

REPORT OF RCRA COMPLIANCE EVALUATION INSPECTION

At

Univar Solutions USA Inc¹ [sic].
7710 Polk Street
Saint Louis, Missouri 63111

EPA ID Number: MOD031005341

On

April 6, 2022

By

U.S. ENVIRONMENTAL PROTECTION AGENCY
Region 7

Enforcement and Compliance Assistance Division

1.0 INTRODUCTION

I performed a Resource Conservation and Recovery Act (RCRA) compliance evaluation inspection (CEI) at Univar Solutions USA Inc, (Univar) located in Saint Louis, Missouri, on April 6, 2022. I conducted the RCRA inspection under the authority of RCRA Section 3007(a), as amended. During the inspection, I collected the information and data necessary to determine compliance with the applicable RCRA regulatory and statutory requirements. This report and attachments present the results of the inspection. Univar (then known as Nexeo Solutions at that time) was last inspected for compliance with RCRA on June 22, 2017, by the Missouri Department of Natural Resources (MDNR). The finding of MDNR CEI was:

- Labeling of Satellite Accumulation container in QA/QC sample room

2.0 PARTICIPANTS

Univar

David Rowlands, Operations Manager

Missouri Department of Natural Resources

Brandon Backus, Environmental Specialist

Environmental Protection Agency Region 7

Kenneth Herstowski, Environmental Engineer, ECAD/CB/RCRA (Lead Inspector)

¹ As entered into RCRAInfo

INSPECTION PROCEDURES

Prior to arriving at Univar, I rallied with Mr. Backus at an offsite location. At about 07:54, we arrived at Univar. A drive-by visual observation was completed from Polk Street with no findings. We proceeded to the Univar parking area. In the parking area we were approached by Mr. Rowlands who had been supervising truck traffic at the facility. Mr. Backus and I introduced ourselves and explained the purpose of the visit was to conduct a RCRA CEI. We adjourned to a conference room in the Univar offices where I proceeded with the entrance conference.

I explained the purpose and procedures of the RCRA CEI to Mr. Rowlands. I provided a copy of RCRA Section 3007 which provides inspection authority. I presented Mr. Rowlands with a copy of Title 18 United States Code, Sections 1001 and 1002, which provides for penalties if false and/or misleading information is provided to Federal representatives, and for the possession and use of fraudulent documents. Mr. Rowlands was made aware of his confidentiality rights and was informed that a Confidentiality Notice would be provided at the end of the inspection for them to make a confidential business information claim. Mr. Rowlands acted as the primary facility representative during the inspection.

I followed the inspection procedures discussed in the RCRA CEI Standard Operating Procedure (No. 2321.1D), unless noted differently. I completed checklists and other inspection related documents and collected photocopies that are included as attachments to this report. I collected 17 photographs with a digital camera and prepared a photographic log (attachments 1 and 2). I monitored for volatile organic emissions with a Thermo Fisher Scientific TVA2020 organic vapor analyzer utilizing a flame ionization detector (hereafter referred to as the "EPA FID"). Mr. Backus viewed potential volatile emission points with an optical gas imaging camera (a FLIR model GF320 – hereafter the "MDNR Gas Imaging Camera"). I obtained copies of records from the facility as detailed in the sections that follow. During the inspection, discussions consisted of the facility operations, wastes generated, waste management practices, and an evaluation of RCRA air emissions compliance. I conducted a visual inspection of the areas noted below.

I obtained aerial photographs of the facility using Google Earth (attachment 3) and a facility map (attachment 4). A Notice of Preliminary Findings (NOPF) was issued to the facility at the conclusion of the inspection (attachment 5). Documents and records were collected during the inspection and a Receipt for Documents and Samples was prepared and signed by Mr. Rowlands (attachment 6). A Confidentiality Notice in which the facility did not claim any records or documents as confidential business information was prepared and signed by Mr. Rowlands (attachment 7). A site-specific inspection checklist was prepared and completed.

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At about 07:54, Mr. Backus and I arrived at the Univar facility and conducted a drive by inspection. No issues were identified from the drive by inspection. We proceeded to the facility parking lot and entered the office entrance. In the parking area we were approached by Mr. Rowlands who had been supervising truck traffic at the facility. We introduced ourselves and stated the purpose of our visit was to conduct a RCRA CEI. We adjourned to a conference room in the Univar offices for the opening conference. I presented my EPA credentials and Mr. Backus presented his identification. I explained the purpose and procedures of the inspection. After the entrance discussions, Mr. Backus and I conducted a visual inspection of the facility. Mr. Rowlands accompanied us during the visual inspection. The areas reviewed included:

- Truck Loading Rack.
- I Warehouse Hazardous Waste Storage Area

- Bulk Product “Lab”
- Fill Room

Following the visual inspection, I requested and reviewed records (attachment 8).

