

Region 6 - Enforcement & Compliance Assurance Division

INSPECTION REPORT

Inspection Date(s):	10/04-07/2022	
Media Program:	RCRA Compliance Evaluation Inspection	
Regulatory Program(s)	RCRA Large Quantity Generator	
Company Name:	Invista Houston	
Facility Name:	Invista Houston	
Facility Physical Location:	9822 La Porte Fwy	
(city, state, zip code)	Houston, Tx, 77017	
Mailing address:	9822 La Porte Fwy	
(city, state, zip code)	Houston, Tx, 77017	
County/Parish:	Harris County	
Facility Phone Number	(713) 740 3900	
Facility Contact:	Benji Maxwell	Environmental Manager
	benji.maxwell@invista.com	
FRS Number:	NA	
Identification/Permit Number:	NA	
Media Identifier Number:	TXD096035274	
NAICS:	32511 - Petrochemical Manufacturing	
SIC:	NA	
Personnel participating in inspection:		
John Penland	EPA Region 6 (ECDSR)	Lead Inspector
Adolphus Talton	EPA Region 6 (ECDSR)	Asst. Inspector
Sandesh Thapa	EPA Region 6 (ECDSR)	Asst. Inspector
Elizabeth Pham	EPA Region 6 (ECDSR)	Asst. Inspector
Benji Maxwell	Invista Houston	Environmental Manager
EPA Lead Inspector Signature/Date		12/22/2022
	John Penland – Lead Inspector	Date
Supervisor Signature/Date		
	Jeff Yurk – Waste Section Chief	Date

Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

During the week of October 3, 2022, I, John Penland, conducted an unannounced inspection of the Invista Houston (Invista) facility located at 9822 La Porte Fwy, Houston, Tx for compliance with the Resource Conservation and Recovery Act (RCRA). I was assisted on this inspection by Environmental Protection Agency (EPA) inspectors Adolphus Talton, Sandesh Thapa and Elizabeth Pham. The inspection included a walkthrough of the facility's production, waste generation, and management units and a review of the facility records related to hazardous waste management.

The Invista facility was targeted for inspection as part of facilities located in Environmental Justice communities and Regional and National investigation initiatives to evaluate facilities subject to RCRA Subpart AA, BB, CC, regulations related to air emissions from hazardous waste management units.

We concluded the inspection of the Invista facility on October 7, 2022, with a closing conference where we presented our provisional areas of concern.

This report serves as documentation of all onsite activities and observations during the inspection of the Invista facility. Photographs taken during the inspection to document onsite observations are included in Appendix 1. A summary of all areas of concern identified during the inspection is provided in Section III.

FACILITY DESCRIPTION

Invista is located at 9822 La Porte Fwy in Houston, TX. There are one hundred employees at the facility. It engages in commercial production of propylene, fuels and aromatics by propane dehydrogenation. The facility is operational 24 hours a day, seven days a week.

A general map of the plant is included in Appendix 2. A process flow diagram is included in Appendix 3.

The Invista facility was issued the EPA ID# TXD096035274. Invista has been operating as a Large Quantity Generator (LQG) of hazardous waste since March 1990.

Section II - OBSERVATIONS

We conducted the onsite inspection during normal business hours from October 4-7, 2022. During the inspection, the facility was conducting normal operations and all areas of the facility were in use. Throughout the week, we visited each of the facility's waste generation, accumulation, and management areas. We also reviewed the facility's operating records pertaining to the facility's RCRA applicability and compliance requirements.

This section provides an abbreviated description of our daily activities, see Appendix 4. Appendix 1 provides photographs of our observations. Unless otherwise specified, the statements cited in this section reflect those claims made by facility personnel or documents reviewed during the inspection.

