distillation phase of the recovery system on a continuous basis until the tank is empty. The recovered cleaning solution is then stored in a 450-gallon tank for later use. Since the processing rate of the distillation unit is 300 gallons per day, and approximately sixty gallons of waste inks and cleaning solution are sent to the tank from the drum washer and receiving drum per day, all waste is recycled within a twenty-four hour period.

Accordingly, it is clear that the receiving drum and tank are not used for storing the waste inks and cleaning solutions but rather are merely integral components of the overall recovery and recycling process which are subject to regulation under 40 C.F.R. § 261.6(c)(2) rather than Subparts I and J of 40 C.F.R. § 265 (as would be required under 40 C.F.R. § 262.34(a) when regulated wastes are actually stored). Given the foregoing description of the recycling process and particularly in view of the very substantial capital expenditure by Venture Packaging of approximately \$200,000 to install this system which has effectively reduced their hazardous waste disposal by approximately 65%, Venture Packaging should not now be penalized for its efforts for any unwarranted application of Subparts I and J of 40 C.F.R. § 265.

Should any additional information be necessary to finally resolve this matter, please let me know as soon as possible since I am anxious to remove the matter from the administrative docket.

Sincerely,

  
J. Stephen Shi

JSS:bw

cc: Charles H. May  
William Lopp, Esq.

1295\18470.LTR



State of North Carolina  
Department of Environment, Health, and Natural Resources  
Division of Solid Waste Management  
P.O. Box 27687 · Raleigh, North Carolina 27611-7687

James G. Martin, Governor  
William W. Cobey, Jr., Secretary

William L. Meyer  
Director

August 23, 1991

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

9/16/91

NOTICE OF VIOLATION  
DOCKET #91-343

Ms. Anne Dodds  
Venture Packaging, Inc. Stylecraft  
1600 Westinghouse Blvd.  
Charlotte, North Carolina 28273

NCD 074 503 129

Dear Ms. Dodds:

On December 18, 1980, the State of North Carolina, Hazardous Waste Section (State) was authorized to operate the State RCRA hazardous waste program under the Solid Waste Management Act (ACT), N.C.G.S. 130A, Article 9 and rules promulgated thereto at 15A NCAC 13A (Rules) in lieu of the federal RCRA program. Venture Packaging, Inc. Stylecraft, Charlotte, North Carolina is classified as a generator of hazardous waste and is subject to the requirements of 40 CFR 262, codified at 15A NCAC 13A .0007.

On July 10, 1991, Ms. Spring Allen, Waste Management Specialist with this office inspected your facility for compliance with North Carolina Hazardous Waste Management Rules. During that inspection the following violations were noted:

- A. 40 CFR 262.34(a)(4), codified at 15A NCAC 13A .0007, states that a generator may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status, provided that the generator complies with the requirements for owners or operators in Subparts C and D in 40 CFR Part 265 and with Section 265.16.
1. 40 CFR 265.34(a), codified at 15A NCAC 13A .0010, states that whenever hazardous waste is being poured, mixed, spread, or otherwise handled, all personnel involved in the operation must have immediate access to an internal alarm or emergency communication device, either directly or through visual or voice contact with another employee, unless such a device is not required under Section 265.32.

Venture Packaging, Inc. Stylecraft is in violation of 40 CFR 262.34(a)(4), codified at 15A NCAC 13A .0007, referenced at 40 CFR 265.34(a), codified at 15A NCAC 13A .0010, in that whenever hazardous waste was being poured, mixed, spread or otherwise handled, all personnel involved in the operation did not have immediate access to an internal alarm or emergency communication device, either directly or through visual or voice contact with another employee.

2. 40 CFR 265.52(e), codified at 15A NCAC 13A .0010, states that the contingency plan must include a list of all emergency equipment at the facility (such as fire extinguishing systems, spill control equipment, communications and alarms systems (internal and external), and decontamination equipment) where this equipment is required. This list must be kept up to date. In addition, the contingency plan must include the location and a physical description of each item on the list, and a brief outline of its capabilities.

Venture Packaging, Inc. Stylecraft is in violation of 40 CFR 262.34(a)(4), codified at 15A NCAC 13A .0007, referenced at 40 CFR 265.52(e), codified at 15A NCAC 13A .0010, in that the contingency plan did not include a list of all emergency equipment at the facility. The contingency plan also did not include a physical description of each item on the list, and a brief outline of its capabilities.

3. 40 CFR 265.52(f), codified at 15A NCAC 13A .0010, states that the contingency plan must include an evacuation plan for facility personnel where there is a possibility that evacuation could be necessary. This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes (in cases where the primary routes could be blocked by releases of hazardous waste or fires).

Venture Packaging, Inc. Stylecraft is in violation of 40 CFR 262.34(a)(4), codified at 15A NCAC 13A .0007, referenced at 40 CFR 265.52(f), codified at 15A NCAC 13A .0010, in that the contingency plan did not include an evacuation plan for facility personnel where there is a possibility that evacuation could be necessary.

#### COMPLIANCE SCHEDULE

By September 16, 1991, you shall comply with the following requirements:

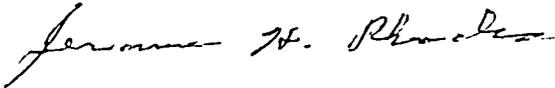
- A. Comply with 40 CFR 262.34(a)(4), codified at 15A NCAC 13A .0007, specifically by:
  1. Ensuring that whenever hazardous waste is being poured, mixed, spread or otherwise handled, all personnel involved in the operation must have immediate access to an internal alarm or emergency communication device, either directly or through

visual or voice contact with another employee as required in 40 CFR 265.34(a).

2. By amending the contingency plan to include all emergency equipment at the facility (such as fire extinguishing systems, spill control equipment, communications, and alarm systems (internal and external) and decontamination equipment). The contingency plan must also include the location and a physical description of each item on the list and a brief outline of its capabilities as described in 40 CFR 265.52(e).
3. By amending the contingency plan to include an evacuation plan for facility personnel where there is a possibility that evacuation could be necessary. The evacuation plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes (in cases where the primary routes could be blocked by releases of hazardous waste or fires) as required in 40 CFR 265.52(f).

If the requirements above are not met, pursuant to N.C.G.S. 130A-22(a) and 15A NCAC 13B .0701 - .0707, an administrative penalty of up to \$25,000.00 per day may be assessed for violation of the hazardous waste law or regulations.

Sincerely,



Jerome H. Rhodes, Chief  
Hazardous Waste Section

JHR/dd/KM290

cc: Keith Masters  
Central Files  
Spring Allen  
Doug Holyfield  
Al Hilton



State of North Carolina  
Department of Environment, Health, and Natural Resources  
Division of Solid Waste Management  
P.O. Box 27687 · Raleigh, North Carolina 27611-7687

James G. Martin, Governor  
William W. Cobey, Jr., Secretary

William L. Meyer  
Director

February 5, 1990

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Ms. Anne Dodds  
Venture Packaging, Inc.  
1600 Westinghouse Blvd.  
Charlotte, North Carolina 28217

Re: Compliance Order with Administrative Penalty  
Venture Packaging, Inc. NCD 074 503 129

Dear Ms. Dodds:

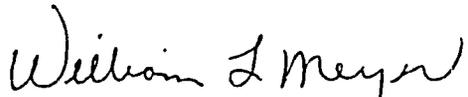
Enclosed is a Compliance Order with Administrative Penalty issued to Venture Packaging, Inc. for certain violations of the North Carolina Solid Waste Management Act, N.C.G.S. 130A, Article 9 (Act), and the North Carolina Hazardous Waste Management Rules, 10 NCAC 10F (Rules). The Compliance Order with Administrative Penalty describes both the violations and the actions required for compliance, at your facility, with the Act and Rules.

Pursuant to N.C.G.S. 130A-22(a), an administrative penalty of \$31,500.00 is imposed on the Compliance Order with Administrative Penalty. You may appeal this Compliance Order with Administrative Penalty by filing a written petition for an administrative hearing to the Office of Administrative Hearings, P. O. Drawer 11666, Raleigh, North Carolina 27604, and by serving a copy of the petition to John Hunter, Process Agent, Department of Environment, Health, And Natural Resources, 512 N. Salisbury Street, Raleigh, North Carolina 27611, within 30 days of the receipt of the Compliance Order with Administrative Penalty. The petition must be in accordance with N.C.G.S. 150B-23(a) and 10 NCAC 10G .0704.

If no administrative hearing is requested, the administrative penalty must be paid by Venture Packaging, Inc. within 60 days of receipt of the Compliance Order with Administrative Penalty by check or money order, payable to the Solid Waste Management Division, and mailed to Jerome H. Rhodes, Section Chief, Hazardous Waste Section, Solid Waste Management Division, P. O. Box 27687, Raleigh, N. C., 27611-7687.

If you desire to schedule an informal conference to discuss the Compliance Order with Administrative Penalty, please contact R. Douglas Holyfield, Branch Head, Waste Management Branch, at (919) 733-2178.

Respectfully,



William L. Meyer, Director  
Solid Waste Management Division

JHR/dd/DH315H

Enclosures: Compliance Order

cc: Central File  
Adam Wipfield ✓  
Jim Edwards  
Doug Holyfield  
Keith Masters  
Steve Reid  
Mecklenburg County Health Director  
Jerry Rhodes  
Bill Lopp  
Bob Glaser

North Carolina Department of Environment, Health,  
and Natural Resources  
Solid Waste Management Division

In Re: Venture Packaging, Inc.)  
NCD074503129 )

COMPLIANCE ORDER WITH  
ADMINISTRATIVE PENALTY  
Docket # 89-344

PRELIMINARY STATEMENT

This Compliance Order with Administrative Penalty is issued under the North Carolina Solid Waste Management Act, N.C.G.S. 130A, Article 9 (Act), and the North Carolina Hazardous Waste Management Rules, 10 NCAC 10F (Rules). William L. Meyer, Director, Solid Waste Management Division, Department of Environment, Health, and Natural Resources, has been delegated the authority to implement the Act and Rules. Venture Packaging, Inc. is a Michigan corporation which generates hazardous waste in Charlotte, Mecklenburg County, North Carolina. Based upon an inspection performed at Venture Packaging, Inc. the North Carolina Solid Waste Management Division has determined that Venture Packaging, Inc. is in violation of certain requirements of the Act and Rules as set forth in this Compliance Order with Administrative Penalty.

STATEMENTS OF FACT AND LAW

1. On December 18, 1980, the State of North Carolina, Solid Waste Management Division (Division), was authorized to operate the State RCRA hazardous waste program under the North Carolina Solid Waste Management Act, N.C.G.S. 130A, Article 9, and Rules codified at 10 NCAC 10F. William L. Meyer, Division Director, has been delegated those responsibilities.
2. Venture Packaging, Inc. is a Michigan corporation which generates hazardous waste as defined in N.C.G.S. 130A-290(5) and 10 NCAC 10F .0002, in Charlotte, North Carolina. Venture Packaging, Inc. is a person as defined in N.C.G.S. 130A-290(15) and 10 NCAC 10F .0002.
3. 40 CFR Part 262, codified at 10 NCAC 10F .0030, contains standards and requirements applicable to generators of hazardous waste.
4. Prior to November 19, 1980, Venture Packaging, Inc. notified the United States Environmental Protection Agency (EPA) that it generated a solid waste which is defined as a hazardous waste under 40 CFR 261, codified at 10 NCAC 10F .0029.
5. On August 3, 1989, Mr. Adam Wipfield, Waste Management Specialist, with the Division, inspected Venture Packaging, Inc. facility and found the facility to be in violation of certain

requirements contained in 40 CFR 262, codified at 10 NCAC 10F .0030. Specifically:

- A. 40 CFR 262.34(a)(1), codified at 10 NCAC 10F .0030, states that a generator may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status provided the waste is placed in containers and the generator complies with Subpart I (265.170-265.177) of 40 CFR 265.

40 CFR 265.171, codified at 10 NCAC 10F .0033, states that if a container holding hazardous waste is not in good condition or if it begins to leak, the owner or operator must transfer the hazardous waste from this container to a container that is in good condition, or manage the waste in some other way that complies with the requirements of this part.

Venture Packaging, Inc. is in violation of 40 CFR 262.34(a)(1), codified at 10 NCAC 10F .0030, in that it accumulates hazardous waste on-site without a permit or without having interim status, and when a container holding hazardous waste was not in good condition, or when it began to leak, it did not transfer the hazardous waste from this container to a container that was in good condition, or manage the waste in some other way that complies with the requirements of this part, as required by 40 CFR 265.171, codified at 10 NCAC 10F .0033.

- B. 40 CFR 262.34(a)(2), codified at 10 NCAC 10F .0030, states that a generator may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status, provided that the date upon which each period of accumulation begins is clearly marked and visible for inspection on each container.

Venture Packaging, Inc. is in violation of 40 CFR 262.34(a)(2), codified at 10 NCAC 10F .0030, in that it accumulates hazardous waste on-site without a permit or without having interim status, and the date upon which each period of accumulation began was not clearly marked and visible for inspection on each container.

- C. 40 CFR 262.34(a)(3), codified at 10 NCAC 10F .0030, states that a generator may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status, provided that, while being accumulated on-site, each container and tank is labeled or marked clearly with the words, "Hazardous Waste".

Venture Packaging, Inc. is in violation of 40 CFR 262.34(a)(3), codified at 10 NCAC 10F .0030, in that it accumulates hazardous waste on-site without a permit or without having interim status, and each container was not

labeled or marked clearly with the words "Hazardous Waste". Six 300-gallon tote bins containing F003 hazardous waste were not marked with the words "Hazardous Waste".

- D. 40 CFR 262.34(a)(4), codified at 10 NCAC 10F .0030, states that a generator may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status, provided that the generator complies with the requirements for owners or operators in Subparts C (265.30 - 265.37) and D (265.50 - 265.56) in 40 CFR Part 265 and with Section 265.16

40 CFR 265.16(c), codified at 10 NCAC 10F .0033, states that facility personnel must take part in an annual review of the initial training required in paragraph (a) of this section.

Venture Packaging, Inc. is in violation of 40 CFR 262.34(a)(4), codified at 10 NCAC 10F .0030, in that it accumulates hazardous waste on-site without a permit or without having interim status, and facility personnel have not taken part in an annual review of the initial training required in paragraph (a) of this section, as required by 40 CFR 265.16(c), codified at 10 NCAC 10F .0033.

#### CIVIL PENALTY

N.C.G.S. 130A-22(a) and 10 NCAC 10G .0701-.0707 authorizes an administrative penalty of up to \$10,000.00 per day for each violation of the hazardous waste provisions of the Act and Rules. The N.C. Solid Waste Management Penalty Computation Procedure (March 19, 1985) was used to determine the penalty. The factors considered in determining the administrative penalty include, but are not limited to: the nature of the violations, the potential effect on the public health and environment, the degree and extent of harm caused by the violations, the costs of rectifying any damage, the types and amount of wastes, the ease and costs of compliance and the history of noncompliance. For each violation specified above, the following penalties are assessed: A. \$10,000.00; B. \$4,000.00; C. \$10,000.00; D. \$7,500.00. Accordingly, a total penalty of \$31,500.00 is hereby imposed.

#### CONDITIONS FOR CONTINUED OPERATION

Based upon the foregoing, Venture Packaging, Inc. is hereby ordered to take the following actions:

1. Within sixty (60) days submit the amount of the administrative penalty, by check or money order, payable to the Solid Waste Management Division, and mailed to Jerome H. Rhodes, Section Chief, Hazardous Waste Section, Solid Waste Management Division, P. O. Box 27687, Raleigh, NC 27611-7687.

2. By March 5, 1990, Venture Packaging, Inc. shall take the following actions to correct the violations as stated in this Compliance Order with Administrative Penalty and otherwise be in compliance with the generator requirements of 40 CFR 262, codified at 10 NCAC 10F .0030:
  - A. Comply with 40 CFR 262.34(a)(1), codified at 10 NCAC 10F .0030. Venture Packaging, Inc. shall for its hazardous waste accumulated on-site without a permit or without having interim status, transfer hazardous waste from containers holding hazardous waste that are not in good condition or that are leaking, to containers that are in good condition, or manage the waste in some other way that complies with the requirements of his part, as required by 40 CFR 265.171, codified at 10 NCAC 10F .0033.
  - B. Comply with 40 CFR 262.34(a)(2), codified at 10 NCAC 10F .0030. Venture Packaging, Inc. shall for its hazardous waste accumulated on-site without a permit or without having interim status, clearly mark and make visible for inspection the date upon which each period of accumulation began on each container.
  - C. Comply with 40 CFR 262.34(a)(3), codified at 10 NCAC 10F .0030. Venture Packaging, Inc. shall for its hazardous waste accumulated on-site without a permit or without having interim status, label or clearly mark each hazardous waste container with the words "Hazardous Waste".
  - D. Comply with 40 CFR 262.34(a)(4), codified at 10 NCAC 10F .0030. Venture Packaging, Inc. shall make sure that facility personnel take part in an annual review of the initial training required in paragraph (a) of this section, as required by 40 CFR 265.16(c), codified at 10 NCAC 10F .0033.

#### POTENTIAL CONSEQUENCES OF FAILURE TO COMPLY

Venture Packaging, Inc. is hereby advised that pursuant to N.C.G.S. 130A-22, each day of continued violation of any requirement of the Act or the Rules, constitutes a separate violation for which an additional penalty of up to \$10,000.00 per day may be imposed. If the violation(s) continues, Venture Packaging, Inc. may also be subject to further enforcement including injunction from any further generation of hazardous waste and such further relief as may be necessary to achieve compliance with the North Carolina Solid Waste Management Act and Rules.

#### OPPORTUNITY TO REQUEST A HEARING

Venture Packaging, Inc. has the right to request an administrative hearing to contest any matter of law, material fact, requirement, or

penalty set forth in this Compliance Order with Administrative Penalty. To avoid being in default and having the penalty collected without further administrative proceedings, a written petition must be submitted within 30 days of receipt of this Compliance Order with Administrative Penalty in accordance with N.C.G.S. 150B-23(a) and 10 NCAC 10G .0704.

The petition shall be verified or supported by affidavit and shall state facts tending to establish that the agency has deprived Venture Packaging, Inc. of property, has ordered Venture Packaging, Inc. to pay a fine or civil penalty, or has otherwise substantially prejudiced Venture Packaging, Inc.'s, rights and that the Division:

1. exceeded its authority or jurisdiction;
2. acted erroneously;
3. failed to use proper procedure;
4. acted arbitrarily or capriciously; or
5. failed to act as required by law or rule.

The petition must be filed with the Office of Administrative Hearings, P. O. Drawer 11666, Raleigh, North Carolina 27604, in accordance with N.C.G.S. 150B-23(a). A copy of the petition must be served to John Hunter, Process Agent, Department of Environment, Health, and Natural Resources, 512 N. Salisbury Street, Raleigh, North Carolina 27611. Requested administrative hearings will be conducted in accordance with applicable rules contained in the North Carolina Administrative Code, a copy of which will be furnished to you upon request. If no hearing is requested, payment of the administrative penalty becomes due within 60 days after receipt of this notice. If a hearing is requested, payment of the administrative penalty is due within 60 days after service of a written copy of the decision. If payment is not received as required, the Secretary of Environment, Health, and Natural Resources shall request the Attorney General to commence an action to recover the amount of the administrative penalty and may also request that an injunctive action be commenced to achieve compliance pursuant to 130A-22(g).

#### INFORMAL CONFERENCE

Whether or not Venture Packaging, Inc. requests an administrative hearing, the Division encourages an informal conference to discuss this matter and to give Venture Packaging, Inc. an opportunity to provide additional information, including any actions it has taken to correct the violation(s). If an informal conference is desired, please contact:

R. Douglas Holyfield, Branch Head  
Waste Management Branch  
Hazardous Waste Section  
P. O. Box 27687  
Raleigh, N. C. 27611-7687  
(919) 733-2178

THE SCHEDULING OF AN INFORMAL CONFERENCE WILL NOT RELIEVE VENTURE PACKAGING, INC. OF THE NEED TO FILE A WRITTEN PETITION FOR AN ADMINISTRATIVE HEARING WITHIN 30 DAYS OF RECEIPT OF THIS COMPLIANCE ORDER WITH ADMINISTRATIVE PENALTY IF A HEARING IS DESIRED.

By: William L Meyer  
William L. Meyer, Director  
Solid Waste Management Division  
Department of Environment, Health  
And Natural Resources

Date: FEB 5, 1990

CERTIFICATE OF SERVICE

I hereby certify that I have caused a copy of the foregoing Compliance Order with Administrative Penalty to be served upon the person(s) designated below, at the last known address, by causing said copy to be deposited in the U.S. Mail, First Class (certified mail, restricted delivery, and return receipt requested, postage prepaid) in an envelope addressed to:

Ms. Anne Dodds  
Venture Packaging, Inc.  
1600 Westinghouse Blvd.  
Charlotte, North Carolina 28217

Dated this 5<sup>th</sup> day of FEB, 1990.

William L. Meyer  
William L. Meyer, Director  
Solid Waste Management Division  
Department of Environment, Health  
And Natural Resources

DH315H

FACILITY INFORMATION:

DATE OF INSPECTION

VENTURE PACKAGING, INC. STYLCRAFT

8-3-89

1600 WESTINGHOUSE BLVD.

CHARLOTTE

EPA ID NUMBER:

MECKLENBURG COUNTY

NCD 074 503129

RESPONSIBLE OFFICIAL: Bobby KIKKARD, PLANT MANAGER

SURVEY PARTICIPANTS: Adam WIPFIELD, ANNE DODDS, TECHNICAL MANAGER

DOCUMENTATION OF SITE DEFICIENCIES: ~~THE~~ 5 300-gallon TOTE bins OUTSIDE appear to have been recently cleaned by scraping off excess dried ink waste from their outside surfaces. The waste ink scrapings were left on the ground along with a general build-up of dried waste ink that was a result of past incidental spillage. The containers are situated on an asphalt surface, but some vegetation near the [REDACTED] edge of the asphalt appears to be stressed, possibly as a result of waste ink spillage AND RUN-OFF. These 5 300-gallon containers along with another of the same capacity stored in the prep room were NOT marked with the words "HAZARDOUS WASTE" nor were they marked with an accumulation start date. The last personnel training session regarding the contents of the contingency plan was held on March 15, 1988.

