

RCRA Inspection Report

1) Inspector and Author of Report

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U.S. Environmental Protection Agency, Region 4
Enforcement and Compliance Assurance Division
Chemical Safety and Land Enforcement Branch
61 Forsyth Street, S.W.
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2) Facility Information

SABIC Innovative Plastics US LLC
3531 Port and Harbor Drive
Port Bienville Industrial Park
Bay St. Louis, Mississippi 39520-9669

EPA ID# MSD000742668

3) Responsible Officials

Albert Ragas
Site EHSS Manager
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4) Inspection Participants

Olusoa Okumodi, SABIC MS
Chris Kennedy, SABIC MS
Kenny King, SABIC MS

Brad Justice, MDEQ
Laurie Benton DiGaetano, USEPA

5) Date of Inspection

January 9, 2023

6) Applicable Regulations¹

Resource Conservation and Recovery Act (RCRA) Sections 3002 (42 U.S. Code – Annotated U.S.C.A. 6925 and 6927), and 40 Code of Federal Regulation (C.F.R.) Parts 260 - 270, 273, 278, & 279; and Mississippi Code of 1972, Miss. Code Ann. § 17-17-1 *et seq.*, and Mississippi Hazardous Waste Management Regulations, 11 Miss. Admin. Code Pt. 3, R. 1.1-1.24.

¹ As the State's authorized hazardous waste program operates in lieu of the federal RCRA program, the citations of those authorized provisions will be to the authorized State program. However, for ease of reference, the federal citations will follow in brackets.

Pursuant to 11 Miss. Admin. Code Pt. 3, R. 1.1 [40 C.F.R. § 260.10], a large quantity generator (LQG) of hazardous waste is a generator who generates greater than or equal to 1,000 kilograms (2,200 pounds) of non-acute hazardous waste in a calendar month.

Pursuant to 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.15(a)], a generator may accumulate as much as 55 gallons of non-acute hazardous waste in containers at or near any point of generation where wastes initially accumulate, which is under the control of the operator of the process generating the waste, without a permit or without having interim status, as required by Section 17-17-27(4) of the Mississippi Code of 1972, Miss. Code Ann. § 17-17-27(4) [Section 3005 of RCRA, 42 U.S.C. § 6925], and without complying with 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.16(b) or § 262.17(a)], except as required in 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.15(a)(7) and (8)], provided that the generator complies with the satellite accumulation area conditions listed in 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.15(a)] (hereinafter referred to as the “SAA Permit Exemption”).

Pursuant to 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.17], an LQG may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status, as required by Section 17-17-27(4) of the Mississippi Code of 1972, Miss. Code Ann. § 17-17-27(4) [Section 3005 of RCRA, 42 U.S.C. § 6925], provided that the generator complies with the conditions listed in 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.17] (hereinafter referred to as the “LQG Permit Exemption”).

7) Purpose of Inspection

The purpose of this inspection was to conduct an unannounced compliance evaluation inspection to determine SABIC Innovative Plastics US LLC’s compliance with the applicable requirements of RCRA and the corresponding Mississippi regulations. This was an EPA lead inspection.

8) Facility Description

Company and Facility Overview:

SABIC, a public company based in Riyadh, Saudi Arabia, operates through three Strategic Business Units: Petrochemicals, Agri-Nutrients, and Specialties. The company has operations in fifty countries, including the subject SABIC Innovative Plastics US, LLC (SABIC MS) facility in Bay St. Louis, Mississippi. This facility includes approximately 540 acres near the Gulf of Mexico about 55 miles east of New Orleans, Louisiana. Facility operations, which occupy approximately 75 acres of the site, were established in 1981 and acquired by SABIC in 2007. The facility operates under the NAICS Code 325211 for Plastics Material and Resin Manufacturing. SABIC has approximately 120 employees at this location, and operations run twenty-four hour per day, seven days per week.

SABIC MS primarily manufactures polypropylene (PP) compounds, acrylonitrile-butadiene-styrene (ABS) and styrene-acrylonitrile (SAN) at the subject facility. These products may be used in the automotive, consumer goods, business equipment, and electronics and electrical industries. Although one subsection of the production area uses a batch process, most products are manufactured using one of three active continuous process lines. One line is dedicated to the manufacture of ABS and two are dedicated to the manufacture of SAN. Raw materials used on-

site include acrylonitrile, styrene, alpha methyl styrene, and methyl methacrylate. The main raw materials typically arrive in bulk via barge, and other raw materials arrive in drums and totes transported via trucks. The finished products typically leave via rail cars.

