UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

FEB 04 2003

REPLY TO THE ATTENTION OF
DE-9J

RECEIVED
FEB 06 2003

**CERTIFIED MAIL**
**RETURN RECEIPT REQUESTED**

Mr. Gary Hilliard
Graphics and Technical Manager
Hood Packaging Corporation
1887 Gateway Blvd
St. Paul, MN 55112

Re: Return to Compliance
EPA I.D. No.: MNR 000 102 509

Dear Mr. Hilliard:

On November 7, 2002, a representative of the United States Environmental Protection Agency (U.S. EPA) inspected Hood Flexible Packaging Corporation ( facility or you) located in Arden Hills, Minnesota. In response to violations of the Standards Applicable to Generators of Hazardous Waste set forth at Minnesota Rules, Chapter 7045 [40 CFR part 262] identified during the inspection, we issued a Notice of Violation (NOV) to you on January 13, 2003. Subsequent to our NOV, you submitted additional information regarding the identified violations in a correspondence dated January 27, 2003.

This letter is to inform you that U.S. EPA has reviewed the referenced responses, and does not plan additional enforcement action at this time. This letter does not limit the applicability of the requirements evaluated, or of other federal or state statutes or regulations. U.S. EPA and the Minnesota Pollution Control Agency (MPCA) will continue to evaluate your facility in the future.

If you have any questions or concerns regarding this matter, please contact Daniel Chachakis, of my staff, at (312) 886-9871.

Sincerely,

Lorna M. Jereza, P.E., Chief
Enforcement and Compliance Assurance Branch
Compliance Section 1

cc: Raymond Bissonnette, MPCA

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
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REPLY TO THE ATTENTION OF:
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JAN 13 2003

**CERTIFIED MAIL**
**RETURN RECEIPT REQUESTED**

Mr. Gary Hilliard
Graphics and Technical Manager
Hood Packaging Corporation
1887 Gateway Boulevard
St. Paul, MN 55112

Re: Notice of Violation
Compliance Evaluation Inspection
EPA I.D. No.: **MNR 000 102 509**

Dear Mr. Hilliard:

On November 7, 2002, a representative of the United States Environmental Protection Agency (U.S. EPA) inspected Hood Flexible Packaging Corporation located in Ardan Hills, Minnesota (the Facility). The purpose of the inspection was to evaluate the Facility's compliance with the Standards Applicable to Generators of Hazardous Waste set forth at Minnesota Rules, Chapter 7045 [40 CFR part 262]. Enclosed please find a copy of our inspection report dated November 12, 2002.

Based on the November 7, 2002, inspection, we have determined that Hood Flexible Packaging Corporation is violating the following requirements.

- Minn. R. 7001.0520 [40 CFR 270.1(c)]: Failure to obtain a permit by losing the permit exemption through failing to comply with Minn. R. 7045.0292, Subpart 1 B [40 CFR 262.34(a)(1)(i)], under which the generator must comply with Minn. R. 7045.0626 Subpart 4 [40 CFR 265.173(a)]. A container holding hazardous waste must always be closed during storage, except when it is necessary to add or remove waste. The facility failed to close:

  – Two 5 gallon pails near the end of the printing machine. The Facility states that the waste determination for the solvent / pigment mixture (mixture waste) is not done until end of shift when the waste is brought to the Ink Storage and Mixing Area. The Facility states that the question is whether the Facility will reuse the

mixture waste, making the mixture waste not subject to the hazardous waste rules. However, there is no indication that the mixture waste is ever reused, and statements from the Facility representative indicate that reuse options are few and had failed in the past. The mixture waste is hazardous waste based on Facility knowledge and the MSDS sheets. The two 5 gallon pail containers holding the mixture waste must be labeled and closed. See Picture P6.

– Five drums containing rags mixed with solvents throughout the Facility. According to the MPCA Fact Sheet for Managing Towels, Wipes and Sorbents, the Facility should treat rags contaminated with solvents as hazardous waste until the Facility removes the free liquids. At that point, the liquid is handled as hazardous waste and the rags as non-hazardous waste. If the rags are sent to a commercial laundry, the commercial laundry must have a discharge permit from its local wastewater treatment plant (refer to Managing Towels, Wipes and Sorbents, Hazardous Waste # 4.61, February 2001). See Pictures P7, P8 and 9, P12, P13, and P17.

– Two drums in the Hazardous Waste Collection Area. The two drums contained waste solvent / Ink, a hazardous waste. The MPCA standard for closed containers states that, "Containers used to store hazardous waste must ... have lids, caps, hinges, or other closure devices of sufficient strength and construction so that when closed they will withstand dropping, overturning, or other shock without impairment of the container's ability to fully contain the hazardous waste" (Minn. R. 7045.0626 Subpart 1 B). While the drums did have covers, the covers were set on top of the drums and not secured, and therefore the drums could not fully contain the waste in the event of dropping, overturning, or other shock. See Pictures P19 and P20.

- Minn. R. 7001.0520 [40 CFR 270.1(c)]: Failure to obtain a permit by losing the permit exemption through failing to comply with Minn. R. 7045.0292, Subpart 1 B [40 CFR 262.34(c)]. A Generator may accumulate as much as 55 gallons of hazardous waste ... in containers at or near the point of generation where wastes initially accumulate.

  – The Facility had 110 gallons of hazardous waste in two drums at the accumulation point for the centrifuge machine. The Facility marked both drums with a start date of 11/1, with no year, on the drums. The two drums contained waste solvent, a hazardous waste, and both drums were full. Both drums were in the area beyond the three day limit for transfer to the hazardous waste storage area in accordance with Minn. R. 7045.0292 Subpart 8 D 2 [40 CFR 262.34(c)(2)]. See Pictures P10 and P11.

- Minn. R. 7001.0520 [40 CFR 270.1(c)]: Failure to obtain a permit by losing the permit exemption through failing to comply with Minn. R. 7045.0292, Subpart 1 G [40 CFR

262.34(a)(4)] under which the generator must comply with Minn. R. 7045.0558 Subpart 6 D [40 CFR 265.16(d)(4)]. The facility must maintain training records that document that the training or job experience required ... has been given to, and completed by, facility personnel.

– The Facility was missing or had incomplete documents for eight personnel who manage hazardous waste at the Facility as evidenced by their signatures on Facility hazardous waste manifests.

- Minn. R. [40 CFR 279.22(a)]: Used oil generators shall not store used oil in units other than tanks, containers, or units subject to regulation.

  – The Facility had oil on the floor under the drill press. See Picture P24.

According to Section 3008(a) of the Resource Conservation and Recovery Act (RCRA), U.S. EPA may issue an order assessing a civil penalty for any past or current violation requiring compliance immediately or within a specified time period. Although this letter is not such an order, we request that you submit a written response to the violations cited above within 30 days of receipt of this letter. The response should document the actions, if any, which you have taken since the inspection to comply with the above requirements. You should submit your response to Daniel Chachakis, United States Environmental Protection Agency, Region 5, 77 West Jackson Boulevard, DE-9J, Chicago, Illinois 60604.

If you have any questions regarding this matter feel free to contact Daniel Chachakis, of my staff, at (312) 886-9871.

Sincerely,

Lorna M. Jereza, P.E., Chief
Compliance Section 1
Enforcement and Compliance Assurance Branch

Enclosure

cc: Raymond Bissonette, MPCA
Larry Carlson, Ramsey County

American Business Directory:

SIC: 738988 Packaging Service

Facility Registry System (FRS) Report:

Ramsey County
LQG
Clean Air Act (Air) - Major Facility
Owner: Southern Bag Corp, LTD

The Facility:

The Facility contains a printing operation. The Facility takes plastic sheeting, prints on the plastic, and either forms the plastic into bags or ships rolls of printed plastic sheeting as "roll stock" for other facilities to form into bags or use as shrink rap.

Previous Inspections and Enforcement Actions:

None noted in the U.S. EPA or MPCA files.

Waste Reports:

Waste: D001

## The Opening Conference

I arrived at the facility at or about 8:00 AM. I did a drive / walk reconnaissance around the facility and made the following observations:

The Facility is located in a commercial / industrial park setting on high ground, with wetlands / swamps / water bodies located within 440 yards of the Facility. Round Lake is located Northeast of the Facility.

Picture 1 (P1): Front of Hood Packaging Corporation
P3: Lake from the Parking Lot

There were "On Strike" signs located at the front drive to the Facility. I later learned from the Facility representatives that the strike was settled the previous day.

P2: Strike Sign

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY - REGION 5
WASTE PESTICIDES AND TOXICS DIVISION
ENFORCEMENT COMPLIANCE AND ASSURANCE BRANCH

# COMPLIANCE EVALUATION INSPECTION REPORT

| | |
|---|---|
| **FACILITY NAME:** | **Hood Flexible Packaging Corporation** |
| **FACILITY ID:** | **MNR 000 102 509** |
| **FACILITY ADDRESS:** | **1887 Gateway Blvd, Ardan Hills, MN** |
| **COUNTY:** | **Ramsey** |
| **FACILITY TYPE:** | **LQG** |
| **SIC CODE:** | **738988 (Packaging Service)** |
| **PBTs:** | **None** |
| **INSPECTION DATE:** | **November 7, 2002** |
| **REPORT DATE:** | **November 12, 2002** |
| **INSPECTOR:** | **Daniel Chachakis, U.S. EPA Region 5** |
| **COMPANY REP:** | **Gary Hillard, Hood Flexible Packaging Corporation** |
| **REPORT PREPARED BY:** | **Daniel Chachakis** |

# RCRA COMPLIANCE EVALUATION INSPECTION

## Introduction

The U.S. Environmental Protection Agency (EPA) conducted a Compliance Evaluation Inspection (CEI)at the Hood Flexible Packaging Corporation facility(the Facility), located at 1887 Gateway Blvd., Ardan Hills, Minnesota. The Facility is a Large Quantity Generator (LQG)and has a SIC code of 738988 Packaging Service. Inspector Chachakis conducted a file review on November 5, 2002, using U.S. EPA Region 5 and the Minnesota Pollution Control Agency (MPCA) Resource Conservation and Recovery Act (RCRA) files, as well as conducting an Internet search of Hood Flexible Packaging Company on October 9, 2002. The inspection took place on November 7, 2002. This was a no notice inspection.

## Pre-Inspection File Review

Inspector Chachakis conducted a file review of the Facility using U.S. EPA and MPCA files, as well as the Internet. Inspector Chachakis made the following observations:

I entered the Facility. I was requested to sign in, but the sign in document included "conditions and agreements". I refused to sign in, but did leave my card and was granted access to the facility.

I was escorted to a conference room where I began the opening conference. The following personnel were in attendance at the opening conference:

| | | |
|---|---|---|
| Dan Chachakis | U.S. EPA | Inspector |
| Gary Hilliard | Hood Flexible Packaging | Graphics and Technical Manager |

I presented my Federal Credentials to Mr. Hilliard, and left with Mr. Hilliard the Information Sheet, "U.S. EPA Small Business Resources"; and the RCRA Organic Air Emission Standards for TSFDs and Generators information sheet.

I informed the Facility representatives the purpose of the inspection, LQG CEI, and the order with which I wanted to conduct the inspection (opening conference, brief process overview, walk-through, record review and closing conference). After asking for questions, the Facility began its brief process overview.

## Facility Operation, Processes, and Products

Mr. Hilliard explained that the Facility is basically a printing facility. The Facility prints on plastic sheeting, and forms the plastic sheeting into bags or provides the plastic sheeting as "roll stock" to other companies to form into bags or use as shrink rap.

## Description of Hazardous Waste Management Units

Mr. Hilliard stated that the hazardous waste generated is mostly used solvents from the printing operations. Mr. Hilliard stated that the Facility has one 90-day hazardous waste storage area , and no satellite hazardous waste storage areas. Mr. Hilliard stated that the solvents include ethanol alcohol, normal propyl alcohol, and normal propyl acetate.

Mr. Hilliard stated that the Facility does not re-use / recycle solvents in the process. Mr. Hilliard stated that the Facility may try to reuse the solvents for cleanup operations.

Mr. Hilliard stated that the used solvents are sent off-site and incinerated.

## The Walk-Through Inspection

Process Floor:

Mr. Hilliard led me through the Facility. I immediately noticed a solvent smell as I entered the operations floor. We began looking at the end of the product line.

P4: Finished product at the end of the line.

I observed four 5 gallon containers (pails) with liquid in them, without covers or labels. Mr. Hilliard explained that the process machine nearby was in the process of being cleaned, using solvents, and that the pails contained used solvents with pigments. He stated that facility personnel will move the pails to the hazardous waste storage area at the end of the shift. I observed at least two facility personnel working on a machine.

P5: Containers, 2, open
P6: Containers, 2, open

I observed a barrel with rags in it, labeled "Dirty Rags". Mr. Hilliard explained that the rags contained solvents, and are sent to a centrifuge within the Facility to remove the solvents.

P7: Dirty Rags Barrel, no cover
P8 and P9: Dirty Rags barrel, with cover, not closed

Mr. Hilliard stated that the Facility has an oxidizer to "catch" VOCs. He stated that the oxidizer is located outside the Facility.

Rag Centrifuge Area:

I observed two drums with hazardous waste labels in this area.

The first drum had a 90 dayaccumulation hazardous waste label, with a start date of 11/1, no year. I observed that the drum was full, and was not closed.

P10: top of drum

The second drum had a 90 day accumulation hazardous waste label, a start date of 11/1, no year. I observed that the drum was full, and was not closed.

Note: Closed means closed to withstand dropping, overturning, or other shock while filled, without impairment of the container's ability to fully contain the hazardous waste, in accordance with Minn. R. 7045.0626.

P11: top of drum

I observed two drums without labels in this area. Both drums were marked with the words "Dirty Rags". One was full, one was half full.

P12: Full rag drum, not closed
P13: Half full rag drum, not closed

I observed a bucket under the centrifuge with approximately 1" of solvent in it (according to Mr. Hilliard).

P14: Bucket under centrifuge, not closed

I observed a spill kit.

P15: Spill kit

Ink Storage and Mixing Area

I took an overview picture of the Ink Storage and Mixing Area.

P16: Overview of the Ink Storage and Mixing Area

I observed another rag drum, 3/4 full.

P17: Rag drum, 3/4 full, not closed

I observed what Mr. Hilliard indicated as the Facility Hazardous Waste Storage Area. I observed four drums in the area:

- Hazardous Waste Label: Solvent / Ink Waste 10/20/02
- Hazardous Waste Label: Solvent / Ink Waste 10/20/02
- Hazardous Waste Label: Solvent / Ink Waste 10/14/02

○ Hazardous Waste Label: Solvent / Ink Waste 10/14/02

P18: Four drums of hazardous waste

I observed that it was difficult, but not impossible, to look at the labels on the drums due to a lack of aisle space on the left side. I also observed that there was no signs designating the hazardous waste storage area.

I observed near the hazardous waste storage area, an area which Mr. Hilliard referred to as the Hazardous Waste Collection Area. I observed three drums in this area:

| ○ 1 | ○ 2 | ○ 3 |
|---|---|---|
| HW Label | HW Label | HW Label |
| 10/27/02 | 10/27/02 | 10/14/02 |
| Solvent / Ink Waste | Solvent / Ink Waste | Solvent /Ink Waste |
| Not Closed | Closed | Not Closed |

P19: Drums 1 and 2
P20: Drums 2 and 3

I observed 12 five gallon pails, six being emptied into six.

P21: Twelve 5 gallon pails, six into six.

I observed a fan blowing air from the paint room to the outside of the facility. The fan was in operation.

P22: Fan

I could smell solvents in the paint room.

Process Floor: Laminator

Mr. Hilliard stated that this area / machine uses water based adhesives.

I took a general picture of the process floor.

P23: General picture, process floor

Maintenance Area

I observed oil under the drill press.

P24: Oil on floor.

I observed a dumpster in the facility.

P25: Inside the dumpster

Outside

I observed the vent from the paint room.

2/P1: Outside vent.

I observed the outside storage tanks. Mr. Hilliard stated that the tanks hold product / input only. I observed the following labels on the tanks:

2000 gal: 85% Ethanol, 15% N-Propyl Acetate
3000 gal: 90% N-Propyl Alcohol, 10% N-Propyl Acetate

2/P2: Outside solvent storage tanks

I observed the oxidizer.

2/P3: Outside oxidizer.

Mr. Hilliard stated that the oxidizer was for the printing unit only.

Back Inside the Facility

I took another general picture of the facility.

2/P4: General picture of the process floor

I observed a mop bucket which contained some liquid, a mop, and had a strong smell of solvent.

2/P5: Mop bucket with liquid.

## Document Review

Waste Determination(s):

Mr. Hilliard stated that the facility did not use lab analysis to conduct waste determinations. Rather, the waste solvent is assumed to be hazardous waste based on the MSDS sheets and operator knowledge.

Printing Ink MSDS: Flash point <73° F (D001 <140° F)

Ink Thinner Flash point 58° F, lowest flashing compound
N-Propyl Alcohol
N-Propyl Acetate

Manifests and Land Disposal Restrictions (LDR):

I observed the following manifests and manifest summaries.

| Date | Drums | Manifest | Gallons / Pounds |
|---|---|---|---|
| 9/29/99 | 24 | 99005 | 1,320 / 9,264 |
| 12/17/99 | 20 | 99006 | 1,100 / 7,791 |
| 3/2/00 | 22 | 00001 | 1,210 / 8,641 |
| 5/10/00 | 22 | 00002 | 1,210 / 10,537 |
| 7/21/00 | 29 | 00003 | 1,595 / 10,909 |
| **10/5/00** | **26** | **00004** | **1,430 / 10,213** |
| **1/17/01** | **23** | **01001** | **1,265 / 8,951** |
| 02/5/01 | Spill Cleanup MN 33565 | | 210 / 1,424 |
| 3/7/01 | 24 | 01001 | 1,320 / 8,745 |
| 4/6/01 | 11 | 01002 | 605 / 4,139 |
| 5/11/01 | 9 | 01003 (WIK 173910) | 495 / 3,383 |
| 7/2/01 | 12 | 01005 | 660 / 4,602 |
| 7/31/01 | 12 | 01006 | 660 / 4,657 |
| 8/21/01 | 8 | 01007 (WIK 210350) | 440 / 3,145 |
| 9/14/01 | 11 | 01008 (WIK 210431) | 605 / 4,298 |
| 10/10/01 | 10 | 01009 (WIK 231054) | 550 / 3,849 |
| 11/2/01 | 10 | 01010 (WIK 231157) | 550 / 3,771 |
| 12/3/01 | 12 | 01011 (WIK 231289) | 660 / 4,627 |
| 1/9/02 | 11 | 02001 (WIK 231452) | 605 / 4,255 |
| 2/6/02 | 11 | 02002 (WIK 291035) | 605 / 4,189 |
| 3/12/02 | 13 | 02003 (WIK 291150) | 715 / 5,107 |
| 4/18/02 | 10 | 02004 (WIK 291253) | 550 / 3,919 |

| | | | |
|---|---|---|---|
| 6/13/02 | 13 | 00001 (WIK 238904) | 715 / 5,850 |
| 8/8/02 | 13 | 00002 (WIK 276256) | 715 / 5,024 |
| 9/20/02 | 11 | 00003 (WIK 276473) | 605 / 4,379 |
| 10/18/02 | 11 | 00004 (WIK 308087) | 605 / 4,353 |

Note that there is one over-90-day period in the manifests (in bold above).

