



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue, Suite 155
Seattle, WA 98101

ENFORCEMENT &
COMPLIANCE ASSURANCE
DIVISION

Clean Air Act - Section 112(r)
Risk Management Program
and EPCRA 312 – Tier II
Facility Inspection Report

FACILITY INFORMATION:

Name: Bakelite Chemicals LLC – Eugene, Oregon
Physical Address: 2665 Hwy 99N, Eugene, Oregon 97402
Phone Number: (541) 688-5221
Latitude/Longitude: 44.101515/-123.168446
RMP Facility ID#: 100000098084
FRS ID#: 110071312961
EJ Concerns: No (Below 80%)

CONTACT INFORMATION (RMP Implementation):

Name: Adam Walkoviak
Phone Number: (541) 688-5221
E-mail: adam.walkoviak@bakelite.com

EMERGENCY CONTACT INFORMATION:

Name: Adam Walkoviak
Phone (24-hr): (541) 688-5221
E-mail: adam.walkoviak@bakelite.com

TRIP DETAILS:

Inspection Date: February 8, 2024
Inspection Time: 0900 hours through 1430 hours
EPA Inspection Team:
Peter Phillips, US EPA Region 10 SEE Grantee, Lead RMP Inspector
Terry Garcia, US EPA Region 10 SEE Grantee, RMP Inspector
Edward Johannes, US EPA Region 10 SEE Grantee, RMP Inspector
Robert Faries, Weston Solutions, Inc., EPA START Contractor

DATE AND PROGRAM LEVELS OF SUBMITTED RMP:

Initial Submission Date: June 21, 1999
Date of Latest Update: August 4, 2023

Process (Program 1, 2, 3) as reported in RMP:

Process ID	Description	Process Chemical ID	NAICS Code	Program Level	Chemical Name CAS Number	Quantity (lbs)
1000131916	Resin Manufacturing	1000165338	325211	3	Epichlorohydrin 106-89-8	930,000
1000131916	Resin Manufacturing	1000165339	325211	3	Formaldehyde 50-00-0	320,000

PURPOSE:

The purpose of this inspection was to determine if this facility is in compliance with Section 112(r) of the Clean Air Act (CAA) and Title 40 Code of Federal Regulations (CFR) Part 68, Chemical Accident Prevention Provisions.

- The facility has been previously inspected in the past 5 years: No ☒ Yes ☐
- The facility is High Risk: No ☒ Yes ☐
- Joint EPCRA inspection: No ☐ Yes ☒

CAA Title V Air Permit:

Does the facility have a CAA Title V Permit?

No ☐ Yes ☒

If Yes, Permit Number: 203129

RELEASE/ACCIDENT HISTORY:

Did the facility have a reportable release in the past 5 years?

No ☒ Yes ☐

EPCRA TIER II REPORTING:

Did the facility submit the 2022 Tier II report to the SERC?

No ☐ Yes ☒

If Yes, Date the Tier II was submitted: February 24, 2023

Did the facility submit a Tier II to the LEPC and local fire department?

No ☐ Yes ☒

If Yes, Date the Tier II was submitted: February 24, 2023

INSPECTION ENTRY:

Peter Phillips led the inspection entry. The EPA Inspection Team (EPA) met with facility representatives Justin Roudabush, Jon Mead, Ed Park, Adam Walkoviak, Marcus Lanning, and Spenser Louderback at the Bakelite Chemicals LLC facility in Eugene, Oregon. EPA arrived at the facility at 0900 and was joined by the following facility personnel:

Name	Title, Organization
Justin Roudabush	H&S Leader
Jon Mead	QA Chemist
Ed Park	Quality/Environmental Manager
Adam Walkoviak	Director of Manufacturing
Marcus Lanning	Production Manager
Spenser Louderback	Maintenance Leader

Was a state/county/or local emergency representative present?

No ☒ Yes ☐

The facility is a first responder:

No ☒ Yes ☐

If No, Responding Agency: Eugene-Springfield Fire Department

Facility representatives escorted EPA to a conference room located in the facility's office building. Lead Inspector Peter Phillips, introduced all parties present, provided a summary of the Risk Management Program (RMP), and explained the purpose of the visit. Each EPA Inspector presented his/her credentials.