Waste and Waste Management:

SABIC MS has operated as a large quantity generator of hazardous waste at the subject facility since it was acquired by SABIC in 2007. At the time of the inspection, the facility had identified twenty-two potential satellite accumulation areas (SAAs) for managing hazardous waste, but personnel estimated that no more than five of those areas are routinely and consistently in use. The facility was also operating one central accumulation area (CAA) for managing containers of hazardous waste and two 7,000-gallon hazardous waste storage tanks. Hazardous waste SAAs are located in the maintenance area, the pilot plant, in the production areas, in the truck unloading area, and at the tank farm.

The facility's primary hazardous waste stream is acrylonitrile (AN) water (mixed monomer), which is generated in the production process and transferred to one of the hazardous waste storage tanks before it is shipped off-site. Facility personnel explained that incoming raw materials may contain water, which separates and builds up during the manufacturing process. About once each operating shift, operations personnel purge this excess water from the process tank(s) to one of the hazardous waste storage tanks. SABIC has identified the contaminated water as hazardous waste AN water with the EPA hazardous waste codes D001 (ignitable), D018 (toxic due to benzene concentration), and F003 (spent nonhalogenated solvent).

Other hazardous wastes generated onsite include wastes generated from flushing process lines, from onsite laboratory activities, and from onsite maintenance activities. The facility most recently re-notified as an LQG as part of the 2021 Biennial Report that was submitted on February 28, 2022. According to this report, SABIC MS shipped the following hazardous wastes off-site during calendar year 2021:

Volume	Waste Code(s)	Waste Description
439,975 lbs	D001, D018, F003	AN water ignitable (mixed monomer)
86,889 lbs	D001	mixed monomer / polymer / stabilized
181 lbs	D001	lab glassware and debris
1,965 lbs	D001, D035	paint waste and MEK
452 lbs	D001, F003	ethylbenzene – normal octyl mercaptan
128 lbs	D002	dodecylbenzene sulfonic acid
100 lbs	D001	kerosene (spent diesel fuel)
100 lbs	D002, D008	broken batteries

9) Previous Inspection History

Since it was acquired by SABIC in 2007, MDEQ has conducted three RCRA CEIs at the subject facility. On May 19, 2019, MDEQ and EPA conducted the most recent RCRA CEI at the subject facility and found apparent violations of RCRA's requirements for maintaining universal waste in a closed container, for updating the contingency plan, and for documenting weekly inspections of the hazardous waste central accumulation area.

10) Opening Conference

On January 9, 2023, EPA inspector Laurie Benton DiGaetano, accompanied by MDEQ inspector Brad Justice, arrived at SABIC Innovative Plastics US, LLC at approximately 10:35 a.m. Olusola Okumodi, Environment Health and Safety Engineer, immediately received the inspectors. Olusola Okumodi, and the inspectors were joined by Chris Kennedy, Operations Engineer, and Kenny King, SHS Leader, for the opening conference. The inspectors introduced themselves, showed their credentials to Olusola Okumodi, and explained the purpose of the visit.

The inspectors described the anticipated use of equipment (digital camera) during the inspection and provided a request for records. The EPA inspector explained that the Small Business Regulatory Enforcement Fairness Act's classification of a "small business" is generally set by the Small Business Administration using the business' SIC/NAICS code and annual receipts or number of employees. A copy of the EPA's information sheet for small businesses can be found at <https://www.epa.gov/sites/production/files/2017-06/documents/smallbusinessinfo.pdf>. The EPA inspector also discussed the company's ability, pursuant to 40 C.F.R. §2.203, to assert a business confidentiality claim for information submitted to EPA. The company did not assert a business confidentiality claim.

Facility representatives provided an overview of the facility's history and current operations during the opening conference. The inspection participants also discussed health and safety protocols and required personal protective equipment before Olusola Okumodi and Chris Kennedy led the inspectors on a tour of the Facility operations.

