

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
COMPLIANCE EVALUATION INSPECTION REPORT

1) **Inspector and Author of Report**

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U.S. Environmental Protection Agency, Region 4 (EPA)
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2) **Facility Information**

Georgia Gulf Chemicals & Vinyls LLC (GGC)
715 Hwy. 25, Post Office Box 91, Aberdeen, Mississippi, 39730
MSD007031230 Phone: 662-369-8111 Facility SIC code: 2869, 2821
Facility Latitude; 33 48 32.0 Facility longitude; 88 32 33.0

3) **Responsible Official (s)**

Kenny Atkins, Manager

4) **Inspection Participants**

Kenny Atkins - GGC Jan Patton - MDEQ
Edmond Burks - EPA

5) **Date and Time of Inspection**

June 20, 2002 9:00 a.m.

6) **Applicable Regulations**

Title 40 Code of Federal Regulations (CFR) Parts 260 through 270 and 40 C.F.R. Parts 260-270, RCRA Sections 3005 and 3007; Mississippi Hazardous Waste Management Regulations (MHWMR) Parts 260 through 266, and 268 through 270, and Chapter 391-3-11 of the Mississippi Hazardous Waste Management Act, adopted and codified by reference.

7) **Purpose of Inspection**

To conduct a Compliance Evaluation Inspection (CEI) and determine the compliance status of the Georgia Gulf Chemicals & Vinyls LLC facility with the applicable State and Federal RCRA rules and regulations.

8) Facility Description

The Georgia Gulf Chemicals & Vinyls LLC (GGC), located at 715 Hwy. 25, Post Office Box 91, Aberdeen, Mississippi, is a manufacturer of Poly Vinyl Chloride (PVC) resin. Available data and file reviews indicated that this facility was last inspected by EPA in January 1997, and by the Mississippi Department of Environmental Quality (MDEQ) in September 2000.

9) Findings

The findings in this report were discovered during the inspection of the facility. Agency inspectors conducted an entrance interview with the GGC representatives. During the entrance interview the inspectors presented their agency credentials. A walk through of the facility operations was conducted. Unless otherwise described, all containers and tanks were closed, properly identified, and appeared to be in good condition.

GGC employs approximately 170 people at this location. The facility notified pursuant to RCRA regulation in February 2000, as a Small Quantity Generator of hazardous waste. GGC is located directly off of New Highway 25 in Aberdeen, Mississippi. GGC consists of numerous buildings with the main processing and reaction vessels located inside and outside. The facility grounds encompass about 40 acres. Access to the site is restricted by a 6-foot chain link fence and gates. According to GGC personnel, a chemical plant has been operated at this location since 1964. The facility is normally operated seven (7) days a week. GGC receives, processes, and ships product utilizing both railcar and tractor trailers. GGC receives Vinyl Chloride Monomer (VCM) by railcar. The VCM is stored in a tank located next to the rail line. GGC receives approximately eighteen (18) rail cars per day which are pumped into the product storage tank. All process piping at the facility appeared to be aboveground.

GGC receives Vinyl Chloride Monomer (VCM) which is polymerized into Poly Vinyl Chloride (PVC). GGC's production capacity is a reportedly one (1) billion pounds per year. GGC utilizes two separate reactor units. Each reactor unit consists of five reactors each. The five reactors have a parallel configuration. Typical polymerization takes 3 - 4 hours for each reactor. The reactors are constructed of stainless steel, including a carbon steel jacket that provides cooling water to the reactor. The reactors are also equipped with an agitator, sparge apparatus to improve mixing. Between each process batch each reactor is evacuated using a two-stage steam jet ejector system to ensure that all components are removed before charging occurs. According to GGC personnel, the reactors are hydro blasted on intervals dictated by customer satisfaction and product quality. GGC alleges that hydro blasting is necessary to remove agglomerated products

9) Findings Cont..

(PVC) from the reactor walls and/or condensers. Further, GGC alleges that when the hydro blasting occurs, the reactor contains no commercial chemical product. Therefore, the rinse water does not meet the definition of the hazardous waste the U043 code.

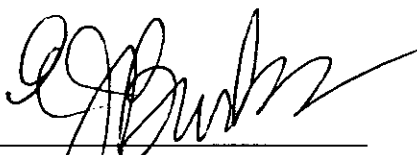
The facility utilizes a lead compound as a process stabilizer. The lead compound primarily consists of lead phosphate, and lead phthalate. GGC personnel conduct manual batch loading in an enclosed area/room. Two thousand (2,000) pound cubic yard bags of lead compound enters the process via a system of hoppers from into the hoppers. The empty bags are returned to the manufacturer for re-use. The lead compounds are mixed with the PVC resin through a blending system. Due to spillage around the hoppers, the floor sweepings exhibit the characteristic of toxicity for lead. The floor sweepings are identified as D008. At the time of the inspection, the floor sweepings were being accumulated in a fifty-five (55) gallon container located within the mixing area. According to GGC personnel, when the D008 containers located in the mixing room are filled, the contents are then consolidated into cubic yard boxes to facilitate economical shipping.

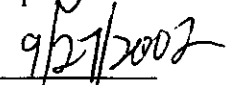
GGC utilizes three (3) Safety Kleen part washing systems that contain a petroleum-based cleaner in its maintenance/shop area. The system utilizes filters to prolong the service life of the cleaner. According to GGC personnel, the facility utilizes petroleum naphtha-based solvent with a Flash Point above 140°F, which appeared to be nonhazardous for the characteristic of ignitability. GGC appears to generate considerable amounts of used oil generated during maintenance activities. Used oil is stored in a containers and drums. At the time of the inspection, a large tote which held used oil failed to have a label, indicating used oil. ***GGC has violated 40 CFR /MHWMR 40 CFR § 279.22(c) for failing to label a container of Used Oil.*** The tote was also stored on a concrete slab in an area which appeared to be a scrap metal or part area. The tote also failed to have a shelter from the rain and other elements.

During the walkthrough of the maintenance shop and in other locations in the facility, oil-saturated rags were observed in the soil waste container. GGC personnel removed the rags from the solid waste container. However, during the walk through, additional observances of oily, and/or oil-saturated rags, or wipes were observed in solid waste containers (Photo(s) 1- 3). The inspectors encouraged GGC to segregate the oily, and/or oil-saturated rags and wipes for the solid waste stream. ***GGC is in violation of 40 CFR /MHWMR 40 CFR § 262.11, for failing to complete a hazardous waste determination on the oily and/or oil-saturated rags and wipes which are generated at GGC.*** EPA/MDEQ inspectors informed GGC that a hazardous waste determination must be performed on the oily rags prior to disposal. According to GGC representatives, all the nonhazardous solid waste generated onsite is shipped to Pine Bluff Landfill, located in Mississippi.

During the CEI no additional RCRA violations were observed.

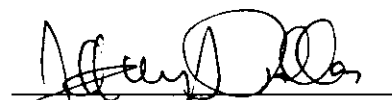
10) **Signed**

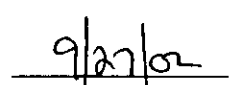


Edmond J. Burks
Inspector and Author of Report


Date

11) **Concurrence and Approval**



Jeffrey T. Pallas, Chief
South Enforcement and Compliance Section
Enforcement and Compliance Branch


Date