

TOXIC SUBSTANCES CONTROL ACT – NEW AND EXISTING CHEMICALS PROGRAM
COMPLIANCE MONITORING INSPECTION REPORT

LG Chem America, Inc.

**3475 Piedmont Road NE, Suite 1200
Atlanta, Georgia 30305**

Inspection Date: February 24, 2022

Report Prepared By: Ryan Jones
U.S. Environmental Protection Agency, Region 4
TSCA Enforcement Section
61 Forsyth Street SW
Atlanta, Georgia 30303

Inspectors: Gopal Timsina EPA Region 4, TSCA-NEC Inspector
Ryan Jones EPA Region 4, Inspector in Training

Report Date: March 14, 2022

1.0 Company Information:

- 1.1 Company/Site Name: LG Chem America, Inc.
- 1.2 Facility Name: LG Chem America, Inc.
- 1.3 Number of employees in Atlanta: 41
- 1.4 Number of employees nationwide: 69
- 1.5 Type of Ownership: Private
- 1.6 Year of last TSCA-NEC Inspection: No Record of TSCA-NEC Inspection
- 1.7 Gross annual sales in 2019: Over \$120 million
- 1.8 Nature of Business: Chemical importer and distributor
- 1.9 Site Latitude and Longitude: 33.8499567 and -84.3772729

2.0 Representatives Present:

- 2.1 LG Chem America, Inc.: Hyunsoo Kim, Compliance Manager
- 2.2 U.S. Environmental Protection Agency: Gopal Timsina, TSCA-NEC lead Inspector; Ryan Jones, TSCA-NEC Inspector in training

3.0 Inspection Objectives: The inspection was conducted pursuant to Section 11 of the Toxic Substances Control Act (TSCA), 15 U.S.C. § 2610, to determine compliance with TSCA Sections 4, 5, 8, 12 and 13.

4.0 Inspection Notice:

- 4.1 Inspection Notice: On January 20, 2022, Gopal Timsina contacted Mr. Hyunsoo Kim, Compliance Manager at LG Chem America, Inc. (LG Chem) to schedule a “Neutral Scheme TSCA compliance monitoring inspection” to determine compliance with TSCA Sections 4, 5, 8, 12, and 13. Based on the discussions with Mr. Kim, the inspection was scheduled for February 24, 2022, at LG Chem’s office located at 3475 Piedmont Road NE, Suite 1200. During the initial telephone conversation, Mr. Kim was informed that the inspection would focus on the chemical substances that were imported, processed, distributed, or exported at LG Chem’s site located in Atlanta, Georgia.

On January 25, 2022, the EPA Region 4, TSCA Enforcement Section emailed a notice of inspection (NOI) letter to LG Chem confirming the inspection date/location and requesting certain records be made available for review during the inspection.

5.0 Onsite Inspection

- 5.1 Office Entry: On February 24, 2022, at approximately 9:30 a.m., the EPA Inspectors Gopal Timsina and Ryan Jones arrived at LG Chem’s office located at 3475 Piedmont Road NE, Suite 1200, Atlanta, Georgia. Upon entering to the building, the inspectors signed the visitors’ login sheet. The EPA inspectors were escorted to a conference room. The EPA inspectors presented their government-issued credentials and explained the purpose of the inspection to LG Chem’s representative Hyunsoo Kim. This area is where the opening conference, partial records review, and closing conference occurred.

- 5.2 Opening Conference: At the beginning of the opening conference, the EPA inspector informed LG Chem's representatives that: (1) the inspection was being conducted pursuant to TSCA Section 11 to determine compliance with TSCA Sections 4, 5, 8, 12, and 13; and (2) the inspection target was based on Region 4's neutral scheme inspection targeting strategy. The EPA inspector presented the TSCA Notice of Inspection (Form 7740-3), and the Confidentiality Notice (Form 7740-4) to Mr. Kim and explained both forms to him. Mr. Kim signed the both the Notice of Inspection and Confidential Notice. Mr. Kim then made a copy of both notices. The original copies were provided to Mr. Kim and the EPA retained a copy of each.

The EPA inspector informed Mr. Kim that in order to ensure confidentiality of any CBI documents, the facility must make a TSCA-CBI claim when the documents are provided to the EPA. In addition, the inspector informed Mr. Kim that all CBI submissions to the EPA should be mailed to the TSCA Document Control Officer based on the instructions referenced in the inspection notice letter.

- 5.3 Records Review: During the inspection, the EPA inspector used the NOI letter as a guide to review the records associated with the chemical substances that were manufactured, imported, used, processed, or exported at LG Chem (Atlanta). The EPA inspector requested LG Chem to submit certain records to the EPA regarding LG Chem's compliance with TSCA, including import and export records.
- 5.4 Plant Tour: This inspection activity is not applicable since LG Chem is an importer.
- 5.5 Closing Conference: The EPA inspector informed LG Chem's representatives that a site visit summary (inspection report) will be provided to LG Chem within 60 days of the date of the inspection. The inspection concluded at approximately 11:00 a.m. and the EPA inspectors left the facility.

6.0 Index of Attachments

1. TSCA Notice of Inspection (Form 7740-3)
2. Confidentiality Notice (Form 7740-4)

REPORT APPROVAL

Report – Primary Author

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Date: 2022.03.29 09:55:39 -04'00'

Ryan Jones
TSCA Inspector in Training

Gopal Timsina
TSCA Inspector

Report - Approver

F. Bryce Covington
Chief
TSCA Enforcement Section