Mr. Hilliard stated the Facility runs three shifts (24 hour operations), and the phone number on the manifest rings at the supervisor area on the operations floor.

I observed that the facility uses the National Emergency Response phone number for the emergency phone number on the manifests.

I observed that the used rags sent to the laundry, containing solvent, are not manifested by the Facility nor are the containers marked with the words "Hazardous Waste". Mr. Hilliard reported that the Facility produces approximately 4,550 individual rags per week.

Pre-Transport:

None

Contingency Plan:

I observed that the Facility has a contingency plan, and that it is being maintained at the Facility.

Mr. Hilliard stated the Facility runs three shifts (24 hour operations).

Inspections:

I observed the facility inspection records.

Training:

I observed the Facility training program and training records. The facility does have a training program. However, it is difficult to track whether specific employees have received their initial / annual training.

The following personnel signed the manifests and participate in the hazardous waste training program:

| Employee | Training Dates |
|---|---|
| Kay Grier | 6/4/97, 10/12/00, 6/24/02<br>Missing documents for three years |
| Marcel Luchsinger | One document, not dated |
| Robert Haugen | 8/24/99<br>No documents since 1999 |
| Timothy Richardson | No documents |
| Larry Esterberg | 06/24/02 |
| Douglas Canlson (sp?) | 10/12/00, 06/24/02<br>One year missing |
| Gary Hilliard | 8/24/99, 6/24/02<br>At least two years missing |
| Marc Hampton | 8/24/99, 6/24/02<br>At least two years missing |

Reports: None

Additional Release(s): None

Additional Storage Areas: See final out brief.

Storage Tanks: None

MSDSs:

Printing Ink MSDS: Flash point <73° F (D001 <140° F)

Ink Thinner Flash point 58° F, lowest flashing compound
N-Propyl Alcohol
N-Propyl Acetate

## Out Brief

I conducted an out brief conference with the Facility prior to departure. The Facility representatives included:

| | |
|---|---|
| Gary Hilliard | Graphics and Technical Manager |
| Nick Heupel | Human Resources Manager |

I discussed the following issues with the Facility representatives:

Satellite Accumulation Vs 90 Day Storage
- the differences between the two
- dating requirements
- the meaning of closed containers

Containers with liquids that were not closed (with no covers)

Rags: Not in closed containers. Allowable? Research says no, the containers must be closed.

The Air Permit and its relationship to RCRA subpart CC.

The Fan blowing VOCs outside from the paint room

Training records - that they were incomplete.

I departed the facility at approximately 12:30 PM.

# Attachments

A Photos

B File Review

C MPCA LQG Checklist

D MSDS Sheets

E County Inspection Summaries

F MPCA Fact Sheet

G Updated Facility Documents

# Annex A

# Photo Log

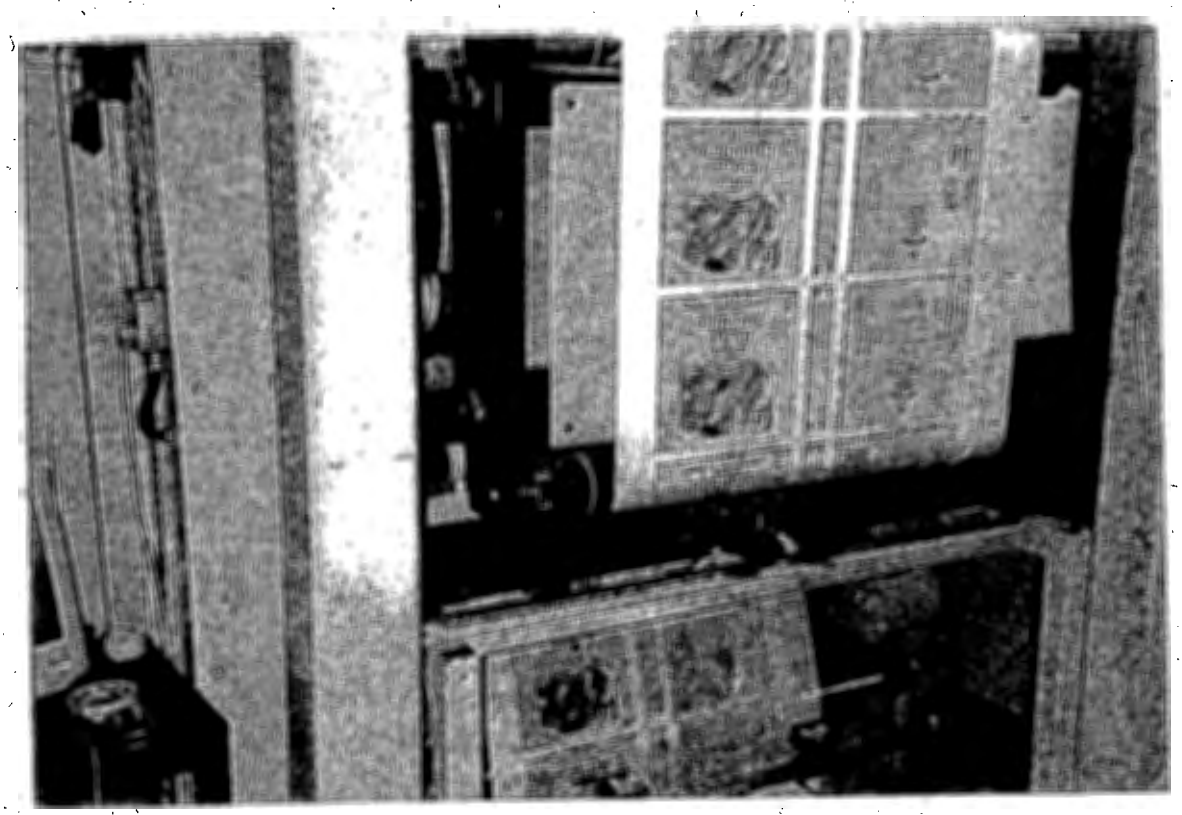
Picture 1 (P1): Front of Facility
P2: Strike Sign
P3: Lake from Parking Lot
P4: Finished Product at the End of the Line
P5: Containers with Liquid
P6: Containers with Liquid, Blue and Brown
P7: Dirty Rag Barrel
P8: Dirty Rag Barrel, same as P9
P9: Dirty Rag Barrel, same as P8
P10: Drum, not closed
P11: Drum, not closed
P12: Rag Drum
P13: Rag Drum
P14: Bucket under Centrifuge
P15: Spill Kit
P16: Overview of Process Floor
P17: Rag Drum
P18: Four Drums of Hazardous Waste
P19: Two Drums of Hazardous Waste, with P20
P20: Two Drums of Hazardous Waste, with P19
P21: Twelve 5 gallon pails
P22: Fan, see 2/P1
P23: Overview of Process Floor
P24: Oil on Floor
P25: Inside Dumpster

2/P1: Outside Fan Vent, see P22
2/P2: Outside Solvent (Product) Storage Tanks
2/P3: Oxidizer
2/P4: Overview of Process Floor
2/P5: Mop Bucket with Liquid