Facility description: No change since the previous inspection

8-3-89

VENTURE ST/ECRAFT

ANNE DODDS  
TECHNICAL MANAGER

262.41 ANNUAL REPORT: EACH TSD: NAME \_\_\_\_\_ EPA#  ADDRESS \_\_\_\_\_ (a)(3)

TRANSPORTER: NAME \_\_\_\_\_ EPA# \_\_\_\_\_ (a)(4)

WASTE listed by each TSD  (a)(5) WASTE MINIMIZATION (a)(6)

Describe  $\Delta$  in Volume, toxicity \_\_\_\_\_

MANIFESTS: DOCUMENT# OK LAND BAN OK BURDEN DISC. (AFTER 7-2-89) OK

TSD'S: HERITAGE  
OLOOVER

TRANSPORTERS:

SHIPMENT DESCRIPTIONS:

262.42 EXCEPTION REPORT N/A

265.52 CONTINGENCY PLAN: SPPC  (b) DESCRIBE ARRANGEMENTS \_\_\_\_\_ (c)

ERC info  (d) LIST OF EMERGENCY EQUIPMENT  (e)

LOCATION  DESCRIPTION <sup>LIST & TYPE</sup> <sub>OF EXTINGUISHERS</sub> CAPABILITIES A, B, C

EVACUATION PLAN: SIGNAL  ROUTES  EXITS

265.53(b) COPIES: Police  FIRE  medical   
Charlotte Emergency Response

265.32(a) INTERNAL COMMUNICATION OF ALARM  REQUIRED EQUIPMENT: SPILL CONTROL

fire extinguishers;  deCONTAMINATION OK (c) WATER city H<sub>2</sub>O (d)  
<sub>eyewash</sub>

265.16 PERSONNEL TRAINING: WITHIN 6 mo. (b) OK INSTRUCTOR TRAINED (a)(2)

ANNUAL REVIEW (c) <sup>3/15/88</sup> Job Titles, descriptions (d)(1), (2)

WRITTEN OUTLINE (d)(3)  RECORDS (d)(4)

39075 - M. ATKINSON - SENIOR WORKMAN  
29075 - JANITORIAL WASH-UP  
1 - TECHNICAL MANAGER

SUBPART I CONTAINERS: LEAKAGE (173b) \_\_\_\_\_ LIDS (173a) \_\_\_\_\_ DEFECTS (171) \_\_\_\_\_

WORDS "HAZWASTE" (a)(3) \_\_\_\_\_ START DATES (a)(2) \_\_\_\_\_

INSPECTIONS: 90° area ✓ (174) SATellite ✓ RECORDED ✓

262.34 SATellite (sum): 55 gal (c)(1) \_\_\_\_\_ Leaks (c)(1)(i) \_\_\_\_\_ LIDS (c)(1)(i) \_\_\_\_\_  
173(a)

WORDS "HAZWASTE" or OTHER \_\_\_\_\_ (c)(1)(ii)

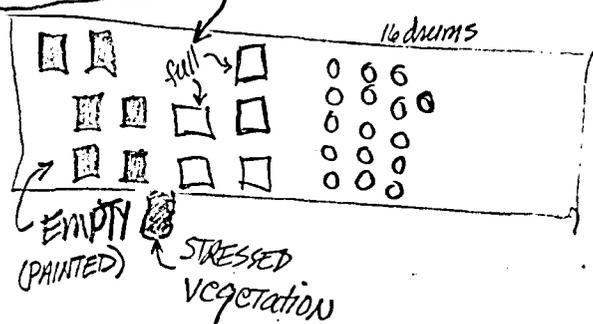
90° - OUTSIDE \_\_\_\_\_  
↓

Press ROOM bin (300-gallon) label partially obliterated, NO DATE, EXCESS dried INK ON TOP.

1655 gal drums - waste adhesive

⊘ 5 have an excess of waste INK on top of lids

⊘ NO bins are labeled or dated



⊘ AREA is covered w/ waste INK solids & contaminated debris

eyewash OK

8-3-89

ANNEDODDS - TECHNICAL MANAGER

Pat Baines - Director of operations

- ① FO03 still bottoms → 325 gal collection bin
- ② waste ink → ↗
- ③ FO03 WASH UP SOLVENTS

ANNUEL REPORT  
WASTE MIN

TSD's Heritage E.S. CHARLOTTE FO03, FO05  
Oldover

- ④ D002 - ~~is~~ Caustic WASH TANK sediment for washing INK PANS  
To Heritage ↗ THIS IS GOING TO BE REPLACED BY A SOLVENT  
WASH UNIT



13. Annual Reporting (262.41)

- submitted (a)(1-6)
- submitted (b)

14. Exception Reporting (262.42)

- transporter contact (a)
- exception report (b)(1)(2)

REMARKS: 265.16 (c) No annual review of personnel training  
265.171\* accumulation of waste spillage on 6 300-gallon TOTE BINS  
(5 OUTSIDE, 1 INSIDE) AND ON 5 55-gallon CONTAINERS of WASTE  
(adhesive. AND evidence of past leakage ON THE GROUND (STRESSED VEGETATION))  
262.34 (a)(2) - No accumulation ~~and~~ start dates on 6 300-gallon  
TOTE bins.  
262.34 (a)(3) - No words "HAZARDOUS WASTE" on 6 300-gallon tote bins  
\*265.171 (CONTINUED) - CONTAMINATED debris and WASTE INK scrapings  
are ON THE GROUND AROUND THE WASTE CONTAINERS

CONTAINER/TANK INSPECTION FORM - PART 265

VENTURE CORP. STYLCRAFT NCD 074503129 8-3-89  
 Name of Site EPA I.D. Inspection Date

SUBPART I - USE AND MANAGEMENT OF CONTAINERS

- 1. Condition Of Containers (265.171)
  - leakage
  - past leakage (evidence)
  - severe rusting
  - structural defect
- 2. Compatibility Of Waste With Containers (265.172)
  - visual evidence of noncompliance (leakage, corrosion)
- 3. Management of Containers (265.173)
  - closed (a)
  - improper handling or storage (b)
- 4. Inspections (265.174)
  - weekly (minimum)
- 5. Special Requirements For Ignitable or Reactive Waste (265.176)
  - 15m (50 ft)
- 6. Special Requirements For Incompatible Waste (265.177)
  - mixing (a)
  - unwashed container (b)
  - separation (c)

SUBPART J - TANKS

- 1. General Operating Requirements (265.192)
  - compatibility (a)(b)
  - uncovered tank precautions (c)
  - overflow prevention (d)
- 2. Waste Analysis and Trial Tests (265.193)\*
  - \*Section not applicable to a generator only
  - waste analysis/trial test
- 3. Inspections (265.194)
  - discharge control equipment (a)(1)
  - monitoring equipment (a)(2)
  - waste level (a)(3)
  - construction material (a)(4)
  - surrounding area (a)(5)
  - assessment schedule/procedures (b)
- 4. Closure (265.197)
  - plan on-site
- 5. Special Requirements For Ignitable Or Reactive Waste (265.198)
  - properly stored (a)(1)(2)(3)
  - buffer requirements (b)
- 6. Special Requirements For Incompatible Wastes (265.199)
  - properly stored (a)
  - tank washed (b)

REMARKS: 265.171 - see page 2

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WASTE MANAGEMENT

5. On AUGUST 3, 1989, ADHM WIRFIELD, SPECIALIST, made an inspection of the VPI Facility and found the facility to be in violation of certain requirements contained in 40 CFR 262, codified at 10 NCAC 10F .0030. Specifically:

A. 40 CFR 262.34(a)(2), codified at 10 NCAC 10F .0030, states that a generator may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status, provided that the date upon which each period of accumulation begins is clearly marked and visible for inspection on each container.

VPI  
[redacted] is in violation of 40 CFR 262.34(a)(2), codified at 10 NCAC 10F .0030, in that ~~six~~ hazardous waste containers stored on-site at the time of the inspection were not clearly marked with the accumulation start date:

B. 40 CFR 262.34(a)(3), codified at 10 NCAC 10F .0030, states that a generator may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status, provided that, while accumulated on-site, each container and tank is labeled or marked clearly with the words, "Hazardous Waste".

VPI  
[redacted] is in violation of 40 CFR 262.34(a)(3), codified at 10 NCAC 10F .0030, in that containers in the hazardous waste storage are were not labeled or marked clearly with the words "Hazardous Waste". SIX 300-GALLON TOTE BINS

CONTAINING 6003 HAZARDOUS WASTE WERE NOT MARKED WITH THE WORDS "HAZARDOUS WASTE".

C. 40 CFR 262.34(a)(4), codified at 10 NCAC 10F .0030, states that a generator may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status, provided that: the generator complies with the requirements for owners or operators in Subparts C (265.30 - 265.37) and D (265.50 - 265.56) in 40 CFR Part 265 and with Section 265.16.

P. TRAINING  
C-PLAN  
-AD-IN

40 CFR 265.16(c) Codified at 10 NCAC 10F .0033 referenced at 40 CFR 262.34(a)(4) codified at 10 NCAC 10F .0030 states that facility personnel must take part in an annual review of the initial training required in paragraph (a) of this section.  
VPI is in violation of 40 CFR 265.16(c) codified at 10 NCAC 10F .0033 referenced at: 40 CFR 262.34(a)(4) codified at 10 NCAC 10F .0030 in that no annual review of the initial training required in paragraph (a) of this section was provided to facility personnel.

● D) 40 CFR 262.34(a)(1), codified at 10 NCAC 10F .0030, states that a generator may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status provided the waste is placed in containers and the generator complies with Subpart I (265.170-265.177) of 40 CFR 265.

40 CFR 265.171, codified at 10 NCAC 10F .0033, states that if a container holding hazardous waste is not in good condition or if it begins to leak, the owner or operator must transfer the hazardous waste from this container to a container that is in good condition, or manage the waste in some other way that complies with the requirements of his part.

Venture Stylecraft Corp. is in violation of 40 CFR 262.34(a)(1), codified at 10 NCAC 10F .0030, referenced at 40 CFR 265.171, codified at 10 NCAC 10F .0033, in that hazardous waste is handled in such a manner that it is allowed to accumulate on top of the 300-gallon "tote bin" containers between the lid and the containment collar. *IN addition, debris contaminated with*

*FOO3 hazardous waste was lying on the ground in the vicinity of the hazardous waste containers along with an accumulation of waste ink wrappings.*

Because of this situation, hazardous waste is not being managed in such a way as to meet the full containment requirements of this part.

see attached sheet.

C. ....

CIVIL PENALTY

N.C.G.S. 130A-22(a) and 10 NCAC 10G .0701-.0707 authorize an administrative penalty of up to \$10,000 per day for each violation of the hazardous waste provisions of the Act and Rules. The N.C. Solid Waste Management Penalty Computation Procedure (March 19, 1985) was used to determine the penalty. The factors considered in determining the administrative penalty include, but are not limited to: the nature of the violations, the potential effect on the public health and environment, the degree and extent of harm caused by the violations, the costs of rectifying any damage, the types and amount of wastes, the ease and costs of compliance and the history of noncompliance. For each violation specified above, the following penalties are assessed: A. \$0,000.00; B. \$0,000.00. Accordingly, a total penalty of \$00,000.00 is hereby imposed.

CONDITIONS FOR CONTINUED OPERATION

Based upon the foregoing, VPI is hereby ordered to take the following actions:

1. Within sixty (60) days submit the amount of the administrative penalty, by check or money order, payable to the Division of Health Services, and mailed to William L. Meyer, Head, Solid and Hazardous Waste Management Branch, Division of Health Services, P. O. Box 2091, Raleigh, NC 27602.
2. By \_\_\_\_\_, take the following action to correct all violations as stated in this Compliance Order with Administrative Penalty and otherwise be in compliance with the generator requirements of 40 CFR 262, codified at 10 NCAC 10F .0030:
  - A. Comply with 40 CFR 262.34(a)(2), codified at 10 NCAC 10F .0030, by clearly marking containers in the hazardous waste storage area with the accumulation start date.
  - B. Comply with 40 CFR 262.34(a)(3), codified at 10 NCAC 10F.0030, by ensuring that each hazardous waste container is labeled or clearly marked with the words "Hazardous Waste".

- C. Comply with 40 CFR 262.34(a)(4), codified at 10 NCAC 10F .0030, ~~referenced at 40 CFR 265.16(c) codified at 10 NCAC 10F.0033 by~~ *ENSURING that facility personnel take part in an annual review of the initial training required in paragraph (a) of this section,*
- D. Comply with 40 CFR 262.34(a)(1), codified at 10 NCAC 10F .0030, referenced at 40 CFR 265.171, codified at 10 NCAC 10F .0033, by handling waste ink in such a manner as to preclude the accumulation of waste by spillage on any part of the hazardous waste storage container ~~or any of the surrounding area.~~

VPI is hereby advised that pursuant to N.C.G.S. 130A-22, each day of continued violation of any requirement of the Act or the Rules, constitutes a separate violation for which an additional penalty of up to \$10,000 per day may be imposed. If the violation(s) continues, VPI may also be subject to further enforcement including injunction from any further generation of hazardous waste and such further relief as may be necessary to achieve compliance with the North Carolina Solid Waste Management Act and Rules.

OPPORTUNITY TO REQUEST A HEARING

VPI has the right to request an administrative hearing to contest any matter of law, material fact, requirement, or penalty set forth in this Compliance Order with Administrative Penalty. To avoid being in default and having the penalty collected without further administrative proceedings, a written petition must be submitted within 30 days of receipt of this Compliance Order with Administrative Penalty in accordance with N.C.G.S. 150B-23(a) and 10 NCAC 10G .0704.

The petition shall be verified or supported by affidavit and shall state facts tending to establish that the agency has deprived VPI of property, has ordered VPI to pay a fine or civil penalty, or has otherwise substantially



North Carolina Department of Human Resources  
Division of Health Services  
P.O. Box 2091 • Raleigh, North Carolina 27602-2091-

James G. Martin, Governor  
David T. Flaherty, Secretary

October 14, 1988

Ronald H. Levine, M.D., M.P.H.  
State Health Director

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

NOTICE OF VIOLATION  
Docket # 88-317

Mr. Bobby Kikkard, Plant Manager  
Venture Stylecraft Corp.  
P.O. Box 7149  
Charlotte, North Carolina 28217

NCD 074 503 129

Dear Mr. Kikkard:

On December 18, 1980 the State of North Carolina, Hazardous Waste Branch (State) was authorized to operate the State RCRA hazardous waste program under the Solid Waste Management Act (Act), N.C.G.S. 130A, Article 9 and rules promulgated thereto at 10 NCAC 10F, (Rules) in lieu of the federal RCRA program. Venture Stylecraft Corp. in Charlotte, North Carolina is classified as a generator of hazardous waste and is subject to the requirements of 40 CFR 262 codified at 10 NCAC 10F .0030.

In addition, Venture Stylecraft Corp. is subject to the current prohibitions on land disposal of hazardous waste, effective November 8, 1986, that applies to spent solvent wastes F001/F005 and effective July 8, 1987 for the "California List Wastes".

On September 2, 1988, Mr. Adam Wipfield, Waste Management Specialist, with this office, inspected your facility for compliance with North Carolina Hazardous Waste Management Rules. During that inspection, the following violations were noted:

- A. 40 CFR 268.7(a)(1), states that a generator who manages a restricted waste under this part and the waste requires treatment prior to land disposal, for each shipment of waste the generator must notify the treatment facility in writing of the appropriate treatment standard set forth in 40 CFR 268 Subpart D. The notice must include the following information:
- (i) EPA Hazardous Waste Number;
  - (ii) The corresponding treatment standard;
  - (iii) The manifest number associated with the shipment of waste; and
  - (iv) Waste analysis data, where available.

Venture Stylecraft Corp. has failed to send in writing with each shipment of solvents since November 8, 1986, the aforementioned notice.

B. 40 CFR 262.11, codified at 10 NCAC 10F .0030 states that: A person who generates a solid waste, as defined in 40 CFR 261.2, must determine if that waste is a hazardous waste using the following method:

- a. He should first determine if the waste is excluded from regulation under 40 CFR 261.4 and 261.5.
- b. He must then determine if the waste is listed as a hazardous waste in Subpart D of 40 CFR Part 261.

Venture Stylecraft Corp. is in violation of 40 CFR 262.11, codified at 10 NCAC 10F .0030, in that ink waste containing spent F- listed solvents was misidentified on hazardous waste manifests as D001.

C. 40 CFR 262.34(a)(1), codified at 10 NCAC 10F .0030, states that a generator may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status provided the waste is placed in containers and the generator complies with Subpart I (265.170-265.177) of 40 CFR 265.

40 CFR 265.171, codified at 10 NCAC 10F .0033, states that if a container holding hazardous waste is not in good condition or if it begins to leak, the owner or operator must transfer the hazardous waste from this container to a container that is in good condition, or manage the waste in some other way that complies with the requirements of his part.

Venture Stylecraft Corp. is in violation of 40 CFR 262.34(a)(1), codified at 10 NCAC 10F .0030, referenced at 40 CFR 265.171, codified at 10 NCAC 10F .0033, in that hazardous waste is handled in such a manner that it is allowed to accumulate on top of the 300-gallon "tote bin" containers between the lid and the containment collar. Because of this situation, hazardous waste is not being managed in such a way as to meet the full containment requirements of this part.

D. 40 CFR 262.20(a), codified at 10 NCAC 10F .0030, states that a generator who transports, or offers for transportation, hazardous waste for off-site treatment, storage or disposal must prepare a manifest OMB control number 2000-0404 on EPA Form 8700-22 and, if necessary, EPA Form 8700-22A according to the instructions included in the appendix to Part 262, which states in item 1. Enter the generator's US EPA twelve digit identification number and the unique five digit number assigned to this manifest by the generator.

Venture Stylecraft Corp. is in violation of 40 CFR 262.20(a),

codified at 10 NCAC 10F .0030, in that a unique, 5-digit manifest document number was not assigned to each hazardous waste manifest by the generator.

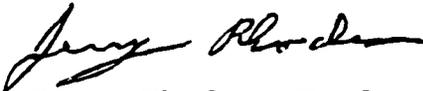
COMPLIANCE SCHEDULE

By October 21, 1988 you must comply with the following requirements:

- A. Comply with 40 CFR 268.7(a)(1), for all future shipments of hazardous waste solvents (F001, F002, F003, F004, and F005).
- B. Comply with 40 CFR 262.11, codified at 10 NCAC 10F .0030, by properly identifying future shipments of waste ink and solvent press wash as F003.
- C. Comply with 40 CFR 262.34(a)(1), codified at 10 NCAC 10F .0030, referenced at 40 CFR 265.171, codified at 10 NCAC 10F .0033, by handling waste ink in such a manner as to preclude the accumulation of waste by spillage on any part of the hazardous waste storage container.
- D. Comply with 40 CFR 262.20(a), codified at 10 NCAC 10F .0030, by assigning a unique, 5-digit manifest document number to all future hazardous waste manifests.

If the requirements above are not met, pursuant to N.C.G.S. 130A-22(a) and 10 NCAC 10G .0701 - .0707, an administrative penalty of up to \$10,000.00 per day may be assessed for violation of the hazardous waste law or regulations.

Sincerely,



Jerry Rhodes, Head  
Hazardous Waste Branch  
Solid Waste Management Section

JR/dd

cc: Douglas Holyfield  
Central Files  
Adam Wipfield

DH77



North Carolina Department of Human Resources  
Division of Health Services  
P.O. Box 2091 • Raleigh, North Carolina 27602-2091

James G. Martin, Governor  
David T. Flaherty, Secretary

Ronald H. Levine, M.D., M.P.H.  
State Health Director

April 26, 1989

Venture Packaging Inc., Stylecraft  
PO Box 7148  
Charlotte NC 28241

RE: EPA ID No.: NCD074503129

Dear Sir:

Based on information supplied by you for the site identified with the above EPA ID number, the state has accepted and processed the change RCRA listing or information that you requested.

Listed below is site information contained on our computer files:

COMPANY NAME	Venture Packaging Inc., Stylecraft
OWNERSHIP	Venture Corporation
CONTACT	Dodds, Anne
PHONE NUMBER	(704)588-0220
LOCATION ADDRESS	1600 Westinghouse Blvd
CITY, STATE & ZIP	Charlotte NC 28217

Please verify that the above computer listing/information is correct by notifying us of any corrections.

We are advising EPA of the change. Please notify us if there is any further change in your operations which would affect your status. Your EPA ID number has not been inactivated.

Sincerely,

  
R.J. Edwards, Compliance Officer  
Hazardous Waste Management Branch

CC: ADAM WIPFIELD  
EPA Region IV  
Mecklenburg County Health Department

GENERATOR INSPECTION FORM - PART 262

VENTURE STYLECRAFT CORP. NCD 074503129 MECKLENBURG County  
 Name of Site EPA I.D.  
1600 WESTINGHOUSE BLVD. CHARLOTTE 10-20-88 John W. [Signature] Signature of Inspector(s)  
 Location Inspection Date  
Follow-up from 9/2/88 - full compliance x Julia M. [Signature] Signature of Facility Contact  
 Compliance Date

An inspection of your facility has been made this date and you are notified of the violations, if any, marked below with a cross (X).