After completing the records review, I summarized my findings and recommendations in an exit conference with Mr. Rowlands. I provided Mr. Rowlands with a Confidentiality Notice and a Receipt for Documents and Samples which he signed as acknowledgement of receipt. I provided Mr. Rowlands with a copy of the Confidentiality Notice (yellow copy of the completed carbonless transfer set) and Receipt of Documents and Samples (yellow copy of the completed carbonless transfer set). I reviewed and discussed my findings detailed in the NOPF. I provided Mr. Rowlands the NOPF which he signed as acknowledgement of receipt. I provided a copy of the NOPF with “Instructions for Responding to a Notice of Preliminary Findings (NOPF)” printed on the reverse of the copy to Mr. Rowlands (yellow copy of the completed carbonless transfer set). I discussed providing a response to the NOPF. I described my process and timeline for converting field and record review observations into an inspection report. I provided and discussed compliance assistance information.

3.0 FINDINGS AND OBSERVATIONS

3.1 General Information/Facility Description

Univar acquired Nexeo Solutions making it a wholly owned subsidiary of Univar with the combined company operating under the name Univar Solutions. The acquisition of Nexeo Solutions was completed on February 28, 2019. Univar is located in southeastern Saint Louis, Missouri, in an area zoned for commercial use. Residences are approximately 0.25 mile² west and southwest of the facility. The Mississippi River is approximately 0.1-mile east of the facility. The site is approximately 9 acres. The site has three building complexes (attachment 3). One approximately 7,115 square foot building contains offices and product storage, the second approximately 4,000 square foot building is a warehouse for product storage and a hazardous waste storage area, and the third is a standalone structure for hazardous waste storage. The site has two tank farms containing above ground vertical storage tanks for bulk liquid products. The facility is surrounded by security fencing with locked access gates.

Univar is a distributor of flammable and combustible liquids and dry chemical products. Univar receives bulk organic liquids via rail tank car and semi-trailer truck in cargo tank trailers. The bulk liquids received are off loaded into above ground vertical tanks. The materials in the tanks are loaded into cargo tank trucks and containers for distribution. Products can be combined in the cargo trucks or containers to create custom chemical blends as may be ordered by customers. Univar receives pre-packaged dry (bagged) and liquid materials (intermediate bulk containers, drums, or cans) which are distributed to customers.

Univar operates a less than 10-day transfer facility for containerized hazardous waste picked up from customers within the warehouse hazardous waste storage area.

3.2 RCRA Status

The Notification Acknowledgement/Verification Report (attachment 9) indicates that Univar is a large quantity generator of hazardous waste, a hazardous waste transfer facility, and a small quantity handler of universal waste. Univar generates used oil from servicing of forklift trucks which is removed after it is generated by the servicing vendor. Vehicles are serviced off site.

² Distances and areas estimated using Google Earth Pro

3.3 Hazardous Waste Streams and Management

Univar has notified as a generator of hazardous wastes which exhibit one or more hazardous waste characteristics of ignitability, corrosivity, or toxicity, listed spent solvents, and unused or off specification commercial chemical products. The EPA hazardous waste codes for which Univar has notified the MDNR as being generated are shown on the Notification Acknowledgement/Verification Report (attachment 9). Mr. Rowlands did not identify changes to the information in the Notification Acknowledgement/Verification Report during this inspection. The following summarizes the wastes with the highest generation rates.

Line Flush

Line Flush as described by Mr. Rowlands is the initial product material flushed through dispensing piping and equipment when Univar changes from packaging one organic liquid to another organic liquid. When a campaign of filling a product into drums, intermediate bulk containers, or cargo tank trucks, a “pig” is used to push the product in the piping back to the bulk product tank. The pig is a urethane plug matched to the inside diameter of the product piping which is pushed through the piping to the respective bulk product tank with nitrogen to clear product from the dispensing piping. With a manifold and valving at the tank farm, the new product can then be routed into the dispensing piping to fill drums, intermediate bulk containers, and cargo tank trucks or trailers. The initial amount of product, described as 75 to 100 pounds by Mr. Rowlands, is collected in a Line Flush drum in the Fill Room or Truck Loading Rack loading bays. Univar fills containers in the Fill Room and unloads and loads cargo tank trucks and trailers at the Truck Loading Rack. Products that are not resold as Liquifier comprise the Line Flush. Mr. Rowland stated that bulk product samples are added to the Line Flush container when the sample retention time has been expired.