11) Inspection Observations

Hazardous Waste Central Accumulation Area (CAA):

The facility tour began at the hazardous waste CAA (Photo 1), which is on a covered, concrete pad and surrounded by a chain link fence. The area was identified with signs which read "danger, hazardous waste accumulation area," "unauthorized persons keep out," "danger, flammable materials," and "no smoking." Facility personnel working in this area carry hand-held two-way radios to summon emergency assistance. The CAA is also equipped with a portable fire extinguisher, spill control equipment, and an emergency shower and eyewash station.

The inspectors observed lines painted on the concrete pad which divided the area into three distinct storage rows separated by aisle spacing. Two wooden pallets were present in the first row:

- One pallet held one 55-gallon drum of hazardous waste. This drum was labeled D001, F005 hazardous waste solid (MEK), identified with a flammable liquid DOT hazard placard, and marked with an accumulation start date of December 14, 2022. The drum was not marked to indicate that its contents exhibit the characteristic of toxicity.

Pursuant to 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.17(a)(5)(i)], which is a condition of the LQG Permit Exemption, a generator must mark or label its containers with an indication of the hazards of the contents clearly visible for inspection on each container.

- The second pallet held three 55-gallon drums of hazardous waste. Each of these drums were labeled hazardous waste (acrylonitrile, styrene), identified with flammable liquid and toxic DOT hazard placards, and marked with an accumulation start date of December 29, 2022.

One wooden pallet was observed in the second row:

- This pallet held one 55-gallon drum of hazardous waste. The drum was labeled as D001, F003 hazardous waste (acrylonitrile, styrene), identified with flammable liquid and toxic DOT hazard placards, and marked with an accumulation start date of November 7, 2022.

Hazardous Waste Tank Farm:

The inspectors observed two hazardous waste storage tanks near the CAA (Photos 2 and 3). The tanks were located within a curbed, concrete secondary containment area and each tank was labeled with the words “hazardous waste.” The inspectors also observed the piping line used to transfer hazardous waste from the production area to the tank farm. At the tank farm, a valve is used to direct this combined influent line into one of two lines. Each of these two lines is used to feed one of the two hazardous waste storage tanks. The combined influent line between the production area and the tank farm is labeled as “hazardous waste,” and each of the two lines between the combined influent line and the associated storage tank is painted orange and labeled “AN wastewater” (Photos 4 and 5).

Facility personnel explained that SABIC accumulates hazardous waste in one tank until the volume approaches the maximum level that can be loaded onto a tanker truck. At that time, personnel turn the valve to direct the flow from the combined influent line to the other storage tank. When a tanker truck arrives to remove the waste load, the full tank is emptied into the tanker truck and, if the truck has additional storage capacity, waste from the second tank is pumped into the truck until the load is full. An accumulation start date is added to each tank on the date that hazardous waste is first directed into that tank, and the accumulation start date is removed from the tank when its contents are emptied into the tanker truck.

At the time of the inspection, one tank was identified as tank 007-25-027 hazardous waste mixed monomers and water and it was marked with an accumulation start date of December 1, 2022. The second tank was identified as tank 007-08-415, but it was not marked with an accumulation start date. The inspectors observed the liquid level indicator on the second tank and verified that it was empty.

Non-Hazardous Waste Storage Area:

Next, the inspection participants visited the facility’s nonhazardous waste storage area (Photo 6). This area is divided into two sections on a covered, concrete pad and surrounded by a chain link fence. The inspectors observed lines painted on the concrete pad which divided each section into three distinct storage rows separated by aisle spacing. The inspectors observed fifty-two 55-gallon drums of used oil on one side of this area. The drums were placed on wooden pallets, which were stacked one or two pallets high. Each pallet held four 55-gallon drums, and each drum was labeled used oil therminol. The inspectors observed sixteen additional 55-gallon drums of nonhazardous waste on the other side of this area. These drums were also placed on wooden pallets, but the pallets were not stacked.