SUBPART A - GENERAL

- 1. Hazardous Waste Determination (262.11)
  - Subpart D waste (b)
  - Subpart C waste (c)(1)(2)
- 2. EPA Identification Numbers
  - EPA generator number (a)
  - EPA transporter/facility (c)

SUBPART B - THE MANIFEST

- 3. General Requirements (262.20)
  - proper manifest (a)
  - permitted facility (b)
- 4. Required Information (262.21)
  - document number (a)(1)
  - generator identification (a)(2)
  - transporter identification (a)(3)
  - facility identification (a)(4)
  - D.O.T. description (a)(5)
  - total quantity (a)(6)
  - certification (b)
  - LAND BAN 268.7
- 5. Number of Copies (262.22)
  - minimum number
- 6. Use of the Manifest (262.23)
  - generator handwritten signature (a)(1)
  - transporter signature/date (a)(2)
  - retain copy (a)(3)
  - copies to transporter (b)

SUBPART C - PRE-TRANSPORT REQUIREMENTS

- 7. Packaging (262.30)
  - D.O.T. compliance
- 8. Labeling (262.31)
  - D.O.T. compliance
- 9. Marking (262.32)
  - D.O.T. compliance (a)
  - "HAZARDOUS WASTE" label (b)
- 10. Placarding (262.33)
  - D.O.T. compliance
- 11. Accumulation Time (262.34)
  - Subpart I; J (a)(1)
  - accumulation date (a)(2)
  - "Hazardous Waste" (a)(3)
  - Subpart C; D (a)(4)\*
  - personnel training (a)(4)\*

\*Cite specific violations of 40 CFR 265 under remarks

SUBPART D - RECORDKEEPING AND REPORTING

- 12. Recordkeeping (262.40)
  - manifest retention (a)
  - annual/exception report (b)
  - test/waste analysis (c)



FACILITY INFORMATION

Venture Stylecraft, Corp.  
1600 Westinghouse Blvd.  
Charlotte

DATE OF INSPECTION

9-2-88

APPLICABLE REGULATIONS:

40CFR 262

EPA ID NUMBER:

NCD 074 503129

MECKLENBURG COUNTY

RESPONSIBLE OFFICIAL: Bob KIKKARD, PLANT MANAGER

SURVEY PARTICIPANTS: ADAM WIPFIELD, JOHN RUCKDESCHEL, Technical Manager,  
William "RED" LAYE, PRINTING SUPERINTENDENT

PURPOSE OF SURVEY: A RCRA inspection was conducted at this site in CHARLOTTE, N.C. by the N.C. Solid and Hazardous Waste Management Branch. The inspection included a site survey and records review. Regulatory requirements covered those contained in 40 CFR 262 Generator Standards.

DOCUMENTATION OF SITE DEFICIENCIES:

① 262.20(a): manifest document numbers are NOT UNIQUE, 5-digit identifiers assigned by the generator  
② 268.7: No LAND BAN CERTIFICATION for F003 shipments  
③ 265.171: accumulation of spilled waste on top of 300-gallon hazardous waste container.  
④ 261.11: F003 waste ink & press wash is misclassified as D001.

COMPLIANCE SCHEDULE AND RECOMMENDATIONS:

N.O.V. drafted

FACILITY DESCRIPTION:

Venture is a flexographic printing facility that applies graphic designs to plastic film substrates. Two hazardous waste streams are generated: Press wash consisting of spent solvents (N-propyl alcohol, N-prop. acetate, ethyl alcohol, methanol and ethyl acetate) and waste ink; and still bottoms from a 15-gallon batch still, which is used to reclaim some of the press wash solvents. Still bottoms are placed in a hazardous waste container along with the waste press wash. Four flexographic presses are operated along with one laminator. The waste adhesive from the laminator is collected separately and is sent to Heritage Environmental Services in Charlotte for disposal. Press wash is sent to Oldover Corp. in Norwood, N.C.

SEPT 2, 1988

VENTURE

JOHN RUCKDESHEL

RED LAYE - PRINTING  
SUPERINTENDENT

Eliminated lead pigments from ink formulation in APRIL 1988  
will " methanol from ethanol in ink (complete in OCT 88)

only H/W STREAM:

① Press wash is the waste ink - D001 CONTAINS:

N Propyl  
N-P acetate  
ethyl alc AND a little ethyl acetate  
methanol 1-2% (will be eliminated)

② 15 gal batch still - sludge is "recycled", i.e., PUT INTO WASTE INK CONTAINER  
IN SATELLITE ACCUM. AREA.  
Some Press wash is done now  
will install a larger unit to distill all Press wash

waste is called F003, F005 on Heritage Environmental manifests  
in the DOT description section and D001 UNDER "Waste No."

③ Laminator - adhesive application - waste collected in CONTAINERS  
separate from waste ink - Goes to H.E.S. should be  
F003, NOT D001 as on manifest.

Manifest document # needs to be sequential

VENTURE

SEPT. 2, 1988

TSD'S: H.E.S., CHARLOTTE  
Oldover, Norwood, NC

ANNUAL REPORT OK TNG OK CONTPLAN OK INSP LOG OK

SATellite Accumulation areas:

←  
1. Wash-up room - 1 TOTE BIN

90-DAY AREA (OUTSIDE) - 10 55-gal drums - 100K OK  
4 TOTE BINS (300 gal)

waste <sup>INK</sup> paint has accumulated within the "collars"  
ON TOP OF THE TOTE BINS OUTSIDE. \*

discussed label & date requirements for all waste CONTAINERS,  
bins & satellite accumulation areas.

- \* 1 Bin had 2-3 gallons of liquid INK ON TOP
- 1 " " a dark sludge 2-3" deep within the collars
- 1 " " some sludge + rainwater
- 1 " " some sludge

GENERATOR INSPECTION FORM - PART 262

Name of Site Venture Corp, STYECRAFT NCD 074503129 MECKLENBURG County  
 EPA V.D. 9-7-88  
 Location 1400 WESTINGHOUSE BLVD, CHARLOTTE Inspection Date 9-7-88 Signature of Inspector(s) [Signature]  
 Compliance Date X Signature of Facility Contact [Signature]

An inspection of your facility has been made this date and you are notified of the violations, if any, marked below with a cross (X).

SUBPART A - GENERAL

- 1. Hazardous Waste Determination (262.11)
  - Subpart D waste (b)
  - Subpart C waste (c)(1)(2)
- 2. EPA Identification Numbers
  - EPA generator number (a)
  - EPA transporter/facility (c)

SUBPART B - THE MANIFEST

- 3. General Requirements (262.20)
  - proper manifest (a)
  - permitted facility (b)
- 4. Required Information (262.21)
  - document number (a)(1)
  - generator identification (a)(2)
  - transporter identification (a)(3)
  - facility identification (a)(4)
  - D.O.T. description (a)(5)
  - total quantity (a)(6)
  - certification (b)
  - LAND BAN 268.7
- 5. Number of Copies (262.22)
  - minimum number
- 6. Use of the Manifest (262.23)
  - generator handwritten signature (a)(1)
  - transporter signature/date (a)(2)
  - retain copy (a)(3)
  - copies to transporter (b)

SUBPART C - PRE-TRANSPORT REQUIREMENTS

- 7. Packaging (262.30)
  - D.O.T. compliance
- 8. Labeling (262.31)
  - D.O.T. compliance
- 9. Marking (262.32)
  - D.O.T. compliance (a)
  - "HAZARDOUS WASTE" label (b)
- 10. Placarding (262.33)
  - D.O.T. compliance
- 11. Accumulation Time (262.34)
  - Subpart I; J (a)(1)
  - accumulation date (a)(2)
  - "Hazardous Waste" (a)(3)
  - Subpart C; D (a)(4)\*
  - personnel training (a)(4)\*

\*Cite specific violations of 40-CFR 265 under remarks

SUBPART D - RECORDKEEPING AND REPORTING

- 12. Recordkeeping (262.40)
  - manifest retention (a)
  - annual/exception report (b)
  - test/waste analysis (c)

13. Annual Reporting (262.41)

- C submitted (a)(1-6)
- C submitted (b)

14. Exception Reporting (262.42)

- C transporter contact (a)
- C exception report (b)(1)(2)

REMARKS: 262.21 (a)(1) manifest document numbers must be sequential

A. 268.7 No Land ban certification for all F003 SHIPMENTS

C. 262.34 Subpart I 265.171 - Evidence of past spillage  
of waste ink on top of 300-gallon tote bin container.

B. 266.11 (Subpart 2) waste ink misclassified as D001; should be F003  
(c)(1)(2)

CONTAINER/TANK INSPECTION FORM - PART 265

VENTURE CORP. ST/ECRAFT

NCD 074503129

9-2-88

Name of Site

EPA I.D.

Inspection Date

SUBPART I - USE AND MANAGEMENT OF CONTAINERS

SUBPART J - TANKS

1. Condition Of Containers (265.171)

- leakage
- past leakage (evidence)
- severe rusting
- structural defect

2. Compatibility Of Waste With Containers (265.172)

- visual evidence of noncompliance (leakage, corrosion)

3. Management of Containers (265.173)

- closed (a)
- improper handling or storage (b)

4. Inspections (265.174)

- weekly (minimum)

5. Special Requirements For Ignitable or Reactive Waste (265.176)

- 15m (50 ft)

6. Special Requirements For Incompatible Waste (265.177)

- mixing (a)
- unwashed container (b)
- separation (c)

1. General Operating Requirements (265.192)

- compatibility (a)(b)
- uncovered tank precautions (c)
- overflow prevention (d)

2. Waste Analysis and Trial Tests (265.193)\*

- \*Section not applicable to a generator only
- waste analysis/trial test

3. Inspections (265.194)

- discharge control equipment (a)(1)
- monitoring equipment (a)(2)
- waste level (a)(3)
- construction material (a)(4)
- surrounding area (a)(5)
- assessment schedule/procedures (b)

4. Closure (265.197)

- plan on-site

5. Special Requirements For Ignitable Or Reactive Waste (265.198)

- properly stored (a)(1)(2)(3)
- buffer requirements (b)

6. Special Requirements For Incompatible Wastes (265.199)

- properly stored (a)
- tank washed (b)

REMARKS: 265.171 a contained accumulation of waste ink spillage is on top of 4 300-gallon tote bin containers.

DATE:

March 15, 1988

SUBJECT:

Hazardous Waste Management - Annual Training Report

FROM:

William "Red" Laye

TO:

Bob Kikkert

In accordance with Hazardous Waste Management Regulations, the following personnel directly responsible for the handling, collecting, and removal of hazardous waste have been instructed on:

1. Stylecraft Contingency Plan and Emergency Procedures.
2. Proper safety and fire procedures.
3. Proper labeling and identification requirements.



Trainee Signatures:

John Ruckdeschel  
M.G. Atkinson  
James H. Beeres  
John V. Haglin  
Walt M. A.

William "Red" Laye  
Waste Management Director

cc: John Ruckdeschel, Coordinator  
Adam Wipfield., NC Inspector  
File

VENTURE CORP, STYLCRAFT  
1600 WESTINGHOUSE BLVD.  
CHARLOTTE, N.C.

8-11-89

2

074503129

Mecklenburg

William Lape

JOHN RUCKDESCHEL

Charlotte

2 Generator

None

N/A

VENTURE is a flexographic printing facility that applies graphic designs to plastic film substrates. Hazardous waste generated is 0001 waste ink sludge, consisting of Resins, pigments, lead chromate and Titanium dioxide (UN1325). Transporters are: ① Oldavel CORP (VHD 098443442) and ② USPCI TRANSPORT (OKD 981046295). Disposal facilities are: ① Oldavel CORP, Cirronia, Va. (waste fuel incinerator) and ② ThermalKEM, INC. in Rock Hill, S.C. (HFW incineration)

8-11-87 VENTURE STYLCRAFT

JOHN RUCKDESCHEL : TECHNICAL MANAGER

flexographic printing - on plastic

H/W: "waste ink" D001 Resins (30-40%), Pigments (30-40%), Lead Chromate  
(solids) Titanium Dioxide (5-10%) Ethanol (3-5%) Pigments 5-10%  
DOT "Flammable solid" Propanol 3-5% N-Propylacetate 3-5%  
UN1325

ANNUAL REP OK analysis OK log OK TRAINING OK 2/87

TRANS: Oldover Corp. VAD 098443443

DISP.: Oldover Corp. Arvonja, Va. VAD 098443443

↑ burned as fuel supplement

also

T: USPCI TRANSPORT OKD 981046295

D: THERMAL KEM INC. ROCK HILL, S.C. SCD 044442333





CONTAINER/TANK INSPECTION FORM - PART 265

VENTURE CORP. STEELCRAFT      NCD 074503129      5/11/87  
 Name of Site      EPA I.D.      Inspection Date

SUBPART I - USE AND MANAGEMENT OF CONTAINERS

SUBPART J - TANKS

1. Condition Of Containers (265.171)

- leakage
- past leakage (evidence)
- severe rusting
- structural defect

2. Compatibility Of Waste With Containers (265.172)

- visual evidence of noncompliance (leakage, corrosion)

3. Management of Containers (265.173)

- closed (a)
- improper handling or storage (b)

4. Inspections (265.174)

- weekly (minimum)

5. Special Requirements For Ignitable or Reactive Waste (265.176)

- 15m (50 ft)

6. Special Requirements For Incompatible Waste (265.177)

- mixing (a)
- unwashed container (b)
- separation (c)

1. General Operating Requirements (265.192)

- compatibility (a)(b)
- uncovered tank precautions (c)
- overflow prevention (d)

2. Waste Analysis and Trial Tests (265.193)\*

- \*Section not applicable to a generator only
- waste analysis/trial test

3. Inspections (265.194)

- discharge control equipment (a)(1)
- monitoring equipment (a)(2)
- waste level (a)(3)
- construction material (a)(4)
- surrounding area (a)(5)
- assessment schedule/procedures (b)

4. Closure (265.197)

- plan on-site

5. Special Requirements For Ignitable Or Reactive Waste (265.198)

- properly stored (a)(1)(2)(3)
- buffer requirements (b)

6. Special Requirements For Incompatible Wastes (265.199)

- properly stored (a)
- tank washed (b)

REMARKS: NO CONTAINER VIOLATIONS

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DATE:

March 3, 1987

SUBJECT:

Hazardous Waste Management - Annual Training Report

FROM:

William "Red" Laye

TO:

Pat Baines

In accordance with Hazardous Waste Management Regulations, the following personnel directly responsible for the handling, collecting, and removal of hazardous waste have been instructed on:

1. Stylecraft Contingency Plan Emergency Procedures.
2. Proper safety and fire procedures.
3. Proper labeling and identification requirements.



Trainee Signatures:

*John Ruckdeschel*  
*William "Red" Laye*  
*James H. Baines*  
*John V. Wofford*

William "Red" Laye  
Waste Management Director

cc: John Ruckdeschel, Coordinator  
C. Rick Doby Sr., NC Inspector  
File



VENTURE PACKAGING, INC.  
P. O. Box 7149  
Charlotte, North Carolina 28217

PLANT LOCATIONS:

Cleveland, Ohio  
216 • 521-6570

Charlotte, North Carolina  
704 • 588-0220

March 28, 1986

Mr. Rick Doby  
N.C. Dept. of Human Resources  
66 Eastcliff Dr.  
Concord, NC 28025

Dear Mr. Doby:

Thank you for coming Wednesday to inspect our tank site. During your visit we discussed that Bryson Industrial Services was contracted to remove our in-ground tanks and provide proper expertise to complete the closure.

At the time you were here, the tanks had been removed, cut up, and sent to a scrap yard. Solvent contaminated ground water was removed from the tanks by Oldover Corp. The dirt from the hole was treated and airated around the site. The ground water seeping back into the hole was pumped into a tanker and disposed of at DuPont.

With your recommendation, the airated soil was used along with over 50 cu. yds. of clay and soil to fill the hole. After settling, we will be resurfacing the parking lot.

I am enclosing copies of the following documents for your records:

1. Purchase order for Bryson Industrial.
2. Hazardous waste manifest for liquid taken from the tanks.
3. Chem-Back laboratory report on initial boring samples.
4. Par laboratory report on flash point of treated soil.
5. Gas chromatograph analysis of the ground water.

For any additional information, please call me. I am looking forward to your annual visit. We are proud to show you our new above ground tank installation which replaced the underground tanks.

Respectfully,

A handwritten signature in blue ink, appearing to read 'John Ruckdeschel', is written over a blue horizontal line.

John Ruckdeschel  
Project Manager

JR/jh

Enclosure



STYLECRAFT  
PACKAGING DIVISION

PURCHASE ORDER

1600 Westinghouse Blvd. • Charlotte, N. C. 28217  
P. O. Box 7149 • Area Code: 704-588-0220

No. 4023

THIS NUMBER MUST BE SHOWN  
ON ALL INVOICES AND PACK-  
ING CASES.

BRYSON INDUST. SERVICES  
411 BURTON RD.  
LEXINGTON, SC.  
29072

DATE 3-3-86  
DATE WANTED  
SHIP VIA

PLEASE ENTER OUR ORDER FOR THE FOLLOWING:

QUANTITY	SIZE	SPECIFICATIONS	PRICE
		CLEANING, EXCAVATING, AND DISPOSAL OF FOUR (4) UNDERGROUND STORAGE TANKS AS PER ATTACHED QUOTE.	\$14,500
		PROVIDED THAT EXPENSES NOT INCURRED ARE SUBTRACTED FROM THE ESTIMATED COST.	

PROVS CONFIRMED

STYLECRAFT PACKAGING DIVISION

BY  

IMPORTANT: IMMEDIATELY UPON SHIPMENT SEND INVOICE IN DUPLICATE  
TO STYLECRAFT PACKAGING DIVISION, P. O. BOX 7149, CHARLOTTE, N. C. 28217. OUR  
PURCHASE ORDER NUMBER MUST APPEAR ON YOUR INVOICE, PACKING SLIPS, BILLS OF  
LADING AND ON ALL PACKAGES. WE RESERVE THE RIGHT TO CANCEL THIS ORDER IF  
DELIVERY IS NOT MADE WITHIN A REASONABLE TIME OR BY DATE SPECIFIED.

The Equal Employment Opportunity Clause in Section 202 of Executive Order #11246, as  
amended, relative to equal employment opportunity and the implementing rules and regulations

<b>UNIFORM HAZARDOUS WASTE MANIFEST</b>		1. Generator's US EPA ID No. N.C.D.0.7.4.5.0.3.1.2.9		Manifest Document No. 08114		2. Page 1 of 1		Information in the shaded areas is not required by Federal law.					
3. Generator's Name and Mailing Address STYLECRAFT PACKAGING P.O. BOX 7149, CHARLOTTE, NC 28217						A. State Manifest Document Number							
4. Generator's Phone (704) 588-0220						B. State Generator's ID							
5. Transporter 1 Company Name OLDOVER CORP.			6. US EPA ID Number V.A.D.0.4.0.1.5.9.4.3.6			C. State Transporter's ID							
7. Transporter 2 Company Name						D. Transporter's Phone 804-798-7981							
9. Designated Facility Name and Site Address OLDOVER CORP. RT #1 BOX #1 CASCADE, VA 24069						10. US EPA ID Number V.A.D.0.7.7.9.4.2.2.6.6							
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)						12. Containers		13. Total Quantity		14. Unit Wt/Vol		15. Waste No.	
a. WASTE FLAMMABLE LIQUID, NOS FLAMMABLE LIQUID UN1993						. 1 TT		. 6.9.0.0		G		Dool	
b.													
c.													
d.													
J. Additional Descriptions for Materials Listed Above						K. Handling Codes for Wastes Listed Above 502 T-18 Lightweight Aggregate Rotary Kiln							
15. Special Handling Instructions and Additional Information WASH HANDS WITH SOAP AND WATER. KEEP OUT OF STREAMS. "Unless I am a small quantity generator who has been exempted by statute or regulation from the duty to make a waste minimization certification under Section 3002(b) of RCRA, I also certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and I have selected the method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment.													
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.													
Printed/Typed Name JOHN RUCKDESCHEL, WASTE COORDINATOR								Signature <i>John Ruckdeschel</i>		Date 3/18/86			
17. Transporter 1 Acknowledgement of Receipt of Materials													
Printed/Typed Name RONNIE TURNER								Signature <i>Ronnie Turner</i>		Date 3/18/86			
18. Transporter 2 Acknowledgement or Receipt of Materials													
Printed/Typed Name								Signature		Date			
19. Discrepancy Indication Space													
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.													
Printed/Typed Name BARBARA SMITH								Signature <i>Barbara Smith</i>		Date 03/18/86			

GENERATOR  
TRANSPORTER  
FACILITY

# CHEM-BAC Laboratories, Inc.

P. O. BOX 19198, CHARLOTTE, N. C. 28219

TEL 394-6382

March 12, 1986

REF: 1201.

Analyses of Soil Boring Samples for Ethyl Alcohol

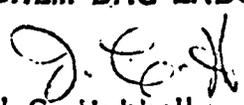
MADE FOR: Bryson Industrial Service  
411 Burton Road  
Lexington, S.C. 29702

ATTENTION: Evon Reynolds

MARKED: Samples received at Chem-Bac Labs, Inc. on 03/11/86

ANALYSIS: Boring 1	Ethyl Alcohol -- parts per million
Sample 1	2.58
Sample 2	1.11
Sample 3	0.91
Sample 4	1.13
Boring 2	
Sample 1	1.22
Boring 3	
Sample 1	0.06
Sample 2	0.06
Sample 3	0.13
Boring 4	
Sample 1	0.27

Respectfully submitted,  
CHEM-BAC LABORATORIES, INC.