Line Flush is accumulated in Satellite Accumulation containers at the Fill Room and Truck Loading Rack. Full containers of Line Flush are transferred to the less than 90-day hazardous waste accumulation area in the I Warehouse Hazardous Waste Storage Area. The waste profile provides an estimated annual generation of 120 to 180 55-gallon drums of Line Flush. I observed 34 55-gallon drums of Line Flush in the I Warehouse Hazardous Waste Storage Area (photograph 13, attachment 1). I asked Mr. Rowlands what period of time it takes to fill a 55-gallon Line Flush container to which he replied “about 1 – 2 days. Univar reported 193,052 pounds of Line Flush transported to AES Asset Acquisition DBA Clean Earth of Calvert City, Calvert City (AES), Kentucky, KYD985073196, for fuel blending. Based on 2022 eManifest data, 17,600 pounds have been shipped to AES for fuel blending.

Notice of Preliminary Finding (NOPF) 4 – 40 Code of Federal Regulations (CFR) 262.11(b): Generator must determine waste code listings 10 Code of State Regulations (CSR) 25-5.262(1)

The State of Missouri has adopted by reference the EPA’s requirements for generators of hazardous waste found at 40 CFR Part 262, Standards Applicable to Generators of Hazardous Waste.³ The requirement at 40 CFR 262.11, Hazardous Waste Determination, requires generators to determine if a solid waste is a hazardous waste. In pertinent part, 40 CFR 262.11(b) requires generators to “...*determine if the waste is listed as a hazardous waste in subpart D of 40 CFR part 261.*” The State of Missouri has adopted by reference 40 CFR Part 261, Identification and Listing of Hazardous Waste.⁴ I discussed with Mr. Rowland that I wanted to review

³ See 10 CSR 25-5.262, Standards Applicable to Generators of Hazardous Waste, incorporating by reference the requirements in 40 CFR Part 262, July 1, 2013.

⁴ See 10 CSR 25-4.261, Methods for Identifying Hazardous Waste, incorporating by reference the requirements in 40 CFR Part 261, July 1, 2013.,

the hazardous waste determination for Line Flush. I obtained a copy of the bulk product tank inventory (attachment 10). I reviewed the inventory and identified the following products were listed in 40 CFR 261.33, Discarded commercial chemical products, off-specification species, container residues, and spill residues thereof, and would be hazardous wastes if discarded in Line Flush.

PRODUCT	Commercial Chemical Product Waste Code
Acetone	U002
Butanol	U031
Methyl Ethyl Ketone	U159
Methanol	U154
Methyl Isobutyl Ketone	U161
Toluene	U220
Xylene	U239

I obtained a copy of the waste profile for Line Flush (attachment 11). The waste profile identifies the EPA waste codes D001, F003 and F005. In the constituent section of the waste profile, the chemicals in the above table are described as ranging from 25 percent to 40 percent (except methanol which has a range of 30 percent to 40 percent). Based on the above description of how Line Flush is generated, at least a portion if not all of the Line Flush would be discarded commercial chemical product.

Rags and Debris

Rags and Debris as described by Mr. Rowlands is rags, adsorbent pads, mats, or socks and/or granular adsorbent used to adsorb bulk product materials on the surface of containers and equipment that are being filled or to clean up releases of bulk product materials in the Fill Room and Truck Loading Rack.

Rags and Debris are accumulated in Satellite Accumulation containers at the Fill Room and Truck Loading Rack. Full containers of Rags and Debris are transferred to the less than 90-day hazardous waste accumulation area in the I Warehouse Hazardous Waste Storage Area. The waste profile provides an estimated annual generation of one to ten 55-gallon drums of Rags and Debris. I observed two 55-gallon drums of Rags and Debris in the I Warehouse Hazardous Waste Storage Area (photograph 13, attachment 1). Based on eManifest data, 1,027 pounds of Rags and Debris was shipped in 2021 to AES Asset Acquisition DBA Clean Earth of Calvert City, Calvert City, Kentucky, KYD985073196, where it is stored/bulked and transferred to another treatment, storage, and disposal facility.

NOPF 4 – 40 CFR 262.11(b): Generator must determine waste code listings 10 CSR 25-5.262(1)

The State of Missouri has adopted by reference the EPA’s requirements for generators of hazardous waste found at 40 CFR Part 262, Standards Applicable to Generators of Hazardous Waste.⁵ The requirement at 40 CFR 262.11, Hazardous Waste Determination, requires generators to determine if a solid waste is a hazardous waste. In pertinent part, 40 CFR 262.11(b) requires generators to “...*determine if the waste is listed as a hazardous waste in subpart D of 40 CFR part 261.*” The State of Missouri has adopted by reference 40 CFR Part 261, Identification and Listing of Hazardous Waste.⁶ I discussed with Mr. Rowland that I wanted to review

⁵ See 10 CSR 25-5.262, Standards Applicable to Generators of Hazardous Waste, incorporating by reference the requirements in 40 CFR Part 262, July 1, 2013.