Hazardous Waste Satellite Accumulation Areas (SAAs)]:

During the inspection, SABIC personnel provided the inspectors with a list of twenty-two identified potential SAAs. The inspection participants observed fourteen of these areas:

- Truck Unloading - After unloading raw materials, SABIC accumulates material that remains in transfer lines as hazardous waste in a SAA at the truck unloading area (Photo 7). The inspectors observed one 55-gallon drum, which was labeled hazardous waste acrylonitrile and marked to indicate that the contents were a flammable liquid and toxic, in this SAA.
- Line 4/5 Decanter - At some point in the production process, a mixture of unreacted raw materials and water exit the reactor vessel and enter into the collection and separation tanks where the raw materials and water separate into distinct layers. Operation personnel in the control room monitor the water level in these tanks, and they periodically come out to the tanks where they manually engage a pump and transfer the water layer to one of the two hazardous waste storage tanks. SABIC manages a SAA for accumulating hazardous waste generated during sampling events at the collection and separation tanks (Photo 8). The inspectors observed one 55-gallon drum in this SAA. The drum was labeled hazardous waste (acrylonitrile, styrene) and it was identified with flammable liquid and toxic DOT hazard placards. Facility personnel estimated that it takes about one or two months to fill a 55-gallon drum in this SAA but stated that they may ship the container offsite before it is full if they observe surface rust on the container.
- Lines 3/4/5 Second Floor East Side – SABIC manages a SAA for accumulating hazardous waste generated on the east side of the second floor for lines 3/4/5. The inspectors observed one 55-gallon drum in this SAA. The drum was labeled hazardous waste (acrylonitrile, styrene) and it was identified with flammable liquid and toxic DOT hazard placards.
- Lines 3/4/5 Third Floor Middle – SABIC manages a SAA for accumulating hazardous waste generated in the middle of the third floor for lines 3/4/5, but no accumulation container was present in this area at the time of the inspection.
- Lines 3/4/5 Fourth Floor East Stairs – SABIC manages a SAA for accumulating hazardous waste generated near the east stairs on the fourth floor for lines 3/4/5, but no accumulation container was present in this area at the time of the inspection.
- Line 1/2 Walkthrough – SABIC manages a SAA for accumulating hazardous waste generated near the walkthrough area of lines 1/2. The inspectors observed two 55-gallon drums in this SAA. Each drum was labeled hazardous waste mix monomer and identified with flammable liquid and toxic DOT hazard placards. One drum was full, and the other was approximately 1/3 full, so the total volume of hazardous waste in this SAA was greater than 55 gallons. Neither of the drums was marked with an accumulation start date.

Pursuant to 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.15(a)(6)], a generator who accumulates hazardous waste in excess of 55 gallons must, with respect to that amount of excess waste, comply with 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.17(a)] or remove the excess waste from the SAA within three consecutive calendar days. During the three-consecutive-calendar-day period the generator must continue to comply with the conditions of the SAA Permit Exemption. The generator must mark or label

the container(s) holding the excess accumulation of hazardous waste with the date the excess amount began accumulating.

- Line 1/2 Second Level West –SABIC manages a SAA for accumulating hazardous waste generated near the west side of the second floor for lines 1/2, but no accumulation container was present in this area at the time of the inspection.
- Line 1/2 Fourth Level, Rx1, ER Drum – SABIC manages a SAA for accumulating hazardous waste generated on the fourth floor for lines 1/2, but no accumulation container was present in this area at the time of the inspection.
- Rubber Grinding Walkway East – SABIC manages a SAA for accumulating hazardous waste generated near the rubber grinding walkway. The inspectors observed one 55-gallon drum in this SAA. The drum was labeled hazardous waste and it was identified with flammable liquid and toxic DOT hazard placards.
- Feed Tank Walkway West – SABIC manages a SAA for accumulating hazardous waste generated near the feed tank walkway. The inspectors observed one 55-gallon drum in this SAA. The drum was labeled hazardous waste and it was identified with flammable liquid and toxic DOT hazard placards. The inspectors observed an unsecured funnel in the open bung of this container, and facility personnel immediately removed the funnel and closed the container by securing the bung.

Pursuant to 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.15(a)(4)], which is a condition of the SAA Permit Exemption, a generator is required to keep containers of hazardous waste closed at all times during accumulation, except when adding, removing, or consolidating waste; or when temporary venting of a container is necessary for the proper operation of equipment, or to prevent dangerous situations, such as build-up of extreme pressure.