EPA then requested an explanation of the facility's operations and any additional safety measures that should be taken during the site tour. Justin Roudabush gave a brief description of the facility, operations, and personal protective equipment required for the tour.

Prior to the inspection, EPA sent a certified notice of inspection letter to the facility informing them of the CAA Section 112(r)(6)(L) requirement that facility employees and employee representatives (such as a union representative) have the right to participate in the RMP inspection, and that a copy of the letter must be provided to the employee representative(s) and the letter posted in a manner accessible to employees in the facility.

The facility is unionized:	No ☒	Yes ☐
An employee representative present during the facility visit:	No ☒	Yes ☐

GENERAL INFORMATION:

The facility is regulated under RMP rule as a Program Level 3 facility and is owned and operated by Bakelite Chemical LLC. The facility manufactures polymer liquid resins that are used as binding agents in the production of a variety of materials including plywood, paper towels, and aerospace material. The facility is permitted for 930,000 pounds of Epichlorohydrin and 320,000 pounds of Formaldehyde which are both used in the manufacturing process. Both chemicals are stored in above ground storage tanks. Epichlorohydrin is supplied by tanker railcar and Formaldehyde by tanker truck. Both chemicals are piped into the resin reactors. The facility employs 34 full-time employees including two operates in 12-hour shifts seven days a week. There are four to five RMP operators per shift.

ON-SITE OBSERVATIONS:

EPA toured the facility from approximately 0950 hours to 1050 hours, escorted by facility representatives Justin Roudabush, Jon Mead, Ed Park, Adam Walkoviak, Marcus Lanning, and Spenser Louderback. The tour began in the control room. EPA observed Kettles K2 and K3's manual quenches, control monitoring screens, and safety lockboxes (Photos 1-3). Manual quenches are used to counteract anticipated runaway reactions before they trigger the failsafe alarm.

EPA made their way to the epichlorohydrin storage area on the west side of the property, passing by the acid base tote storage area and observing a blocked emergency shutoff switch (Photos 4-6). The epichlorohydrin storage area contains two storage tanks. The tanks are restocked with product shipped in by railcar approximately once every six weeks. An eyewash station is located in the epichlorohydrin storage area (Photo 7). Epichlorohydrin is piped from the storage area to the kettles (Photos 8 & 9).

After viewing the epichlorohydrin storage area, facility representatives led EPA to the kettle area. Epichlorohydrin and formaldehyde are piped into the kettles as part of the resin manufacturing process. Final products produced in Kettle K-1 are primarily used for paper towel manufacturing, Kettle K-2 for plywood, and Kettle K-3 aerospace plastics (Photos 10-12). In the kettle area, EPA observed an emergency eyewash station and five-minute respirator (Photos 13 & 14). EPA went to the second floor of the kettle area to view the tops of the kettles, certification placards, and chemical pipelines (Photos 15-21)

Facility representatives escorted EPA to the formaldehyde storage area. Similar to the epichlorohydrin, formaldehyde is stored in two storage tanks and piped to the kettles to be used in the manufacturing process (Photos 22 & 23). Formaldehyde is loaded into the storage tanks by truck six days a week. Each truck loads approximately 6,500 pounds of material. During the time of the inspection, facility staff were performing valve maintenance on formaldehyde storage tank 306 (Photo 24). The aqua ammonia and phenol storage and unloading areas are adjacent to the formaldehyde storage area (Photo 25). Phenol is unloaded by railcar. The phenol loading area is equipped with an emergency alarm, a phenol burns first aid kit, and fall protection measures (Photos 26-29).

After viewing the formaldehyde storage area, EPA observed the facility's emergency response trailer. The facility is not a first responder, but maintains the trailer full of sorbent material and containment equipment to be used as spill control (Photos 30 & 31).

The facility's flammable liquid storage area is located on the south side of the property. The area contains a combination of finished products and ingredients to be used in the manufacturing process (Photo 32).