October 4, 2022

Adolphus Talton, Sandesh Thapa, Elizabeth Pham, and I entered the facility at 1115hrs. We presented our credentials to Mr. Maxwell and informed him that we were there to conduct an inspection of the facility under Section 3007 of the Resource Conservation and Recovery Act (RCRA). I also explained the right of Invista to assert a Confidential Business Information claim for records requested by the EPA. This discussion was followed by a presentation of EPA Region 6's Confidentiality Notice (40 CFR Section 2.203). Following this introduction, we conducted an inspection opening briefing with Benji Maxwell. This included daily inspection schedules and a request for compliance records.

Following the opening briefing, we conducted a safety brief and a walkthrough of Invista's production and associated waste management areas. The walkthrough began in the control room and laboratory of Invista's facility. Benji Maxwell, the Environmental, Health and Safety Manager for Invista, accompanied us on the walkthrough.

Control Room and Laboratory:

The laboratory primarily processes quality control samples and no hazardous waste was seen inside the laboratory.

Waste Management Unit (WMU):

There are seven WMU's at the Invista facility. I observed one 55-gallon drum containing quench oil rags with benzene at WMU 001. In addition, a single vacuum box containing zeolite waste was present at WMU 036. I have requested Texas waste code and profile numbers of WTU 001 and WTU 036. No hazardous waste was observed at WMU 23, WMU 37 and WMU 38.

Satellite Accumulation Area (SAA):

I observed five SAA's at Invista. All the SAA's were properly managed, labeled and no significant observation was made.

Catalyst Building:

The catalyst used at Invista is a chromium-based catalyst. The process uses screens to separate metal bearing catalyst from inert clay beads. I found the building listed as a tank in a notice of registration and further review is required on applicability of containment building standards. I saw two roll off containers of chromium PPE at the catalyst building and requested waste profiles and Texas waste codes.

Unknown Container:

We identified a container with unknown contents near vessel 4022-JB at the effluent structure.

We departed Invista facility at 1500hrs.

October 5, 2022

Adolphus Talton, Sandesh Thapa, Elizabeth Pham, and I entered the facility at 1000hrs. We conducted our preliminary document review and process overview on this day, including a review of notes from October 3, 2022. The unknown container near vessel 4022-JB contained Class 2 liquid waste.

Facility Process Overview

Propane Dehydrogenation Process

In the production process, the propane is converted to propylene product through dehydrogenation. A spent catalyst is generated from the reactors which has a lifespan of three years. It consists of chromium catalyst beads, alumina chips and support media. The catalyst is spent due to decreased reactivity. The drying agent used in the process is molecular sieve. It has a lifespan of 10 years and categorized as Class 1 non-hazardous waste.

Wastewater Treatment Unit (WWTU)

Spent carbon from the WWTU is sent to Equova for regeneration. During the treatment process, I saw the use of Zeolite filters which get contaminated with benzene due to the presence of benzene in the C5+ product stream.

Catalyst Reclamation

The catalyst reclamation process at Invista consists of alumina chips and chromium catalyst beads. I observed that the alumina chips are reclaimed and returned to process while spent chromium beads are disposed as hazardous waste. I was informed that Tank 2303 and Tank 2304 generate tank bottoms and I have requested waste analysis specific to the sludge which was said to be Class 1 waste.

HSM Applicability Discussion

The facility mentioned that the catalyst reclamation is conducted under exclusion 40 CFR 261.4(a). In the past, the waste was managed as hazardous waste before the exclusion was effective. I discussed with the facility about the requirement of exclusion based on the definition of contained applied to the containment building.

October 6, 2022

Adolphus Talton, Sandesh Thapa, Elizabeth Pham, and I entered the facility at 0945hrs. We conducted our preliminary document review, including a review of notes from October 4, 2022. The facility staff mentioned that zeolite batches are changed every two months.

Team reviewed the following documents:

- Contingency Plan
- Waste Management Standard Operating Procedure (SOP)
- Waste profile records
- Facility maps and process diagrams.
- Waste Management Unit (WMU) inspection records.

I requested employee training records with Benji Maxwell and discussed training records requirement under 40 CFR 261.17(a)(7). I found the WMU inspection records do not identify super sacks located in WMU 39 and WMU 41. This includes dates where the catalyst process was ongoing and waste super sacks were present in the units.