Picture 1 (P1): Front of Facility

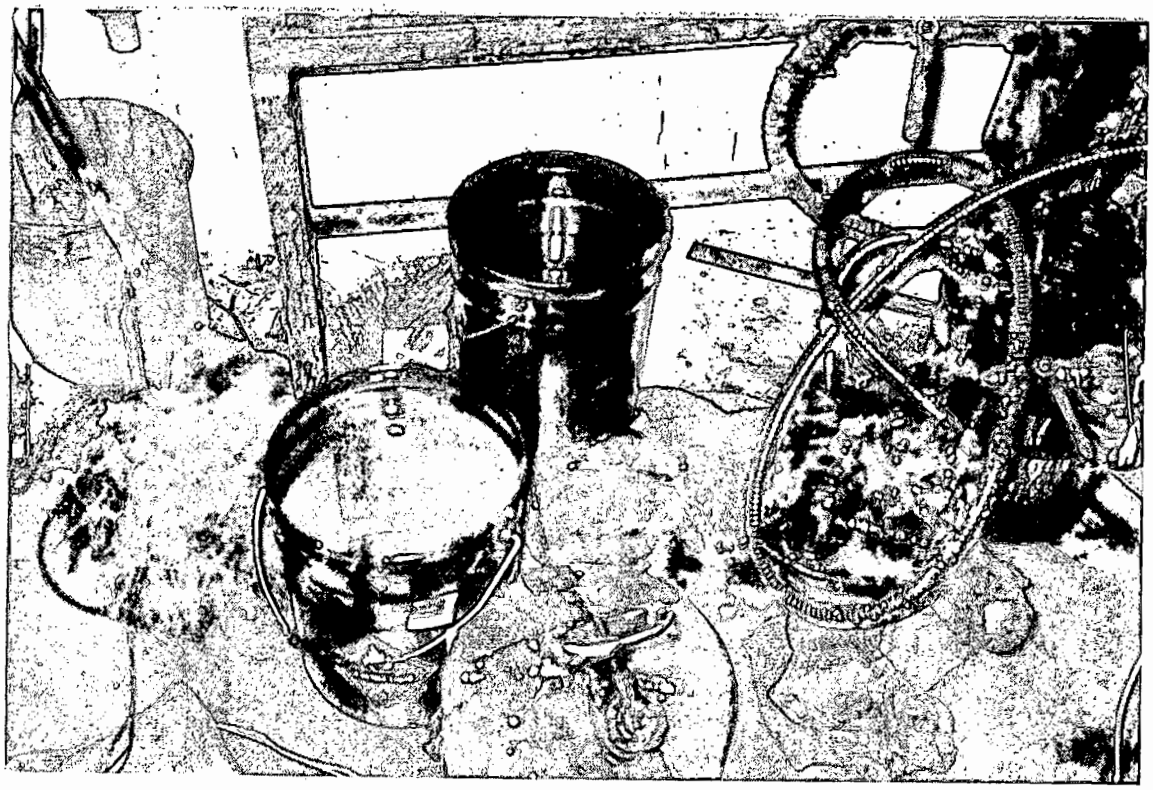

P2: Strike Sign

P3: Lake from Parking Lot

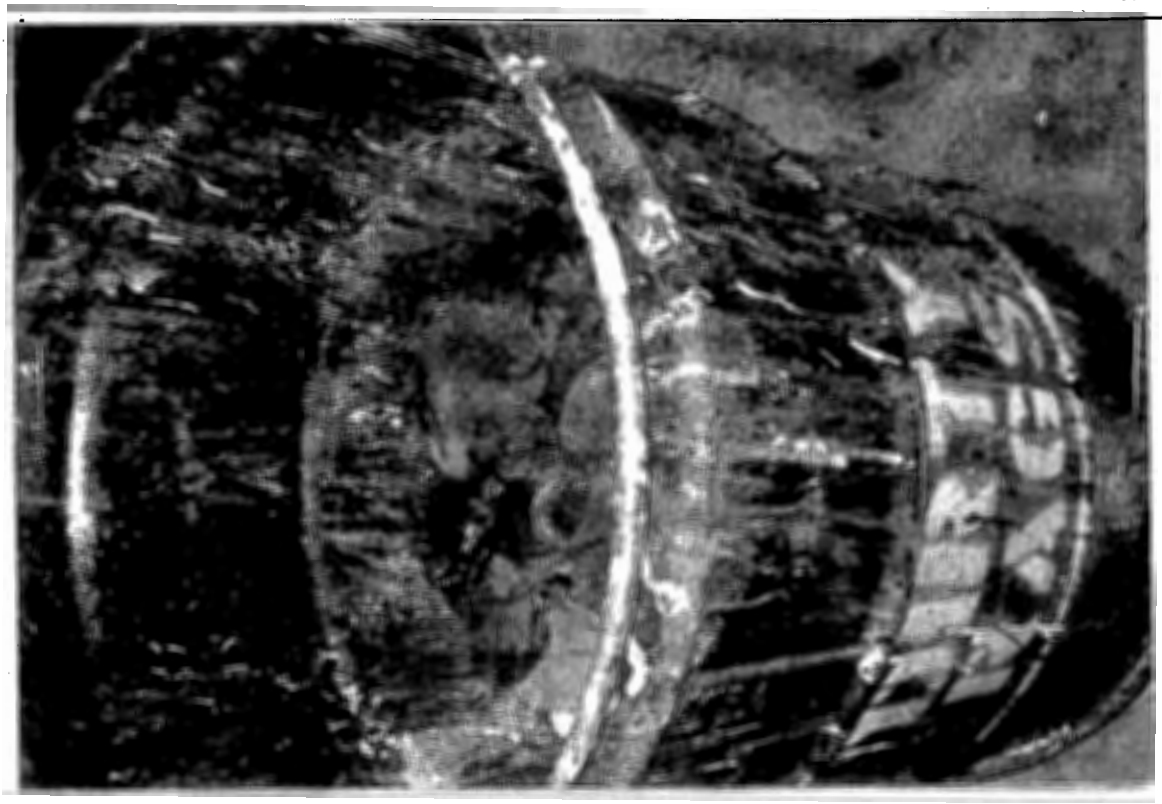


P4: Finished Product at the End of the Line

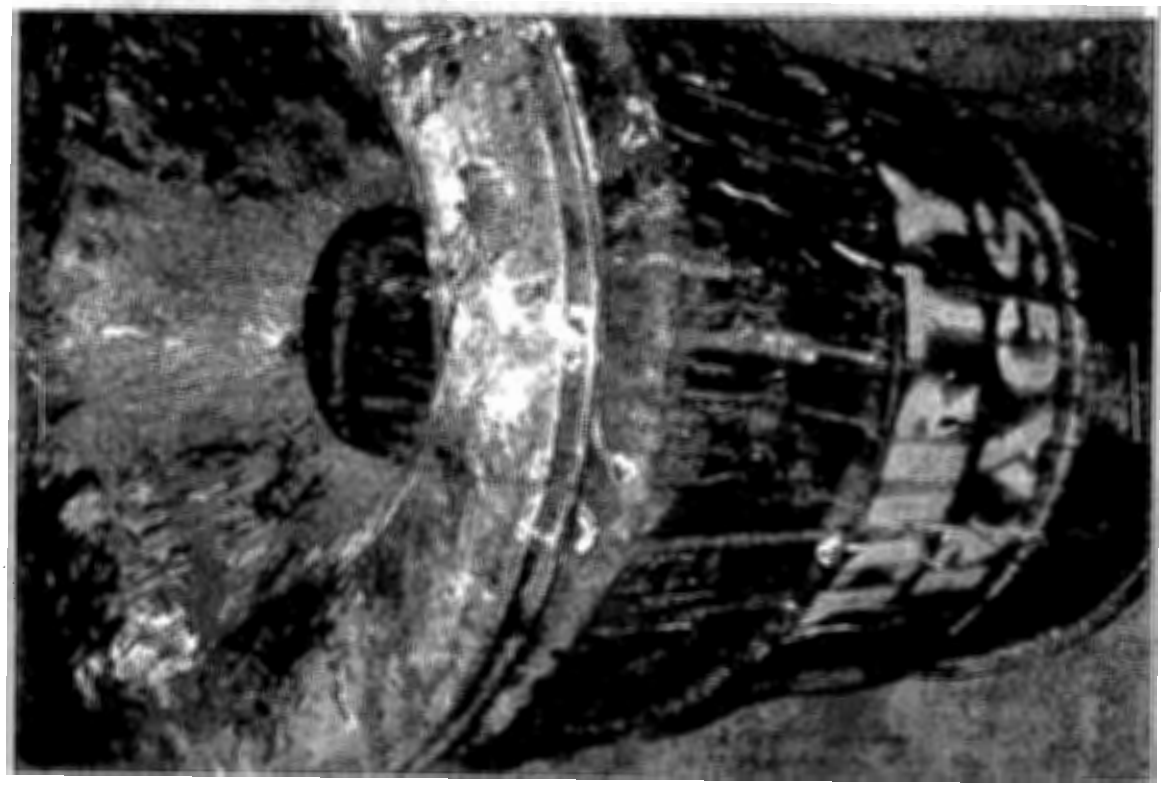
P5: Containers with Liquid



P6: Containers with Liquid, Blue and Brown



P7: Dirty Rag Barrel

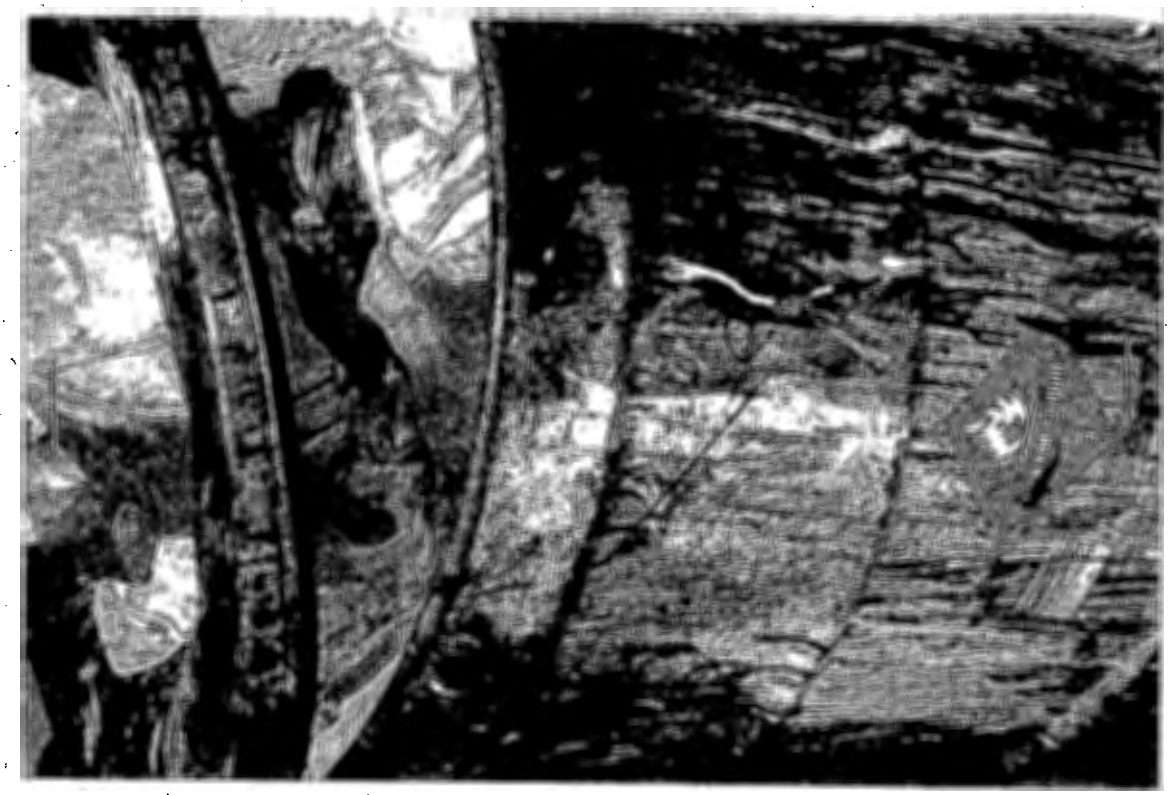


P8: Dirty Rag Barrel, same as P9

P9: Dirty Rag Barrel, same as P8

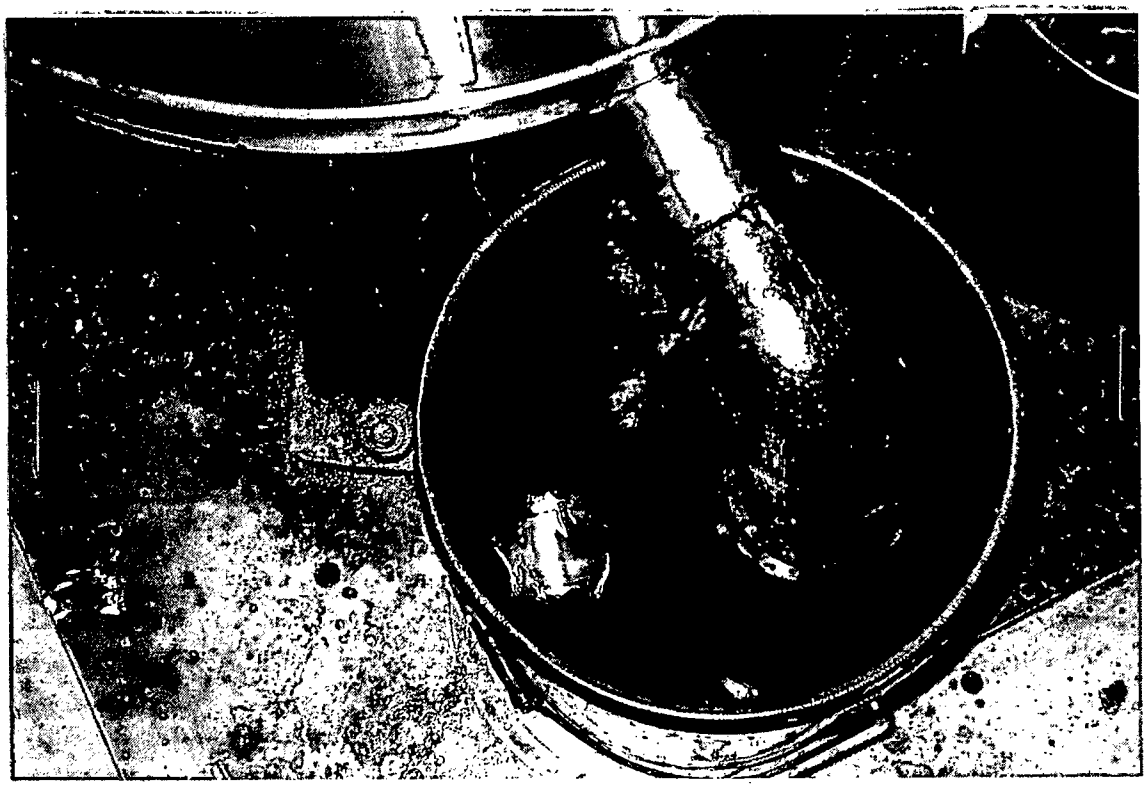
P10: Drum, not closed

P11: Drum, not closed

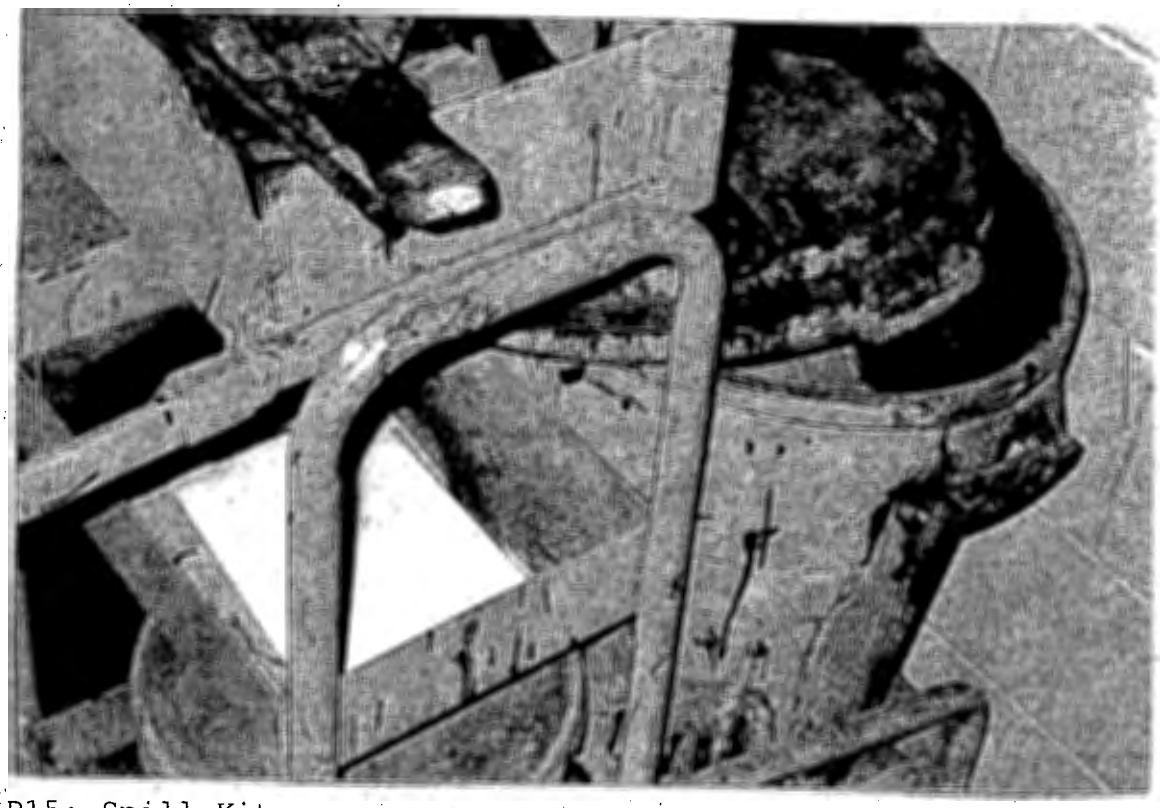


P12: Rag Drum

P13: Rag Drum

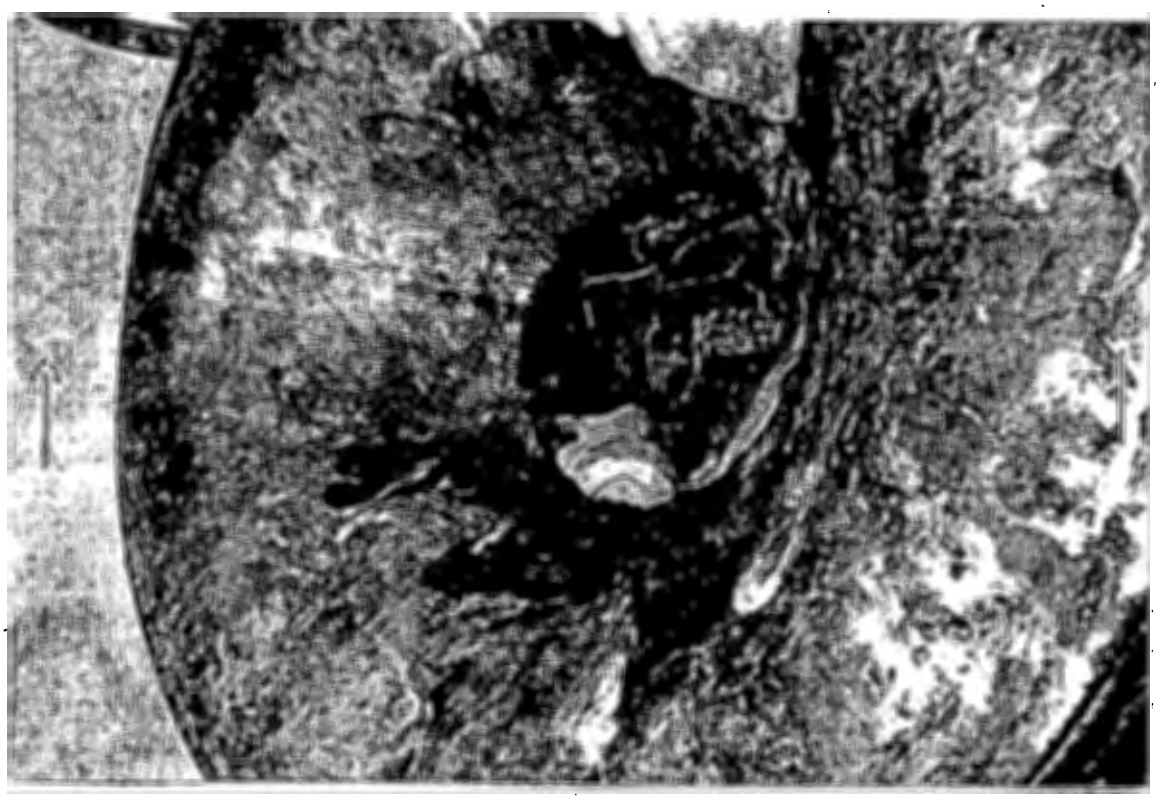


P14: Bucket under Centrifuge

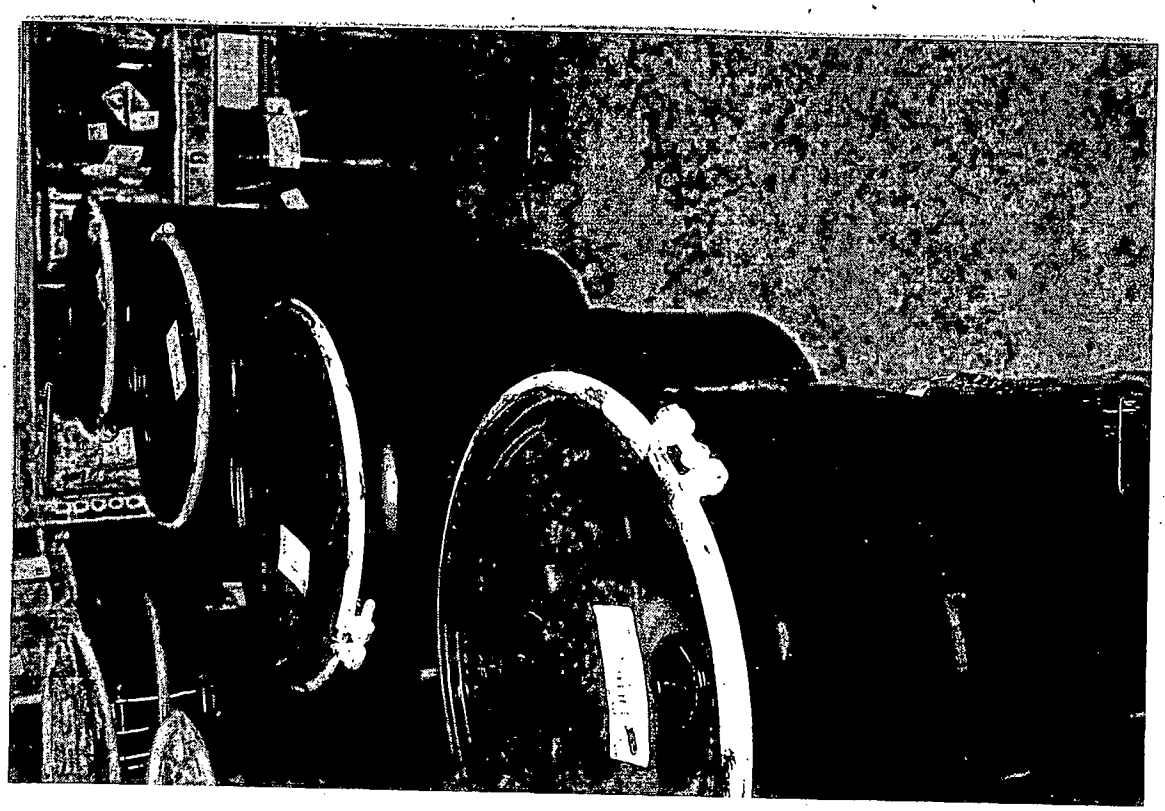


P15: Spill Kit

P16: Overview of Process Floor

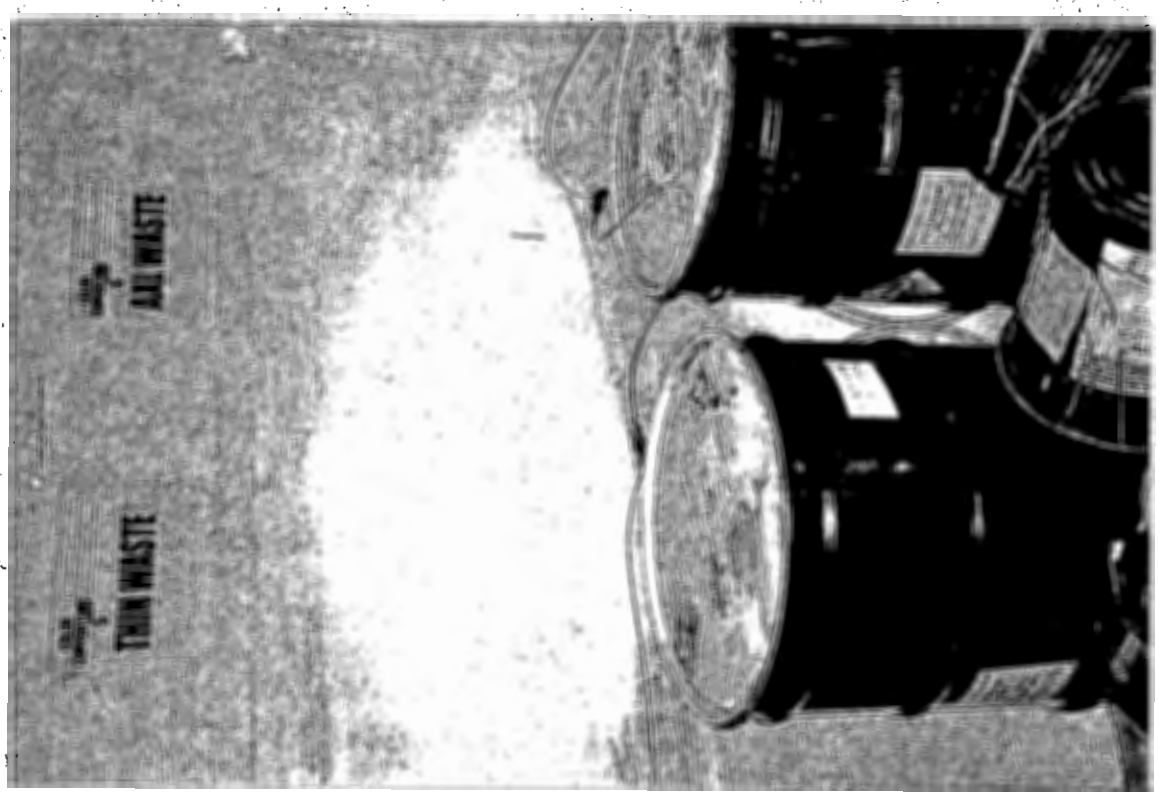


P17: Rag Drum



P18: Four Drums of Hazardous Waste.