EPA made their way back to the acid base storage area to confirm totes had been rearranged to grant access to the epichlorohydrin emergency shut-off (Photo 33). After documenting the correction, EPA and facility staff concluded the walk-through and returned to the conference room to review the RMP documentation. Upon completion of the document review, EPA provided a debriefing to Justin Roudabush, Jon Mead, Ed Park, Adam Walkowiak, Marcus Lanning, and Spenser Louderback.

INFORMATION COLLECTED FROM FACILITY:

1. Sign-in Sheet
2. Bakelite Chemical Process Safety Policy
3. Process Hazard Analysis Completion Notice
4. 2022 emergency Hazardous Chemical Inventory
5. SOP Training Certifications

AREAS OF CONCERNS ADDRESSED IN CLOSING CONFERENCE:

No areas of concern were identified at the time of the inspection.

DOCUMENTS REQUESTED NOT INCLUDED IN REPORT:

The following documents were requested during the inspection but are not included in this report. These documents will still be reviewed to determine compliance with Section 112(r) of the Clean Air Act.

1. Initial PHA (1999) including the tracking of all recommendations and action items/completion dates.
2. Operating procedures for the EHS Bulk Fill Area and training documentation for the truck drivers that work in this area.
3. Contractor company name who delivers to the EHS Bulk Fill Area and the training procedure or policy for the truck drivers.
4. The following information on the October 2022 phenol release at the site [NRC Incident Report #1349664]
 - a. The total release amount, with a description of how this was calculated.
 - b. If the release was over the 1,000 pounds reporting quantity, provide the initial release notification to the NRC, SERC and LEPC, as required under CERCLA Section 103 and EPCRA Section 304.

- c. If the release was over the 1,000 pounds reporting quantity, provide any follow-up notification sent to the SERC and LEPC, as required under EPCRA Section 304.

INSPECTION REPORT CERTIFICATION:

This is to certify that I, Peter Phillips, was the lead inspector at this facility and that I have verified the accuracy of the observations in this inspection report:

PETER PHILLIPS
(Affiliate)

Digitally signed by PETER
PHILLIPS (Affiliate)
Date: 2024.06.11 11:40:14 -07'00'

Inspector Signature

JAVIER MORALES

Digitally signed by JAVIER
MORALES
Date: 2024.06.11 12:16:27 -07'00'

RMP Coordinator/Approval

ERIN WILLIAMS

Digitally signed by ERIN
WILLIAMS
Date: 2024.06.11 14:49:00 -07'00'

EPCRA Coordinator/Approval

MATTHEW
QUARTERMAN

Digitally signed by MATTHEW
QUARTERMAN
Date: 2024.06.11 16:00:23 -07'00'