- Pilot Plant SW End – SABIC manages two SAAs in a curbed concrete area adjacent to the Pilot Plant Building. The area is covered with a roof and enclosed on three sides. The first SAA is used to accumulate hazardous waste generated in the Pilot Plant (Photo 9). The inspectors observed one 55-gallon drum in this SAA. The drum was labeled hazardous waste (acrylonitrile, styrene) and it was identified with flammable liquid and toxic DOT hazard placards. The second SAA is used to accumulate hazardous waste generated in the laboratory (Photo 10). The inspectors observed one 20-gallon container in this SAA. The container was labeled D001, F005 hazardous waste solid (MEK) and it was identified with a Class 9 DOT hazard placard. This SAA is not located at or near the point where the hazardous waste solid MEK is generated, and the Class 9 DOT hazard placard does not indicate the specific hazards of the contents of this container.

Pursuant to 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.15(a)], a generator may accumulate as much as 55 gallons of non-acute hazardous waste in containers at or near the point of generation where wastes initially accumulate, which is under the control of the operator of the process generating the waste, without a permit or without having interim status, as required by Section 17-17-27(4) of the Mississippi Code of 1972, Miss. Code Ann. § 17-17-27(4) [Section 3005 of RCRA, 42 U.S.C. § 6925], and without complying with 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.16(b) or §

262.17(a)], except as required in 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.15(a)(7) and (8)], provided that the generator complies with the SAA Permit Exemption.

Pursuant to 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.15(a)(5)(ii)], which is a condition of the SAA Permit Exemption, a generator is required to mark or label its containers with an indication of the hazards of the contents.

- Maintenance Paint Shop – SABIC manages two SAAs for accumulating hazardous wastes generated in the Maintenance Shop (Photo 11). The first SAA is used to accumulate hazardous waste used paint. The inspectors observed one 55-gallon drum with a latched funnel lid on a portable secondary containment pallet in this SAA. The drum was labeled D001, F005 hazardous waste used paint (MEK) and it was identified with a flammable liquid DOT hazard placard. However, it was not marked with an indication that its contents are also toxic. The second SAA is used to puncture used aerosol cans and accumulate their contents. The inspectors observed one 55-gallon drum in this SAA. The drum was labeled D001, F005 hazardous waste flammable liquids (toluene, MEK) and it was identified with a flammable liquid DOT hazard placard. However, it was not marked with an indication that its contents are also toxic.

Pursuant to 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.15(a)(5)(ii)], which is a condition of the SAA Permit Exemption, a generator is required to mark or label its containers with an indication of the hazards of the contents.

- Laboratory – SABIC manages a SAA for accumulating hazardous waste generated in the laboratory (Photo 12). The inspectors observed one flammable can and one 5-gallon bucket in this SAA. Each container was labeled with the words “hazardous waste,” but neither was marked with an indication of the hazards of its contents. Personnel explained that used samples are accumulated in the flammable can as a hazardous waste flammable liquid and that the contents of the can are transferred to a 55-gallon drum in one of the other SAAs as often as once each week or once each month. Personnel also explained that empty glass sample jars are accumulated in the 5-gallon bucket and that the contents of the bucket are transferred to the 20-gallon container at the Pilot Plant SAA every Friday. Containers in other SAAs are not at or near the laboratory where these hazardous wastes are generated, and they are not under the control of laboratory personnel who generate these hazardous wastes.

Pursuant to 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.15(a)(5)(ii)], which is a condition of the SAA Permit Exemption, a generator is required to mark or label its containers with an indication of the hazards of the contents.

Pursuant to 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.15(a)], a generator may accumulate as much as 55 gallons of non-acute hazardous waste in containers at or near the point of generation where wastes initially accumulate, which is under the control of the operator of the process generating the waste, without a permit or without having interim status, as

required by Section 17-17-27(4) of the Mississippi Code of 1972, Miss. Code Ann. § 17-17-27(4) [Section 3005 of RCRA, 42 U.S.C. § 6925], and without complying with 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.16(b) or § 262.17(a)], except as required in 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.15(a)(7) and (8)], provided that the generator complies with the SAA Permit Exemption.

Maintenance Area (Universal Waste):

SABIC manages universal waste in the Maintenance Area, but no universal waste was present in this area at the time of the inspection.