P19: Two Drums of Hazardous Waste, with P20

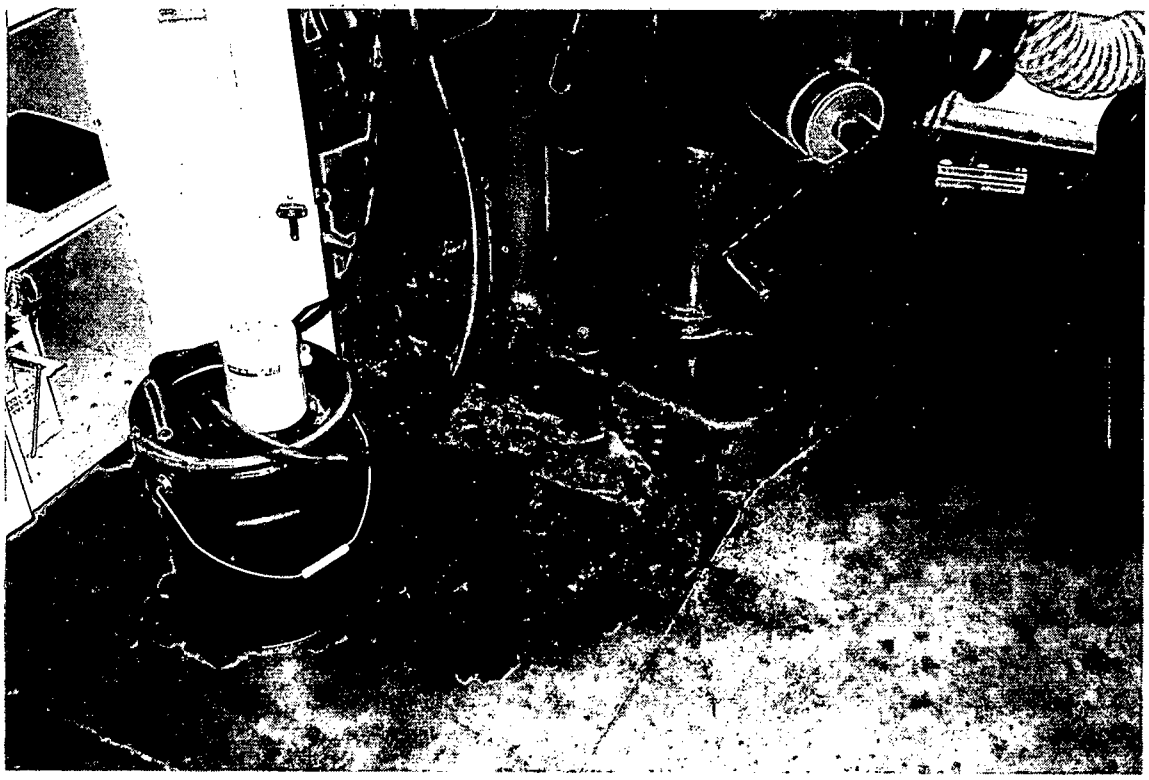



P20: Two Drums of Hazardous Waste, with P19

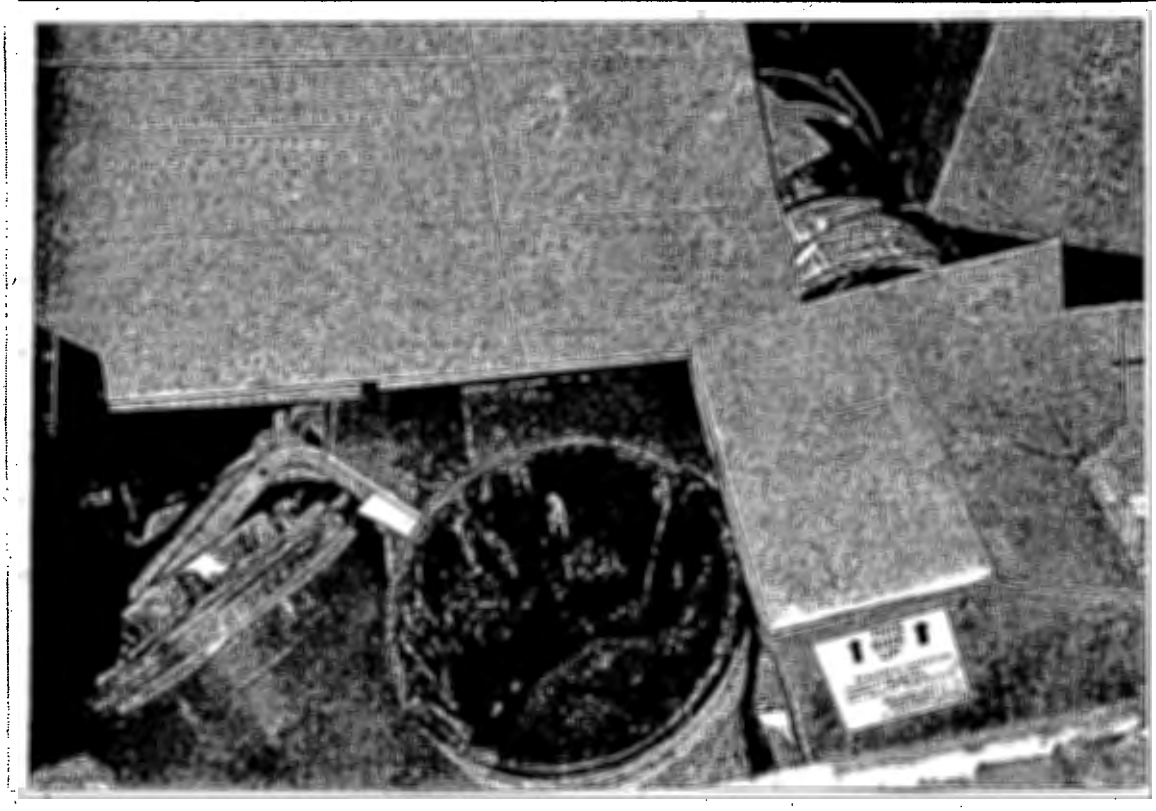

P21: Twelve 5 gallon pails


P22: Fan, see 2/P1

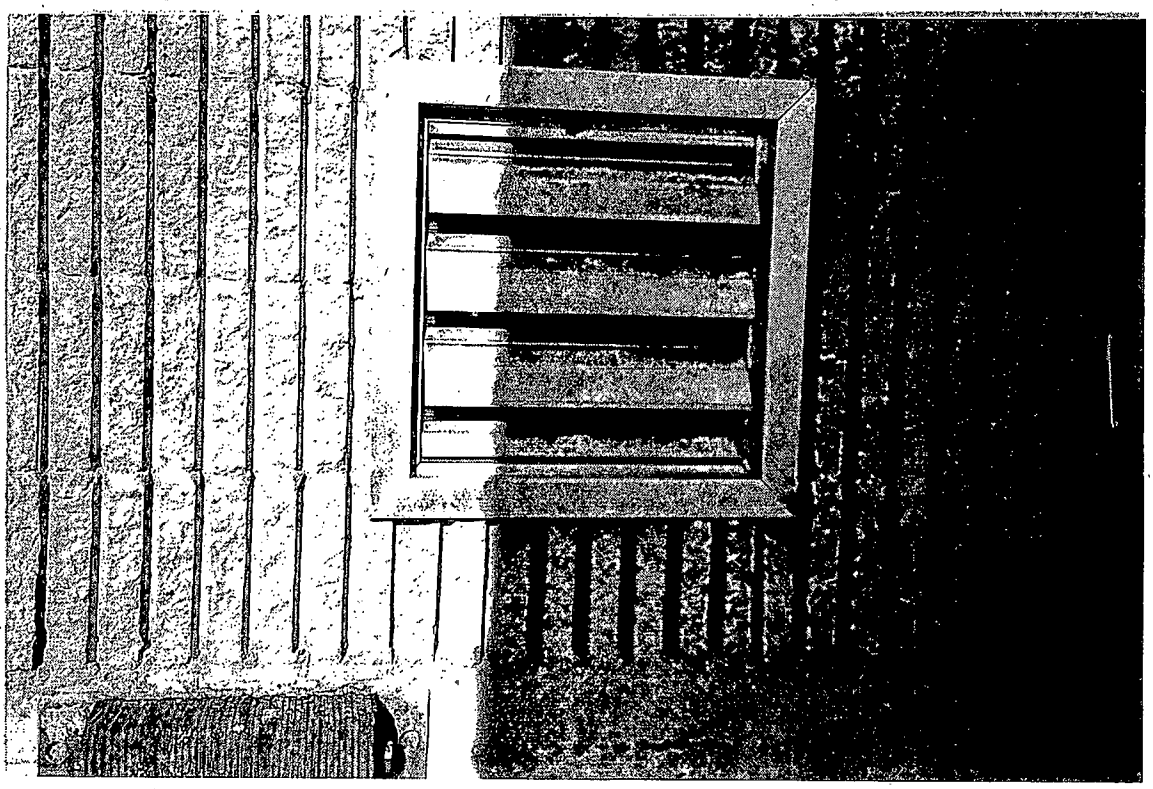
P23: Overview of Process Floor



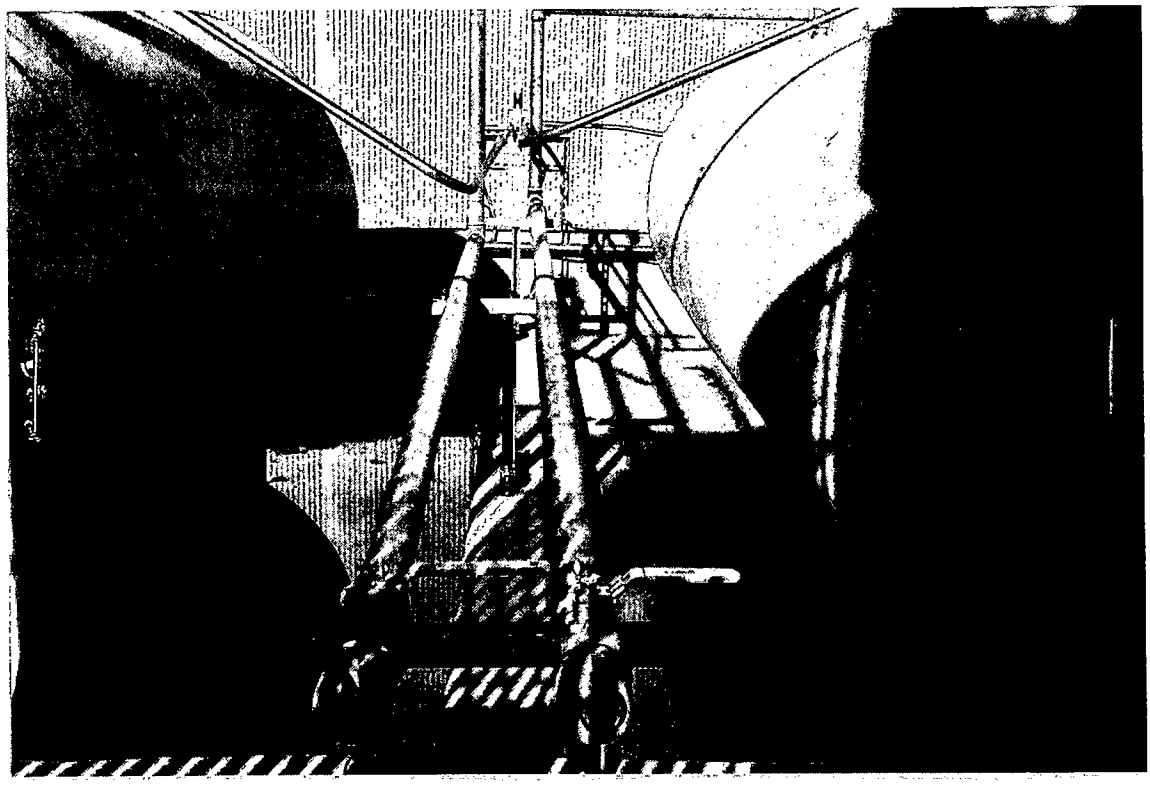
P24: Oil on Floor



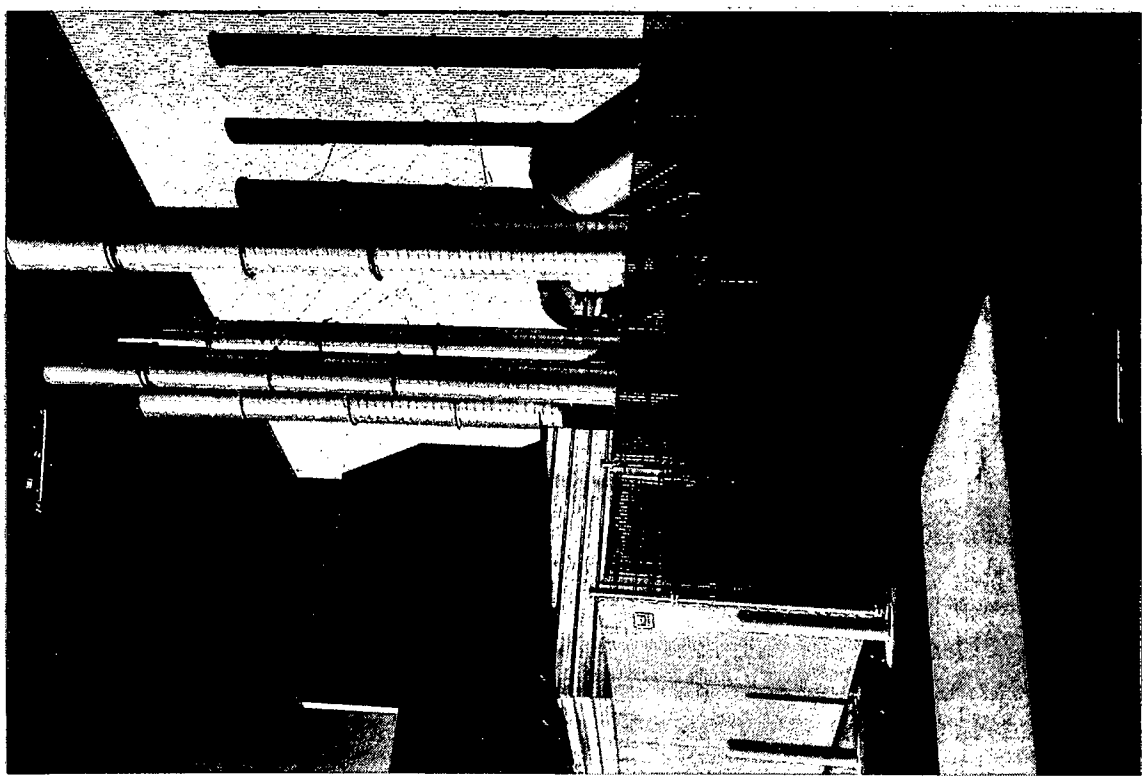
P25: Inside Dumpster



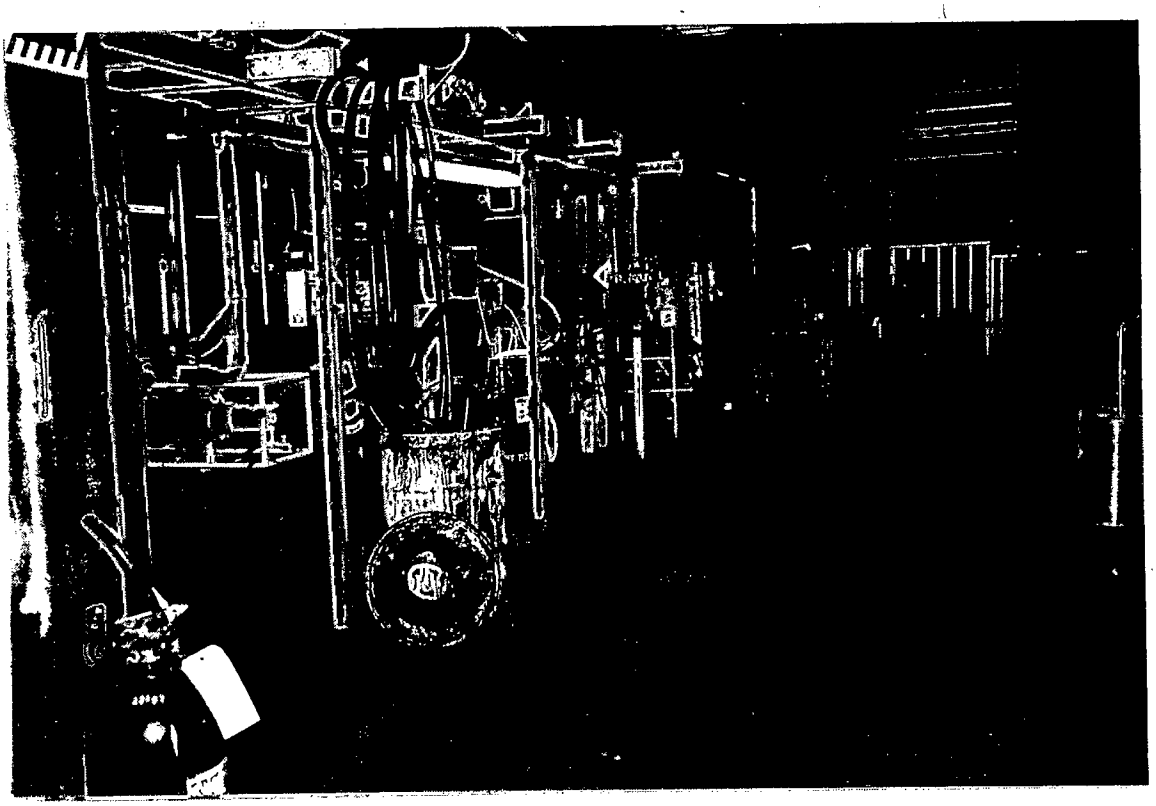
2/P1: Outside Fan Vent, see P22



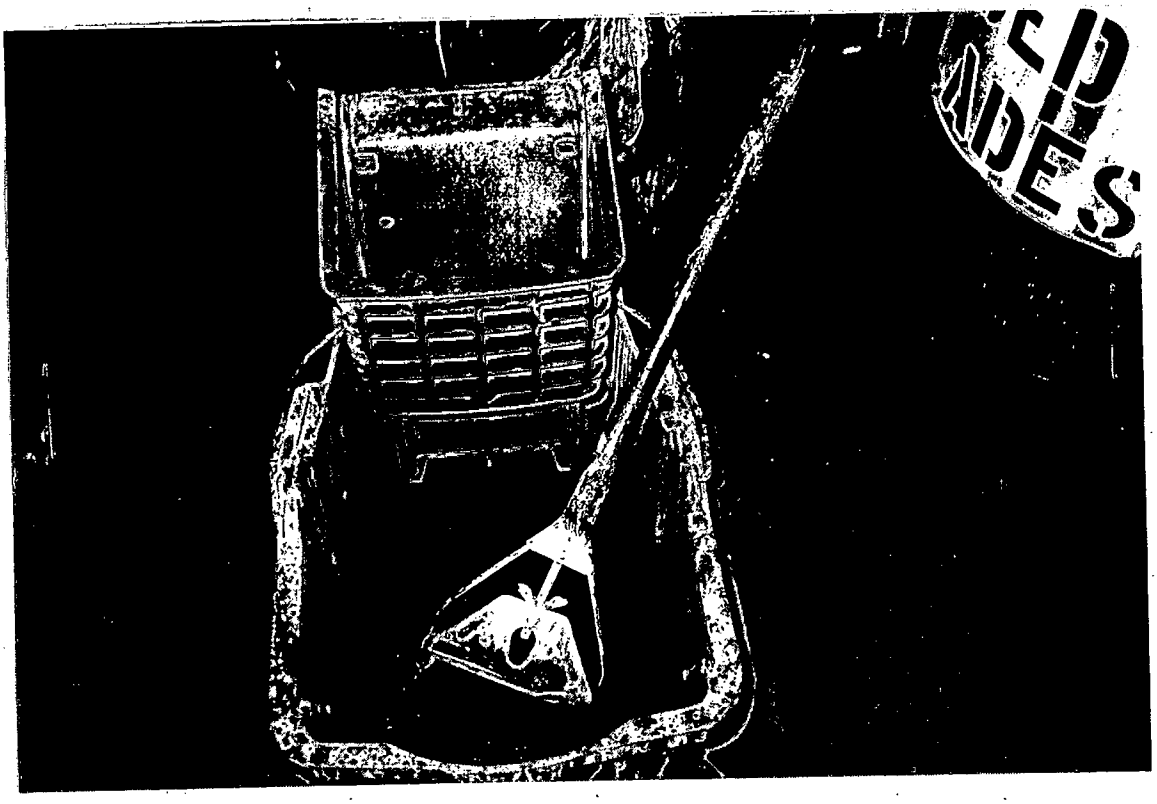
2/P2: Outside Solvent (Product) Storage Tanks