  
J.C. Hubbell  
Supervising Chemist

JCH/th



PAR LABORATORIES, INC.  
4400 OLD PINEVILLE ROAD  
P. O. BOX 240722  
CHARLOTTE, NC 28224  
704/527-7598

MARCH 26, 1986

ANALYSIS OF SUBMITTED SAMPLE

REFERENCE NO: 86 658

MADE FOR: VENTURE PACKAGING, INC.  
P. O. BOX 7149  
CHARLOTTE, NC 28217

ATTENTION: JOHN RUCKDESCHEL

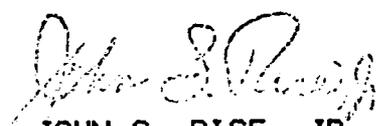
MARKED: NONE

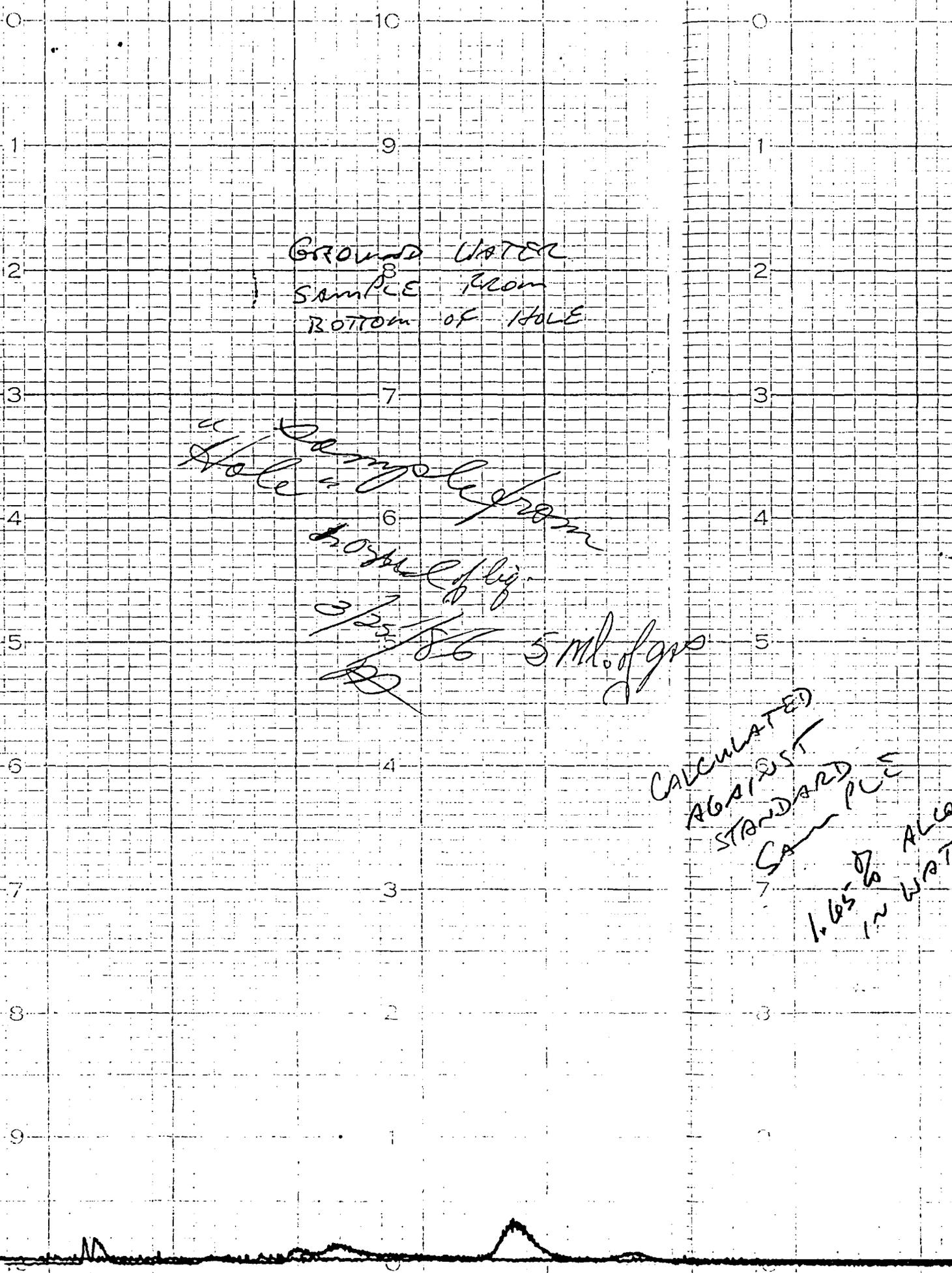
RECEIVED ON: 03/26/86

ANALYSES:

FLASH POINT (CLOSED CUP) >200°F

ANALYZED BY:  
PAR LABORATORIES, INC.

  
JOHN S. RICE, JR.  
LABORATORY DIRECTOR



GROUNDED WATER  
 SAMPLE FROM  
 BOTTOM OF HOLE

"Sample from  
 Hole" <sup>8</sup>  
 3/25/86 5 ml. of gas

CALCULATED  
 AGAINST  
 STANDARD  
 SAMPLES  
 1.65% ALCOHOL  
 IN WATER

DATE: March 10, 1986  
SUBJECT: Hazardous Waste Management - Annual Training Report  
FROM: William "Red" Laye  
TO: Pat Baines

In accordance with Hazardous Waste Management Regulations, the following personnel directly responsible for the handling, collecting, and removal of hazardous waste have been instructed on:

1. Stylecraft Contingency Plan Emergency Procedures.
2. Proper safety and fire procedures.
3. Proper labeling and identification requirements.



Trainee Signatures:

John Ruckdeshcel  
William M. Laye Jr.  
John K. Hogg  
John H. Baines

William "Red" Laye  
Waste Management Director

cc: John Ruckdeshcel, Coordinator  
C. Rick Doby Sr., NC Inspector  
File

N. C. Department of Human Resources  
Div. of Health Services  
P. O. Box 2091 \* Raleigh, North Carolina 27602-2091

James G. Martin, Governor  
Philip J. Kirk, Jr., Secretary

Ronald H. Levine, M.D., M.P.H.  
State Health Director

July 9, 1985

JOHN RUCKDESCHEL  
Venture Corp. Stylocraft Packaging  
PO Box 7149  
Charlotte NC 28217  
EPA NUMBER: NCD074503129

Dear JOHN RUCKDESCHEL:

The United States Environmental Protection Agency has granted the State of North Carolina Interim Authorization for Phase II Components A and B to operate the State's Hazardous Waste Management Program in lieu of the Federal Program under the RCRA.

Section 3007(a) authorizes access to facilities which handle hazardous waste. Access is granted to 'duly designated' officers or employees of the EPA (or State, if that State has a hazardous waste program authorized under section 3006 of the Act.)

Pursuant to section 3006 and N.C.G.S. 130-166.18, an inspection was conducted 05/30/85 by Mr. C. RICHARD DOBY, SR Solid and Hazardous Waste Management Branch. No violations were observed. The inspection did not include a review of the Financial or Ground Water monitoring requirements, if applicable. This office wishes to thank you for your cooperation. Please do not hesitate to contact us if we may be of future assistance.

Sincerely,

ORIGINAL SIGNED BY  
WILLIAM PAIGE

William Paige  
Environmental Engineer  
Solid and Hazardous Waste  
Management Branch  
Environmental Health Section

Copy: C. RICHARD DOBY, SR

N. C. Department of Human Resources  
Div. of Health Services  
P. O. Box 2091 \* Raleigh, North Carolina 27602-2091

James G. Martin, Governor  
Philip J. Kirk, Jr., Secretary

Ronald H. Levine, M.D., M.P.H.  
State Health Director

May 22, 1985

JOHN RUCKDESHELL  
Venture Copr. Stylecraft Packaging  
PO Box 7149  
Charlotte NC 28217  
EPA NUMBER: NCD074503129

Dear JOHN RUCKDESHELL:

The United States Environmental Protection Agency has granted the State of North Carolina Interim Authorization for Phase II Components A and B to operate the State's Hazardous Waste Management Program in lieu of the Federal Program under the RCRA.

Section 3007(a) authorizes access to facilities which handle hazardous waste. Access is granted to 'duly designated' officers or employees of the EPA (or State, if that State has a hazardous waste program authorized under section 3006 of the Act.)

Pursuant to section 3006 and N.C.G.S. 130-166.18, an inspection was conducted 05/13/85 by Mr. C. RICHARD DOBY, SR., Solid and Hazardous Waste Management Branch. The inspection revealed noncompliance in several areas. Attached is a copy of the inspection report which denotes the deficiencies.

A compliance date of 05/27/85 has been established for the correction of these deficiencies. If you have any questions pertaining to this subject, please contact me at (919) 733-2178.

Sincerely,

ORIGINAL SIGNED BY  
WILLIAM PAIGE  
William Paige  
Environmental Engineer  
Solid and Hazardous Waste  
Management Branch  
Environmental Health Section

COPY: C. RICHARD DOBY, SR.



overflow prevention (d)

2. Waste Analysis And Trial Tests (265.193)\*

\*Section NOT APPLICABLE TO A GENERATOR ONLY  
waste analysis/trial test

3. Inspections (265.194)

discharge control equipment (a)(1)  
monitoring equipment (a)(2)  
waste level (a)(3)  
construction material (a)(4)  
surrounding area (a)(5)  
assessment schedule/procedures (b)

4. Closure (265.197)

plan on-site

5. Special Requirements For Ignitable Or Reactive Waste (265.198)

properly stored (a)(1)(2)(3)  
buffer requirements (b)

6. Special Requirements For Incompatible Wastes (265.199)

properly stored (a)  
tank washed (b)

Remarks: 265.17(A), 262.34(B) STORAGE > THAN 90 DAYS

GENERATOR INSPECTION FORM - PART 262

*Venture Corp. Ste. 1000011 Ave. NCD 074 503129* *Mecklenburg*  
 Name of Site EPA I.D. County  
*Charlotte* *5-13-85* *C.R. Selby, Jr.*  
 Location Inspection Date Signature of Inspector(s)  
*5-27-85* *[Signature]*  
 Compliance Date Signature of Facility Contact

An inspection of your facility has been made this date and you are notified of the violations, if any, marked below with a cross (X).

SUBPART A - GENERAL

- 1. Hazardous Waste Determination (262.11)
  - Subpart D waste (b)
  - Subpart C waste (c)(1)(2)
- 2. EPA Identification Numbers
  - EPA generator number (a)
  - EPA transporter/facility (c)

SUBPART B - THE MANIFEST

- 3. General Requirements (262.20)
  - proper manifest (a)
  - permitted facility (b)
- 4. Required Information (262.21)
  - document number (a)(1)
  - generator identification (a)(2)
  - transporter identification (a)(3)
  - facility identification (a)(4)
  - D.O.T. description (a)(5)
  - total quantity (a)(6)
  - certification (b)

- 5. Number of Copies (262.22)
  - minimum number

- 6. Use of the Manifest (262.23)
  - generator handwritten signature (a)(1)
  - transporter signature/date (a)(2)
  - retain copy (a)(3)
  - copies to transporter (b)

SUBPART C - PRE-TRANSPORT REQUIREMENTS

- 7. Packaging (262.30)
  - D.O.T. compliance
- 8. Labeling (262.31)
  - D.O.T. compliance
- 9. Marking (262.32)
  - D.O.T. compliance (a)
  - "HAZARDOUS WASTE" label (b)
- 10. Placarding (262.33)
  - D.O.T. compliance
- 11. Accumulation Time (262.34)
  - Subpart I; J (a)(1)
  - accumulation date (a)(2)
  - "Hazardous Waste" (a)(3)
  - Subpart C; D (a)(4)\*
  - personnel training (a)(4)\*

\*Cite specific violations of 40 CFR 265 under remarks

SUBPART D - RECORDKEEPING AND REPORTING

- 12. Recordkeeping (262.40)
  - manifest retention (a)
  - annual/exception report (b)
  - test/waste analysis (c)

13. Annual Reporting (262.41)

- submitted (a)(1-6)
- submitted (b)

14. Exception Reporting (262.42)

- transporter contact (a)
- exception report (b)(1)(2)

REMARKS: 265,170s - No markings, <sup>Sign</sup> marked.

265101 - 3 drums of waste covered 90 days  
 in. 14 had drums overturned over. Two drums  
 were found in site with unknown contents and no  
 labels. You then asked to remove 14 in drums for  
 more covered by 5-27-85

CONTAINER/TANK INSPECTION FORM - PART 265

St. Lawrence St. Lawrence, NY      NCA 107-1503129      5-13-85  
 Name of Site      EPA I.D.      Inspection Date

SUBPART I - USE AND MANAGEMENT OF CONTAINERS

1. Condition Of Containers (265.171)
  - leakage
  - past leakage (evidence)
  - severe rusting
  - structural defect
2. Compatibility Of Waste With Containers (265.172)
  - visual evidence of noncompliance (leakage, corrosion)
3. Management of Containers (265.173)
  - closed (a)
  - improper handling or storage (b)
4. Inspections (265.174)
  - weekly (minimum)
5. Special Requirements For Ignitable or Reactive Waste (265.176)
  - 15m (50 ft)
6. Special Requirements For Incompatible Waste (265.177)
  - mixing (a)
  - unwashed container (b)
  - separation (c)

SUBPART J - TANKS

1. General Operating Requirements (265.192)
  - compatibility (a)(b)
  - uncovered tank precautions (c)
  - overflow prevention (d)
2. Waste Analysis and Trial Tests (265.193)\*
  - \*Section not applicable to a generator only
  - waste analysis/trial test
3. Inspections (265.194)
  - discharge control equipment (a)(1)
  - monitoring equipment (a)(2)
  - waste level (a)(3)
  - construction material (a)(4)
  - surrounding area (a)(5)
  - assessment schedule/procedures (b)
4. Closure (265.197)
  - plan on-site
5. Special Requirements For Ignitable Or Reactive Waste (265.198)
  - properly stored (a)(1)(2)(3)
  - buffer requirements (b)
6. Special Requirements For Incompatible Wastes (265.199)
  - properly stored (a)
  - tank washed (b)

REMARKS: Tank is shut must be closed if cannot filling  
Waste is not visible

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# FROM THE DESK OF

JOHN RUCKDESCHEL

---

DATE 5-20-85 TIME \_\_\_\_\_ A.M.  
P.M.  
TO RICK DOBY

---

ATTACHED IS A FORM  
I MADE UP FOR THE  
WEEKLY INSPECTION.

LET ME KNOW IF  
THIS WILL BE ADEQUATE.

*John Ruckdeschel*

---



DATE: April 17, 1985  
SUBJECT: Hazardous Waste Management - Annual Training Report  
FROM: William "Red" Laye  
TO: Pat Baines

In accordance with Hazardous Waste Management Regulations, the following personnel directly responsible for the handling, collecting, and removal of hazardous waste have been instructed on:

1. Stylecraft Contingency Plan and Emergency Procedures.
2. Proper safety and fire procedures.
3. Proper labeling and identification requirements.



Trainee Signatures:

John Ruckdeschel  
William M. Laye Jr.  
J. F. Breen  
John V. Higgins

William "Red" Laye  
William "Red" Laye  
Waste Management Director

cc: John Ruckdeschel, Coordinator  
C. Rick Doby Sr., NC Inspector  
File



Ronald H. Levine, M.D., M.P.H.  
STATE HEALTH DIRECTOR

DIVISION OF HEALTH SERVICES  
P.O. Box 2091  
Raleigh, N.C. 27602-2091

March 9, 1984

John Ruckdeschel  
Venture Copr. Stylecraft Packaging  
PO Box 7149  
Charlotte, NC 28217  
EPA NUMBER: NCD074503129

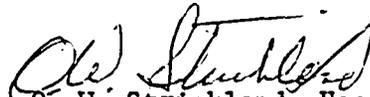
Dear Mr. Ruckdeschel:

The United States Environmental Protection Agency has granted the State of North Carolina Interim Authorization for Phase II Components A and B to operate the State's Hazardous Waste Management Program in lieu of the Federal Program under the RCRA.

Section 3007(a) authorizes access to facilities which handle hazardous waste. Access is granted to 'duly designated' officers or employees of the EPA (or State, if that State has a hazardous waste program authorized under section 3006 of the Act.)

Pursuant to section 3006 and N.C.G.S. 130-166.18, an inspection was conducted 02/21/84 by Mr. C. Richard Doby, Sr, Solid and Hazardous Waste Management Branch. The inspection revealed compliance with the regulations. This office wishes to thank you for your cooperation. Please do not hesitate to contact us if we may be of future assistance.

Sincerely,

  
O. W. Strickland, Head  
Solid and Hazardous Waste  
Management Branch  
Environmental Health Section

copy: C. Richard Doby, Sr

GENERATOR INSPECTION FORM - PART 262

Ventura Corp. Stylcraft Div. MCD 074 503 129 Mobile, Ala.  
 Name of Site EPA I.D. County  
 Charlotte 2-21-84 C.R. Duke, Sr.  
 Location Inspection Date Signature of Inspector(s)  
 No Violations Compliance Date Signature of Facility Contact

An inspection of your facility has been made this date and you are notified of the violations, if any, marked below with a cross (X).

SUBPART A - GENERAL

- 1. Hazardous Waste Determination (262.11)
  - Subpart D waste (b)
  - Subpart C waste (c)(1)(2)
- 2. EPA Identification Numbers
  - EPA generator number (a)
  - EPA transporter/facility (c)

SUBPART B - THE MANIFEST

- 3. General Requirements (262.20)
  - proper manifest (a)
  - permitted facility (b)
- 4. Required Information (262.21)
  - document number (a)(1)
  - generator identification (a)(2)
  - transporter identification (a)(3)
  - facility identification (a)(4)
  - D.O.T. description (a)(5)
  - total quantity (a)(6)
  - certification (b)

- 5. Number of Copies (262.22)
  - minimum number

- 6. Use of the Manifest (262.23)
  - generator handwritten signature (a)(1)
  - transporter signature/date (a)(2)
  - retain copy (a)(3)
  - copies to transporter (b)

SUBPART C - PRE-TRANSPORT REQUIREMENTS

- 7. Packaging (262.30)
  - D.O.T. compliance
- 8. Labeling (262.31)
  - D.O.T. compliance
- 9. Marking (262.32)
  - D.O.T. compliance (a)
  - "HAZARDOUS WASTE" label (b)

- 10. Placarding (262.33)
  - D.O.T. compliance
- 11. Accumulation Time (262.34)
  - Subpart I; J (a)(1)
  - accumulation date (a)(2)
  - "Hazardous Waste" (a)(3)
  - Subpart C; D (a)(4)\*
  - personnel training (a)(4)\*

\*Cite specific violations of 40 CFR 265 under remarks

SUBPART D - RECORDKEEPING AND REPORTING

- 12. Recordkeeping (262.40)
  - manifest retention (a)
  - annual/exception report (b)
  - test/waste analysis (c)



DATE:

February 14, 1984

SUBJECT:

Hazardous Waste Management - Annual Training Report

FROM:

William "Red" Laye

TO:

Pat Baines

In accordance with Hazardous Waste Management Regulations, the following personnel directly responsible for the handling, collecting, and removal of hazardous waste have been instructed on:

1. Stylecraft Contingency Plan and Emergency Procedures.
2. Proper safety and fire procedures.
3. Proper labeling and identification requirements.

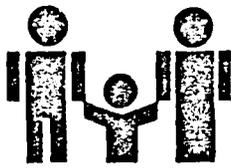


Trainee Signatures:

John Ruckdeschel  
William M. Laye  
James H. Baines  
John Kaggia

William "Red" Laye  
William "Red" Laye  
Waste Management Director

cc: John Ruckdeschel, Coordinator  
C. Rick Doby Sr., NC Inspector  
File



*Rick*

Ronald H. Levine, M.D., M.P.H.  
STATE HEALTH DIRECTOR

DIVISION OF HEALTH SERVICES  
P.O. Box 2091  
Raleigh, N.C. 27602-2091

April 11, 1983

Mr. John Ruckdeschel  
Venture Corporation  
Stylecraft Division  
Box 7149  
Charlotte, NC 28217

RE: NCD074503129

Dear Mr. Ruckdeschel:

On March 18, 1983 Mr. Rick Doby of the Solid and Hazardous Waste Management Branch conducted a RCRA inspection of your facility. You were found to be in compliance with the standards.

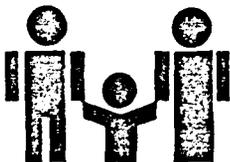
This office wishes to thank you for your cooperation and please do not hesitate to contact us if we may be of future assistance.

Sincerely,

O. W. Strickland, Head  
Solid & Hazardous Waste Management Branch  
Environmental Health Section

OWS:nlc

cc: Mr. Rick Doby



*Rich*

Ronald H. Levine, M.D., M.P.H.  
STATE HEALTH DIRECTOR

DIVISION OF HEALTH SERVICES  
P.O. Box 2091  
Raleigh, N.C. 27602-2091

March 25, 1983

Mr. John Ruckdeschel  
Rospatch Corporation  
Venture Corporation  
Stylecraft Division  
P.O. Box 7149  
Charlotte, NC 28217

RE: NCD074503129

Dear Mr. Ruckdeschel:

On March 7, 1983 Mr. Rick Doby of the Solid and Hazardous Waste Management Branch conducted a RCRA re-inspection of your facility. The following violations were noted:

1. 262.34(a)(1-2) - A generator may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status, provided that: the waste is placed in containers and the generator complies with Subpart I of 40 CFR Part 265, or the waste is placed in tanks and the generator complies with Subpart J of 40 CFR Part 265 except Section 265.193; the date upon which each period of accumulation begins is clearly marked and visible for inspection on each container.
2. 265.16(c) - Facility personnel must take part in an annual review of the initial training.

A compliance date of March 21, 1983 was established.

If you have any questions concerning this matter, please contact Mr. William Paige, Environmental Chemist at (919) 733-2178.

Sincerely,

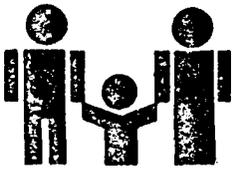


G. W. Strickland, Head  
Solid & Hazardous Waste Management Branch  
Environmental Health Section

OWS:nlc

cc: Mr. Rick Doby





Ronald H. Levine, M.D., M.P.H.  
STATE HEALTH DIRECTOR

DIVISION OF HEALTH SERVICES  
WESTERN REGIONAL OFFICE  
Building 3  
Black Mountain, N.C. 28711  
(704) 669-3349

March 28, 1983

TO: O. W. Strickland  
Head  
Solid & Hazardous Waste Mgt.