Contingency Plan:

The actions that facility personnel should take in response to fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents are described in the facility's Contingency Plan, which is part of the Emergency Manual and was last updated on September 7, 2016. The plan describes the location of fire extinguishers, safety showers and spill kits available to respond to an emergency at the CAA and hazardous waste storage tanks, and it references an evacuation plan and map for personnel, which are included in an attached emergency manual. The plan lists the names and emergency telephone numbers for persons identified as the primary and secondary emergency coordinators, but facility personnel indicated that the list will be updated soon. Please note that 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.262(b)] requires an LQG that is amending its contingency plan to submit a quick reference guide of the contingency plan to the local emergency responders. The required contents of the contingency plan are specified in 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.261], and the required contents of the quick reference guide are specified in 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.262(b)].

Training Records:

The inspectors reviewed facility job descriptions and employee names that were provided for the EHSS Engineer and Operations Technicians. SABIC personnel provided records of outside hazardous waste management, DOT and hazmat training provided in calendar years 2021 and 2022 to personnel who then provided in-house training to employees at the facility. The inspectors reviewed records of in-house employee hazardous waste training completed in calendar years 2020, 2021 and 2022.

Waste Manifest Records:

In 2022, SABIC initiated one or two bulk shipments of D001, D018, F003 waste flammable liquid, toxic (acrylonitrile, styrene) to Eco Services Operations (LAD008161234) about once every one or two months. A similar shipment of sixty-three drums of D001, F003 waste flammable liquid, toxic (acrylonitrile, styrene) was sent to Eco Services Operations (LAD008161234) on September 2, 2022, using manifest number 000530201GRR. It is unclear why the bulk shipments included the D018 hazardous waste code, but the container shipment did not.

Pursuant to 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.11], a person who generates a solid waste, as defined in 11 Miss. Admin. Code Pt. 3, R. 1.2 [40 C.F.R. § 261.2], must use the steps articulated in 11 Miss. Admin. Code Pt. 3, R. 1.3 [40

C.F.R. § 262.11] to make an accurate determination as to whether that waste is a hazardous waste in order to ensure wastes are properly managed according to applicable RCRA regulations. A generator must maintain records supporting its hazardous waste determinations, and if the waste is determined to be hazardous, a generator must identify all applicable EPA hazardous waste numbers.

The facility also initiated eight shipments of hazardous waste to Giant Resource Recovery Atalla (ALD070513767) during 2021 and 2022 and two shipments of hazardous waste to Safety Kleen Smithfield (KYD053348108) during 2022. The shipments to Giant Resource Recovery Atalla included one or more of the following hazardous wastes:

- D001, F003 waste flammable liquid, toxic (acrylonitrile, styrene);
- D001, F005 waste flammable solid (MEK);
- D001, F005 waste flammable liquids (toluene, MEK);
- D001, D018 waste flammable liquids (ethylbenzene, xylene);
- D001 hazardous waste solid (empty glass containers);
- D001 waste diesel fuel;
- D001 waste combustible liquid (octyl mercaptan);
- D002 waste alkyl sulfonic acids; and
- D001, D002 waste corrosive flammable liquid (tertiary butyl catechol, methanol).

The shipments to Safety Kleen Smithfield included F003, F005, D001, D005, D006, D007 waste paint related material.

The inspectors reviewed available hazardous waste manifest records and land disposal restriction forms for shipments of hazardous waste sent during calendar years 2021 and 2022. The records did not include the signed, returned copy or an exception report for the following manifests:

Date	Manifest Number	Designated Facility
11/03/2021	006663880GBF	Eco Services Operations (LAD008161234)
11/05/2021	00296453GRR	Giant Resource Recovery Atalla (ALD070513767)
11/12/2021	006663881GBF	Eco Services Operations (LAD008161234)
06/13/2022	006663889GBF	Eco Services Operations (LAD008161234)
09/07/2022	008579382SKS	Safety Kleen Smithfield (KYD053348108)

Pursuant to 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.42(a)(1)], an LQG who does not receive a copy of the manifest with the handwritten signature of the owner or operator of the designated facility within 35 days of the date the waste was accepted by the initial transporter must contact the transporter and/or the owner or operator of the designated facility to determine the status of the waste.

Pursuant to 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.42(a)(2)], an LQG must submit an Exception Report to the EPA Regional Administrator for the Region in which the generator is located if he has not received a copy of the manifest with the handwritten signature of the owner or operator of the designated facility within 45 days of the date the waste was accepted by the initial transporter.