⁶ See 10 CSF 25-4.261, Methods for Identifying Hazardous Waste, incorporating by reference the requirements in 40 CFR Part 261, July 1, 2013.,

the hazardous waste determination for Rags and Debris. I obtained a copy of the bulk product tank inventory (attachment 10). I reviewed the inventory and identified the following products were listed in 40 CFR 261.33, Discarded commercial chemical products, off-specification species, container residues, and spill residues thereof, and would be hazardous wastes if discarded in Rags and Debris.

PRODUCT	Commercial Chemical Product Waste Code
Acetone	U002
Butanol	U031
Cyclohexane	U056
Ethyl Acetate	U112
Methyl Ethyl Ketone	U159
Methanol	U154
Methyl Isobutyl Ketone	U161
Toluene	U220
Xylene	U239

I obtained a copy of the waste profile for Rags and Debris (attachment 12). The waste profile identifies the EPA waste codes D001, D035 (methyl ethyl ketone) F003 and F005. In the constituent section of the waste profile, the chemicals in the above table are not described as present in any specific range (described as “% - %”), dirt, debris, etc., is described as ranging from 10 percent to 100 percent, and absorbents are described as ranging from 10 percent to 100 percent. Based on the above description of how line flush is generated, at least a portion if not all of the chemicals contained in Rags and Debris would be discarded commercial chemical product.

Containment Sump Water

Containment Sump Water as described by Mr. Rowlands is precipitation removed from the secondary containment sump that extends across the two loading bays at the Truck Loading Rack. Containment Sump Water is shipped to AES Asset Acquisition DBA Clean Earth of Calvert City, Calvert City, Kentucky, KYD985073196, where its disposition is unknown.

NOPF 3 – 40 CFR 262.11: Waste determination needed for Contaminated Sump Water 10 CSR 25-5.262(1)

The State of Missouri has adopted by reference the EPA’s requirements for generators of hazardous waste found at 40 CFR Part 262, Standards Applicable to Generators of Hazardous Waste.⁷ The requirement at 40 CFR 262.11, Hazardous Waste Determination, requires generators to determine if a solid waste is a hazardous waste.

I visually inspected the Truck Loading Rack on April 6, 2022. I observed one 1,041-liter capacity IBC present at the Truck Loading Rack containing approximately 350 liters of Containment Sump Water (photographs 4 and 5, attachment 1). I requested Mr. Rowlands remove the cap of the Contaminated Sump Water IBC in order to screen the contents for volatile organic chemicals (VOC) with the EPA FID. Mr. Rowland directed the loading rack personnel to remove the cap. I measured a VOC concentration of 7,146 parts per million by weight with the EPA FID (attachment 13). I asked Mr. Rowlands to describe Univar’s waste determination for

⁷ See 10 CSR 25-5.262, Standards Applicable to Generators of Hazardous Waste, incorporating by reference the requirements in 40 CFR Part 262, July 1, 2013.

Contaminated Sump Water. Mr. Rowlands stated he would have to get that information from his corporate environmental manager. I have not received additional information regarding the waste determination for Contaminated Sump Water as of the writing of this report.

Following the exit conference, Mr. Rowlands requested that I screen a Contaminated Sump Water IBC in the I Warehouse Hazardous Waste Storage Area. We returned to the warehouse where Mr. Rowland opened the cap on a Containment Sump Water IBC (front most IBC pictured in photograph 17, attachment 1). I measured a VOC concentration of 1.43 percent by weight with the EPA FID (attachment 13). I obtained a closeup photograph of the label on the container (front most IBC pictured in photograph 16, attachment 1). I observed a total of seven filled 1,041-liter IBCs of Contaminated Sump Water in the I Warehouse Hazardous Waste Storage Area (photograph 17, attachment 1). Mr. Rowlands did not request VOC screening of additional IBCs in the I Warehouse as a forklift would be needed to unstack the remaining IBCs so the caps could be opened for screening.

Liquifier [sic]

Univar produces an industrial chemical with the product name *Liquifier*. Line flush from certain chemicals are collected in a 55-gallon drum. I observed Liquifier collection drums in the Fill Room and both the east and west bays of the Truck Loading Rack. Mr. Rowlands described that the filled drums are accumulated on site and shipped to the Univar Solutions facility in Willow Springs, Illinois, where they are distributed to customers. I asked if the Willow Springs facility does any processing of the Liquifier before it is sold. Mr. Rowlands stated he did not have direct knowledge of any processing that the Willow Springs facility may do before Liquifier is sold. I obtained a list of the line flush chemicals that can comprise Liquifier (attachment 14). I obtained a safety data sheet for Liquifier (attachment 15).