Land Enforcement Section Chief/Approval

Attachment A – Photo Log

Site Name: Bakelite Chemicals, LLC

City, State: Eugene, Oregon

Photographer: Robert Faries, Weston Solutions

File	Photo Layout ID	Date	Time	Description
Photo1.jpg	1	2/8/2024	10:00 a.m.	Manual quenches for kettles K-2 and K-3. Manual quenching is used to counteract runaway reactions before they set off the failsafe alarm. The auto quench system triggers with no input. Location in Facility: Control Room.
Photo2.jpg	2	2/8/2024	10:01 a.m.	Control room overview. Location in Facility: Control room.
Photo3.jpg	3	2/8/2024	10:02 a.m.	Lockboxes. Location in Facility: Control Room.
Photo4.jpg	4	2/8/2024	10:07 a.m.	Emergency shutdown station for Isopropyl alcohol, epichlorohydrin, and propane blocked by totes. Location in Facility: Acid/base tote storage area.
Photo5.jpg	5	2/8/2024	10:11 a.m.	Emergency shutdown station for Isopropyl alcohol, epichlorohydrin, and propane sign. Location in Facility: Acid/base tote storage area.
Photo6.jpg	6	2/8/2024	10:11 a.m.	EPCRA chemical storage area overview. Location in Facility: Acid/base tote storage area.
Photo7.jpg	7	2/8/2024	10:21 a.m.	Epichlorohydrin storage tank, pipes, and eyewash station. Location in Facility: Epichlorohydrin storage area.
Photo8.jpg	8	2/8/2024	10:21 a.m.	Epichlorohydrin storage tank and pipes. Location in Facility: Epichlorohydrin storage area.
Photo9.jpg	9	2/8/2024	10:22 a.m.	Epichlorohydrin storage tank and pipes. Location in Facility: Epichlorohydrin storage area.
Photo10.jpg	10	2/8/2024	10:23 a.m.	Bottom of Kettle K-2. Product primarily used for plywood resins. Location in Facility: Kettle area.
Photo11.jpg	11	2/8/2024	10:23 a.m.	Bottom of Kettle K-1. Product primarily used in paper towel manufacturing process. Location in Facility: Kettle area.
Photo12.jpg	12	2/8/2024	10:24 a.m.	Bottom of Kettle K-3. Product primarily used in industrial resins. Location in Facility: Kettle area.
Photo13.jpg	13	2/8/2024	10:24 a.m.	Emergency eye wash station. Location in Facility: Kettle area.
Photo14.jpg	14	2/8/2024	10:25 a.m.	Emergency five-minute respirator. Location in Facility: Kettle area
Photo15.jpg	15	2/8/2024	10:30 a.m.	Top of Kettle K-1. Location in Facility: Kettle area.
Photo16.jpg	16	2/8/2024	09:35 a.m.	Top of K-3. Location in Facility: Kettle area.
Photo17.jpg	17	2/8/2024	10:29 AM	Top of K-2 Location in Facility: Kettle area.

Photo18.jpg	18	2/8/2024	10:30 AM	Epichlorohydrin and formic acid lines. Location in Facility: Kettle area.
Photo19.jpg	19	2/8/2024	10:30 AM	Formaldehyde and formic acid lines. Location in Facility: Kettle area.
Photo20.jpg	20	2/8/2024	10:32 AM	Phenol line running to K-2. Location in Facility: Kettle area.
Photo21.jpg	21	2/8/2024	10:33 a.m.	Data plate for K-2. Location in Facility: Kettle area.
Photo22.jpg	22	2/8/2024	10:33 a.m.	Formaldehyde storage tank 304. Location in Facility: Formaldehyde storage area.
Photo23.jpg	23	2/8/2024	10:36 a.m.	Formaldehyde storage tank 306. Location in Facility: Formaldehyde storage area.
Photo24.jpg	24	2/8/2024	10:36 a.m.	Maintenance crew replacing valve on formaldehyde storage tank 306. Location in Facility: Formaldehyde storage area.
Photo25.jpg	25	2/8/2024	10:38 a.m.	EPCRA regulated aqua ammonia storage tank. Location in Facility: Formaldehyde storage area.
Photo26.jpg	26	2/8/2024	10:38 a.m.	Phenol unloading. Location in Facility: Formaldehyde storage area.
Photo27.jpg	27	2/8/2024	10:39 a.m.	Fall protection. Location in Facility: Formaldehyde storage area.
Photo28.jpg	28	2/8/2024	10:41 a.m.	Phenol alarm. Location in Facility: Formaldehyde storage area.
Photo29.jpg	29	2/8/2024	10:29 a.m.	Phenol burn first aid kit. Location in Facility: Formaldehyde storage area.
Photo30.jpg	30	2/8/2024	10:45 a.m.	Emergency response trailer. Location in Facility: Main lot.
Photo31.jpg	31	2/8/2024	10:45 a.m.	Contents of emergency response trailer. Location in Facility: Main lot.
Photo32.jpg	32	2/8/2024	10:46 a.m.	Flammable liquid storage area containing a mix of finished products and process ingredients. Location in Facility: Flammable liquid storage area.
Photo33.jpg	33	2/8/2024	10:54 a.m.	Totes rearranged to provide access to the emergency shutoff. Location in Facility: Acid/base storage area.