FROM: C. Rick Doby *CRD*  
Waste Management Specialist  
Western Regional Office

RE: Followup RCRA Inspection:

Venture Corporation  
Sytlecrafft Division  
Box 7149  
Charlotte, NC 28217  
704/588-0220  
EPA ID #NCD074503129  
Contact: John Ruckdeschel  
Project Manager

A followup RCRA inspection of the Venture Corporation on March 18, 1983 indicates that the facility is now in compliance with all applicable RCRA requirements. Violations noted during the March 7th annual reinspection have been corrected.

CRD/dgh



March 18, 1983

Mr. C. Richard Doby, Sr.  
Solid & Hazardous Waste Management  
N.C. Dept. of Human Resources  
66 Eastcliff Dr.  
Concord, N.C. 28025

Dear Mr. Doby:

This letter is to inform you that the discrepancies of the Annual Inspection have been corrected. The waste drums stored outside have all been labeled and dated. A new procedure has been instituted to label and date the waste drums at the time of filling. In addition, all personnel involved in waste handling have been instructed in proper handling, safety, and labeling procedures. A copy of the report is attached for your records.

Sincerely,

  
JOHN RUCKDESCHEL  
Waste Coordinator

VENTURE PACKAGING, INC.  
P. O. Box 7149  
Charlotte, North Carolina 28217

cc: Pat Baines, Operations Manager  
R. A. Dodge, Technical Director  
Red Laye, Waste Management Director

MUNSON PACKAGING DIVISION  
Cleveland, Ohio  
216 • 521-6570

STYLECRAFT PACKAGING DIVISION  
Charlotte, North Carolina  
704 • 588-0220

DATE:

March 17, 1983

SUBJECT:

Hazardous Waste Management - Annual Training Report

FROM:

William "Red" Laye

TO:

Pat Baines

In accordance with Hazardous Waste Management Regulations, the following personnel directly responsible for the handling, collecting, and removal of hazardous waste have been instructed on:

1. Stylecraft Contingency Plan and Emergency Procedures.
2. Proper safety and fire procedures.
3. Proper labeling and identification requirements.



Trainee Signatures:

*John Ruckdeschel*

*John Haggan*

*John Breen*

*Pat Baines*

William "Red" Laye  
Waste Management Director

cc: John Ruckdeschel, Coordinator  
C. Rick Doby Sr., NC Inspector  
File



Ronald H. Levine, M.D., M.P.H.  
STATE HEALTH DIRECTOR

DIVISION OF HEALTH SERVICES  
WESTERN REGIONAL OFFICE  
Building 3  
Black Mountain, N.C. 28711  
(704) 669-3349

March 9, 1983

TO: O. W. Strickland  
Head  
Solid & Hazardous Waste Mgt.

FROM: C. Rick Doby, Sr. *CRD*  
Waste Management Specialist  
Western Regional Office

RE: RCRA Annual Reinspection: Rosptach Corporation (Old Name)  
Venture Corporation (New Name)  
Stylecraft Division  
P. O. Box 7149  
Charlotte, NC 28217  
704/588-0220  
EPA ID #NCD074503129  
Contact: John Ruckdeschel  
Project Manager

An RCRA annual reinspection of this facility was conducted on March 7, 1983. Venture Packaging was not found to be in compliance with RCRA standards. Violations noted were:

262.34(a)(1-2)  
and 265.16(c)

Drums were not labeled or dated; however, waste was not being stored for 90 days. The facility did not label the drums due to weather effects on the labels. The hazardous waste storage area is outside the plant.

The personnel training was being updated at the time of the inspection; however, annual training had not taken place. Mr. Ruckdeschel agreed to conduct the annual training review immediately and notify me in writing of the review.

Mr. Ruckdeschel also agreed to label the drums immediately according to the rules and continue to do so. He plans to use a stencil and spray paint to mark the drums prior to placing the label on the drum for shipment.

Compliance for all violations set for March 21, 1983 as agreed upon.

CRD/dgh

VENTURE Corp  
Stylcraft Div.  
 Name of Site NC0074503129  
 EPA I.D. Mecklenburg  
 County 1600 Westinghouse Blvd. Box 7149 Char. NC 28217  
 Location 3/7/83  
 Inspection Date John R. ...  
 Signature of Inspector(s) March 21, 1983  
 Compliance Date John R. ...  
 Signature of Facility Contact

INSTRUCTIONS: Place a check to indicate Compliance (C), NonCompliance (NC) or Not Applicable (NA). Cite specific violation by Section No.

GENERATOR STANDARDS (262.00)

	C	NC	NA	Violation(s)
1. GENERAL (.10-.12)	✓			
2. THE MANIFEST (.20-.23)	✓			
3. PRE-TRANSPORT REQUIREMENTS (.30-.34)		✓		262.34(a)(2-3) p. 56 embellony
4. RECORDKEEPING/REPORTING (.40-.43)	✓			
5. SPECIAL CONDITIONS (.50-.51)			✓	

TRANSPORTER STANDARDS (263.00)

1. GENERAL (.11-.12)				
2. MANIFEST/RECORDKEEPING (.20-.22)				
3. HAZARDOUS WASTE DISCHARGES (.30-.31)				

TSDF STANDARDS (265.00)

1. GENERAL (.1-.4)	✓			
2. GENERAL FACILITY STANDARDS (.10-.17)		✓		265.16(c) Annual Training p. 142
3. PREPAREDNESS AND PREVENTION (.30-.37)	✓			
4. CONTINGENCY PLAN AND EMERGENCY PROCEDURES (.50-.56)	✓			
5. MANIFEST SYSTEM, RECORDKEEPING, AND REPORTING (.70-.77)				
6. GROUND-WATER MONITORING (.90-.94)				
7. CLOSURE AND POST-CLOSURE (.110-.120)				
8. FINANCIAL REQUIREMENTS (.140-.145)				
9. USE AND MANAGEMENT OF CONTAINERS (.170-.177)				
10. TANKS (.190-.199)				
11. SURFACE IMPOUNDMENTS (.220-.230)				
12. WASTE PILES (.250-.257)				
13. LAND TREATMENT (.270-.282)				
14. LANDFILLS (.300-.315)				
15. INCINERATORS (.340-.351)				
16. THERMAL TREATMENT (.370-.382)				
17. CHEM., PHYS./BIO. TREATMENT (.400-.406)				
18. UNDERGROUND INJECTION (.430)				

RCRA STATUS

GENERATOR  TRANSPORTER  TREATER  STORER  DISPOSER

IMMINENT HAZARD: YES  NO

RCRA INSPECTION REPORT

FACILITY INFORMATION

Rospatch Corporation (old name)  
Venture Corporation (new name)  
Stylecraft Division  
P. O. Box 7149  
Charlotte, NC 28217  
EPA ID #NCDO74503129

FACILITY CONTACT

John Ruckdeschel  
Project Manager  
704/588-0220

SURVEY PARTICIPANTS

John Ruckdeschel  
C. Rick Doby

DATE OF INSPECTION

March 7, 1983  
10 a.m. - 12 noon

APPLICABLE REGULATIONS

No Change

PURPOSE OF SURVEY

No Change

FACILITY DESCRIPTION

No Change

SITE DEFICIENCIES

262.34(a)(1-2)  
265.16(c)

COMPLIANCE SCHEDULE/RECOMMENDATIONS

All violations are to be corrected immediately or by March 21, 1983.



Ronald H. Levine, M.D., M.P.H.  
STATE HEALTH DIRECTOR

*Rich*

DIVISION OF HEALTH SERVICES  
P.O. Box 2091  
Raleigh, N.C. 27602-2091

February 11, 1982

Mr. John Ruckdeschel  
Stylecraft Packaging Division  
P.O. Box 7149  
1600 Westinghouse Blvd.  
Charlotte, NC 28217

Dear Mr. Ruckdeschel:

On February 4, 1982 Mr. Rick Doby of the Solid and Hazardous Waste Management Branch conducted a RCRA inspection of your facility. The following violations were noted:

- (40 CFR Part 265.16) Personnel Training
- (40 CFR Part 265 - Subpart C) Preparedness and Prevention
- (40 CFR Part 265 - Subpart D) Contingency Plan

A compliance date of April 4, 1982 was established.

If you have questions concerning this matter, please contact Mr. William Paige, Environmental Chemist at (919) 733-2178.

Sincerely,

*O.W. Strickland*

O. W. Strickland, Head  
Solid & Hazardous Waste Management Branch  
Environmental Health Section

OWS:nlc

cc: *✓* Mr. Rick Doby





Ronald H. Levine, M.D., M.P.H.  
STATE HEALTH DIRECTOR

DIVISION OF HEALTH SERVICES  
WESTERN REGIONAL OFFICE  
Building 3  
Black Mountain, N.C. 28711  
(704) 669-3349

February 9, 1982

MEMORANDUM

TO: O. W. Strickland, Head  
Solid & Hazardous Waste Management Branch

FROM: C. Rick Doby, Sr. *CRD*  
District Sanitarian

DATE OF INSPECTION: February 4, 1982

SUBJECT: ISS Inspection of: Rospatch Corp.  
Stylecraft Packaging Division  
P. O. Box 7149  
1600 Westinghouse Blvd.  
Charlotte, NC 28217  
704-588-0220  
EPA ID No. NCD074503129  
Contact: John Ruckdeschel, Proj. Mgr.

The following violations of I.S.S. for Rospatch-Stylecraft Division were identified during an inspection of February 4, 1982:

- 40 CFR Part 265.16 - Personnel Training
- 40 CFR Part 265 - Subpart C - Preparedness/Prevention
- 40 CFR Part 265 - Subpart D - Contingency Plan

Compliance Agreement

It was agreed by all survey participants that full compliance with the above-noted violations would be reached by April 4, 1982.

slg

INSPECTION FORM FOR INTERIM STATUS STANDARDS FOR  
OWNER/OPERATOR OF HAZARDOUS WASTE MANAGEMENT  
FACILITIES

NC D0745-03129

Rosatch Stylecrafft Packaging Div. Meck.  
Name of Site EPA I.D. County

1600 Westinghouse Blvd. [Signature]  
Location Signature of Facility Contact

Feb. 4, 1982 [Signature]  
Date Signature of Inspector(s)

INSTRUCTIONS: Place a check to indicate Compliance (C), NonCompliance (NC) or Not Applicable (NA). Cite specific violation by Section No.

	C	NC	NA	Violation(s)
1. GENERAL	✓			
2. GENERAL FACILITY STANDARDS				265.16
3. PREPAREDNESS AND PREVENTION				Subpart C
4. CONTINGENCY PLAN AND EMERGENCY PROCEDURES				" D
5. MANIFEST SYSTEM, RECORDKEEPING, AND REPORTING	✓			
6. GROUND-WATER MONITORING			✓	
7. CLOSURE AND POST-CLOSURE			✓	
8. FINANCIAL REQUIREMENTS			✓	
9. USE AND MANAGEMENT OF CONTAINERS			✓	
10. TANKS			✓	
11. SURFACE IMPOUNDMENTS			✓	
12. WASTE PILES			✓	
13. LAND TREATMENT			✓	
14. LANDFILLS			✓	
15. INCINERATORS			✓	
16. THERMAL TREATMENT			✓	
17. CHEMICAL, PHYSICAL, AND BIOLOGICAL TREATMENT			✓	
18. UNDERGROUND INJECTION			✓	

Large Generator

Compliance date is 4-4-82

Imminent hazard YES ( ) NO (✓)

## RCRA INSPECTION REPORT

- 1) Facility Information  
Rospatch Corp.  
Stylecraft Packaging Division  
P. O. Box 7149  
1600 Westinghouse Blvd.  
Charlotte, NC 28217  
704-588-0220  
EPA ID No. NCD074503129
- 2) Responsible Official  
John Ruckdeschel, Project Manager
- 3) Survey Participants  
John Ruckdeschel, Rospatch  
Don Willard, Mecklenburg County Environmental Health Dept.  
Rick Doby, DHS
- 4) Date of Inspection  
February 4, 1982 1:30 PM
- 5) Applicable Regs.  
40 CFR Parts 262 and 265
- 6) Purpose of Survey  
RCRA Interim Status Inspection including review of records, site survey and sampling procedures. Regulatory requirements covered included those contained in 40 CFR Generator Standards and 40 CFR Part 265 under General Facility Standards.
- 7) Facility Description  
Rospatch - Stylecraft Division is a food packaging flexographic printer using inks, solvents and adhesives in their printing and manufacturing processes. Cellophane and polyethylene is purchased from various manufactures by Stylecraft and converted to printed food wrapping materials, usually in rolls.

Flammable waste solvents are generated from three (3) manufacturing processes. (1) The printing machines use ink trays that are routinely cleaned with alcohols. The wash-up solution of ink pigment and alcohol is properly drummed as it is generated. (2) A dip tank is used to wash ink trays and is cleaned out quarterly by removing settled ink pigments. This waste solvent and pigment is also properly drummed and labeled prior to shipment. (3) Adhesives and flammable solvents are also generated in a wash-up operation of the adhesive tray on a cellophane laminating machine. This waste is drummed properly and labeled.

The total volume of waste solvents including pigments and adhesives is about 10,000 lbs./month. All waste is being drummed, labeled and manifested properly. Drums are stored together outside the manufacturing building. All other waste appears to be routine solids.

Stylecraft has used the following transporters/disposers for removal of their waste solvents:

- (1) Industrial Chemical Co., Rock Hill, SC SCD0044442333
- (2) Oldover Corp. in Virginia, Trans, ID VAD040159436, Disp. ID VAD077942266
- (3) American Waste Oil Service, Fairburn, GA GAD097389530
- (4) National Oil Service, Doraville, GA GAT150011351

Stylecraft ships its waste monthly and does not store waste for 90 days.

8) Detected Violations

(a) 40 CFR Part 265.16 - Personnel Training - Stylecraft did not have written documentation of a personnel training program.

(b) 40 CFR Part 265 - Subpart C - Preparedness/Prevention - Stylecraft must comply with all of Subpart C.

(c) 40 CFR Part 265 - Subpart D - Contingency Plan - Stylecraft did not have a documented contingency plan and must gather already prepared SPCC plans, etc. and prepare a hazardous waste contingency plan.

9) Compliance Agreement

It was agreed by all survey participants that full compliance with the above-noted violations would be reached by April 4, 1982.

---

# FROM THE DESK OF

JOHN RUCKDESCHEL

---

DATE 3/8/82 TIME \_\_\_\_\_ A.M.  
P.M.

TO MR. DOBY

---

ATTACHED ARE COPIES OF  
OUR 40 CFR PART 265.16,  
SUBPART C AND D.

IF THEY ARE SATISFACTORY,  
WE WILL SIGN THE ORIGINALS.  
IF NOT, PLEASE INDICATE  
ANY CHANGES REQUIRED.

PLEASE CALL IF YOU HAVE  
ANY QUESTIONS.



---



**RöSPATCH  
PACKAGING GROUP**

P.O. Box 7149  
1600 Westinghouse Boulevard  
Charlotte, N.C. 28217  
(704) 588-0220  
Telex: 57-5279

**RöSPATCH  
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STYLECRAFT PACKAGING DIVISION  
Charlotte, North Carolina  
(704) 588-0220

MUNSON PACKAGING DIVISION  
Cleveland, Ohio  
(216) 521-6570

STERLING MANUFACTURING DIVISION  
Westmont, Illinois 60559  
(312) 325-9790

February 24, 1982

Hazardous Waste Management

In accordance with 40 CFR Part 265.16, the following personnel are responsible for the hazardous waste management:

Director: William "Red" Laye; Plant Superintendent

Coordinator: John Ruckdeschel; Ink Room Supervisor

1. Job description:

- a. Director: It is the responsibility of the Director to supervise the hazardous waste management program, establish training and record-keeping procedures, investigate potential waste carriers and processors, submit annual reports to the state and/or regional authority.
- b. Coordinator: It is the responsibility of the Coordinator to collect, ship and maintain the proper records. The Coordinator contacts the carrier and prepares the manifest in accordance with Subpart E of 40 CR Part 265, maintains the proper copies and compiles the annual reports for examination by the Director.

2. Training:

a. Introductory training:

All personnel involved in the hazardous waste management program will be instructed in the proper handling and record-keeping requirements. In addition to in-house instruction, personnel will attend seminars pertaining to hazardous waste management and regulations when available. All personnel will receive training in emergency fire-fighting procedures.

b. Continuing training:

Continuing training will consist of an annual review of the handling, emergency and record-keeping procedures. Periodic changes promulgated by state and/or regional authorities will be reviewed as received.

3. Training records:

All formal training records will be maintained and a copy attached.

JR/kt  
Attachment



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direct the handling and transporting  
of hazardous materials and wastes.

Explains concisely and clearly Department of Transportation hazardous materials regulations and Environmental Protection Agency hazardous wastes regulations.

Outlines areas of individual compliance responsibility from the inception of a hazardous materials or wastes shipment through final destination.

Details procedures for establishing a total hazardous materials and wastes compliance program.

Provides valuable reference and source materials which can be used on the job to help insure compliance with hazardous materials and wastes regulations.



## Who Should Attend?

It is recommended companies send **teams** of supervisors, terminal, warehouse, distribution and management personnel: Freight operations managers • terminal managers • assistant terminal managers • dock supervisors • dispatchers • office managers • safety supervisors • management trainees • sales representatives • plant managers • distribution managers • warehouse managers • packaging managers • training supervisors

## REGISTRATION INFORMATION

### Registration Fee Payable in Advance

Non-Member Companies  
—\$95.00 per person

TOC Motor Carrier Member  
Companies—\$75.00 per person

Registration fee includes luncheon, two coffee breaks, seminar instruction and all collateral materials.

**Registration Must Be Made in Advance.**  
**Enrollment is Limited.**

Complete and return Advance Registration Form in this brochure. Late registrations (made two weeks or less

prior to date of seminar) accepted by phone on a space available basis. For late phone registration, call Cindy Allen at (AC) 202-797-5438.

### Substitutions Can Be Made in Any City at Any Time.

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**NOTE:** You may receive a duplicate of this brochure. If so, please pass it along to an interested associate. Brochures are frequently mailed to selected lists which cannot be cross-checked against our files.

# 1979-80 Seminar on HANDLING HAZARDOUS MATERIALS AND WASTES REGISTRATION FORM

Please make reservations for the following personnel: My check is enclosed

\$95.00 per person—Non-Member Companies     \$75.00 per person—TOC Motor Carrier Member Companies.

### REMITTANCE MUST ACCOMPANY REGISTRATION FORM

INDIVIDUAL'S NAME & TITLE	SESSION CITY	SESSION DATE
Wm. Laye	Charlotte, N. C.	3-14-80

(If additional space is required, you may attach a supplementary list)

Late registrations (made two weeks or less prior to date of seminar) accepted by phone on a space available basis. For late phone registration, call Cindy Allen at (202) 797-5438.

Make checks payable and mail to:  
**The Operations Council**  
**1616 P Street, N.W.**  
**Washington, D.C. 20036**

Send confirmation to:

NAME	TITLE
COMPANY	
ADDRESS	
CITY/STATE/ZIP	A/C TELEPHONE

STYLECRAFT PACKAGING DIV.  
FIRE BRIGADE TRAINING

The following personnel have been instructed in the proper use  
of portable CO<sub>2</sub> fire extinguishers.

William "Red" Laye

John Ruckdeschel

FIRE BRIGADE CHIEF  
2/24/82

HAZARDOUS WASTE MANAGEMENT PREPAREDNESS AND PREVENTION

In accordance with 40 CR Part 265 Subpart C, the following equipment and procedures are implemented to prevent accidental injury, fire or contamination.

Equipment:

Portable CO<sub>2</sub> fire extinguisher  
Portable dry power extinguisher  
Non-sparking tools  
Gloves  
Goggles

Maintenance:

All extinguishers are maintained and inspected quarterly by:

Fire Equipment Sales, Inc., 1407 E. 10th St., Charlotte, N.C.

Emergency Communication:

- 1) Telephone access with both internal and external lines.
- 2) Fire alarm system in the building.
- 3) Arrangement with local authorities for all emergencies is dialing 911 on the telephone.

JR/kt  
Dated 2/25/82.

HAZARDOUS WASTE MANAGEMENT

STYLECRAFT CONTINGENCY PLAN AND EMERGENCY PROCEDURES

In accordance with 40 CFR Part 265, Subpart D, the following procedure is to be implemented immediately in case of emergency due to handling or shipping flammable waste material:

1. Prior to handling flammable waste material, insure that:

- A. No smoking or open flame is allowed in the area.
- B. At least one portable extinguisher is available at the site.
- C. Gloves and goggles are worn.
- D. Grounding cables and proper tools are used.

2. In case of emergency:

A. Fire or explosion -

Contact the Foreman immediately. The Foreman will initiate the fire evacuation plan. Copy attached. Use fire extinguishers to contain the fire until the fire brigade arrives.

B. Spillage -

In case of a spill or accidental rupture of the waste drums, clean up completely. If outside, use shovels and brooms and transfer waste to new drums. If inside, use mops to clean up.

JR/kt

Dated 3/2/82.

Attachment

DATE:

April 9, 1981

SUBJECT:

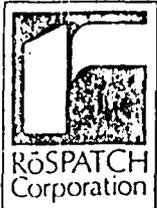
Fire Evacuation Plan (FSR II-C)

FROM:

William O'Haver

TO:

All Employees



STYLCRAFT  
PACKAGING DIVISION

I. When the fire evacuation alarm sounds, all persons not belonging on the fire brigade should move at once through the nearest safe exit, to their designated meeting point--well away from the building.

A) Persons working in the Bag Department, Sleeve Department, or Shipping Department will meet in the open field on the Shipping side of the plant, near the drive leading to the Shipping docks.