Inspection Records:

The inspectors reviewed SABIC's available records of inspections of the hazardous waste central accumulation area (CAA) since January 2020. The inspection log includes a checklist to record observations about leaking containers and for deterioration of containers caused by corrosion or other factors. The inspection log includes a checklist to record observations about the total volume of waste, aisle space, spills/leaks, rust/swelling, pallet condition, drum labels, labels facing outward, date and contents on labels, and the age of the oldest drum. It also included areas to record observations about the condition of the area's curbing, floor, fence, roof, and gate; the presence of no smoking and hazardous waste signs; and the secondary containment drain and plug. The records include the date and time of the inspection and the name of the employee conducting the inspection.

The inspectors also reviewed SABIC's available records of inspections of the hazardous waste storage tanks and ancillary equipment. The tank inspection log includes a checklist to record observations about the condition of each tank, the tank labels, and the accumulation start date(s). It also includes a checklist to record observations about the fire extinguishers, spill kit(s), safety showers and their inspections. The ancillary equipment inspection log includes a checklist to record observations about the level, temperature and pressure of each tank; evidence of leaks in the tanks, lines, valves and flanges; and evidence of corrosion of the tanks, lines, valves and flanges. It also includes a checklist to record observations concerning cracks and erosion, corrosion, seal, grass/vegetation in concrete, and dead grass/vegetation in and around the diked secondary containment area surrounding the tanks. Finally, the log includes a checklist to record observations concerning cracks, foreign material, water in the sump, water in the drain, and valve closure at the secondary containment sump.

Finally, the inspectors reviewed SABIC's available records of air monitoring events conducted during calendar year 2022. Records indicate that monitoring of 242 points associated with the hazardous waste storage tanks and ancillary equipment was conducted once during each quarter of 2022.

12) Closing Conference

The inspectors conducted the exit meeting at 4:10 p.m. with Olusola Okumodi, Chris Kennedy, and Kenny King. During this meeting, the inspectors stated their preliminary conclusions of the inspection.

13) List of Appendices

Appendix 1 – Photo Log:

Twelve Photos taken on: January 9, 2023

Photos taken by: Laurie Benton DiGaetano

Photos taken with: Panasonic DMC TS-5 Digital Camera

EPA Property Tag: S09533

14) **Signed**

LAURIE DIGAETANO

Digitally signed by LAURIE
DIGAETANO

Date: 2023.02.28 08:59:31 -05'00'

Laurie Benton DiGaetano
Environmental Engineer

Concurrence

ARACELI CHAVEZ

Digitally signed by ARACELI
CHAVEZ

Date: 2023.03.01 16:17:45 -05'00'

Araceli B. Chavez
RCRA Enforcement Section

SABIC Innovative Plastics US LLC
RCRA CEI Photographs
Laurie Benton DiGaetano, USEPA



Photo 1: Central Accumulation Area



Photo 2: Hazardous Waste Storage Tank 007-08-415.



Photo 3: Hazardous Waste Storage Tank 007-25-027.



Photo 4: Piping to transfer combined influent line to the hazardous waste storage tanks.



Photo 5: Piping to transfer combined influent line to the hazardous waste storage tanks.



Photo 6: Nonhazardous waste storage area.



Photo 7: One 55-gallon drum, which was labeled hazardous waste acrylonitrile (AN) and marked to indicate that the contents are flammable and toxic, in the Truck Unloading SAA.



Photo 8: One 55-gallon drum, which was labeled hazardous waste (acrylonitrile, styrene) and identified as flammable and toxic, in the Line 4/5 Decanter SAA.



Photo 9: One 55-gallon drum, which was labeled hazardous waste (acrylonitrile, styrene) and identified as flammable and toxic, in the first Pilot Plant SW End SAA.

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Photo 10: One 20-gallon container, which was labeled D001, F005 hazardous waste solid (MEK), in the second Pilot Plant SW End SAA.



Photo 11: One 55-gallon drum, which was labeled D001, F005 hazardous waste used paint (MEK) and identified as flammable, in the first Maintenance Paint Shop SAA on the left pallet; and one 55-gallon drum, which was labeled D001, F005 hazardous waste flammable liquids (toluene, MEK) and identified as flammable, in the second Maintenance Paint Shop SAA on the right pallet.



Photo 12: One flammable can and one 5-gallon bucket in the Laboratory SAA. Each container was labeled with the words “hazardous waste,” but neither was marked with an indication of the hazards of its contents.