3.4 I Warehouse Hazardous Waste Storage Area

The I Warehouse Hazardous Waste Storage Area is located in the west side of the I Warehouse (attachments 3 and 4). The I Warehouse is also known as the Debasio warehouse. Mr. Backus and I visually inspected the area on April 6, 2022, accompanied by Mr. Rowlands. I observed hazardous waste being accumulated in 55-gallon steel drums (photograph 13, attachment 1). The containers were on pallets arranged in rows. Pallets of four containers each were stacked two pallets high. The pallets were within an area surrounded by a berm to contain spills. The berm was radiused to allow fork trucks to move containers and pallets into and out of the area. I observed fire extinguishers, an overhead sprinkler system and a spill kit available. Mr. Rowlands stated that employees working in the area have two-way radios with which they can summon assistance.

I observed containers of unused products, hazardous and non-hazardous waste in the Container Storage Area. Mr. Rowlands stated that the waste paint solvent containers (photograph 5, attachment 1) against the south wall of the Container Storage Area were in storage and the other observed containers of hazardous and non-hazardous waste were transfer wastes. All observed containers of hazardous waste were closed, labeled with "Hazardous Waste," and in good condition. I visually inspected the condition of the secondary containment which was in good condition. I observed the secondary containment collection sumps were free of liquids. I observed a telephone that can be used to summon assistance, a spill kit and fire extinguishers. I observed "No Smoking" signs at the exterior entrance to the Container Storage Area.

NOPF 2 – 10 CSR 25-5.262(2)(C)1.B: Two drums with labels not visible in <90-day accumulation (not clearly marked for inspection)

The State of Missouri regulations at 10 CSR 25-5.262(2)(C)1.B which, in pertinent part, requires hazardous waste generator to “*Clearly label each container with words that correctly identify the hazards of the contents of the container during the entire on-site storage period.*” Alternatively at 10 CSR 25-5-262(2)(C)1.A, generators can label “*All containers used to accumulate hazardous waste must be labeled in accordance with applicable United States Department of Transportation labeling requirements in 49 CFR part 172 subpart E during the entire time the waste is accumulated on-site.*” I observed a 55-gallon drum that did not have a visible label indicating the hazard of the contents of the container. The container (photographs 8 and 9, attachment 1) was the right drum of the two drums when viewing the pallet looking north and was located on the rearmost upper pallet on the south side of the second row of pallets from the left (photograph 13, attachment 1).

I observed a second 55-gallon drum that did not have a visible label indicating the hazard of the contents of the container. The container (photograph 10, attachment 1) was the right drum of the two drums when viewing the pallet looking south and was located on the rearmost upper pallet on the north side of the third row of pallets from the left (photograph 13, attachment 1). Additionally, while not cited in the NOPF, both containers did not have “Hazardous Waste” visible on the containers as required by 40 CFR 262.34(a)(3) which states in pertinent part “*While being accumulated on-site, each container and tank is labeled or marked clearly with the words, ‘Hazardous Waste.’*”

See Section 3.8.1 for the discussion of air emission requirements for hazardous waste accumulation containers.

3.5 Satellite Accumulation in Containers

Univar utilizes Satellite Accumulation⁸ containers in both the east and west bays of the Truck Loading Rack, in the Fill Room and in the Lab. When full, satellite accumulation containers in the east and west bays of the Truck Loading Rack and in the Fill Room are transferred to the I Warehouse Hazardous Waste Storage Area. When full, the Satellite Accumulation containers in the Lab are transferred into the Line Flush container in the Fill Room in the case of the container used to discard retain sample liquids and into the Rags and Debris container in the Fill Room in the case of the rags and debris in the step can. Mr. Backus and I visually inspected the Satellite Accumulation Containers on April 6, 2022. We were accompanied by Mr. Rowlands.

3.5.1 Truck Loading Rack

The Truck Loading Rack is located between two tank farms located in the northern portion of the facility (attachments 3 and 4). The loading rack is covered with a roof and has two truck loading bays arranged on the north/south axis of the loading area referred to as the east and west loading bays. Mr. Backus and I visually inspected the area on April 6, 2022, accompanied by Mr. Rowlands.

West Loading Bay

Univar was utilizing the Missouri Option⁹ for Satellite Accumulation which allows for more than one waste stream to be accumulated at the point of generation. I observed two 55-gallon Satellite Accumulation

⁸ Satellite accumulation is a term of art for the situation where the generator accumulates hazardous waste in containers at or near any point of hazardous waste generation. The pertinent requirements are found at 40 CFR 262.34(c)(1), et seq. (10 CSR 25-5.262(1)).

⁹ 10 CSR 25-5.262(2)(C)3

containers, one containing Line Flush (photograph 3, attachment 1), one containing Rags and Debris, and one container of Liquifier in the West Loading Bay. Both Satellite Accumulation containers were closed, labeled “Hazardous Waste” and with the hazard of the contents, and Satellite Accumulation start dates.

I observed no apparent issues or findings related to Satellite Accumulation in the West Loading Bay.