WMU 41

WMU 41 contains a super sack staging area and roll off containers used for storage of waste catalysts. I noticed the super sack staging area lacks aisle spacing to fully access material and conduct proper

inspection. I saw yellowish-green discoloration on the ground near the super sack and green discoloration on the bag. See Appendix 1. Since constituent of concern is chromium, the facility will need to evaluate this as a potential spill of waste. Catalyst support media was seen on the ground in the area, but I did not identify any catalyst. All the containers were labeled and dated at WMU 41.

WMU 39

WMU 39 is a containment building housing the reclamation process and catalyst blending units. In addition, this area serves as an accumulation area of waste catalysts stored in super sacks. I found the containers were labeled, dated and in good condition.

Contaminated Building Dust Collection System

This system is located outside WMU 39. Dust from the catalyst process is controlled by a cartridge dust collector and accumulates in an attached super sack. I observed a small spill of dust near the dust collector on the concrete pad. See Appendix 1.

We departed Invista facility at 1500hrs.

October 7, 2022

Sandesh Thapa, Elizabeth Pham, and I entered the facility at 0850hrs. I facilitated a closeout meeting at 0900hrs to review my observations and outstanding document request. We departed the facility at approximately 1100 hrs.

Section III – AREAS OF CONCERN

- Based on my observation, the facility needs to evaluate the possible spill of hazardous waste material at WMU 41 40 CFR 262.17 (a)(1).
- Facility weekly inspection require further review. I was unable to track inspection records for, WMU 39 and WMU 41, super sack storage area 40 CFR 262.17(a)(1)(v).

Section IV – FOLLOW UP

The following information was received by EPA on October 21, 2022, after exiting the facility on October 7, 2022.

- Manifest for 2019 through 2022.
- Land disposal restriction one-time notice from March 10, 2017.
- Catalyst SOPs and Training Documents.
- Service agreements.
- Air Permit.
- Waste Profiles.

Section V – LIST OF APPENDICES

Appendix 1 – Photo Log – 3 photos taken on 10/6/2022

Appendix 2 – Facility Diagram

Appendix 3 – Process Flow Diagram

Appendix 4 – EPA Daily Summary E-mails

Appendix 1

Photograph Log



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY Photograph Log

Photo No. 1

Location: Invista Houston, 9822 La Porte Fwy		
City: Houston	County/Parish: Harris	State: Texas



Photo #:	WMU 41 Staining_5.jpg (Photo filename updated by facility on 10/21/2022)
Date:	10/06/2022
Camera:	Nikon COOLPIX AW120
Photographer:	Elizabeth Pham
Witness:	Adolphus Talton, Sandesh Thapa, Elizabeth Pham, John Penland
Description: Spill located at WMU41- blue arrows added to photo to indicate area of contamination.	



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Photograph Log

Photo No. 2

Location: Invista Houston, 9822 La Porte Fwy		
City: Houston	County/Parish: Harris	State: Texas



Photo #:	WMU 39 dust collection system_2.jpg (Photo filename updated by facility on 10/21/2022)
Date:	10/06/2022
Camera:	Nikon COOLPIX AW120
Photographer:	Elizabeth Pham
Witness:	Adolphus Talton, Sandesh Thapa, Elizabeth Pham, John Penland
Description: Dust collection system outside WMU 39, blue arrow added to photo to indicate spill on the concrete pad.	



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY Photograph Log

Photo No. 3

Location: Invista Houston, 9822 La Porte Fwy		
City: Houston	County/Parish: Harris	State: Texas



Photo #:	WMU 41 overall view.jpg (Photo filename updated by facility on 10/21/2022)
Date:	10/06/2022
Camera:	Nikon COOLPIX AW120
Photographer:	Elizabeth Pham
Witness:	Adolphus Talton, Sandesh Thapa, Elizabeth Pham, John Penland
Description: Overview of WMU 41- blue arrow added to photo to indicate lack of aisle spacing.	