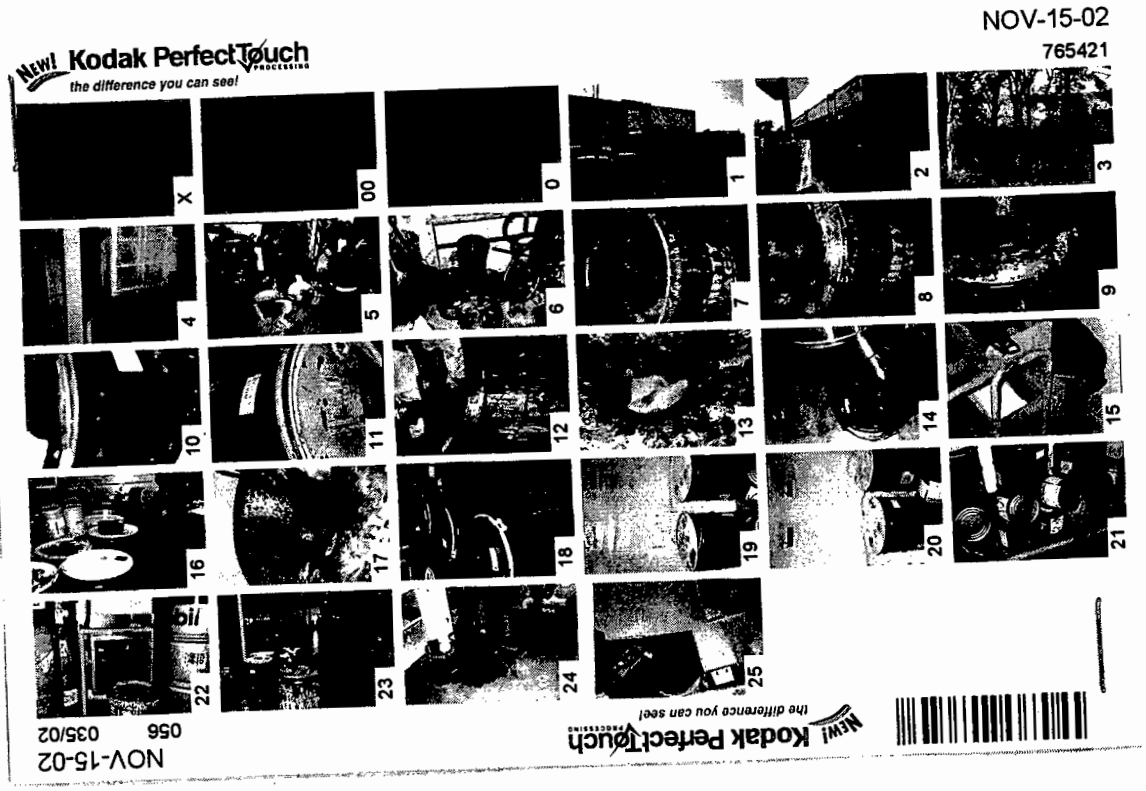
2/P3: Oxidizer



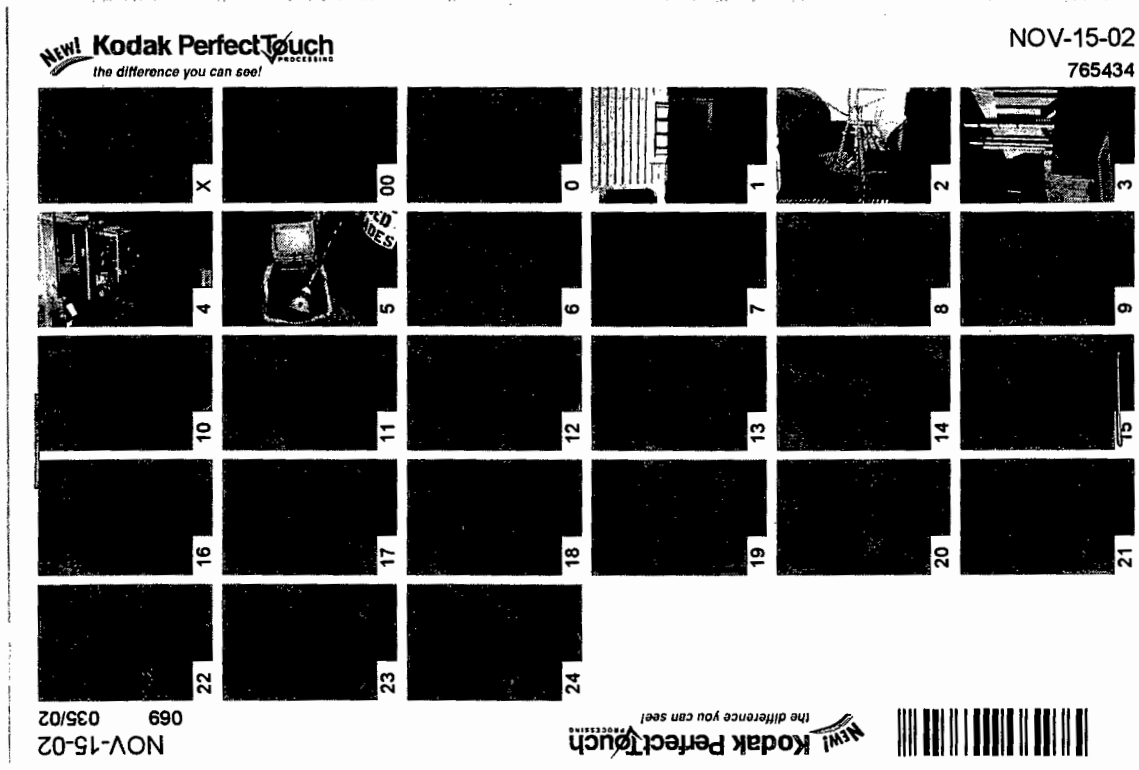
2/P4: Overview of Process Floor



2/P5: Mop Bucket with Liquid




Summary, Roll 1




Summary, Roll2

# Annex B

**U.S. Environmental Protection Agency**

# Facility Registry System (FRS)



## Facility Detail Report

Report Error

FRS

| | |
|---|---|
| Facility Name: | HOOD FLEXIBLE PACKAGING COMPANY |
| Location Address: | 3075 LONG LAKE RD |
| Supplemental Address: | SITE B |
| City Name: | SAINT PAUL |
| State | MN |
| County Name: | RAMSEY |
| ZIP/Postal Code: | 551130000 |
| EPA Region: | 05 |
| Congressional District Number: | 04 |
| Legislative District Number: | |
| HUC Code: | 07010206 |
| Federal Facility: | NO |
| Tribal Land : | |
| Latitude: | 45.032525 |
| Longitude: | -93.196892 |
| Method: | ADDRESS MATCHING-HOUSE NUMBER |
| Reference Point Description: | PLANT ENTRANCE (GENERAL) |
| Supplemental Environmental Interests: | |

Report Facility Discrepancy

Map this facility

Moved => facility Closed
25 Jun. Count Insp. Feb 20, 2001
MNR 000 10 25 09
New facility: Jan 5, 01
1887 Gateway Blvd,
Arden Hills 55112
Gary Hilliard : Contact

| Alternative Name |
| --- |
| HOOD FLEX PACKAGING |
| HOOD FLEXIBLE PACKAGING - ST PAUL |
| SENGEWALD USA |
| SENGWALD USA |

Query executed on: OCT-09-2002

# IDEA Detailed Facility Report

Report Error | Data Dictionary

## For Public Release - Unrestricted Dissemination Report Generated on 10/09/2002

### Facility Permits and Identifiers

Interpreting table data.

| Statute | System | Source ID | Facility Name | Street Address | City | State | Zip |
|---|---|---|---|---|---|---|---|
| . | FRS | 110000798192 | HOOD FLEXIBLE PACKAGING COMPANY | 3075 LONG LAKE RD | SAINT PAUL | MN | 55113 |
| CAA | AFS | 2712300486 | HOOD FLEXIBLE PACKAGING - ST PAUL | 3075 LONG LAKE RD | ST PAUL | MN | 55113 |
| RCRA | BRS | MN0000618074 | HOOD FLEXIBLE PACKAGING CO | 3075 LONG LAKE RD | ST PAUL | MN | 55113 |
| RCRA | RCR | MN0000618074 | HOOD FLEXIBLE PACKAGING CO | 3075 LONG LAKE RD SITE B | ST PAUL | MN | 55113 |

### Facility Characteristics

Interpreting table data.

| Statute | Source ID | Facility Status | Permit Expiration Date | Lat/Long | Indian Lands? | Primary SIC | Secondary SICs |
|---|---|---|---|---|---|---|---|
| CAA | 2712300486 | Operating, Major (Fed. Rep.) | . | . | NA | 3081 | . |
| RCRA | MN0000618074 | LQG | . | . | No | . | . |

### Inspection and Enforcement Summary Data

Interpreting table data.

| Statute | Source ID | RECAP Insp. Last 05Yrs | Date of Last Inspection | Formal Enf Act Last 05 Yrs | Penalties Last 05 Yrs |
|---|---|---|---|---|---|
| CAA | 2712300486 | 0 | Never | 0 | $00 |
| RCRA | MN0000618074 | 0 | Never | 0 | $00 |

### Inspection History (05 years )

Interpreting table data.

| Statute | Source ID | Inspection Type | Lead Agency | Date |
|---|---|---|---|---|
| - No data records returned. | | | | |

### Compliance Summary Data

Interpreting table data.

| Statute | Source ID | Current SNC/HPV? | Current Quarter | Description | Qtrs In NC (of 8) |
|---|---|---|---|---|---|
| CAA | 2712300486 | NO | Jul-Sep02 | . | 0 |
| RCRA | MN0000618074 | NO | Apr-Jun02 | . | 0 |

### Two Year Compliance Status by Quarter

Interpreting table data.

| AIR Compliance Status | | | | | | | | |
|---|---|---|---|---|---|---|---|---|
| Statute:Source ID<br>CAA: 2712300486 | QTR1<br>Oct-Dec00 | QTR2<br>Jan-Mar01 | QTR3<br>Apr-Jun01 | QTR4<br>Jul-Sep01 | QTR5<br>Oct-Dec01 | QTR6<br>Jan-Mar02 | QTR7<br>Apr-Jun02 | QTR8<br>Jul-Sep02 |
| Program/Pollutant in Current Violation | | | | | | | | |
| TITLE V PERMITS | C-CERT | C-CERT | C-CERT | C-CERT | C-CERT | C-CERT | C-CERT | UNKNOWN |

### Formal Enforcement Actions (05 year history)

Interpreting table data.

| Statute | Source ID | Type of Action | Lead Agency | Date | Penalty | Penalty Description |
|---|---|---|---|---|---|---|
| - No data records returned. | | | | | | |

### EPA Enforcement Cases (05 year history)

Interpreting table data.

| Primary Law/Section | Case Number | Case Type | Case Name | Issued/Filed Date | Settlement Date | Penalty | SEP Cost |
|---|---|---|---|---|---|---|---|
| - No data records returned. | | | | | | | |

## History of Reported Chemicals Released in Pounds per Year at Site:

Interpreting table data.

| Year / | Total Air Emissions | Surface Water Discharges | Underground Injections | Releases to Land | Total On-site Releases | Total Off-site Transfers | Total Releases and Transfers |
|---|---|---|---|---|---|---|---|
| No data records returned. | | | | | | | |

## TRI Total Releases and Transfers by Chemical and Year

| Chemical Name | 1992 | 1993 | 1994 | 1995 | 1996 | 1997 | 1998 | 1999 | 2000 |
|---|---|---|---|---|---|---|---|---|---|
| No data records returned. | | | | | | | | | |

## Demographic Profile of Surrounding Area ( 3.00000E+00Miles)

Interpreting table data.

| Radius of Area: | N/A | Land Area: | N/A | Households in area: | N/A |
|---|---|---|---|---|---|
| No data records returned. | | | | | |

Please Note: Entries in gray denote records that are not federally required to be reported to EPA. These data may not be reliable.

***Map Returned Facility***

This report was generated by the Integrated Data for Enforcement Analysis (IDEA) system, which updates its information from program databases monthly. The data were last updated: AFS: 09/15/2002. RCRAInfo: 09/09/2002. FRS: 09/12/2002.

**HOOD FLEXIBLE PACKAGING**
3075 LONG LAKE RD
ROSEVILLE, MN 55113-1025

**Telephone:** 651-633-0632
**County:** RAMSEY
**Metropolitan Statistical Area (MSA):** MINNEAPOLIS-ST. PAUL, MINNESOTA-WISCONSIN

**Industry:** BUSINESS & PERSONAL SERVICES

**Primary Standard Industrial Classification (SIC) and Yellow Page Product Line:**
7389 (BUSINESS SERVICES NEC)
738988 (PACKAGING SERVICE)

**Employees at this Location:** 3 (Estimated)
**Location Sales($):** 282,000

**Revision Date:** November 2001

American Business Directory

Dialog® File Number 531 Accession Number 6126872

# Annex C

# MINNESOTA POLLUTION CONTROL AGENCY
# MINNESOTA LARGE QUANTITY GENERATOR INSPECTION CHECKLIST

## I. GENERAL INSPECTION INFORMATION

| | |
|---|---|
| **Site Name:** Hood Flexible Packaging | **EPA ID Number:** MNR 000 102 509 |
| **Address:** ~~3075 Long Lake~~ 1887 Gateway Blvd | **Waste Activity:** |
| **City:** Ardan Hills | **Zip/9 Digit:** 55112 |
| **County:** Ramsey | **District:** |
| | **Waste generated per month** ≈ ~~3,500~~ 1,800 lbs |
| **Current Number of Employees:** office ≈ 20 Floor ≈ 70 | **Years in Business or** ≈ 1978 **Date Company Started:** 2001 at current location |
| **Date of last MPCA Hazardous Waste Inspection:** _____ | |
| **Inspection Date:** 11-07-02 | **Time: From** 0810 **to** |

**LEAD INSPECTOR:** Dan Chachakis U.S. EPA Region 5 Phone # 312/886-9871

| **Other People present:** (name, title, organization) | Phone # |
|---|---|
| Gary Hilliard Graphics and Technical Manager | 651/636-2500 |
| | |
| | |
| | |

Company Products or Services:

## II. LICENSING/IDENTIFICATION/PERMITS

**IDENTIFICATION – WASTE TABLE**

| Waste Name/Code | Quantity Generated in (last year) | Changes |
|---|---|---|
| D001 | | |
| | | |
| | | |
| | | |

# MINNESOTA POLLUTION CONTROL AGENCY
# MINNESOTA LARGE QUANTITY GENERATOR INSPECTION CHECKLIST

| | | |
|---|---|---|
| | | |

| G1: Licensing / EPA / Permits | | | |
|---|---|---|---|
| **Rule** | **Requirement** | **Compliance Status** | **Remarks** |
| 7045.0221 | Has generator obtained a generator identification number? | Yes | |
| 7045.1020 A | Metro Area – Does the generator have an approved license? | Yes | |
| 7045.0225 1 | Outstate – Does the site have a current hazardous waste generator license? | N/A | |
| 7045.0230 1, B | Outstate – Did the company include all hazardous waste streams on its license application? | N/A | |
| 7045.0225 2 | Is the generators license displayed in a public area at the licensed site? | Yes | |
| 7001.0520 1, A | Does the generator operate as a TSD without a permit? | NO | |

| G1: General Management for Generators | | | |
|---|---|---|---|
| **Rule** | **Requirement** | **Compliance Status** | **Remarks** |
| 7045.0208 1, B | Is hazardous waste disposed of at a permitted TSD? (VSQGs can also deliver to a VSQG collection program site) | Yes | |
| 7045.0294 5 | Are the required records (training, analytical results, inspection reports, license renewal app, exception reports, manifests) located at the licensed site and available for inspection? | Yes | |
| 7045.0626 5 | Are weekly inspections of hazardous waste containers and their storage areas conducted AND documented? | Yes | |
| 7045.0568 1 | Have emergency response arrangements been made with local authorities and outside providers? (fire, police, local hospital, emergency responders) | Yes | Not documented, but in plan |

| | | | |
|---|---|---|---|
| 7045.0568 3 | If the company was unable to make arrangements with local authorities, have they documented the attempts? | N/A | |

# MINNESOTA POLLUTION CONTROL AGENCY
# MINNESOTA LARGE QUANTITY GENERATOR INSPECTION CHECKLIST

| G1: General Management for Generators | | | |
|---|---|---|---|
| **Rule** | **Requirement** | **Compliance Status** | **Remarks** |
| 7045.0208 1, E | Does the company comply with the POTW requirements for sewered hazardous waste? | N/A | |
| 7045.0655 3, A | If there is an elementary neutralization unit, a pretreatment unit and/or wastewater treatment unit, does the owner or operator conduct timely inspections of the unit(s) for malfunction deterioration, operator error and discharges. | N/A | |
| 7045.0655 3, B | If there is an elementary neutralization unit, a pretreatment unit and/or wastewater treatment unit, does the company follow a written inspection schedule for inspection of all monitoring equipment, safety and emergency equipment, security devices and operating and structural equipment. | N/A | |
| 7045.0655 3, E | If there is an elementary neutralization unit, a pretreatment unit and/or wastewater treatment unit, are all applicable inspection (and repair) records (logs) kept for at least 3 years and available on-site? | N/A | |
| **G1: Manifests** | | | |
| **Rule** | **Requirement** | **Compliance Status** | **Remarks** |
| 7045.0261 | Are shipments of hazardous waste made without using a manifest? (exceptions for VSQGs) | ? | Rags? |
| 7045.0261 7 | Do manifests contain ALL of the following?: Manifest document number, generator data, transporter data, facility data, waste data, required signatures & dates, and a 24 hour emergency number. (document problem manifests in remarks and Description of Violation) | Yes | 24 hour # rings at facility supervisor office. 3 shifts the norm. |
| 7045.0294 1 | Are signed facility copies of manifests available for review for 3 years from the date material was accepted by the initial transporter? | Yes | |
| 7045.0265 1, D | Are two-signature (generator) copies of manifests set to MPCA within 5 days of shipment date? | | |
| 7045.0265 4, A | Does the generator ensure that out-of-state facility copies get to MPCA within 40 days of acceptance by the facility? | | |