East Loading Bay

NOPF 1 – 40 CFR 265.173(a): Satellite Accumulation container not closed. 10 CSR 25-5.262(2)(C)3 → 40 CFR 262.34(c)(1)(i)

The Missouri Option¹⁰ for Satellite Accumulation requires containers to be closed when not adding or removing hazardous waste from the container. Note the citation to the Missouri requirements in the NOPF (attachment 5) should be 10 CSR 25-5.262(2)(C)3. The requirement at requires generators to comply with 40 CFR 262.34(c)(1) during Satellite Accumulation. In accordance with 40 CFR 262.34(c)(1)(i), Satellite Accumulation must comply, in pertinent part, “...with §§ 265.171, 265.172, and 265.173(a) of this chapter” The requirement at 40 CFR 265.173(a) found in 40 CFR Part 265, Subpart I, Use and Management of Containers, requires “A container holding hazardous waste must always be closed during storage, except when it is necessary to add or remove waste.” I observed two 55-gallon Satellite Accumulation containers, one containing Line Flush, one containing Rags and Debris, and one container of Liquifier in the East Loading Bay. I observed the Line Flush container with a drum filling funnel attached to the container using the container bung opening did not have the funnel lid latched (photographs 1 and 2, attachment 1). Personnel closed the lid latching mechanism on the subject Line Flush container, but the lid very shortly thereafter spontaneously unlatched again. The Rags and Debris Satellite Accumulation container was closed. Both Satellite Accumulation containers were labeled “Hazardous Waste” and with the hazard of the contents, and Satellite Accumulation start dates.

3.5.2 Fill Room

Mr. Backus and I visually inspected the area on April 6, 2022, accompanied by Mr. Rowlands. I observed two 55-gallon Satellite Accumulation containers, one containing Line Flush, one containing Rags and Debris, and one container of Liquifier in the Fill Room. The Satellite Accumulation containers were located approximately 15 feet apart. Both Satellite Accumulation containers were closed, labeled “Hazardous Waste” and with the hazard of the contents, and Satellite Accumulation start dates.

I observed no apparent issues or findings related to Satellite Accumulation in the Fill Room.

3.5.3 Lab

Mr. Backus and I visually inspected the area on April 6, 2022, accompanied by Mr. Rowlands. Mr. Rowlands described Univar’s testing in the lab as specific gravity testing using a handheld meter. I observed two Satellite Accumulation containers in the Lab. One 2.5-gallon safety can contained liquids resulting from specific gravity testing was observed next to a laboratory hood (photograph 15, attachment 1). One 5-gallon self-closing safety container contained rags was observed on the side of the room opposite the laboratory hood. Both Satellite Accumulation containers were closed and were labeled “Hazardous Waste” and with the hazard of the contents. When full, Mr. Rowlands describe the contents are added to the Line Flush container in the Fill room in the case of the contents of the 2.5-gallon safety can and to the Rags and Debris container in the Fill room in the case of

¹⁰ Ibid.

the contents of the 5-gallon self-closing safety can. Mr. Rowlands could not recall the last time the contents of the Satellite Accumulation containers were added to the Satellite Containers in the Fill Room.

I observed no apparent issues or findings related to Satellite Accumulation in the Lab.

3.6 Subpart BB – Air Emission Standards for Equipment Leaks

The EPA promulgated requirements for the control of air emissions from equipment leaks at 40 CFR Part 265, Subpart BB (hereafter “Subpart BB”). The State of Missouri has adopted by reference the EPA’s requirements for owners and operators of hazardous waste treatment, storage, and disposal facilities found at 40 CFR Part 265¹¹. Univar, as a large quantity generator of hazardous waste, is subject to the requirements of Subpart BB. The provisions of Subpart BB apply to equipment such as valves, pumps, connectors, etc., that are in contact with hazardous waste with a total organic concentration at least ten percent by weight.

I did not observe equipment subject to Subpart BB during my visual inspection of Univar hazardous waste management areas.

3.7 Method 21 Monitoring

I calibrated a Thermo Fisher Scientific TVA-2020 (EPA FID) (attachment 16) used for Method 21¹² monitoring the morning of April 6, 2022, prior to our arrival at the facility. The EPA FID has a flame ionization detector and a photoionization detector to measure organic vapor concentrations. Only the flame ionization detector was calibrated and operated for the Method 21 monitoring, i.e., the photoionization detector was switched off.

3.8 Subpart CC Air Emissions

3.8.1 Containers

The EPA promulgated requirements for the control of air emissions from tanks, surface impoundments, and containers at 40 CFR Part 265, Subpart CC (hereafter “Subpart CC”). The State of Missouri has adopted by reference the EPA’s requirements for owners and operators of hazardous waste treatment, storage, and disposal facilities found at 40 CFR Part 265¹³. Univar is subject to Subpart CC for containers used to store or accumulate hazardous waste with a volatile organic concentration of 500 parts per million (ppm) or greater. The required air emission controls are specified in 40 CFR Part 265, Subpart CC.