Appendix 2

Facility Diagram

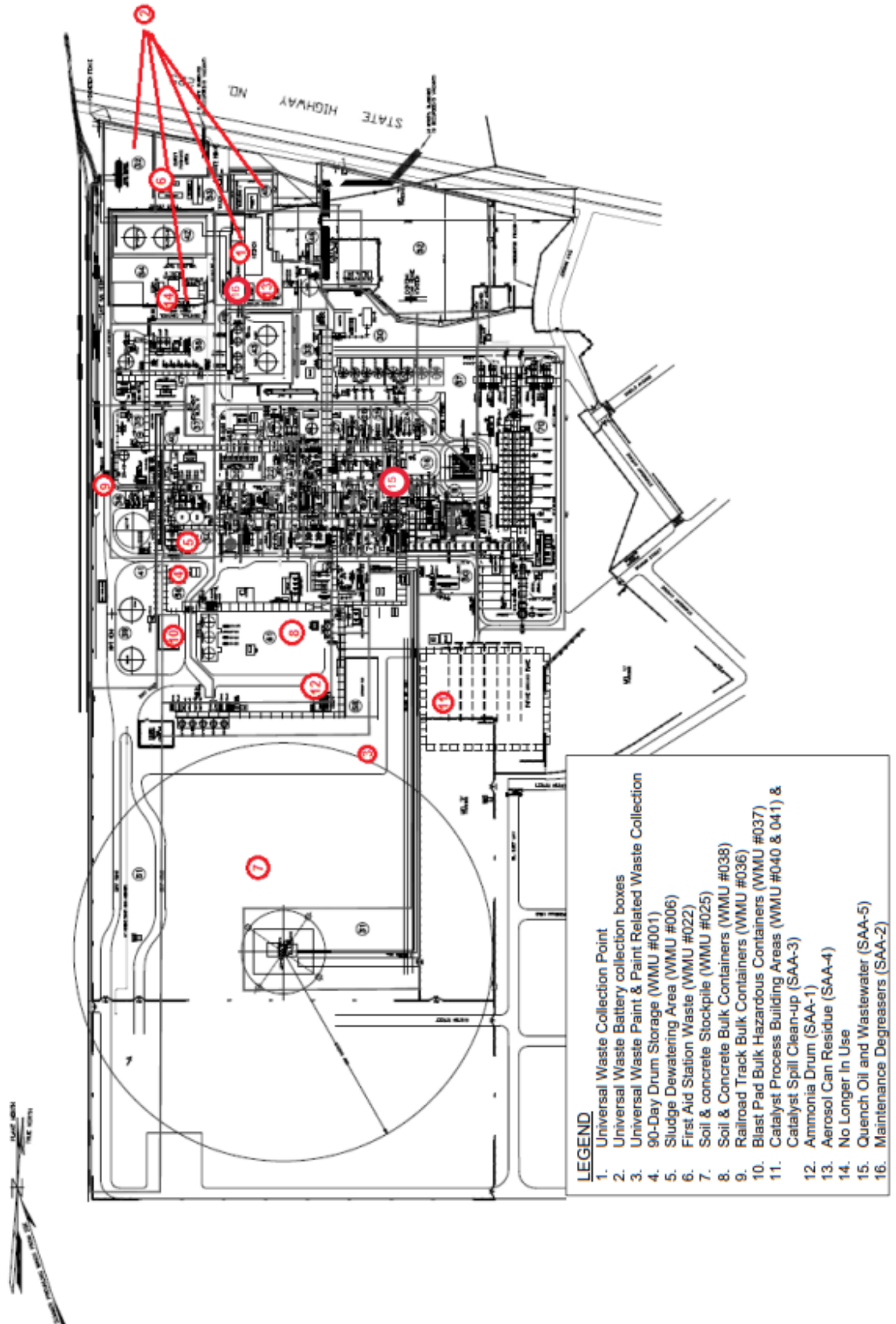
FHR HCP
ENV-403.01

Current five years from last review
Revision Date: 7/26/17

Document Title
Waste Handling

Page 14 of 14

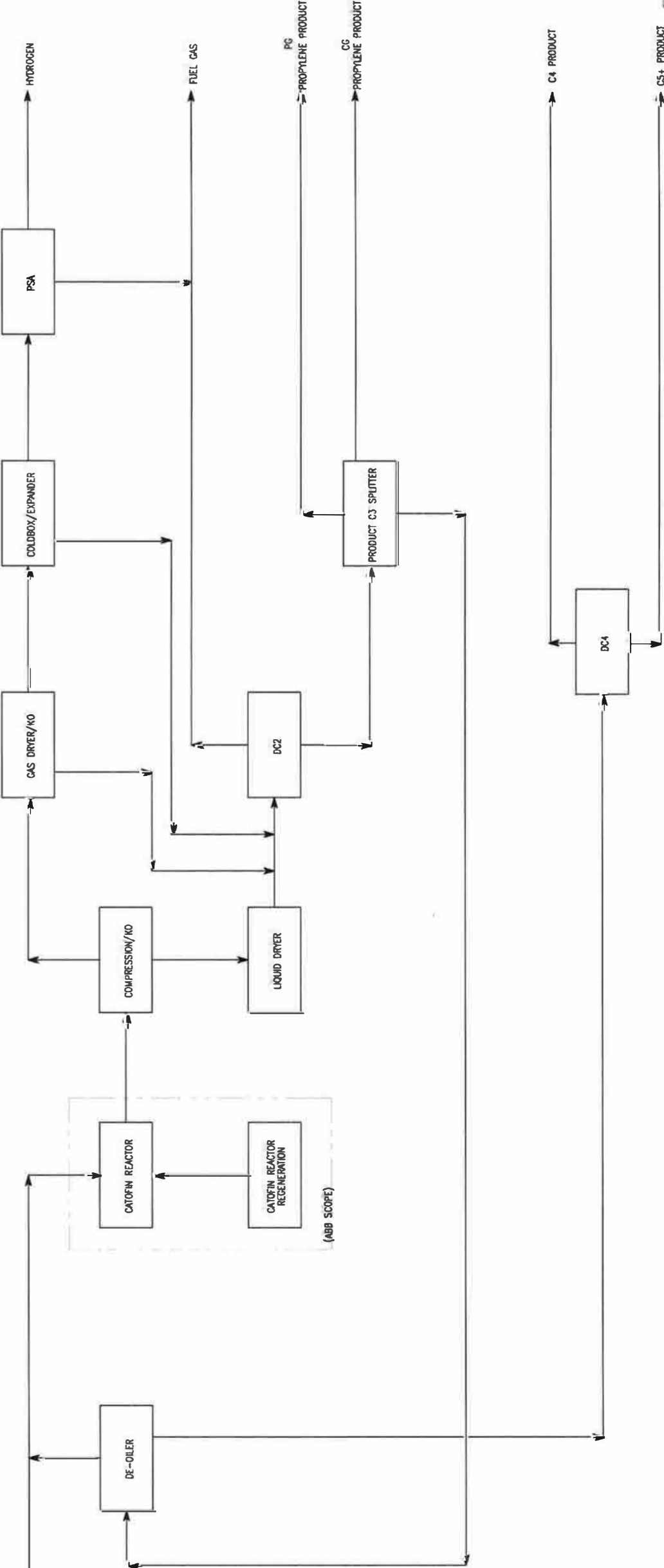
Attachment 6: Waste Area Map



Appendix 3

Process Flow Diagram

PROPANE FEED



ISSUED FOR
DATE: 07/22/09
CONSTRUCTION

JOB. NO. C-1360
SAB ENGINEERS and
CONSTRUCTORS, LTD.
HOUSTON, TEXAS

PetroLogistics
PL PROPYLENE, LLC
HOUSTON, TX

PROCESS FLOW DIAGRAM
BLOCK FLOW DIAGRAM

DWG NO	REVISION	DATE
2	08/09	ISSUED FOR CONSTRUCTION
1	01/09	ISSUED FOR DESIGN
0	07/08	ISSUED FOR DESIGN

TAB	-	AM	DATE
INS	JMS	AM	01/09
SDN	JMS	AM	07/08

SCALE
DATE
DRAWN BY

DWG. NO. A00 - D05 - 001 2

Appendix 4

EPA Daily Summary E-mails

From: [Penland, John](#)
To: [Pham, Elizabeth](#); [Thapa, Sandesh](#); [Talton, Adolphus](#); benji.maxwell@invista.com
Subject: Daily Summary for FY2022 RCRA CEI - Invista Houston, TX (TXD096035274) - October 4, 2022
Date: Tuesday, October 4, 2022 11:43:50 PM
Attachments: [cbi form RCRA 2-19-20.pdf](#)

All, Here is a summary of my notes from today's inspection. If there are any errors or omissions please let me know.

Introduction

During the week of October 3, 2022, I, John Penland, will be conducting an unannounced inspection of the Invista petrochemical facility located at 9822 La Porte Freeway in Houston, Texas for compliance with the Resource Conservation and Recovery Act (RCRA). I will be assisted on this inspection by Environmental Protection Agency (EPA) inspectors