B) Persons working in the Press Department, Slitting Department, Rewind Department, Laminating Department, Mounting Department, Ink Department, and Office Personnel will meet on the front lawn, at the Office side of the plant.

C) No person is to remain in the building or in the fenced-in parking area.

D) It will be the responsibility of the Supervisor for each department to take a head count and to maintain order.

II. Brigade Members:

A) When the fire alarm sounds, all fire brigade members should meet at the fire alarm switch. At this time, fire location will be pointed out, and plans for controlling and extinguishing the fire will be made.

B) If the fire cannot be readily extinguished, a brigade member will be designated to call the Fire Department and to meet them outside to advise them of the fire location.

C) If the fire becomes completely out of hand, all fire brigade members will leave the plant. This point in time will be determined by the Supervisor.

III. Under no circumstances should anyone re-enter the building unless the word has been given to do so by the Brigade Chief, Brigade Captain, or the Fire Department.

IV. Fire locator bells (which are being installed by the Company), distinguishable as a bell sound, not a siren, do not signal an evacuation of the plant. They are being installed to aid the fire brigade in responding closer to the immediate area of the fire.

A

B

# PLANT

A

BAG DEPT  
SLEEVE DEPT  
Shipping DEPT

B

PRESS DEPT  
SLITTING DEPT  
REWIND DEPT  
LAMINATING DEPT  
MOUNTING DEPT  
INK DEPT  
OFFICE

OFFICE



Ronald H. Levine, M.D., M.P.H.  
STATE HEALTH DIRECTOR

*Rich*

DIVISION OF HEALTH SERVICES  
WESTERN REGIONAL OFFICE  
Building 3  
Black Mountain, N.C. 28711  
(704) 669-3349

March 11, 1982

Mr. John Ruckdeschel  
Hazardous Waste Coordinator  
RöSpatch Packaging Group  
P. O. Box 7149  
1600 Westinghouse Boulevard  
Charlotte, NC 28217

Dear Mr. Ruckdeschel:

I have received and reviewed your personnel training plans, preparedness and prevention plans and your contingency plan in accordance with our compliance request made on February 4, 1982.

The personnel training program appears complete. I suggest that you incorporate the information sent to me regarding preparedness and prevention into your contingency plan and regard all the paperwork as your plan of contingency.

Your personnel training program lists Mr. Laye as Hazardous Waste Director and you as Hazardous Waste Coordinator with a good description of each job title. This list, along with all other hazardous waste trained employees, should be found in your contingency plan as well. See 40 CFR Part 265.52(d).

I would like for you to resubmit your contingency plan with the above-described additions and also indicate that you have submitted the revised contingency plan to local police department, fire department and hospital for their review. I do realize that the emergency telephone number (911) is available in Charlotte-Mecklenburg; however, according to 40 CFR Part 265.53(b), this information must be submitted.

Thank you for your cooperation and please call if I can be of assistance in this matter.

Respectfully,

*C. Rick Doby*

C. Rick Doby  
District Sanitarian  
704/788-4449

CRD/dgh

cc: Mr. O. W. Strickland



**RöSPATCH  
PACKAGING GROUP**

P.O. Box 7149  
1600 Westinghouse Boulevard  
Charlotte, N.C. 28217  
(704) 588-0220  
Telex: 57-5279

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MUNSON PACKAGING DIVISION  
Cleveland, Ohio  
(216) 521-6570

STERLING MANUFACTURING DIVISION  
Westmont, Illinois 60559  
(312) 325-9790

March 15, 1982

Mr. C. Richard Doby, Sr.  
Solid & Hazardous Waste Management  
N.C. Dept. of Human Resources  
66 Eastcliff Dr.  
Concord, N.C. 28025

Dear Mr. Doby:

As per your letter of 3/11/82, I have rewritten the contingency plan. The plan contains all the information submitted before, plus additional procedures. Copies have been submitted to the following:

Chief of Police, Mecklenberg County  
Fire Chief, Steele Creek Fire Dept.  
Administrator, Charlotte Memorial  
Hospital

I am enclosing the hazardous waste personnel training program and the revised contingency and emergency plan for your approval.

Sincerely,

John Ruckdeschel  
Project Manager

JR/kt  
Enclosure

cc: Pat Baines, Operations Manager  
R. A. Dodge, Technical Director  
Red Laye, Waste Management Director  
John Gibson, Meck. Co. Env. Health



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Cleveland, Ohio  
(216) 521-6570

STERLING MANUFACTURING DIVISION  
Westmont, Illinois 60559  
(312) 325-9790

February 24, 1982

Hazardous Waste Management

In accordance with 40 CFR Part 265.16, the following personnel are responsible for the hazardous waste management:

Director: William "Red" Laye; Plant Superintendent

Coordinator: John Ruckdeschel; Ink Room Supervisor

1. Job description:

- a. Director: It is the responsibility of the Director to supervise the hazardous waste management program, establish training and record-keeping procedures, investigate potential waste carriers and processors, submit annual reports to the state and/or regional authority.
- b. Coordinator: It is the responsibility of the Coordinator to collect, ship and maintain the proper records. The Coordinator contacts the carrier and prepares the manifest in accordance with Subpart E of 40 CR Part 265, maintains the proper copies and compiles the annual reports for examination by the Director.

2. Training:

a. Introductory training:

All personnel involved in the hazardous waste management program will be instructed in the proper handling and record-keeping requirements. In addition to in-house instruction, personnel will attend seminars pertaining to hazardous waste management and regulations when available. All personnel will receive training in emergency fire-fighting procedures.

b. Continuing training:

Continuing training will consist of an annual review of the handling, emergency and record-keeping procedures. Periodic changes promulgated by state and/or regional authorities will be reviewed as received.

3. Training records:

All formal training records will be maintained and a copy attached.

JR/kt  
Attachment



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# Handling Hazardous Materials and Wastes

Practical, concentrated instruction  
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of hazardous materials and wastes.

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Outlines areas of individual compliance responsibility from the inception of a hazardous materials or wastes shipment through final destination.

Details procedures for establishing a total hazardous materials and wastes compliance program.

Provides valuable reference and source materials which can be used on the job to help insure compliance with hazardous materials and wastes regulations.



## Who Should Attend?

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## REGISTRATION INFORMATION

### Registration Fee Payable in Advance

Non-Member Companies  
—\$95.00 per person

TOC Motor Carrier Member  
Companies—\$75.00 per person

Registration fee includes luncheon, two coffee breaks, seminar instruction and all collateral materials.

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Enrollment is Limited.**

Complete and return Advance Registration Form in this brochure. Late registrations (made two weeks or less

prior to date of seminar) accepted by phone on a space available basis. For late phone registration, call Cindy Allen at (AC) 202-797-5438.

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# 1979-80 Seminar on HANDLING HAZARDOUS MATERIALS AND WASTES REGISTRATION FORM

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\$95.00 per person—Non-Member Companies     \$75.00 per person—TOC Motor Carrier Member Companies.

### REMITTANCE MUST ACCOMPANY REGISTRATION FORM

INDIVIDUAL'S NAME & TITLE

SESSION CITY

SESSION DATE

Wm. Laye

Charlotte, N. C.

3-14-80

(If additional space is required, you may attach a supplementary list)

Late registrations (made two weeks or less prior to date of seminar) accepted by phone on a space available basis. For late phone registration, call Cindy Allen at (202) 797-5438.

Make checks payable and mail to:  
**The Operations Council**  
1616 P Street, N.W.  
Washington, D.C. 20036

Send confirmation to:

NAME

TITLE

COMPANY

ADDRESS

CITY/STATE/ZIP

A/C

TELEPHONE

STYLECRAFT PACKAGING DIV.  
FIRE BRIGADE TRAINING

The following personnel have been instructed in the proper use  
of portable CO<sub>2</sub> fire extinguishers.

William "Red" Laye

John Ruckdeschel

FIRE BRIGADE CHIEF  
2/24/82



**RöSPATCH  
PACKAGING GROUP**

P.O. Box 7149  
1600 Westinghouse Boulevard  
Charlotte, N.C. 28217  
(704) 588-0220  
Telex: 57-5279

**RöSPATCH  
PACKAGING GROUP**

STYLECRAFT PACKAGING DIVISION  
Charlotte, North Carolina  
(704) 588-0220

MUNSON PACKAGING DIVISION  
Cleveland, Ohio  
(216) 521-6570

STERLING MANUFACTURING DIVISION  
Westmont, Illinois 60559  
(312) 325-9790

March 15, 1982

HAZARDOUS WASTE MANAGEMENT

STYLECRAFT CONTINGENCY PLAN AND  
EMERGENCY PROCEDURES

Purpose: The following procedure is to be implemented immediately in case of emergency due to handling or shipping flammable waste material.

Waste management director - William "Red" Laye

Waste management coordinator - John Ruckdeschel

I. Prior to handling flammable waste material, insure that:

- a. No smoking or open flame is allowed in the area.
- b. At least one portable fire extinguisher is available at the site.
- c. Gloves and goggles are worn.
- d. Grounding cables and proper tools are used.

II. In case of emergency:

a. Fire or explosion -

Contact the foreman immediately. The foreman will initiate the fire evacuation plan. Copy attached. Use fire extinguisher to contain the fire until the fire brigade arrives.

b. Spillage -

In case of a spill or accidental rupture of the waste drums, clean up completely. If outside, use shovels and brooms and transfer waste to new drums. If inside, use mops to clean up.

c. Injury -

In case of injury to any personnel such as burns, or solvent splashed into eyes, call ambulance. Minor injuries such as cuts, bruises, send individual to plant physician.



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(312) 325-9790

PAGE TWO

III. Equipment:

Portable CO<sub>2</sub> Fire Extinguisher  
Portable Dry Powder Extinguisher  
Non-Sparking Tools  
Gloves  
Goggles

IV. Maintenance:

All extinguishers are maintained and inspected quarterly by: Fire Equipment Sales, Inc., 1407 E. 10th St., Charlotte, N.C.

V. Emergency Communication:

- a. For emergencies that require assistance for fire or medical, dial 911.
- b. Call William "Red" Laye, Plant Superintendent and Waste Management Director.
- c. Copies of this plan have been filed with:
  - 1) Press Room supervisor's office.
  - 2) Plant superintendent's office.
  - 3) Chief of Police, Mecklenburg County.
  - 4) Fire Chief, Steele Creek Fire Dept.
  - 5) Administrator, Charlotte Memorial Hospital.

A handwritten signature in dark ink, appearing to be 'JR/kt', is written above the typed name.

JR/kt  
Attachment

DATE:

April 9, 1981

SUBJECT:

Fire Evacuation Plan (FSR II-C)

FROM:

William O'Haver

TO:

All Employees

I. When the fire evacuation alarm sounds, all persons not belonging on the fire brigade should move at once through the nearest safe exit, to their designated meeting point--well away from the building.

A) Persons working in the Bag Department, Sleeve Department, or Shipping Department will meet in the open field on the Shipping side of the plant, near the drive leading to the Shipping docks.

B) Persons working in the Press Department, Slitting Department, Rewind Department, Laminating Department, Mounting Department, Ink Department, and Office Personnel will meet on the front lawn, at the Office side of the plant.

C) No person is to remain in the building or in the fenced-in parking area.

D) It will be the responsibility of the Supervisor for each department to take a head count and to maintain order.

II. Brigade Members:

A) When the fire alarm sounds, all fire brigade members should meet at the fire alarm switch. At this time, fire location will be pointed out, and plans for controlling and extinguishing the fire will be made.

B) If the fire cannot be readily extinguished, a brigade member will be designated to call the Fire Department and to meet them outside to advise them of the fire location.

C) If the fire becomes completely out of hand, all fire brigade members will leave the plant. This point in time will be determined by the Supervisor.

III. Under no circumstances should anyone re-enter the building unless the word has been given to do so by the Brigade Chief, Brigade Captain, or the Fire Department.

IV. Fire locator bells (which are being installed by the Company), distinguishable as a bell sound, not a siren, do not signal an evacuation of the plant. They are being installed to aid the fire brigade in responding closer to the immediate area of the fire.



ST. LEONARD  
PACKAGING DIVISION

A

B

# PLANT

A

BAG DEPT  
SLEEVE DEPT  
Shipping DEPT

B

PRESS DEPT  
SLITTING DEPT  
REWIND DEPT  
LAMINATING DEPT  
MOUNTING DEPT  
INK DEPT  
OFFICE

OFFICE



*RW*

Ronald H. Levine, M.D., M.P.H.  
STATE HEALTH DIRECTOR

DIVISION OF HEALTH SERVICES  
WESTERN REGIONAL OFFICE  
Building 3  
Black Mountain, N.C. 28711  
(704) 669-3349

MEMORANDUM

TO: Mr. O. W. Strickland, Head  
Solid & Hazardous Waste Management Branch

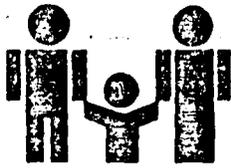
FROM: C. Rick Doby, Sr. *CRD*  
District Sanitarian

DATE: March 24, 1982

DATE OF REVIEW: March 19, 1982

SUBJECT: ISS Record Review of: Rospatch Packaging Group  
P. O. Box 7149  
1600 Westinghouse Blvd.  
Charlotte, NC 28217  
EPA ID No. NCD074503129  
Contact: Mr. John Ruckdeschel  
Hazardous Waste Coordinator

A record review of this facility indicates that Rospatch is apparently in full compliance with all applicable parts of 40 CFR.



Ronald H. Levine, M.D., M.P.H.  
STATE HEALTH DIRECTOR

DIVISION OF HEALTH SERVICES  
P.O. Box 2091  
Raleigh, N.C. 27602-2091

*Rick*

March 30, 1982

Mr. John Ruckdeschel  
Rospach Packaging Group  
P.O. Box 7149  
1600 Westinghouse Blvd.  
Charlotte, NC 28217

Dear Mr. Ruckdeschel:

On March 19, 1982 Mr. Rick Doby of the Solid and Hazardous Waste Management Branch conducted a RCRA re-inspection of your facility. You were found to be in compliance with the standards.

This office wishes to thank you for your cooperation and please do not hesitate to contact us if we may be of future assistance.

Sincerely,

U. W. Strickland, Head  
Solid & Hazardous Waste Management Branch  
Environmental Health Section

OWS:nlc

cc: Mr. Rick Doby

N. C. DEPARTMENT OF HUMAN RESOURCES  
DIVISION OF HEALTH SERVICES

COPY

**N. C. 1981 HAZARDOUS WASTE GENERATORS ANNUAL (PART A) REPORT \***

I. Installation EPA ID Number: N | C | D | 0 | 7 | 4 | 5 | 0 | 3 | 1 | 2 | 9

II. Name of Installation: Stylecraft Packaging

III. Location of Installation: 1600 Westinghouse Blvd.  
(Street or Route Number)

Charlotte (City or Town)      (Mecklenburg) (County)      North Carolina (State)      28217 (Zip Code)

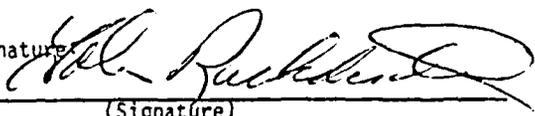
IV. Installation Contact: John Ruckdeschel (Name)      (704) (Area Code)      588-0220 (Phone Number)

V. Waste Identification:

Line Number	A. EPA Waste No.	B. Description of Waste	C. Handling Method/Quantity/Location Waste Shipped to			D. In Storage December 31, 1981	
			1. Handling Method Code	2. Quantity Shipped to TSD or Recovery Facility (000's LBS)	3. TSD Facility EPA ID No./ Recovery Facility Name	1. Storage Method Code	2. Quantity (000's GALLONS)
1	K086	Flammable liquid	TO 1	155	SCD04442333	SO 1	None
2					VAD077942266		
3					GAD097389530		
4					GAT150011351		
5							
6							
7							
8							
9							
10							
11							
12							

VI. List EPA ID Numbers for each Transporter used during reporting year:  
SCD04442333 | VAD040159436 | GAD097389530 | GAJ150011351

VII. Comments:

VIII. Signature:  (Signature)      John Ruckdeschel (Print or Type name)  
 2/19/82

\*Read instructions before completing form

1130 AM

11-20-91

Venture Packaging Reinsp #91-343  
Bob Kikkert (92) comp 7-16-91  
Red dye orig 7-10-91

Patrick Baines

1- Emergency Alarms - 265.34(a)

Compliance 2- capabilities of equip - 265.52(e)  
equipment & communications - portions have been updated.

Compliance 3- evacuation plan 265.52(f)  
contingency plan has been revised to show  
signals routes and 2nd day routes

Tank inspection log. ✓ tank installed 7-90-  
containment has been added to "satt" drum.

Oct 31 - firechill -

# RCRA INSPECTION REPORT

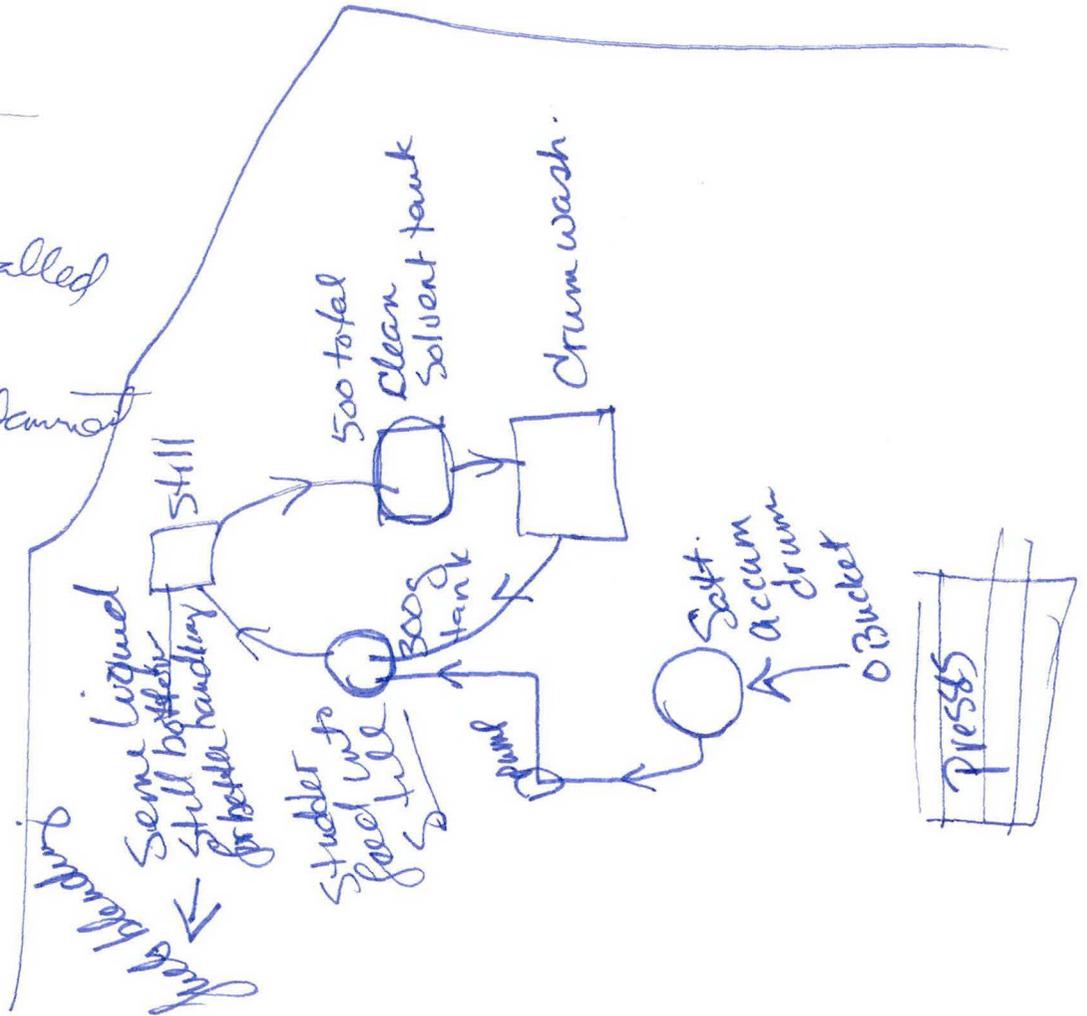
- 1) Facility Information
- 2) Facility Contact
- 3) Survey Participants
- 4) Date of Inspection
- 6) Purpose of Survey
- 7) Facility Description

Containment Room  
 in still area w/ storage tank

6 drums in storage area

CO<sub>2</sub> system recently installed  
 for fire protection

Sump w/ 300 gal outside containment



8) Waste Minimization

9) Site Deficiencies

10) Recommendations

11) Signed

\_\_\_\_\_  
Inspector/Reviewer

\_\_\_\_\_  
Facility Contact

\_\_\_\_\_  
Date

7-10-91 - Pat Baines - Robert Kitterst  
Anne Dodds - 1 PM - Venture Pkging

NET  
Evac Plan - I alarm sound  
What is the alarm -

TRAIN  
? First Responders - cleanup spills &/or handle fires  
55 gals - however, 1st Resp are not trained as HW  
employees. but more stringent w/ C Plan.

X (265.52) (a) ✓ (b) ✓ (c) arrangements ✓ d ✓ e list X  
↳ 265.37 ✓

Industrial Wipes - Commercial Laundry

Tank Integrity Test - tank raised eta end of July.  
Daily Inspection of Tank -

? Tank installed June 90 - 265.172.  
March 18, 1991 letter

- 265.16 OK prog.  
d(4) ✓ Next training Aug 91 scheduled.

Manifests OK  
265.33 - Equip Insy - logged ✓

265.34(a) - No immediate access to alarms at storage tank  
or at the HW Storage area.