Mr. Backus and I visually inspected the less than 90-day hazardous waste accumulation in the I Warehouse on April 6, 2022, accompanied by Mr. Rowlands. I observed 34 55-gallon hazardous waste accumulation containers. The hazardous waste containers observed included both Line Flush, and Rags and Debris waste streams.

I observed thirty-two 55-gallon containers of Line Flush. The Line Flush contains various volatile organics each ranging from 25 percent to 40 percent (attachment 11). I observed the containers appeared to be compliant with

¹¹ See 10 CSR 25-7.265(1) which incorporates by reference 40 CFR Part 265, Subpart BB– Air Emission Standards for Equipment Leaks. Missouri has adopted the provisions of 40 CFR Part 265, as in effect on July 1, 2013.

¹² Method 21 – Determination of Volatile Organic Compound Leaks is found at 40 CFR Part 60, Appendix A.

¹³ See 10 CSR 25-7.265(1), Standards for Owners and Operators of Hazardous Waste Treatment, Storage, and Disposal Facilities, which incorporates by reference 40 CFR Part 265, Subpart CC – Air Emission Standards for Containers. Missouri has adopted the provisions of 40 CFR Part 265, as in effect on July 1, 2013.

the Level 1 requirement for United States Department of Transportation (US DOT) regulations on packaging hazardous materials for transportation found at 49 CFR Part 178, Specifications for Packaging.

I observed two 55-gallon containers of Rags and Debris. The waste profile for Rags and Debris states the waste stream is not subject to Subpart CC due to the volatile organic content (attachment 12). I observed that the containers appeared to be compliant with the Level 1 requirement for United States Department of Transportation (US DOT) regulations on packaging hazardous materials for transportation found at 49 CFR Part 178, Specifications for Packaging.

I observed no apparent issues or findings related to Subpart CC for the observed hazardous waste accumulation containers in the I Warehouse.

3.9 Universal Waste

Mr. Backus and I visually inspected Univar on April 6, 2022. We did not observe universal waste on site.

3.10 Used Oil

Mr. Backus and I visually inspected Univar on April 6, 2022. We did not observe used oil generated by Univar on site.

3.11 Hazardous Waste Transporter Transfer Facility

Univar operates a hazardous waste transfer facility in the I Warehouse (attachment 3). Pursuant to 40 CFR 263.12¹⁴, transporters who store manifested shipments of hazardous waste for less than ten days can do so without a hazardous waste permit. Univar transports hazardous waste in Univar operated vehicles using EPA RCRA transporter identification number TXR000084869 (attachment 17).

Mr. Backus and I visually inspected the transfer hazardous waste in the I Warehouse on April 6, 2022. We were accompanied by Mr. Rowlands. I observed the containers of transfer waste (photograph 12, attachment 1). The containers were on pallets arranged in rows. Pallets of four containers each were stacked two pallets high. The pallets were within an area surrounded by a berm to contain spills. The berm was radiused to allow fork trucks to move containers and pallets into and out of the area. I observed fire extinguishers, an overhead sprinkler system and a spill kit available. Mr. Rowlands stated that employees working in the area have two-way radios with which they can summon assistance. The containers were in good condition, closed, labeled "Hazardous Waste," included the required generator information and United States Department of Transportation hazardous material marking consistent with the contents.

Mr. Backus and I reviewed the transporter manifests for transfer hazardous waste observed in the I Warehouse. Univar was identified as the transporter on the manifests and had signed the manifest when the waste was consigned to Univar. I obtained a copy of Univar's container inventory for the I Warehouse (attachment 18). The transfer hazardous waste containers were consistent with the provided inventory and hazardous waste manifests.

I observed no apparent issues or findings related to hazardous waste transporter requirements.

¹⁴ See 10 CSR 25-6.263, Standards for Transporters of Hazardous Waste, which incorporates by reference 40 CFR Part 263, Standards Applicable to Transporters of Hazardous Waste, as in effect on July 1, 2013.

3.12 Inspections

Univar conducts weekly inspections of the containers in the I Warehouse and records the inspections in a monthly inspection log. I reviewed and obtained copies of select monthly inspection logs (attachment 19).

I observed no apparent issues or findings related to my review of inspection records.