# MINNESOTA POLLUTION CONTROL AGENCY
# MINNESOTA LARGE QUANTITY GENERATOR INSPECTION CHECKLIST

| G1: Manifests | | | |
|---|---|---|---|
| **Rule** | **Requirement** | **Compliance Status** | **Remarks** |
| 7045.0298 | If applicable, has the generator submitted to the MPCA an exception report for manifest copies not received back from the TSDF within 45 days of the date the waste was initially shipped? | NA | |
| 7045.0302 1 | If company exports hazardous waste, are all applicable rules being complied with? (notification, consent, EPA acknowledgement of consent, shipping papers or manifests, etc.) | NA | |

| G1: Personnel Training | | | |
|---|---|---|---|
| **Rule** | **Requirement** | **Compliance Status** | **Remarks** |
| 7045.0558 2 | Does the company have a hazardous waste program director trained in hazardous waste management procedures? | No | Human Resources Manager will get trained in '03 |
| 7045.0558 1 | Have employees that manage hazardous waste completed a hazardous waste training programs? | No | Not all |
| 7045.0558 3 | Does the training program include hazardous waste management and emergency response procedures relevant to the positions held by facility personnel? | Yes | |
| 7045.0558 4 | Are new employees trained in hazardous waste management within 6 months of hire or transfer? | No | documentation incomplete |
| 7045.0558 6, D | Has the company kept records that document that the initial training and annual review training has been given? | ~~No~~ Yes, But | documentation incomplete |
| 7045.0558 5 | Is refresher training regarding the management of hazardous waste provided at least once per calendar year? | Yes | |
| 7045.0558 6, A | Does the company maintain training records which include a job title for each position at the facility related to hazardous waste? | Yes | |
| 7045.0558 6, B | Do the records include a job description for each position related to hazardous waste? | Yes | |
| 7045.0558 C | Is a written description of the type and amount of training (initial & continuing) documented for each position related to hazardous waste? | Yes | |

# MINNESOTA POLLUTION CONTROL AGENCY
# MINNESOTA LARGE QUANTITY GENERATOR INSPECTION CHECKLIST

| G1: Personnel Training | | | |
|---|---|---|---|
| **Rule** | **Requirement** | **Compliance Status** | **Remarks** |
| 7045.0558 7 | Have training records been maintained for lifetime of facility (or 3 years after an employee leaves)? | Yes | incomplete |

| G1: Contingency Plan | | | |
|---|---|---|---|
| **Rule** | **Requirement** | **Compliance Status** | **Remarks** |
| 7045.0572 2 | Does the company have a contingency plan? | Yes | |
| 7045.0574 1 | Does the company have an Emergency Coordinator on-site or on-call, and does s/he have authority to act (commit resources)? | Yes | |
| 7045.0572 4, A | Does the contingency plan specify employees' emergency response actions? | Yes | |
| 7045.0572 4, C | Does the plan describe arrangements agreed to with local emergency responders. | Yes | Emergency Response Comission Local Fire department |
| 7045.0572 4, D | Does the plan include up-to-date name, address and home and work phone numbers for emergency coordinators? | Yes | |
| 7045.0572 4, E | Does the contingency plan include an up-to-date emergency equipment list? | Yes | Fire extinguishers Spill Clean-up cart Fire Alarm |
| 7045.0572 4, F | Is there an evacuation plan for employees that includes signals used to begin evacuation, and primary and alternate evacuation routes? | Yes | |
| 7045.0572 5, A | Is a copy of the contingency plan maintained on-site? | Yes | |
| 7045.0572 5, B | Have copies of the contingency plan been submitted to local authorities and emergency response teams? | Yes | |
| 7045.0572 6 | Has the contingency plan been amended when necessary? (rule change, emergency equipment change, process change, emergency coordination change, plan failed) | Yes | |

# MINNESOTA POLLUTION CONTROL AGENCY
# MINNESOTA LARGE QUANTITY GENERATOR INSPECTION CHECKLIST

| G1: Preparedness & Prevention | | | |
|---|---|---|---|
| **Rule** | **Requirement** | **Compliance Status** | **Remarks** |
| 7045.0566 2 | Is hazardous waste managed to prevent or minimize releases? | No | Uncovered containers release VOC's |
| 7045.0566 3, A | Is a suitable alarm or communication system in place to provide emergency instructions to company personnel? | Yes | |
| 7045.0566 3, B | Is emergency communication equipment available to summon outside emergency responders. | Yes | |
| 7045.0566 3, C | Is fire control equipment, decontamination equipment, and spill control equipment available? | Yes | |
| 7045.0566 3, D | Is water available in adequate volume for fire control (i.e., firehose, sprinkler system and/or foam equipment)? | Yes | |
| 7045,9566 4 | Is emergency equipment tested and maintained? | Yes | |
| 7045.0566 6 | Is aisle space adequate for emergency operations (like fire fighting, spill cleanup, etc.)? | Yes | |
| 7045.0275 2 | If the company had a release to the environment, did the company immediately notify the agency? | NA | |
| 7045.0275 3 | If the company has had a release, did the company recover as rapidly and as thoroughly as possible, any hazardous waste that has leaked, spilled, or otherwise escaped a container? | NA | |

| G1: Waste Evaluation | | | |
|---|---|---|---|
| **Rule** | **Requirement** | **Compliance Status** | **Remarks** |
| 7045.0214 1 | Have wastes been evaluated within 60 days of the date they were initially generated? | Yes | Based on knowledge |
| 7045.0294 3 | Are test result records of waste analyses kept for 3 years from the last time the waste was sent to a TSDF (on- or off-site)? | N/A | |

| G1: Land Disposal Restrictions | | | |
|---|---|---|---|
| **Rule** | **Requirement** | **Compliance Status** | **Remarks** |
| 268.7 (a), (2) | For waste or contaminated soil that does not meet treatment standards, has the company sent a one-time land disposal restriction notification to the receiving treatment or storage facility? Is a copy of the notification available at the generators site? Have new notifications been sent when there are changes in wastestreams and to any new receiving facilities? | NA | |
| 268.7 (a), (4) "Generator Paperwork Requirement Table" column 268.7,(a),(2), item 1 3 | For waste or contaminated soil that does not meet the treatment standards, do land disposal restriction notifications contain the following:<br><br>a. All applicable waste codes and Manifest numbers? | NA | |
| 268.7 (a), (4) "Generator Paperwork Requirement Table" column 268.7,(a),(2), item 4 1 | b. Treatability group (non-wastewater or wastewater) and subcategory (when applicable) | NA | |
| 268.7 (a), (4) "Generator Paperwork Requirement Table" column 268.7,(a),(2), item 1 3 | c. Constituents of concern for F001-F005, F039, and hazardous underlying constituents in characteristic waste (not managed in a CWA or CWA-equivalent facility)? Note: This requirement does not apply if the waste will be treated and monitored for ALL constituents. | NA | |
| 268.7 (a), (4) "Generator Paperwork Requirement Table" column 268.7,(a),(2), item 7 | d. For hazardous debris being treated with alternative treatment standards: the names of the contaminants subject to treatment, and an indication that these contaminants are being treated to comply with 268.45 | NA | |

| G1: Land Disposal Restrictions | | | |
|---|---|---|---|
| **Rule** | **Requirement** | **Compliance Status** | **Remarks** |
| 268.7 (a), (4) "Generator Paperwork Requirement Table" column 268.7,(a),(2) , item 8 | e. For contaminated soil of which the company has applied alternative treatment standards has the company included the constituents subject to treatment, and the statement: This contaminated soil [does/does not] contain listed hazardous waste and [does/does not] exhibit a characteristic of hazardous waste and [is subject to/complies with the soil treatment standards as provided by 268.49 (c) of the universal treatment standard. | NA | |
| 268.7 (a), (3), (i) | For all hazardous waste that does meet treatment standards at the point of generation, has the company sent a one-time notification with signed certifications to the receiving TSD and kept a copy in its file? | NA | |
| 268.7 (a), (4) "Generator Paperwork Requirement Table" column 268.7,(a),(3) , item 1 | For all waste that does meet treatment standards, do notifications contain the following:<br><br>a. All applicable EPA waste codes and manifest number? | NA | |
| 268.7 (a), (4) "Generator Paperwork Requirement Table" column 268.7,(a),(3) , item 9 | b. Certification statement | NA | |
| 268.7 (a), (4) "Generator Paperwork Requirement Table" column 268.7,(a),(4) , item 1 4 | For waste or contaminated soil that are subject to exemptions, does the notification contain:<br><br>a. All applicable EPA waste codes;<br>b. Manifest number? | NA | |

| G1: Land Disposal Restrictions | | | |
|---|---|---|---|
| **Rule** | **Requirement** | **Compliance Status** | **Remarks** |
| 268.7 (a), (4) "Generator Paperwork Requirement Table" column 268.7,(a),(4), item 2 1 | c. The date the waste was subject to the prohibitions? | NA | |
| 268.7 (a), (4) "Generator Paperwork Requirement Table" column 268.7,(a),(4), item 7 | d. For debris being treated with alternative treatment standards, the contaminants subject to treatment, and an indication that these contaminants are being treated to comply with 268.45? | NA | |
| 7045.1305 A | Is dilution used as a substitute for adequate treatment? | NA | |
| 7045.1380 2 | Does the company have justification for storage beyond one year? | NA | |
| 268.7 (a), (8) | Does the company retain, on site, copies of initial notifications, certifications, and other relevant documents for a period of 3 years? | NA | |
| 7045.1315 1, D | For companies that treat prohibited waste in tanks or containers to meet treatment standards, is a copy of the waste analysis plan for this treatment on-site, and available to inspectors? | NA | |
| 7045.1315 1, D, 1 | For companies that treat prohibited waste in tanks or containers, is the waste analysis plan based on detailed chemical and physical analysis? | NA | |
| 7045.1315 1, B,1,a | For waste treated in tanks or containers and then shipped off-site, do notifications and certifications contain: a. All applicable EPA waste codes? | NA | |
| 7045.1315 1, B,1,b | b. Treatability group (non-wastewater or wastewater) and subcategory (when applicable) | NA | |

| | | | |
|---|---|---|---|
| 7045.1315<br>1, B,1,c | c. Manifest number? | NA | |

| G1: Land Disposal Restrictions | | | |
|---|---|---|---|
| **Rule** | **Requirement** | **Compliance Status** | **Remarks** |
| 268.7 (a), (4) "Generator Paperwork Requirement Table" column 268.7,(a),(3) item 3 | d. Constituents of concern for F001-F005, F039, and hazardous underlying constituents (not managed in a CWA or CWA-equivalent facility)? Note: This requirement does not apply if the waste will be treated and monitored for ALL constituents. | NA | |
| 7045.1315 1, B,1,d | e. Waste analysis data (where available) | NA | |
| 7045.1315 1, E | For generators that use "knowledge" to evaluate wastes, does the generator retain on-site all supporting data for waste determinations? | Yes | MSDS's |
| 268.7 (a), (9), (i) | For companies that are using alternative treatment standards for lab packs of hazardous wastes, has the company submitted on-time notification that contains EPA waste codes, manifest number and a one-time certification signed by an authorized representative? | NA | |
| 268.7 (a), (9), (ii) | Due to changes with the lab pack wastes, or receiving facility, has the company submitted additional notification and certifications, and kept a copy on-site? | NA | |

| G1: Pre-Transport | | | |
|---|---|---|---|
| **Rule** | **Requirement** | **Compliance Status** | **Remarks** |
| 7045.0270 1 | Prior to shipment, are hazardous waste containers marked according to US DOT hazardous materials regulations, including: the words "HAZARDOUS WASTE Federal Law Prohibits Improper Disposal. If found, contact the nearest police or public safety authority or the U.S. Environmental Protection Agency.", the name and address of the generator, and the manifest number? | NA | None available |
| 7045.0270 4 | Prior to shipment, are wastes packaged according to US DOT hazardous materials regulations? | NA | None available |

| | | | |
|---|---|---|---|
| 7045.0270 5 | Prior to transport, have the applicable warning labels been placed on each package in accordance with US DOT regulations? | NA | None available |

# MINNESOTA POLLUTION CONTROL AGENCY
# MINNESOTA LARGE QUANTITY GENERATOR INSPECTION CHECKLIST

| G1: Storage Requirements | | | |
|---|---|---|---|
| **Rule** | **Requirement** | **Compliance Status** | **Remarks** |
| 7045.0292 1, A | Has the generator stored hazardous waste for more than 90 days beyond the waste accumulation start date? | No | |
| 7045.0292 1, C | Are hazardous waste containers and tanks labeled with the waste accumulation start date and is it visible for inspection? OR is the accumulation start date recorded in a clear and legible log for non-shipping containers or tanks? | Yes | But: Question start dates HW storage U.S ~~satellite~~. satellite. |
| 7045.0292 1, F | Are hazardous waste containers and tanks properly labeled with the words "Hazardous Waste" and a description that clearly identifies their contents to employees and emergency personnel? | No | Buckets |
| 7045.0292 1, D | Are hazardous waste storage areas (outdoors) protected from unauthorized access and inadvertent damage from vehicles and equipment? | NA | |
| 7045.0292 1, E | Are hazardous waste containers that hold free liquid placed on an impermeable containment surface? ~~If outdoors, is the surface curbed?~~ | Yes | |
| 7045.0626 2, A | Are hazardous waste storage containers in good condition and leakproof? | Yes | |
| 7045.0626 2, B | Are there suitable leakproof covers for the hazardous waste containers? | Yes | |
| 7045.0626 4 | Are hazardous waste storage containers closed? Are waste containers which can be degraded when exposed to moisture or sunlight covered by an overhead roof or other suitable covering that does not hide the labels? | No | |
| 7045.0626 3 | Are hazardous waste storage containers compatible with the waste stored in them? | Yes | |
| 7045.0626 6 | Are incompatible wastes adequately separated? | NA | |
| 7045.0685 2, A | Are spent lead-acid batteries that are stored indoors on an impermeable curbed surface AND are provisions made to recontainerize leaking batteries, AND are there regular inspections to assure the integrity of the batteries? | NA | |

# MINNESOTA POLLUTION CONTROL AGENCY
# MINNESOTA LARGE QUANTITY GENERATOR INSPECTION CHECKLIST

| G1: Storage Requirements | | | |
|---|---|---|---|
| **Rule** | **Requirement** | **Compliance Status** | **Remarks** |
| 7045.0685 2, B,1 | Are spend lead-acid batteries that are stored indoors on an impermeable curbed surface AND are provisions made to recontainerize leaking batteries, AND are there regular inspections to assure the integrity of the batteries AND is the containment area covered to prevent precipitation run on? | NA | |
| 7060.0600 2 | Has the company discharged waste or pollutants to the unsaturated zone, through spills, dumping, sewering or other means? | NA | |
| 7045.0855 2, C | If used oil is stored, is it stored in containers or tanks that are in good condition, stored on impermeable surfaces, kept closed, and labeled "Used Oil" (including tanks, containers and piping)? | NA | |
| 7045.0292 8, B,2 | Are satellite accumulation containers properly labeled with "Hazardous Waste" and a clear description of their contents? | No | |
| 7045.0292 8, C,2 | For satellite accumulation containers, if located away from the point of generation, are they inspected weekly, and are written records kept? | NA | |
| 7045.0292 8, D,1 | For satellite accumulation containers, is fill date marked on the containers? | No | |
| 7045.0292 8, D,2 | For satellite accumulation containers, are they moved within 3 days of fill date to storage area? | No | |

# Annex D

MATERIAL SAFETY DATA SHEET Printed : 01/21/99

For Coatings, Resins and Related Materials

For Customer: SUI-SM HOOD FLEXIBLE PACKAGING Revised : 02/24/98

## SECTION I - PRODUCT INDENTIFICATION

Manufacturer: COLOR CONVERTING INDUSTRIES
129 SE 18TH ST
DES MOINES, IA
50317

Information Phone: 1-515-266-2626
Emergency Phone: 1-800-728-0072
CHEMTREC Phone: 1-800-424-9300

Product Class: PRINTING INK
Trade Name : AXL HIGH OPACITY WHITE
Product Code : FCAA57B6
C.A.S. Number:
Customer's No: FCAA57B6
Prepared By : ENVIRONMENTAL DEPARTMENT
Title :
Hazard ratings are HMIS ratings

! Hazard Ratings: Health - 2
! none -> extreme Fire - 3
! 0 ---> 4 Reactivity - 0

## SECTION II - HAZARDOUS INGREDIENTS

| Ingredients | CAS # | Weight % | --- Exposure Limits ---- ACGIH/TLV | OSHA/PEL | VP mm HG |
|---|---|---|---|---|---|
| N-PROPYL ALCOHOL | 71-23-8 | 28.50 | 200 ppm<br>STEL = 250 ppm | 200 ppm<br>250 ppm | 14.9<br>@ 68F |
| N-PROPYL ACETATE | 109-60-4 | 2.00 | 200 ppm<br>STEL = 250 ppm | 200 ppm<br>250 ppm | 25<br>@ 68F |
| ETHYL ALCOHOL | 64-17-5 | 2.97 | 400 ppm | 400 ppm | 72.8<br>@ 68F |
| ISOPROPYL ALCOHOL | 67-63-0 | 2.53 | 400 ppm<br>STEL = 500 ppm | 400 ppm | 32<br>@ 68F |
| SVM&P NAPHTHA | 64742-49-0 | 2.13 | 300 ppm | ppm | 18<br>@ 68F |
| PROPYLENE GLYCOL NPROPYL ETHER | 1569-01-3 | 1.80 | | | 1.7<br>@ 68F |

## SECTION III - PHYSICAL DATA

Boiling Range: 100-200 F
Evap. Rate: 15.54 x n-Butyl Acetate
Volatiles Wgt % 41.5
Appearance: LIQUID
V.O.C. Wgt %: 40.0%

Vapor Density: Heavier than Air.
Liquid Density: Heavier than Water.
Approx. Wgt per gallon: 11.05 lbs

## SECTION IV - FIRE AND EXPLOSION HAZARD DATA

Flammability Class: IB Flash Point: <73 F F TCC LEL: UEL: 0.00%
-EXTINGUISHING MEDIA:
Carbon Dioxide---Dry Chemical---Foam---Water Fog
(cont.)