Min reuse inks if possible - 1/3 of ink room is  
return - remark - 3 40% of used inks are  
recycled in this manner



State of North Carolina  
Department of Environment, Health, and Natural Resources  
Division of Solid Waste Management  
P.O. Box 27687 · Raleigh, North Carolina 27611-7687

James G. Martin, Governor  
William W. Cobey, Jr., Secretary

William L. Meyer  
Director

October 17, 1990

Mr. J. Stephen Shi  
Petree Stockton & Robinson  
Attorneys at Law  
1001 West Fourth Street  
Winston Salem, NC 27101-2400

Re: Venture Packaging  
Charlotte, NC

Dear Mr. Shi:

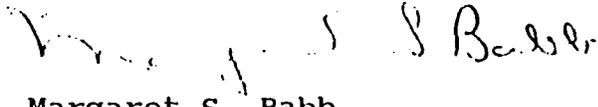
Venture Packaging is to be commended for its waste reduction efforts through the distillation of its solvent-based waste inks and spent cleaning solutions. In answer to your letter of October 9, 1990, to Mr. R. Douglas Holyfield, I will review the regulations regarding this activity at Venture Packaging.

The distillation process is not regulated. However, prior to reclamation, generator requirements apply. While the waste is being accumulated, the requirements of 40 CFR §262.34(a) apply. Required in this section is compliance with the requirements of Subparts I and J of 40 CFR §265. If the waste is stored for a period of time exceeding 90 days before distilling, a storage permit from the Hazardous Waste Section must be obtained.

With on-site distillation, the amount of waste ink and spent solvent is counted one time only each month; subsequently only the hazardous waste still bottoms are counted as hazardous waste generated that month. If the distillation unit is a continuous unit operating on line, directly connected to the manufacturing process, only the still bottoms may be considered a hazardous waste.

If there are any further questions, please do not hesitate to call me at (919) 733-2178.

Sincerely,



Margaret S. Babb  
Environmental Chemist  
Technical Assistance Unit  
Hazardous Waste Section

MSB/pcs

cc: Scott Readling  
Spring Allen

PETREE STOCKTON & ROBINSON ✓

ATTORNEYS AT LAW

1001 WEST FOURTH STREET  
WINSTON-SALEM, NORTH CAROLINA 27101-2400  
TELEPHONE (919) 725-2351  
TELECOPIER (919) 723-2610

CHARLOTTE OFFICE  
3500 ONE FIRST UNION CENTER  
CHARLOTTE, NORTH CAROLINA 28202-6001  
TELEPHONE (704) 372-9110  
TELECOPIER (704) 372-9110

RALEIGH OFFICE  
4101 LAKE BOONE TRAIL  
SUITE 400  
RALEIGH, NORTH CAROLINA 27607-6519  
TELEPHONE (919) 782-5092  
TELECOPIER (919) 781-3656

October 9, 1990

Mr. Douglas R. Holyfield  
Branch Head  
Waste Management Branch  
Hazardous Waste Section  
401 Oberlin Road  
Post Office Box 27687  
Raleigh, North Carolina 27611-7687

Re: Venture Packaging, Inc. - Compliance Order with  
Administrative Penalty/Docket No. 89-344

Dear Doug:

Since I have not heard anything from Bill Lopp in recent weeks, I thought I would follow up with you to ascertain whether the now-settled administrative penalty in above-referenced matter can be removed from the administrative docket and I understand that the facility was reinspected on August 23, 1990, by Scott Readling, who found no significant discrepancies. We certainly appreciate all you have done to facilitate the settlement in this matter.

I thought I would also respond to a suggestion made by Mr. Readling during his visit that two receiving devices incorporated in the recently installed recycling process and may be subject to regulation as storage containers and tanks under Subparts I and J of 40 C.F.R. § 265. As you may recall from our meeting at your office, my client is committed to responsible management of its hazardous waste, particularly with respect to reducing the volume of such waste through enhanced management practices and recycling. In this regard, we discussed with you the extensive investment which was then being undertaken by Venture Packaging to install a state of the art system to recover and recycle solvent-based waste inks through a distillation process in which the recovered product (alcohol and propyl acetate) is then used as a cleaning solution for the printing machines and thereafter recovered again through the same system. The net effect of the process is to substantially reduce the volume of hazardous wastes for which special handling and disposal would be required and to provide a cleaning solution which replaces commercial cleaning products which would otherwise be necessary. For your convenience, I have enclosed diagrams indicating the process flow

of the recovery system and the physical layout of the system and integral receiving devices.

The receiving devices which prompted Mr. Readling's suggestion are a 300-gallon tank and 55-gallon drum. Waste inks and spent cleaning solutions are placed in the 55-gallon drum, which is located in the printing machine area. The wastes are then immediately transferred by an air-driven diaphragm pump to the 300-gallon tank along with waste from a drum washer at a rate of ten gallons per hour. The waste from the tank is then pumped through fixed piping to the distillation phase of the recovery system on a continuous basis until the tank is empty. The recovered cleaning solution is then stored in a 450-gallon tank for later use. Since the processing rate of the distillation unit is 300 gallons per day, and approximately sixty gallons of waste inks and cleaning solution are sent to the tank from the drum washer and receiving drum per day, all waste is recycled within a twenty-four hour period.

Accordingly, it is clear that the receiving drum and tank are not used for storing the waste inks and cleaning solutions but rather are merely integral components of the overall recovery and recycling process which are subject to regulation under 40 C.F.R. § 261.6(c)(2) rather than Subparts I and J of 40 C.F.R. § 265 (as would be required under 40 C.F.R. § 262.34(a) when regulated wastes are actually stored). Given the foregoing description of the recycling process and particularly in view of the very substantial capital expenditure by Venture Packaging of approximately \$200,000 to install this system which has effectively reduced their hazardous waste disposal by approximately 65%, Venture Packaging should not now be penalized for its efforts for any unwarranted application of Subparts I and J of 40 C.F.R. § 265.

Should any additional information be necessary to finally resolve this matter, please let me know as soon as possible since I am anxious to remove the matter from the administrative docket.

Sincerely,

  
J. Stephen Shi

JSS:bw

cc: Charles H. May  
William Lopp, Esq.

\\295\18470.LTR

State Of North Carolina

DEPARTMENT OF ENVIRONMENT, HEALTH, AND NATURAL RESOURCES  
DIVISION OF SOLID WASTE MANAGEMENT  
P.O. BOX 27687 RALEIGH, NC 27611-7687

May 29, 1990

Venture Packaging Inc., Stylecraft  
PO Box 7148  
Charlotte NC 28241

RE: EPA ID No.: NCD074503129

Dear Sir:

Based on information supplied by you for the site identified with the above EPA ID number, the state has accepted and processed the change in RCRA listing or information that you requested.

Your EPA ID number is active.

Current computer record of your facility contains following information:

( X INDICATES OPERATIONAL STATUS OF YOUR FACILITY.)

X LARGE GENERATOR	- SMALL QNTY. GENERATOR
- TRANSPORTER	- TREATER
- STORER	- DISPOSER

COMPANY NAME	Venture Packaging Inc., Stylecraft
OWNERSHIP	Venture Corporation
CONTACT	Dodds, Anne
PHONE NUMBER	(704)588-0220
LOCATION ADDRESS	1500 Westinghouse Blvd
CITY, STATE & ZIP	Charlotte NC 28273

Please verify the above computer information. Please notify us of any corrections.

We are advising EPA of the change. Please notify us if there is any further change in your operations which would affect your status. Your EPA ID number is currently active.

Sincerely,



R.J. Edwards, Administrative Officer  
Hazardous Waste Section

CC: ADAM WIFFIELD  
EPA Region IV  
Mecklenburg County Health Department

DEPARTMENT OF ENVIRONMENT, HEALTH, AND NATURAL RESOURCES  
 SOLID WASTE MANAGEMENT DIVISION  
 P.O. BOX 27687 RALEIGH, NORTH CAROLINA 27611-7687  
 401 OBERLIN ROAD

DOCKET # 89-344

INSPECTION AND EVALUATION REPORT

EPA ID: # NCD 074503129 FACILITY NAME: VENTURE PACKAGING, INC.

ADDRESS: 1600 WESTINGHOUSE BLVD. CITY: CHARLOTTE, NC 28217

NEW:  UPDATE:  DATE OF INITIAL EVALUATION: 8/3/89 STAFF ID: 21

RESPONSIBLE AGENCY S S = STATE    E = EPA    X = OVERSITE    O OTHER

TYPE OF EVALUATION 5 1= COMPLIANCE EVAL. INSP. (CEI) 7= PART B CALL - IN  
 COVERED BY THIS 2= SAMPLING INSPECTION 8= WITHDRAWAL CAND.  
 REPORT: ENTER ONE 3= RECORD REVIEW 9= CLOSED FACILITY  
 4= COMP. GWM EVAL. (CME) 10= GENERAL  
 5= COMPLIANCE SCHED. (FOLLOW UP) 11= CASE DEVELOPMENT  
 6= CITIZEN COMPLAINT 80= INFORMAL MEETING

DATE OF EVALUATION COVERED BY THIS REPORT: 8/29/90

CLASS OF VIOLATION				VIOLATIONS/RELEASES					
CLASS	GWM	C/CP	FIN	PT.B	CMPL. SCH	MNFST	LB	OT	WM
I					0			0	
II					0			0	
ACCEPTABLE CODES									
	X S	X S	X S	X S	X S	X S	X S	X S	X S
	Z O	Z O	Z O	Z O	Z O	Z O	Z O	Z O	Z O
	H	H	I* B*	H	C B	H	H		
			H		H				

KEY X = VIOLATIONS 0 = NO VIOLATION Z = PENDING  
 B = VIOL. & SPECIALITY; S = SAME VIOL./SPEC.  
 SPECIALTIES † = NO INSURANCE ONLY; C = CA SCHED. VIOL.  
 H = HPV VIOLATIONS PRESENT; \* CLASS I ONLY

ENFORCEMENT ACTIONS: (AREA OF VIOL./RISE = GW, CP, PR, PB, CS, MA, OT, LB, OR NA)

CLASS	AREA OF VIOL.	TYPE CODE	DATE ACTION TAKEN	COMPLIANCE DATES		PENALTY ASSES. COLL.	RESP AG.
				SCHED.	ACTUAL		

CODES FOR TYPES OF ENFORCEMENT ACTIONS:  
 03 = WARNING LETTER/NOV 11 = FILED CIVIL ACTION  
 04 = ADMIN. COMPLAINT 12 = FILED CRIMINAL ACTION  
 05 = FINAL ADMIN. ORDER 13 = CIVIL REFERRAL TO AG  
 10 = INFORMAL 90 = HEARING

COMMENTS: FOLLOW UP INSPECTION TO COMPLIANCE ORDER DOCKET # 89-344  
NO VIOLATIONS

[inspect.rje]

## RCRA INSPECTION REPORT

### 1) Facility Information

VENTURE PACKAGING, INC.  
1600 WESTINGHOUSE BLVD.  
CHARLOTTE, NC 28217  
NCD 074503129

### 2) Facility Contact

MS. ANNE DODDS, TECHNICAL MANAGER  
(704) 588-8018 FAX  
(704) 588-0220

### 3) Survey Participants

MS. ANNE DODDS, VENTURE PACKAGING, INC.  
MR. BOB KICKERT, " "  
MR. PAT BAINES, " "  
MR. JOHN KOWBA, NATIONAL ENVIR. TECH. (CONSULTANT)

### 4) Date of Inspection

WEDNESDAY, AUGUST 29, 1990

### 5) Purpose of Survey

FOLLOW UP AUDIT TO DETERMINE FACILITY  
COMPLIANCE TO COMPLIANCE ORDER DOCKET # 89-344

### 7) Facility Description

JULY 1990 INSTALLATION OF NEW 150 GALLON DISTILLATION UNIT  
AND 300 GALLON WASTE STORAGE TANK. WASTE BINS NO  
LONGER USED. SOLVENT WASHING UNIT ALSO INSTALLED USED  
TO CLEAN PRESS PARTS, 5 GAL PALS AND EMPTY DRUMS.  
(2) CAUSTIC TANKS REMOVED AND REPLACED WITH WASHER  
UNIT.

8) Waste Minimization

NEWLY INSTALLED EQUIPMENT (SEE DESCRIPTION)

9) Site Deficiencies

NONE

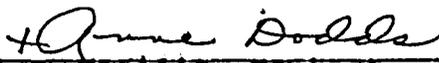
10) Recommendations

NONE

11) Signed

  
\_\_\_\_\_  
Inspector/Reviewer

8/29/90  
\_\_\_\_\_  
Date

  
\_\_\_\_\_  
Facility Contact



State of North Carolina  
Department of Environment, Health, and Natural Resources  
Division of Solid Waste Management  
P.O. Box 27687 · Raleigh, North Carolina 27611-7687

James G. Martin, Governor  
William W. Cobey, Jr., Secretary

William L. Meyer  
Director

February 5, 1990

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Ms. Anne Dodds  
Venture Packaging, Inc.  
1600 Westinghouse Blvd.  
Charlotte, North Carolina 28217

Re: Compliance Order with Administrative Penalty  
Venture Packaging, Inc. NCD 074 503 129

Dear Ms. Dodds:

Enclosed is a Compliance Order with Administrative Penalty issued to Venture Packaging, Inc. for certain violations of the North Carolina Solid Waste Management Act, N.C.G.S. 130A, Article 9 (Act), and the North Carolina Hazardous Waste Management Rules, 10 NCAC 10F (Rules). The Compliance Order with Administrative Penalty describes both the violations and the actions required for compliance, at your facility, with the Act and Rules.

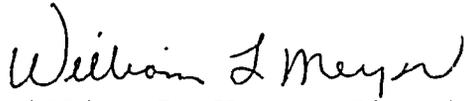
Pursuant to N.C.G.S. 130A-22(a), an administrative penalty of \$31,500.00 is imposed on the Compliance Order with Administrative Penalty. You may appeal this Compliance Order with Administrative Penalty by filing a written petition for an administrative hearing to the Office of Administrative Hearings, P. O. Drawer 11666, Raleigh, North Carolina 27604, and by serving a copy of the petition to John Hunter, Process Agent, Department of Environment, Health, And Natural Resources, 512 N. Salisbury Street, Raleigh, North Carolina 27611, within 30 days of the receipt of the Compliance Order with Administrative Penalty. The petition must be in accordance with N.C.G.S. 150B-23(a) and 10 NCAC 10G .0704.

If no administrative hearing is requested, the administrative penalty must be paid by Venture Packaging, Inc. within 60 days of receipt of the Compliance Order with Administrative Penalty by check or money order, payable to the Solid Waste Management Division, and mailed to Jerome H. Rhodes, Section Chief, Hazardous Waste Section, Solid Waste Management Division, P. O. Box 27687, Raleigh, N. C., 27611-7687.

0220-88

If you desire to schedule an informal conference to discuss the Compliance Order with Administrative Penalty, please contact R. Douglas Holyfield, Branch Head, Waste Management Branch, at (919) 733-2178.

Respectfully,



William L. Meyer, Director  
Solid Waste Management Division

JHR/dd/DH315H

Enclosures: Compliance Order

cc: Central File  
Adam Wipfield  
Jim Edwards  
Doug Holyfield  
Keith Masters ✓  
Steve Reid  
Mecklenburg County Health Director  
Jerry Rhodes  
Bill Lopp  
Bob Glaser

North Carolina Department of Environment, Health,  
and Natural Resources  
Solid Waste Management Division

In Re: Venture Packaging, Inc.)  
NCDO74503129 )

COMPLIANCE ORDER WITH  
ADMINISTRATIVE PENALTY  
Docket # 89-344

PRELIMINARY STATEMENT

This Compliance Order with Administrative Penalty is issued under the North Carolina Solid Waste Management Act, N.C.G.S. 130A, Article 9 (Act), and the North Carolina Hazardous Waste Management Rules, 10 NCAC 10F (Rules). William L. Meyer, Director, Solid Waste Management Division, Department of Environment, Health, and Natural Resources, has been delegated the authority to implement the Act and Rules. Venture Packaging, Inc. is a Michigan corporation which generates hazardous waste in Charlotte, Mecklenburg County, North Carolina. Based upon an inspection performed at Venture Packaging, Inc. the North Carolina Solid Waste Management Division has determined that Venture Packaging, Inc. is in violation of certain requirements of the Act and Rules as set forth in this Compliance Order with Administrative Penalty.

STATEMENTS OF FACT AND LAW

1. On December 18, 1980, the State of North Carolina, Solid Waste Management Division (Division), was authorized to operate the State RCRA hazardous waste program under the North Carolina Solid Waste Management Act, N.C.G.S. 130A, Article 9, and Rules codified at 10 NCAC 10F. William L. Meyer, Division Director, has been delegated those responsibilities.
2. Venture Packaging, Inc. is a Michigan corporation which generates hazardous waste as defined in N.C.G.S. 130A-290(5) and 10 NCAC 10F .0002, in Charlotte, North Carolina. Venture Packaging, Inc. is a person as defined in N.C.G.S. 130A-290(15) and 10 NCAC 10F .0002.
3. 40 CFR Part 262, codified at 10 NCAC 10F .0030, contains standards and requirements applicable to generators of hazardous waste.
4. Prior to November 19, 1980, Venture Packaging, Inc. notified the United States Environmental Protection Agency (EPA) that it generated a solid waste which is defined as a hazardous waste under 40 CFR 261, codified at 10 NCAC 10F .0029.
5. On August 3, 1989, Mr. Adam Wipfield, Waste Management Specialist, with the Division, inspected Venture Packaging, Inc. facility and found the facility to be in violation of certain

requirements contained in 40 CFR 262, codified at 10 NCAC 10F .0030. Specifically:

- A. 40 CFR 262.34(a)(1), codified at 10 NCAC 10F .0030, states that a generator may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status provided the waste is placed in containers and the generator complies with Subpart I (265.170-265.177) of 40 CFR 265.

40 CFR 265.171, codified at 10 NCAC 10F .0033, states that if a container holding hazardous waste is not in good condition or if it begins to leak, the owner or operator must transfer the hazardous waste from this container to a container that is in good condition, or manage the waste in some other way that complies with the requirements of this part.

Venture Packaging, Inc. is in violation of 40 CFR 262.34(a)(1), codified at 10 NCAC 10F .0030, in that it accumulates hazardous waste on-site without a permit or without having interim status, and when a container holding hazardous waste was not in good condition, or when it began to leak, it did not transfer the hazardous waste from this container to a container that was in good condition, or manage the waste in some other way that complies with the requirements of this part, as required by 40 CFR 265.171, codified at 10 NCAC 10F .0033.

- B. 40 CFR 262.34(a)(2), codified at 10 NCAC 10F .0030, states that a generator may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status, provided that the date upon which each period of accumulation begins is clearly marked and visible for inspection on each container.

Venture Packaging, Inc. is in violation of 40 CFR 262.34(a)(2), codified at 10 NCAC 10F .0030, in that it accumulates hazardous waste on-site without a permit or without having interim status, and the date upon which each period of accumulation began was not clearly marked and visible for inspection on each container.

- C. 40 CFR 262.34(a)(3), codified at 10 NCAC 10F .0030, states that a generator may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status, provided that, while being accumulated on-site, each container and tank is labeled or marked clearly with the words, "Hazardous Waste".

Venture Packaging, Inc. is in violation of 40 CFR 262.34(a)(3), codified at 10 NCAC 10F .0030, in that it accumulates hazardous waste on-site without a permit or without having interim status, and each container was not

labeled or marked clearly with the words "Hazardous Waste". Six 300-gallon tote bins containing F003 hazardous waste were not marked with the words "Hazardous Waste".

- D. 40 CFR 262.34(a)(4), codified at 10 NCAC 10F .0030, states that a generator may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status, provided that the generator complies with the requirements for owners or operators in Subparts C (265.30 - 265.37) and D (265.50 - 265.56) in 40 CFR Part 265 and with Section 265.16

40 CFR 265.16(c), codified at 10 NCAC 10F .0033, states that facility personnel must take part in an annual review of the initial training required in paragraph (a) of this section.

Venture Packaging, Inc. is in violation of 40 CFR 262.34(a)(4), codified at 10 NCAC 10F .0030, in that it accumulates hazardous waste on-site without a permit or without having interim status, and facility personnel have not taken part in an annual review of the initial training required in paragraph (a) of this section, as required by 40 CFR 265.16(c), codified at 10 NCAC 10F .0033.

#### CIVIL PENALTY

N.C.G.S. 130A-22(a) and 10 NCAC 10G .0701-.0707 authorizes an administrative penalty of up to \$10,000.00 per day for each violation of the hazardous waste provisions of the Act and Rules. The N.C. Solid Waste Management Penalty Computation Procedure (March 19, 1985) was used to determine the penalty. The factors considered in determining the administrative penalty include, but are not limited to: the nature of the violations, the potential effect on the public health and environment, the degree and extent of harm caused by the violations, the costs of rectifying any damage, the types and amount of wastes, the ease and costs of compliance and the history of noncompliance. For each violation specified above, the following penalties are assessed: A. \$10,000.00; B. \$4,000.00; C. \$10,000.00; D. \$7,500.00. Accordingly, a total penalty of \$31,500.00 is hereby imposed.

#### CONDITIONS FOR CONTINUED OPERATION

Based upon the foregoing, Venture Packaging, Inc. is hereby ordered to take the following actions:

1. Within sixty (60) days submit the amount of the administrative penalty, by check or money order, payable to the Solid Waste Management Division, and mailed to Jerome H. Rhodes, Section Chief, Hazardous Waste Section, Solid Waste Management Division, P. O. Box 27687, Raleigh, NC 27611-7687.