3.13 Contingency Plan

I asked Mr. Rowlands if the contingency plan had been implemented or updated since the MDNR inspection of June 22, 2017. Mr. Rowlands stated that neither event had occurred. I reviewed the contingency plan while I was on site on April 6, 2022. The current contingency plan was dated May 2014. The plan is an integrated plan with the site Spill Prevention, Control and Countermeasure plan required by Section 311 of the Clean Water Act. The plan contained a description of the arrangements agreed to by local police departments, fire departments, hospitals for emergency services. The primary and alternate emergency coordinators were current with Mr. Rowlands acting as the primary emergency contact. The plan contained lists and locations of emergency equipment, their descriptions and capabilities and an evacuation plan.

I observed no apparent issues or findings related to my review of the contingency plan.

3.14 Training Requirements

Mr. Rowlands described all onsite employees receive RCRA training and demonstrated the electronic training tracking system for Mr. Backus and me. Training is completed within six months of starting work on site. Annual RCRA refresher training is provided as a series of online training modules delivered thru out each calendar year. The RCRA training courses are developed and delivered by a third-party training provider. Univar has hired one new person in 2021, Mr. Stewart Limper. I reviewed the initial training records for Mr. Limper.

I observed no apparent issues or findings related to my review of personnel training.

3.15 Manifests

I discussed hazardous waste manifest recordkeeping with Mr. Rowlands. Univar maintains copies of hazardous waste manifests for shipments of Univar generated hazardous waste on site. I obtained copies of manifests for shipments from January 1, 2021, to date (attachment 20). I reviewed the manifest information in the E-Manifest system from June 30, 2018, through March 31, 2022. Univar retains copies of manifest in which drivers and trucks for the Polk Street facility are the transporter listed on the manifest. I reviewed the manifests for the shipments of hazardous waste that we onsite in the I Warehouse.

I observed no apparent issues or findings related to my review of Univar's hazardous waste manifests.

4.0 COMPLIANCE ASSISTANCE

I provided Univar with the following compliance assistance information:

Section 3007 Inspections Sheet (EPA Handout)

RCRA Facility Access Information Sheet (EPA Handout)

United States Code 1001/1002 Annotated (EPA Handout)

Notice Regarding Proprietary/Confidential Business Information Submitted to or Collected by EPA in Connection with Inspections (EPA Handout)
U.S. EPA Small Business Resource Information Sheet (EPA Handout)
Tampering Pollutes Our Air (EPA Handout)
Clean Air Act Vehicle Aftermarket Defeat Devices and Tampering (EPA Handout)
EPA Enforcement Alert National Compliance Initiative Focus on RCRA Air Emissions June 2020 (EPA Handout)
COMPLIANCE ADVISORY Reduction of Hazardous Waste Air Emissions April 2018 (EPA Handout)
Leak Detection and Repair: A Best Practices Guide (EPA Handout)

5.0 SUMMARY

I conducted an inspection of Univar as a large quantity generator of hazardous waste and a transfer facility. The following preliminary finding is noted as discussed above:

NOPF 1 – 40 CFR 265.173(a): Satellite Accumulation container not closed. 10 CSR 25-5.262(2)(C)3 → 40 CFR 262.34(c)(1)(i)

NOPF 2 – 10 CSR 25-5.262(2)(C)1.B: Two drums with labels not visible in <90-day accumulation (not clearly marked for inspection)

NOPF 3 – 40 CFR 262.11: Waste determination needed for Contaminated Sump Water 10 CSR 25-5.262(1)

NOPF 4 – 40 CFR 262.11(b): Generator must determine waste code listings 10 CSR 25-5.262(1)

Other than the items noted above, no other preliminary findings were noted. However, the EPA may review my findings further after the inspection, which may change or add to my findings.

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**KENNETH
HERSTOWSKI**

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Date: 2022.04.13 10:05:55 -05'00'

Kenneth Herstowski
Environmental Engineer

Date

AMBER WHISNANT

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Date: 2022.04.23 16:10:58 -05'00'

Amber Whisnant
Chief, RCRA Section, Chemical Branch
Enforcement and Compliance Assistance Division

Date

Attachments

1. Inspection [17] Photographs (18 pages)
2. Photograph Log (1 page)
3. Univar Aerial Photographs (4 pages)
4. Univar Facility Map (2 pages)
5. Notice of Preliminary Findings (3 pages)
6. Receipt for Documents (1 page)
7. Confidentiality Notice (1 page)
8. Records Request (2 pages)
9. Notification Acknowledgement/Verification Report (2 pages)
10. Bulk Product Tank Inventory (1 page)
11. Line Flush Waste Profile (13 pages)
12. Flammable Solids Waste Profile (10 pages)
13. EPA M21 Field Sheet (1 page)
14. Liquifier Polk Street Mixed Solvent Light Products (1 page)
15. Liquifier SDS (61 pages)
16. EPA FID Calibration (1 page)
17. Univar Transporter EPA ID Number (2 pages)
18. I Warehouse Inventory (1 page)
19. Inspection Log (9 pages)
20. Univar Generator Manifests (16 pages)