## SECTION IV - FIRE AND EXPLOSION HAZARD DATA (cont.)

-EXTINGUISHING MEDIA: (cont.)
Use water for cooling material stored in vicinity of fire.

-SPECIAL FIREFIGHTING PROCEDURES:
Use self-contained breathing apparatus with a full facepiece operated in pressure-demand or other positive pressure mode.

-UNUSUAL FIRE & EXPLOSION HAZARDS:
Vapors may be heavier than air and may travel along the ground to an ignition source some distance from material handling point. Ignition sources include pilot lights, smoking, heaters, electric motors, sparks from electrical switches and static discharges.
CAUTION: Never use cutting torch on empty containers! Residual solvent vapor in empty container may explode.

## SECTION V - HEALTH HAZARD DATA

-PERMISSIBLE EXPOSURE LEVEL:

-EFFECTS OF OVEREXPOSURE:
Eyes: can cause severe irritation, redness, tearing, blurred vision.
Skin: prolonged or repeated contact can cause moderate irritation, defatting, dermatitis, and damage to the nervous system, blood, and kidneys.
Breathing: excessive inhalation of vapors and/or spraymist can cause respiratory irritation, dizziness, weakness, fatigue nausea, headache, unconsciousness and even asphyxiation. Reports have associated repeated and prolonged occupational overexposure to solvents with permanent brain, blood, kidney, and nervous system damage.
Swallowing: can cause gastrointestinal irritation,nausea, vomiting and diarrhea; aspiration of material into the lungs can cause chemical pneumonitis which can be fatal.

-FIRST AID:
Eyes: flush with large amounts of water lifting eyelids occasionally; get prompt medical attention.
Skin: wash thoroughly with soap and water, remove contaminated clothing promptly; wash clothing before reuse.
Swallowing: do NOT induce vomiting! Keep person warm, quiet and get medical attention. Aspiration of material into the lungs due to vomiting can cause chemical pneumonitis which can be fatal.
Breathing: move affected person to fresh air. If breathing is difficult, administer oxygen. If breathing has stopped, give artificial respiration. Keep person warm, quiet, and get medical attention.

(cont.)

## SECTION V - HEALTH HAZARD DATA (cont.)

-FIRST AID: (cont.)

## SECTION VI - REACTIVITY DATA

STABLITY: [ ] Unstable [x] Stable
HAZARDOUS POLYMERIZATION: [ ] May occur [x] Will not occur
-INCOMPATIBILITY
Avoid contact with strong oxidizers ( e.g. nitric acid )
-CONDITIONS TO AVOID:
Keep away from heat and open flame.
-HAZARDOUS DECOMPOSITION PRODUCTS:
May form carbon monoxide and dioxide, various hydrocarbons, etc.

## SECTION VII - SPILL OR LEAK PROCEDURES

-STEPS TO BE TAKEN IN CASE MATERIAL IS RELEASED OR SPILLED
SMALL SPILL: absorb liquid with rags, floor absorbent, vermiculite or other absorbent material and transfer to hood.
LARGE SPILL: eliminate all ignition sources---dike area of spill to prevent spreading---ventilate area if indoors---pump liquid into salvage tank---remaining liquid may be taken up with sand, floor absorbent or other absorbent material and shoveled into containers---prevent run-off to sewers and bodies of water---notify proper authorities as required by local, state and federal regulations.
-WASTE DISPOSAL METHOD:
SMALL SPILL: allow volatile portion to evaporate in hood---dispose of remaining material in accordance with applicable regulations.
LARGE SPILL: destroy by liquid incineration---contaminated absorbent may be deposited in landfill in accordance with local, state and federal regulations.

## SECTION VIII - SPECIAL PROTECTION INFORMATION:

-RESPIRATORY PROTECTION:
If TLV of the product is exceeded, a NIOSH/MSHA jointly approved air supply respirator is advised in absence of proper environmental control. OSHA regulations also permit other NIOSH/MSHA respirators under specified conditions.(see your safety equipmt. supplier). Engineering or administrative controls should be implemented to reduce exposure.
-VENTILATION:
Provide sufficient mechanical (general and/or local exhaust) ventilation to maintain exposure below TLV.
-PROTECTIVE GLOVES:
Wear resistant gloves such as nitrile rubber or neoprene
(cont.)

## SECTION VIII - SPECIAL PROTECTION INFORMATION: (cont.)

-PROTECTIVE GLOVES: (cont.)

-EYE PROTECTION:

Chemical splash goggles in compliance with OSHA regulations are advised; however, OSHA regulations also permit other type safety glasses. ( consult your safety equipment supplier )

-OTHER PROTECTIVE EQUIPMENT:

NONE

## SECTION IX - SPECIAL PRECAUTIONS

-PRECAUTIONS TO BE TAKEN IN HANDLING AND STORING:

NONE

-OTHER PRECAUTIONS:

NONE

## SECTION X - ADDITIONAL REGULATORY INFORMATION

-SARA TITLE III SECTION 313:

This product contains the following toxic chemicals subject to the reporting requirements of section 313 of the Emergency Planning and Community Right To Know Act of 1986 and of 40 CFR 372:

| CAS# | Chemical Name | Percent by Weight |
|---|---|---|
| | None | |

EXHIBIT B

# Material Safety Data Sheet


Distributed by

**WORUM CHEMICAL COMPANY**

2130 ENERGY PARK DRIVE • ST. PAUL, MINNESOTA 55108 • 612-645-9224

24 HOUR EMERGENCY ASSISTANCE • CHEMTREC 800-424-9300


| Acute Health | Fire | Reactivity | HAZARD RATING: LEAST—0 SLIGHT—1 MODERATE—2 HIGH—3 EXTREME—4 |
|---|---|---|---|
| 2 | 3 | 0 | |

| | |
|---|---|
| Chemical Name and Synonyms: N/A | Trade Name and Synonyms: 1145 INK THINNER #11951 |
| Chemical Family: N/A | Formula: N/A |
| DOT Shipping Name: Flammable Liquid N O S | DOT Hazard Class: Flammable Liquid UN 1993 |

## SECTION 1 • PHYSICAL DATA

| Boiling Point @ 760 mm Hg or Range: | Vapor Pressure: mm Hg @ 68° F | Vapor Density (Air = 1): | Solubility (Weight % in Water): |
|---|---|---|---|
| 207°-215° F. | 13.8 | 2.2 | 90.2 |
| **Specific Gravity ($H_2O$ = 1): @ 60° F** | **Volume % Volatile:** | **Evaporation Rate: (Butyl Acetate = 1)** | |
| .816 | 100 | greater than 1 | |

Appearance and Odor:

Clear liquid with a characteristic odor.

## SECTION 2 • HAZARDOUS INGREDIENTS

| | % | T.L.V. (p.p.m.) |
|---|---|---|
| N-PROPYL ALCOHOL | 88-92 | 200 |
| N-PROPYL ACETATE | 4-20 | 200 |

THIS PRODUCT IS NOT SUBJECT TO SECTION 313 OF TITLE III OF S.A.R.A.

## SECTION 3 • FIRE AND EXPLOSION HAZARD DATA

| Flash Point °F Method Used = TCC | Flammable Limits in Air (% by Volume) | Extinguishing Media: |
|---|---|---|
| 58° for lowest flashing component | LEL: 2 UEL: 14 | carbon dioxide, dry chemical or foam |

Special Fire Fighting Procedures: Cool fire exposed containers with water. Do not enter confined fire space without proper protective equipment including a NIOSH approved breathing apparatus.

Unusual Fire and Explosion Hazards:

## SECTION 4 • HEALTH HAZARD DATA

Permissible Exposure Limits (TLV): For the lowest component.

200 PPM

## SECTION 5 • EMERGENCY AND FIRST AID PROCEDURES:

**Eye Contact:** Flush eyes with water for at least 15 minutes. Get medical attention.

**Skin Contact:** Wash with soap and water. Remove contaminated clothing. If irritation persists, get medical attention.

**Inhalation:** Remove victim to fresh air. Provide oxygen if breathing is difficult. Give artificial respiration if not breathing. Get medical attention.

**Ingestion:** Induce vomiting if conscious. Consult a physician immediately.

**Notes to Physician (Including Antidotes):**

## SECTION 6 • REACTIVITY DATA

| Stability: | Hazardous Polymerization: |
|---|---|
| Stable | Will not occur |

Conditions and Materials to Avoid:
Avoid acids, bases and oxidizing agents.

Hazardous Decomposition Products:
Carbon monoxide, carbon dioxide and unidentified organics.

## SECTION 7 • SPILL OR LEAK PROCEDURES

**Steps to be Taken if Material is Spilled or Released:**

Eliminate potential sources of ignition.

Wear appropriate respirator and other protective clothing.

For large spills, dike and contain. Remove with vacuum trucks or pump to storage/salvage vessels.

Soak up residue or small spills with noncombustible absorbant; place in drums for proper disposal.

Flush area with water to remove trace residue. Dispose of flush solutions in drums.

Keep out of surface waters and any watercourses or sewers entering or leading to surface waters.

**Waste Disposal Method:**

Dispose of in an appropriate disposal facility in compliance with local regulations.

Refer to latest EPA or State Regulations regarding disposal.

## SECTION 8 • SPECIAL PROTECTION INFORMATION

**Respiratory Protection:**

Use NIOSH-approved respirator if chance of overexposure.

**Ventilation (Type):** Use explosion-proof ventilation to maintain vapor concentrations below the T.L.V.

**Skin/Eye Protection:** Wear gloves, goggles and other protective clothing to minimize skin contact and prevent eye contact.

**Other Protective Equipment:**

## SECTION 9 • SPECIAL PRECAUTIONS

**Precautions to be Taken During Handling and Storing:**

Keep container closed. Do not store near heat, sparks, flame or oxidizing materials.

Vapors are heavier than air and will collect in low places.

Ground all containers when transferring liquid. Use nonsparking tools.

## References:

## Comments:

The information contained herein is based on the data available to us and is believed to be correct. However, Worum Chemical Company makes no warranty, expressed or implied regarding the accuracy of these data or the results to be obtained from the use thereof. Worum Chemical Company assumes no responsibility for injury from the use of the product described herein.

This MSDS compiles with 29 CFR 1910.1200 (The Hazard Communication Standard)

**Date Prepared:** 9/91

## EFFECTS OF OVEREXPOSURE

**This section covers effects of overexposure for inhalation, eye/skin contact, ingestion and other types of overexposure.**

Overexposure can lead to central nervous system depression producing such effects as headache, dizziness, nausea and loss of consciousness.

Irritating to eyes.

Can cause defatting and drying of the skin resulting in irritation and dermatitis.

Irritating to mucous membranes.

# Annex E

**HOOD FLEXIBLE PACKAGING**

A DIVISION OF SOUTHERN BAG CORPORATION

***INTERNAL CORRESPONDENCE***

**DATE:** 11/25/98

**TO:** B. Peterson, R. Eischen

**CC:** B. Rodgers

**FROM:** G. Hilliard

**SUBJECT:** Hazardous Waste Training

According to the Ramsey County Dept. of Health - Hazardous Waste Division as presented by inspector Paul Gelbmann, we must modify our current Hazardous Waste Training program.

Our Hazardous Waste Management Program contains instruction and training in hazardous materials for our Ink Blenders, and Material Handlers only. Training must also be provided and documented for all employees who may handle or transport hazardous waste within our plant. This must include Press Operators and Press Helpers because they actually create the waste, pour it into containers and may subsequently move it to other satellite waste locations within the plant.

Please work with Ralph to develop a simple training program for these employees. Training must then be provided and documentation obtained with an employee sign-off that they have received the training. A work Instruction should be provided covering the instruction and it should be available in the plant. I must report back to Paul as to our progress, and send him copies of our training program. I was not given a deadline for this, but we must act quickly because we are not in compliance at this time. Thank you.

Ralph Eischen - FYI
Result of a surprise inspection on 11/17.
Bill R

**HOOD FLEXIBLE PACKAGING**

A DIVISION OF SOUTHERN BAG CORPORATION

***INTERNAL CORRESPONDENCE***

**DATE:** 11/17/98

**TO:** B. Peterson, M. Schwartz

**CC:** ~~B. Rodgers~~, T. White **CC:** G. Blackford - CCI

**FROM:** Gary Hilliard

**SUBJECT:** Hazardous Waste Inspection

Below is recap of Inspection and deadlines for required action.

1. Post current License in plant. I overlooked this, and will post new license on 11/17/98.

2. Waste container being used at centrifuge for liquid waste was not marked. We must opaque-out all previous markings and label drums and containers as "hazardous Waste". This must be done before the container or drum is put into use.

3. Must begin using "spring-loaded" lid rings, or closable funnels to seal the drums of accumulating waste in the storage area. B. Peterson and G. Blackford should look into this request. Must be complete by Dec. 1, 1998.

4. Must provide adequate aisle space around drums for inspection in the drum storage area. B. Peterson and G. Blackford to determine proper long term solution. Must be completed by 1/15/98.

5. Documentation for hazardous waste training needs to be on file where it has better access (R. Eischen on vacation). I will work with Ralph to find a better location.

Paul Gelbmann was impressed with our work on waste reduction and asked me to try and document our results. I will work with B. Peterson on this. I would like to thank everyone for their help during the inspection.

# Annex F

Minnesota Pollution Control Agency

# Managing Towels, Wipes and Sorbents

Waste/Hazardous Waste #4.61, February 2001

*This fact sheet outlines management options for reusable and disposable sorbents — cloth towels, paper wipes, rags, and other absorbent and adsorbent materials.*

**Inside**

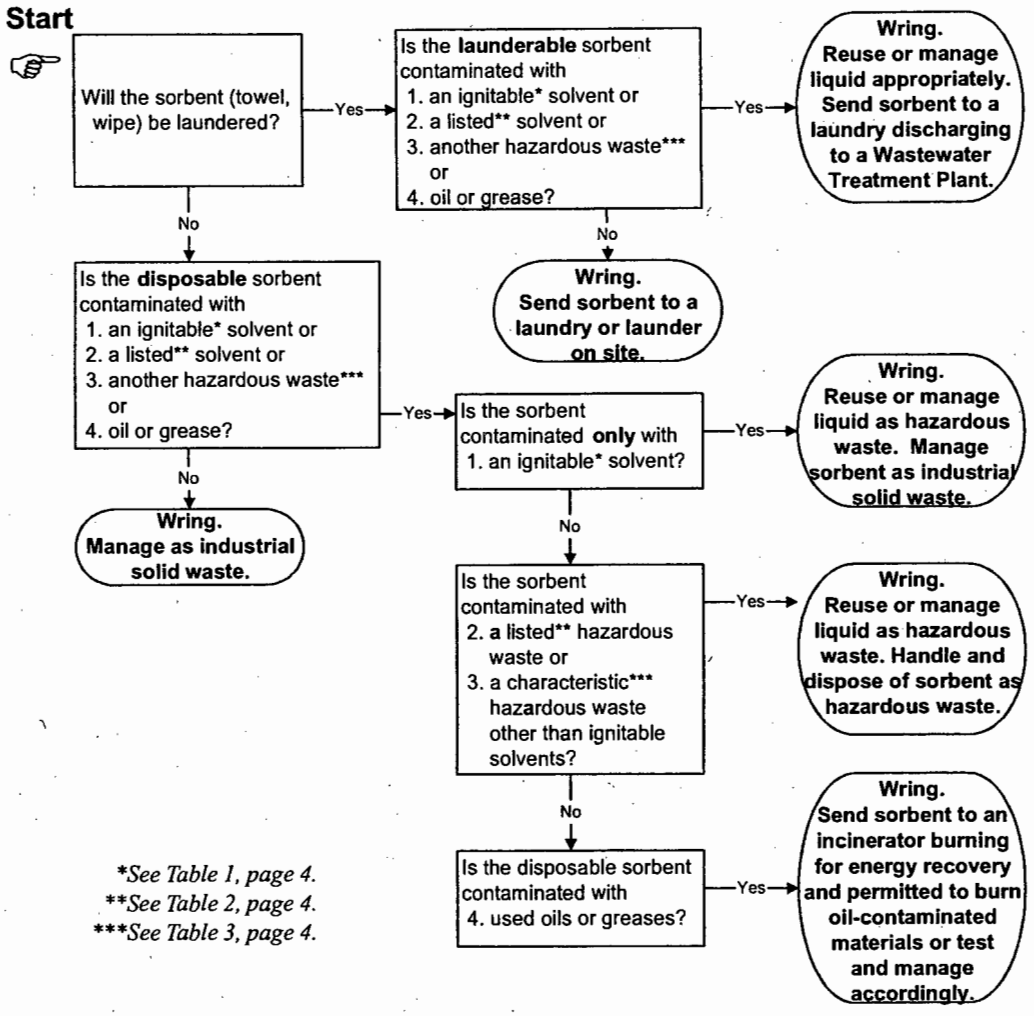

Environmental Concerns ..... 1
Reducing Waste ..... 1
Management Flow Chart ..... 1
Reusable/Launderable Sorbents ..... 2
Disposable Sorbents ..... 3
Ignitable Solvents ..... 4
F-Listed Solvents ..... 4
Toxicity Characteristic Wastes ..... 4
More Information ..... 4


## Environmental Concerns

Many businesses use *sorbents* — cloth towels, paper wipes or other absorbent or adsorbent materials — with solvents, paints, inks or oils. Because of these contaminants, used sorbents may be hazardous and require special handling. Inappropriate handling may impact employee health and safety. Improper disposal may result in environmental harm and may increase your liability.

## Reducing Waste

The Minnesota Pollution Control Agency (MPCA) strongly recommends improving housekeeping methods, using sorbents, towels and wipes until they are no longer usable, substituting non-hazardous solvent for hazardous, and utilizing every possible method to reduce the number of sorbents (towels, wipes) generated by your business.




*See Table 1, page 4.
**See Table 2, page 4.
***See Table 3, page 4.