2. By March 5, 1990, Venture Packaging, Inc. shall take the following actions to correct the violations as stated in this Compliance Order with Administrative Penalty and otherwise be in compliance with the generator requirements of 40 CFR 262, codified at 10 NCAC 10F .0030:
  - A. Comply with 40 CFR 262.34(a)(1), codified at 10 NCAC 10F .0030. Venture Packaging, Inc. shall for its hazardous waste accumulated on-site without a permit or without having interim status, transfer hazardous waste from containers holding hazardous waste that are not in good condition or that are leaking, to containers that are in good condition, or manage the waste in some other way that complies with the requirements of his part, as required by 40 CFR 265.171, codified at 10 NCAC 10F .0033.
  - B. Comply with 40 CFR 262.34(a)(2), codified at 10 NCAC 10F .0030. Venture Packaging, Inc. shall for its hazardous accumulated on-site without a permit or without having interim status, clearly mark and make visible for inspection the date upon which each period of accumulation began on each container.
  - C. Comply with 40 CFR 262.34(a)(3), codified at 10 NCAC 10F .0030. Venture Packaging, Inc. shall for its hazardous waste accumulated on-site without a permit or without having interim status, label or clearly mark each hazardous waste container with the words "Hazardous Waste".
  - D. Comply with 40 CFR 262.34(a)(4), codified at 10 NCAC 10F .0030. Venture Packaging, Inc. shall make sure that facility personnel take part in an annual review of the initial training required in paragraph (a) of this section, as required by 40 CFR 265.16(c), codified at 10 NCAC 10F .0033.

#### POTENTIAL CONSEQUENCES OF FAILURE TO COMPLY

Venture Packaging, Inc. is hereby advised that pursuant to N.C.G.S. 130A-22, each day of continued violation of any requirement of the Act or the Rules, constitutes a separate violation for which an additional penalty of up to \$10,000.00 per day may be imposed. If the violation(s) continues, Venture Packaging, Inc. may also be subject to further enforcement including injunction from any further generation of hazardous waste and such further relief as may be necessary to achieve compliance with the North Carolina Solid Waste Management Act and Rules.

#### OPPORTUNITY TO REQUEST A HEARING

Venture Packaging, Inc. has the right to request an administrative hearing to contest any matter of law, material fact, requirement, or

penalty set forth in this Compliance Order with Administrative Penalty. To avoid being in default and having the penalty collected without further administrative proceedings, a written petition must be submitted within 30 days of receipt of this Compliance Order with Administrative Penalty in accordance with N.C.G.S. 150B-23(a) and 10 NCAC 10G .0704.

The petition shall be verified or supported by affidavit and shall state facts tending to establish that the agency has deprived Venture Packaging, Inc. of property, has ordered Venture Packaging, Inc. to pay a fine or civil penalty, or has otherwise substantially prejudiced Venture Packaging, Inc.'s, rights and that the Division:

1. exceeded its authority or jurisdiction;
2. acted erroneously;
3. failed to use proper procedure;
4. acted arbitrarily or capriciously; or
5. failed to act as required by law or rule.

The petition must be filed with the Office of Administrative Hearings, P. O. Drawer 11666, Raleigh, North Carolina 27604, in accordance with N.C.G.S. 150B-23(a). A copy of the petition must be served to John Hunter, Process Agent, Department of Environment, Health, and Natural Resources, 512 N. Salisbury Street, Raleigh, North Carolina 27611. Requested administrative hearings will be conducted in accordance with applicable rules contained in the North Carolina Administrative Code, a copy of which will be furnished to you upon request. If no hearing is requested, payment of the administrative penalty becomes due within 60 days after receipt of this notice. If a hearing is requested, payment of the administrative penalty is due within 60 days after service of a written copy of the decision. If payment is not received as required, the Secretary of Environment, Health, and Natural Resources shall request the Attorney General to commence an action to recover the amount of the administrative penalty and may also request that an injunctive action be commenced to achieve compliance pursuant to 130A-22(g).

#### INFORMAL CONFERENCE

Whether or not Venture Packaging, Inc. requests an administrative hearing, the Division encourages an informal conference to discuss this matter and to give Venture Packaging, Inc. an opportunity to provide additional information, including any actions it has taken to correct the violation(s). If an informal conference is desired, please contact:

R. Douglas Holyfield, Branch Head  
Waste Management Branch  
Hazardous Waste Section  
P. O. Box 27687  
Raleigh, N. C. 27611-7687  
(919) 733-2178

THE SCHEDULING OF AN INFORMAL CONFERENCE WILL NOT RELIEVE VENTURE PACKAGING, INC. OF THE NEED TO FILE A WRITTEN PETITION FOR AN ADMINISTRATIVE HEARING WITHIN 30 DAYS OF RECEIPT OF THIS COMPLIANCE ORDER WITH ADMINISTRATIVE PENALTY IF A HEARING IS DESIRED.

By: William L. Meyer  
William L. Meyer, Director  
Solid Waste Management Division  
Department of Environment, Health  
And Natural Resources

Date: FEB 5, 1990

CERTIFICATE OF SERVICE

I hereby certify that I have caused a copy of the foregoing Compliance Order with Administrative Penalty to be served upon the person(s) designated below, at the last known address, by causing said copy to be deposited in the U.S. Mail, First Class (certified mail, restricted delivery, and return receipt requested, postage prepaid) in an envelope addressed to:

Ms. Anne Dodds  
Venture Packaging, Inc.  
1600 Westinghouse Blvd.  
Charlotte, North Carolina 28217

Dated this 5<sup>th</sup> day of FEB, 1990.

William L. Meyer  
William L. Meyer, Director  
Solid Waste Management Division  
Department of Environment, Health  
And Natural Resources

DH315H



State of North Carolina  
Department of Environment, Health, and Natural Resources  
Division of Solid Waste Management  
P.O. Box 27687 · Raleigh, North Carolina 27611-7687

James G. Martin, Governor  
William W. Cobey, Jr., Secretary

William L. Meyer  
Director

July 19, 1990

Mr. Charles H. May, President  
Venture Packaging, Inc.  
P.O. Box 7148  
Charlotte, N. C. 28241

RE: Settlement Agreement - Compliance Order Docket #89-344

Dear Mr. May:

Upon receipt of the submittal presented in your behalf by Mr. Stephen Shi, dated July 17, 1990, and upon subsequent discussions with my staff, we concur with your proposal to reach a settlement on this enforcement action. Your proposal to submit a total penalty of \$18,000.00 is accepted. As stipulated in the Administrative Order, please submit this amount payable to the Solid Waste Management Division, and mail to Jerome H. Rhodes, Section Chief, Hazardous Waste Section, P.O. Box 27687, Raleigh, N.C. 27611-7687.

Upon receipt of this penalty payment and processing of a reinspection of the site, Compliance Order with Administrative Penalty, Docket #89-344 will be considered closed. Please call Doug Holyfield at (919)733-2178 if you should have any questions or comments.

Sincerely,

*William L. Meyer*  
William L. Meyer, Director  
Solid Waste Management Division

cc: Doug Holyfield  
Jerry Rhodes  
Jim Edwards  
Keith Masters  
Bill Lopp  
Stephen Shi, Esq.  
Central Files

*cc. JRM Send to Springs Allen  
7/26/90*



State of North Carolina  
Department of Environment, Health, and Natural Resources  
Division of Solid Waste Management  
P.O. Box 27687 · Raleigh, North Carolina 27611-7687

James G. Martin, Governor  
William W. Cobey, Jr., Secretary

William L. Meyer  
Director

April 24, 1990

Mr. Charles H. May, President  
Venture Packaging, Inc.  
P.O. Box 7148  
Charlotte, N.C. 28241

RE: Settlement Agreement - Compliance Order with Administrative  
Penalty - Venture Packaging, Inc., Docket #89-344

Dear Mr. May:

In response to your letter of April 5, 1990, we have reviewed the information supplied concerning the referenced Compliance Order and we have the following comments:

A. 40 CFR 262.34(a)(1), Management of Containers. As stated in this regulation, all hazardous waste in containers must be managed in a way that complies with the requirements of this part. This requires containment of all waste, waste residues, etc. Although sampling does not indicate residual contamination, the incidental splashing on the sides of the container would still constitute a release to the environment. No mitigation of the administrative penalty is proposed for this violation.

B. 40 CFR 262.34(a)(2), Accumulation start date. As stated in this regulation, each container of hazardous waste must be clearly marked and visible for inspection with the date upon which each period of accumulation begins. As stipulated in your letter that waste shipments were occurring on a regular basis (within the 90 day period), I propose to mitigate the the administrative penalty of \$4,000.00 to \$2,000.00.

C. 40 CFR 262.34(a)(3), "Hazardous Waste" label. As stated in this regulation, each container of hazardous waste must be labeled or marked clearly with the words "Hazardous Waste". It was apparent at the time of the inspection, that six (6) 300-gallon totes were not labeled "Hazardous Waste". With the potential adverse impact on site employees and/or third parties (emergency responders), no mitigation of the administrative penalty is proposed for this violation.

D. 40 CFR 262.34(a)(4), Annual Review of Personnel Training. As stated in this regulation, each employee associated with managing hazardous waste must be provided with an annual update of the initial training. In consideration that your letter did not respond to this item, no mitigation of the administrative penalty is proposed for this violation.

Based upon this submittal, I propose to mitigate the \$31,500.00 administrative penalty assessed in the Compliance Order with Administrative Penalty, Docket #89-344, to \$29,500.00. If Venture Packaging, Inc., agrees with this proposal, please submit the amount of the mitigated administrative penalty (\$29,500.00), payable to the Solid Waste Management Division, and mail to Jerome H. Rhodes, Section Chief, Hazardous Waste Section, P.O. Box 27687, Raleigh, North Carolina, 27611-7687.

If you should have any questions or if you should have any further information to justify a re-evaluation, please call me or Doug Holyfield at (919)733-2178.

Sincerely,



William L. Meyer, Director  
Solid Waste Management Division

cc: Doug Holyfield  
Keith Masters ✓  
Jerry Rhodes  
Bill Lopp  
Stephen Shi, Esq. Central Files



February 28, 1990

Mr. Adam Wipfield  
North Carolina Department of Human Resources  
Solid and Hazardous Waste Management Branch  
500 W. Trade Street  
Charlotte, NC 28202

Dear Mr. Wipfield:

Please be advised Venture Packaging has taken the following actions to address the matters you identified as a result of our 8-3-89 Annual Inspection:

- A) All waste ink scrapings and other debris have been collected and sent to a permitted disposal facility via a licensed transporter under appropriate manifest. Also, accumulation of waste spillage on hazardous waste containers has been removed and sent to a permitted disposal facility via a licensed transporter under appropriate manifest.
- B) All hazardous waste containers are clearly marked with accumulation start dates.
- C) All hazardous waste containers are clearly and permanently marked with the words "Hazardous Waste".
- D) All facility personnel designated as Hazardous Waste Handlers have taken part in an annual review of hazardous waste management procedures and contingency plan implementation. A copy of our training procedure and documentation is attached for your records.

If I can provide you with additional information, or should you care to visit our site, please do not hesitate to call.

Respectfully,

*Anne Dodds*

Anne Dodds  
Technical Manager

cc: Pat Baines, Director of Operations  
William Laye, Waste Management Director

Enclosure

VENTURE PACKAGING, INC.  
P. O. Box 7148  
Charlotte, North Carolina 28241

PLANT LOCATIONS:

Cleveland, Ohio  
216 • 521-6570

Charlotte, North Carolina  
704 • 588-0220

DATE: August 16, 1989  
 SUBJECT: Hazardous Waste Management - Annual Training Report  
 FROM: William "Red" Laye  
 TO: Pat Baines

In accordance with Hazardous Waste Management Regulations, the following personnel directly responsible for the handling, collecting, and removal of hazardous waste have been instructed on:

1. Venture Contingency Plan and Emergency Procedures.
2. Proper safety and fire procedures.
3. Proper labeling and identification requirements.



Trainee Signatures and Dates:

<u>Anne Dodds</u> 8-17-89	<u>Maurice C. Calkins</u> 8-17-89
<u>D.E. Frye</u> 8-17-89	<u>John Stutland</u> 8/28/89
<u>William M. Laye</u> 8-17-89	<u>Charles W. Emmell</u> 8-28-89
<u>John W. Haggins</u> 8-17-89	<u>Ray C. Leopard</u> 8-31-89
<u>John W. Haggins</u> 8-17-89	<u>Bill - J. Kikkert</u> 9-15-89
<u>Don Robertson</u> 8-17-89	
<u>J. H. Pierce</u> 8-17-89	

William "Red" Laye  
 Waste Management Director

cc: Anne Dodds, Coordinator  
 Charles May  
 Bob Kikkert

## TRAINING-HAZARDOUS WASTE HANDLERS

PURPOSE: To review basic safety procedures for handling hazardous waste.

TRAINERS: Anne Dodds  
William "Red" Laye

SUPERVISORS: Dan Chamley, Dave Ballard, Ron Robertson, Joe Kirkley,  
Chuck Leopard

WASTE HANDLERS: 1st Shift: Marvin Atkinson-Sr. Inkman  
Doug Frye-Sr. Inkman  
John Haggins-Washup/Janitorial

2nd Shift: Charles Mc Connell-Inkman  
Jim Reeves-Washup/Janitorial

3rd Shift: Sam Strickland-Sr. Inkman

### I. WASTE COLLECTION:

#### A) Bin Waste

- 1) One 325 gallon waste bin for waste inks and washup solvents is kept behind press 12-7 at all times.
- 2) At the end of a job, machine operators and/or helpers are to carry waste inks and washup solvents to the collection bin. The waste should be carried in covered metal kits.
- 3) Only trained WASTE HANDLERS are permitted to pour the waste from the kits into the bin. The WASTE HANDLERS should:
  - a) Use goggles.
  - b) Avoid spilling waste on the outside of the bin.
  - c) Take empty kits to the washup room.
- 4) The bin lid should remain closed unless waste is being added to the bin.

#### B) Caustic Waste

- 1) Janitorial/Washup personnel remove sludge from the washup tank as needed.
- 2) The caustic sludge is placed in a 55 gallon drum designated for that purpose.

B)

- 3) The drum should be securely closed when not in use.
- 4) When the drum is full, washup personnel are to notify Marvin Atkinson or Doug Frye for proper labeling and transport to the outside containment area.
- 5) Caustic waste should be segregated from the flammable waste within the outside containment area.

C) Adhesive Waste

- 1) All waste adhesive generated during the previous 24 hours will be collected by Marvin Atkinson or Doug Frye at the beginning of first shift.
- 2) Adhesive waste will be placed in a 55 gallon drum designated for that purpose.
- 3) When the drum is full, Marvin Atkinson or Doug Frye will insure the drum is properly labeled before moving to the outside containment area.
- 4) Adhesive waste is flammable and should be segregated from caustic waste within the outside containment area.

## II. LABELING:

A) 325 Gallon Waste Bins-

- 1) The words "HAZARDOUS WASTE" are to be clearly stenciled on each side of each bin.
- 2) Vinyl placards stating "FLAMMABLE" are to be clearly visible on each side of each bin. See illustration A-1.
- 3) A label with the beginning accumulation date should be clearly visible on each bin. The accumulation date starts when the bin is put in the pressroom. See illustration A-2.

II. B) 55 Gallon Drums-

- 1) Sludge from the washup room- Refer to illustrations "B-1" and "B-2". Labels must be placed on the side of the drum, approximately 5 inches from the top. The accumulation date begins when a full drum is moved to the outside containment area.
- 2) Waste Adhesive (solidified): Refer to illustrations "C-1" and "C-2". Labels must be placed on the side of the drum, approximately 5 inches from the top. The accumulation date begins when a full drum is moved to the outside containment area.
- 3) Ink Sludge, removed from the bottom of the waste bins- See illustrations "D-1" and "D-2". Labels must be placed on the side of the drum, approximately 5 inches from the top. The accumulation date begins when the sludge is drummed up.

III. MOVING WASTE BINS AND DRUMS:

- A) Bins should be securely closed and padlocked before being moved. Drums should be securely closed before being moved.
- B) Waste bins (or drums) should be moved during daylight hours only.
- C) When a collection bin (or drum) is full, a WASTE HANDLER is to move it to the outside containment area, using a forklift.

IV. HOUSEKEEPING:

- A) IMPORTANT- Spills must not be allowed to accumulate on the outside of the waste bins or drums. Wipe up small spills immediately.
- B) Do not allow any hazardous waste to come in contact with the ground in or around the outside containment area. This applies to both paved and unpaved areas.

V. SPILLS

- A) In the case of a rupture of a drum or bin, notify the supervisor immediately to initiate the spill control plan.
- B) In the case of a slow leak from a drum or bin, notify the supervisor for cleanup instructions.

VI. WASTE PICKUPS:

- A) Just prior to a tanker pickup of the waste stored in the bins, the waste is stirred to disperse solids that have settled.
  - 1) Mixing drill for the bins is located next to the waste storage area.
  - 2) The drill must be grounded to the bin while mixing.
  - 3) Avoid dripping waste outside the bin. Wipe up small spills immediately.
- B) A WASTE HANDLER must be present for all waste pickups.
- C) All manifests must be checked by either Anne Dodds or Marvin Atkinson for completeness and accuracy.

VII. JOB DESCRIPTIONS

- A) Anne Dodds, Technical Manager - Supervise employees in the department. Purchase inks and solvents. Oversee company compliance to all pertinent EPA, DOT, and OSHA regulations. Assist in product development and field problems.
- B) William "Red" Laye, Printing Superintendent - Oversee printing and slitting departments on all shifts. Manage 3 line supervisors. Coordinate training and drills for the First Response Teams.
- C) Supervisors - Train and supervise production employees. Give final approval and release for job startups. Lead First Response Teams for respective shifts.
- D) Marvin Atkinson, Sr. Inkman - Responsible for ink inventories and assigning manufacturing specifications. Match colors and assign color files. Perform weekly waste inspections. Schedule hazardous waste pickups. Perform duties of HAZARDOUS WASTE HANDLER.
- E) Doug Frye, Charles McConnell, Sam Strickland, Sr. Inkmen - Formulate and stage inks for production. Perform required lab tests. Responsible for housekeeping in inkroom and lab. Perform duties of HAZARDOUS WASTE HANDLER.
- F) John Haggins and Jim Reeves - Responsible for cleaning ink pans and kits, disposing of trash. Perform duties of HAZARDOUS WASTE HANDLER.

# FLAMMABLE



3

Printed by LABEL MASTER, Div. of AMERICAN LABEL MARK CO.

CHICAGO, IL 60646

PSR 2

ILLUSTRATION A-1

# HAZARDOUS WASTE

ACCUMULATION

START DATE \_\_\_\_\_

CONTENTS WASTE INK

**HANDLE WITH CARE!**  
CONTAINS HAZARDOUS OR TOXIC WASTES

© Copyright Lab Safety Supply, Janesville, WI 53546

ILLUSTRATION A-2

# HAZARDOUS WASTE

FEDERAL LAW PROHIBITS IMPROPER DISPOSAL.

IF FOUND CONTACT THE NEAREST POLICE  
PUBLIC SAFETY AUTHORITY OR THE  
U.S. ENVIRONMENTAL PROTECTION AGENCY.

PROPER DOT <sup>NO WASTE</sup> ALKALINE LIQUID,  
SHIPPING NAME N.O.S. CORROSIVE UN OR NA# NA1719  
MATERIAL

GENERATOR INFORMATION:

NAME VENTURE PACKAGING, INC.

ADDRESS 1600 WESTINGHOUSE BLVD.

CITY CHARLOTTE STATE N.C. ZIP 28217

EPA ID NO. NC D074503129 EPA WASTE NO. D002

ACCUMULATION START DATE \_\_\_\_\_ MANIFEST DOCUMENT NO. \_\_\_\_\_

**CAUTION:**

**THIS CONTAINER HOLDS HAZARDOUS OR TOXIC WASTE.**

**HANDLE WITH CARE!**

© Copyright Science Related Materials Inc., Janesville, WI 53547

WASTE STREAM NO. 4241-2

COMMON NAME WASHUP SLUDGE

\_\_\_\_\_

GENERATOR VENTURE PACKAGING

TSDF HERITAGE ENVIRONMENTAL SERVICES



PROPER DOT RQ WASTE,  
SHIPPING NAME FLAMMABLE SOLID, n.o.s., UN1325

**ORM-E**

**HAZARDOUS WASTE**  
FEDERAL LAW PROHIBITS IMPROPER DISPOSAL.  
IF FOUND CONTACT THE NEAREST POLICE OR  
PUBLIC SAFETY AUTHORITY OR THE  
U.S. ENVIRONMENTAL PROTECTION AGENCY.

GENERAL INFORMATION:

NAME VENTURE PACKAGING, INC.

ADDRESS 1600 WESTINGHOUSE BLVD.

CITY CHARLOTTE STATE N.C. ZIP 28217

EPA ID NO. NC D074503129 EPA WASTE NO. F003, F005

ACCUMULATION START DATE \_\_\_\_\_ MANIFEST DOCUMENT NO. \_\_\_\_\_

**HANDLE WITH CARE!**  
**CONTAINS HAZARDOUS OR TOXIC WASTES.**

© Copyright Science Related Materials Inc., Janesville, WI 53547

ILLUSTRATION C-1



ILLUSTRATION C-2

PROPER DOT RQ WASTE  
SHIPPING NAME FLAMMABLE LIQUID, n.o.s., UN1993

**ORM-E**

**HAZARDOUS WASTE**  
FEDERAL LAW PROHIBITS IMPROPER DISPOSAL.  
IF FOUND CONTACT THE NEAREST POLICE OR  
PUBLIC SAFETY AUTHORITY OR THE  
U.S. ENVIRONMENTAL PROTECTION AGENCY.

GENERAL INFORMATION:

NAME VENTURE PACKAGING, INC.  
ADDRESS 1600 WESTINGHOUSE BLVD.  
CITY CHARLOTTE STATE N.C. ZIP 28217  
EPA ID NO. NCD074503129 EPA WASTE NO. F003, F005  
ACCUMULATION START DATE \_\_\_\_\_ MANIFEST DOCUMENT NO. \_\_\_\_\_

**HANDLE WITH CARE!**  
**CONTAINS HAZARDOUS OR TOXIC WASTES.**

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ILLUSTRATION D-2