Minnesota Pollution Control Agency, 520 Lafayette Road North, St. Paul, Minnesota 55155-4194
(651) 296-6300. toll-free (800) 657-3864, TDD (651) 282-5332 or (800) 657-3864

## Chart 1: Sorbents (Towels/Wipes) that are Reused, Recycled and/or Laundered

*(See Chart 2 for management of spent launderable sorbents that are no longer reusable.)*

| Used with: | Management | Notes |
|---|---|---|
| • F001, F002, F004 or F005 solvents (*see Table 2*)<br>• Solvent mixtures containing 10% or more F-listed solvents<br>• Hazardous paints or inks containing toxic metals such as barium or chromium (*see Table 3*) | 1. Remove free liquid by wringing*. Reuse extracted liquid or manage it as hazardous waste.<br>2. Manage sorbents as hazardous on site: Store in a covered container marked with the words *Hazardous Waste — Solvent Sorbents [Towels/Wipes]*.<br>3. Send sorbents to a commercial laundry which has a discharge permit from its local wastewater treatment plant. If sorbents are picked up weekly or more often, keep a chart of pick-up dates and pounds picked up. (In this case, an accumulation start date and weekly container inspection is not necessary.) | • Air drying of sorbents must be accompanied by solvent recovery and may require a hazardous waste treatment permit. Contact the MPCA for more information.<br>• If you are a small or large quantity generator, train employees on proper sorbent management.<br>• In Greater Minnesota, small and large quantity generators report amount of used sorbents on annual hazardous waste license application.**<br>• Do not launder sorbents on site.<br>• Do not add waste solvents to used sorbents or sorbent storage container.<br>• If you send sorbents to a commercial laundry, current MPCA policy states: No manifest is needed for transport. The laundry does not need a hazardous waste facility permit. |
| Ignitable solvents only, D001 or F003 (*see Table 1*) | 1. Remove free liquid by wringing.* Reuse extracted liquid or manage it as a hazardous waste.<br>2. Sorbents containing no free liquid (wrung) can be managed as non-hazardous; no hazardous waste rules apply.**<br>3. Send sorbents to a commercial laundry which has a discharge permit from its local wastewater treatment plant. | • Mark container *Used Sorbents [Towels/Wipes] — Wrung* to distinguish from hazardous sorbents.<br>• In Greater Minnesota, do not report these sorbents on your annual hazardous waste license application.**<br>• Laundering on site may require a discharge permit from your local wastewater treatment plant. Also, check with local fire marshal for fire protection requirements. |
| Oil | 1. Remove free liquid by wringing.* Reuse extracted liquid or manage it as used oil.<br>2. Send sorbents to a commercial laundry which has a discharge permit from its local wastewater treatment plant. | • Mark the container with the words *Used Oil Sorbents [Towels/Wipes]*.<br>• No manifest is needed for transport.<br>• Laundry does not need a hazardous waste facility permit.<br>• In Greater Minnesota, do not report these sorbents on your annual hazardous waste license application.** |

***Mechanical wringing or extractor is best.**

****In the metro area: check with your county for reporting requirements.**

****Anticipated federal rules may require management as hazardous waste.**

**Note:** *Provided your laundry service approves, it is acceptable to co-mingle hazardous and non-hazardous towels, wipes and/or sorbents that will be sent to a commercial laundry. While on site, follow storage and marking requirements for hazardous waste. If you cannot keep accurate records of the amount of hazardous towels, wipes and sorbents, you must report them all as hazardous.*

## Chart 2: Sorbents (Towels/Wipes) that are Destined for Disposal After Use

| Used with: | Management | Notes |
|---|---|---|
| • F001, F002, F004 or F005 solvents (*see Table 2*)<br>• Solvent mixtures containing 10% or more F-listed solvents<br>• Hazardous paints or inks containing toxic metals such as barium or chromium (*see Table 3*) | 1. Remove free liquid by wringing*. Reuse extracted liquid or manage it as hazardous waste.<br>2. Manage sorbents as hazardous; all hazardous waste rules apply.<br>• Store in a covered container marked with the words *Hazardous Waste — Solvent Sorbents [Towels/Wipes].*<br>• Inspect containers weekly; keep a record of inspections.<br>• Ship within required storage time limits. (Satellite accumultaion is an option if you accumulate slowly.)<br>• Use a hazardous waste manifest and licensed hazardous waste transporter and send to a hazardous waste facility. | • Air drying of sorbents must be accompanied by solvent recovery and may require a hazardous waste treatment permit. Contact the MPCA for more information.<br>• If you are a small or large quantity generator, train employees on proper sorbent management.<br>• In Greater Minnesota, report amount of used sorbents on annual hazardous waste license application.**<br>• Do not add waste solvents to used sorbents or sorbent storage container.<br>• Storage time limits are based on generator size. (For more information, request MPCA hazardous waste fact sheet #1.04, *Mark and Store Waste Correctly.*) |
| Ignitable solvents only, D001 or F003 (*see Table 1*) | 1. Remove free liquid by wringing.* Reuse extracted liquid or manage it as a hazardous waste.<br>2. Sorbents that have been wrung dry or that become dry through use are non-hazardous; manage as an industrial solid waste. ***<br>3. Sorbents that are not dry should be managed as F001 rags above. | • Mark container *Used Sorbents [Towels/Wipes] — Wrung* to distinguish from hazardous sorbents.<br>• In Greater Minnesota, do not report these sorbents on your annual hazardous waste license application.**<br>• Laundering on site may require a discharge permit from your local wastewater treatment plant. Also, check with fire marshal for fire protection requirements. |
| Oil | 1. Reuse sorbent until unusable. Remove free liquid.* Reuse extracted liquid or manage it as used oil.<br>2. Store sorbents in a closed leakproof container marked with the words *Used Oil Sorbents [Towels/Wipes].*<br>3. Send to an incinerator burning for energy and permitted to burn oily materials. If not burning, evaluate and, based on results, manage as solid or hazardous waste. | • *Optional management*: Evaluate for toxicity characteristics (see Table 3). If hazardous, manage like sorbents used with F001 solvents above. If nonhazardous, manage as an industrial solid waste.<br>• In Greater Minnesota, report sorbents that are burned for energy recovery or recycled on your annual license application. Do not report non-hazardous sorbents.**<br>• For more information, request MPCA hazardous waste fact sheet # 4.30, *Managing Used Oil and Related Wastes.* |

***Mechanical wringing or extractor is best.**
****In the metro area: check with your county for reporting requirements.**
****Anticipated federal rules may require management as hazardous waste.**

### Additional Requirements

Consult your laundry service and your local fire marshal for additional applicable requirements.

## Table 1: Ignitable Solvents

| | |
|---|---|
| **F003** | acetone, cyclohexanone, ethyl acetate, ethyl benzene, ethyl ether, methanol, methyl isobutyl ketone, n-butyl alcohol, xylene and all spent solvent mixtures/ blends containing, before use, only the above spent nonhalogenated solvents. |
| **D001** | All liquid solvents and mixtures not listed above having a flash point below 140°F. *The flash point can be found on the Material Safety Data Sheet (MSDS).* |

## Table 2: F-listed Solvents (Toxic)

| | |
|---|---|
| **F001** | (*halogenated and used for degreasing*) carbon tetrachloride; chlorinated fluorocarbons, methylene chloride, tetrachloroethylene, 1,1,1-trichloroethane, trichloroethylene and all spent solvent mixtures/blends used in degreasing containing, before use, a total of ten percent or more by volume of one or more F001, F002, F004 or F005 solvents. |
| **F002** | (*halogenated*) chlorobenzene, methylene chloride, orthodichlorobenzene, tetrachloroethylene, 1,1,1-trichloroethane, 1,1,2-trichloroethane, trichloroethylene, trichlorofluoromethane, 1,1,2-trichloro-1,2,2-trifluoroethane and all spent solvent mixtures/blends containing, before use, a total of ten percent or more by volume of one or more F001, F002, F004 or F005 solvents. |
| **F004** | (*non-halogenated*) cresols and cresylic acid, nitrobenzene and all spent solvent mixtures/blends containing, before use, a total of ten percent or more by volume of one or more F001, F002, F004 or F005 solvents. |
| **F005** | (*non-halogenated*) benzene, carbon disulfide, 2-ethoxyethanol, isobutanol, methyl ethyl ketone, 2-nitropropane, pyridine, toluene and all spent solvent mixtures/blends containing, before use, a total of ten percent or more by volume of one or more F001, F002, F004 or F005 solvents. |

## More Information

Your metropolitan county and the Minnesota Pollution Control Agency have staff available to answer waste management questions. For more information, contact your metropolitan county hazardous waste office or the MPCA office closest to your county.

**Metro County Hazardous Waste Offices**

| | |
|---|---|
| Anoka County | (763) 422-7093 |
| Carver County | (952) 361-1800 |
| Dakota County | (952) 891-7557 |
| Hennepin County | (612) 348-8100 |
| Ramsey County | (651) 773-4466 |
| Scott County | (952) 496-8177 |
| Washington County | (651) 430-6655 |

**Minnesota Pollution Control Agency**

| | |
|---|---|
| Toll free | (800) 657-3864 |
| Brainerd | (218) 828-2492 |
| Detroit Lakes | (218) 847-1519 |
| Duluth | (218) 723-4660 |
| Marshall | (507) 537-7146 |
| Rochester | (507) 285-7343 |
| St. Paul | (651) 297-2274 |

**MPCA Web Site:** http://www.pca.state.mn.us

## Table 3: Toxicity Characteristic Wastes, Maximum Allowable Concentrations & Waste Codes

| Hazardous Contaminant | Maximum Allowable Concentration in mg/L | Waste Code |
|---|---|---|
| Arsenic* | 5.0 | D004 |
| Barium* | 100.0 | D005 |
| Benzene | 0.5 | D018 |
| Cadmium* | 1.0 | D006 |
| Carbon tetrachloride | 0.5 | D019 |
| Chlordane | 0.03 | D020 |
| Chlorobenzene | 100.0 | D021 |
| Chloroform | 6.0 | D022 |
| Chromium* | 5.0 | D007 |
| *o*-Cresol | 200.0** | D023 |
| *m*-Cresol | 200.0** | D024 |
| *p*-Cresol | 200.0** | D025 |
| Cresol** | 200.0 | D026 |
| 1,4-Dichlorobenzene | 7.5 | D027 |
| 1,2-Dichloroethane | 0.5 | D028 |
| 1,1-Dichloroethylene | 0.7 | D029 |
| 2,4-Dichlorophenoxyacetic acid (2,4-D) | 10.0 | D016 |
| 2,4-Dinitrotoluene | 0.13 | D030 |
| Endrin | 0.02 | D012 |
| Heptachlor | 0.008 | D031 |
| Hexachlorobenzene | 0.13 | D032 |
| Hexachloro-1,3-butadiene | 0.5 | D033 |
| Hexachloroethane | 3.0 | D034 |
| Lead* | 5.0 | D008 |
| Lindane | 0.4 | D013 |
| Mercury* | 0.2 | D009 |
| Methoxychlor | 10.0 | D014 |
| Methyl ethyl ketone | 200.0 | D035 |
| Nitrobenzene | 2.0 | D036 |
| Pentachlorophenol | 100.0 | D037 |
| Pyridine | 5.0 | D038 |
| Selenium* | 1.0 | D010 |
| Silver* | 5.0 | D011 |
| Tetrachloroethylene | 0.7 | D039 |
| 2,4,5-Trichlorophenol | 400.0 | D041 |
| 2,4,6-Trichlorophenol | 2.0 | D042 |
| 2,4,5-Trichlorophenoxypropionic acid (Silvex) | 1.0 | D017 |
| Vinyl chloride | 0.2 | D043 |

**Toxic Metals*

***Laboratory analyses that show any individual cresol above the 200.0 mg/L level are hazardous for that reason. For analyses where o-, m- and p-cresol concentrations cannot be differentiated, the total cresol concentration is used.*

# Annex G

# PRESSROOM COLLECTION AND EVALUATION FOR DETERMINATION OF HAZARDOUS WASTE

A method has been established for pressroom materials collection and evaluation, for the determination of hazardous waste.

- Return ink and clean-up solvent will be returned to the ink room by pressroom or ink room personnel after each clean up or end of shift. These materials are not deemed has hazardous waste at this time.

- Ink room personnel will evaluate the return ink and clean-up solvents to determine which materials may be suitable for reuse. Any materials considered not suitable for reuse will be deemed as hazardous waste and properly deposited and stored in labeled hazardous waste containers.

- **Solvent reclaimed by centrifuge will be stored in one 55-gallon drum in the satellite storage area adjacent to the centrifuge. This container will be properly labeled and dated when started. Once the container is full, it will be taken to the hazardous waste storage area in the ink room, re-dated, and shipped out within 90 days.**

- All ink room personnel, and employees of in-house ink supplier (if any) will be trained in hazardous waste management. Training records will be kept by the Human Resources Manager.

# 7045.0572 CONTINGENCY PLAN

**Hood Packaging Corporation 1887 Gateway Blvd., Arden Hills, MN 55112**

This plan addresses emergency procedures to be followed in case of a hazardous waste or hazardous chemical spill of more than 5 gallons, and is designed to minimize hazards to human health, or the environment.

## Emergency spill coordinators:

The following personnel are designated as emergency spill coordinators. These coordinators are to be contacted immediately if a hazardous waste or hazardous chemical spill of more than 5 gallons arise.

**Hazardous Chemicals Spill Coordinator:**
Gary Hilliard - ext. 230
Home Phone: (952) 944-1531
**Home Address:**
**7146 W. 113th Street**
**Bloomington, MN 55438**

**Alternate:**
Steve Hendrickson – ext 224
Home Phone: (651) 777-4544
**Home Address:**
**2590 Hydram Ave. N.**
**Oakdale, MN 55128**

**Other Emergency Phone Numbers:**
Arden Hills Fire Department – (641) 481-7024 (non-emergency) or **911**.

## HAZARDOUS WASTES GENERATED ON SITE:

The only hazardous waste generated at the Arden Hills plant that could constitute a health or environmental threat is our waste ink and solvent. This waste stream is considered hazardous because it is flammable. This waste stream is identified as follows:

Waste Ink/Solvent Containing one or more of the following:

- Normal Propyl (NP) Acetate
- Methyl Acetate (laminating solvent, non-VOC)
- Normal Propyl (NP) or Ethyl Alcohol
- Solvent based flexographic printing ink

Storage and Quantities of hazardous waste:

- Hazardous waste is stored in 55-gallon drums located in the ink room. No more than 715 gallons of hazardous waste is on site at any time.

Storage and quantities of other hazardous chemicals:

- 55-Gallon Drums of Normal Propyl Alcohol and Normal Propyl Acetate are stored in the Ink room. Maximum Quantity of 275 Gallons total.

- 90/10 Slow Solvent Blend (90% NP Alcohol/10% NP Acetate) is stored in above ground storage tank outside of the building on the East Side behind the ink room. Maximum quantity is 3000 gallons

- 85/15 Fast Solvent Blend (85% Ethyl Alcohol/15% NP Acetate) is stored in above ground storage tank outside of the building on the East Side behind the ink room. Maximum quantity is 1000 gallons.

Note: Above ground storage tanks comply with all MPCA rules and regulations.

- Solvent Based Flexographic Printing Inks are stored in the ink room, in both 5 gallon and 55 gallon containers. Maximum quantity is 6,000 gallons.

## Hazardous waste and chemical spill reporting:

Hazardous waste or chemical spills of over 5 gallons in quantity must be reported to the Minnesota Pollution Control Agency (MPCA). To report a spill call:

**(612) 649-5451 or 1-(800) 422-0798**
**Ask for the State Duty Officer**

When reporting a spill tell the duty officer:

1. Your name, the company name and phone number
2. Company address and EPA ID #MNR000102509
3. Date, time, and type of spill
4. Quantity and type of material spilled
5. That the material is a flammable hazardous waste, chemical solvent, or solvent based printing ink
6. That the material will be collected and labeled as hazardous waste according to Minnesota Hazardous Waste Rules

## Emergency Response - What to do in case of a spill:

- Evaluate the situation. If there is any potential for danger of fire or contamination, remove any personnel at risk.

- Notify the emergency coordinator, or alternate listed above.

- Alert Fire Department if danger of fire may result from the spill.

- Contain and clean up the spill using the spill clean-up cart located near the ink room under the stairwell to the mezzanine. Try to recover liquid materials as liquids if it can be done safely. Liquid materials must be placed into an empty or partially filled hazardous waste drum from the hazardous storage area in the ink room. The drum must be properly labeled according to Minnesota Hazardous Waste Rules (see Overview section of this manual).

## Arrangements with local Emergency Response Services:

The Emergency Response Commission and local Fire Department have been notified of our hazardous waste and chemical storage by means of the annual Tier II reports.

Tier II identifies types of materials by hazard, quantities, and their location within the facility. It also includes a site map for reference (see Tier II file).

**Spill Prevention:**

- Hazardous waste is accumulated and stored in sealed 55-gallon drums. These drums are inspected weekly for leaks, and an inspection log is maintained with the Hazardous Waste Manifest file. The drums are stored in the ink room that has concrete floors and walls, and has raised dykes for spill containment.

- Employees that handle hazardous waste are trained to respond to spill emergencies and clean up (see training section).

- A spill cart is available for spill containment (see Emergency Response).

**Emergency Equipment:**

- Fire extinguishers are available throughout the building. Refer to site plan for locations.

- Spills – There is a spill clean-up cart located near the ink room under the stairwell to the mezzanine for use to contain and clean up spills.

- A fire alarm system is available to alert personnel of fire danger (see site plan)

- A telephone paging system is also available to alert employees of any danger or need for evacuation. The paging system can be used from the phone in the Supervisors office by dialing 000 (see site plan).

**Emergency evacuation:**

If the need should arise to evacuate the building due to fire, spills or explosions of hazardous waste or chemicals, please follow the procedures below:

- Pull fire alarm. Follow route shown on building evacuation map.
- Use paging system to alert personnel to evacuate the building. Follow route shown on building evacuation map.

**Post Emergency Requirements:**

- Upon implementation of the contingency plan the Hazardous Spills Coordinator will review the spill clean-up, inspect the spill site, spill equipment, and insure that the spill clean up is properly stored, labeled, and disposed of as a hazardous waste according to the Minnesota Hazardous Waste Rules.
- The Coordinator will also request that Hood Packaging Corporation notify the MPCA that the facility is in compliance with all hazardous waste rules, before resuming operations in the affected area or areas of the facility.
- Within 15 days, Hood Packaging Corporation will submit a report to the commissioner of the MPCA in accordance with the requirements of Minnesota Rules 7045.0576 (see attachment).