Adolphus Talton, Sandesh Thapa, and Elizabeth Pham. The inspection will include walkthroughs of the facility's hazardous waste generation and management units; a review of the facility records related to hazardous waste management; and a specific evaluation of the facility's compliance with the RCRA air pollution control requirements.

Purpose

The Invista facility was targeted for inspection as part of an ongoing National Compliance Initiative for air emissions from hazardous waste management units and hazardous waste facilities located in environmental justice communities.

Inspection Attendees:

NAME	TITLE	REPRESENTING	PHONE	EMAIL
John Penland	Lead Inspector	US EPA Region 6	214-665-9717	Penland.john@epa.gov
Adolphus Talton	Asst. Inspector	US EPA Region 6		Talton.adolphus@epa.gov
Sandesh Thapa	Asst. Inspector	US EPA Region 6		Thapa.sandesh@epa.gov
Elizabeth Pham	Asst. Inspector	US EPA Region 6		Pham.elizabeth@epa.gov
Benji Maxwell	Environmental Manager	Invista	903-309-8407	Benji.maxwell@invista.com

Daily Summary

- Initial Entry to the facility – 11:15am
- Opening meeting start – 11:20am
- I presented my credentials to Mr. Maxwell and informed him that we were there to conduct an inspection of the facility under the authority of section 3007 of the Resource Conservation and Recovery Act
- We discussed the authority for the inspection – RCRA Section 3007 - For purposes of developing or assisting in the development of any regulation or enforcing the provisions of this chapter, any person who generates, stores, treats, transports, disposes of, or otherwise handles or has handled hazardous wastes shall, upon request of any officer, employee or representative of the Environmental Protection Agency, duly designated by the Administrator, or upon request of any duly designated officer, employee or representative of a State having an authorized hazardous waste program, furnish information relating to such wastes and permit such person at all reasonable times to have access to, and to copy all records relating to such wastes. For the purposes of developing or assisting in the development of any regulation or enforcing the provisions of this chapter, such officers, employees or representatives are authorized—
 - (1) to enter at reasonable times any establishment or other place where hazardous wastes are or have been generated, stored, treated, disposed of, or transported from;
 - (2) to inspect and obtain samples from any person of any such wastes and samples of any containers or labeling for such wastes.
- We discussed the purpose of EPA’s inspection – Assessment of Invista’s compliance with its requirements under RCRA, including, but not limited to, the requirements for: waste determination and counting; waste marking; waste container management; use of the hazardous waste manifest; emergency planning; personnel training; and air pollution control requirements for hazardous waste units.
- Discussed the right of Invista to assert a Confidential Business Information claim for records requested by EPA (see attachment)
- Discussed the process for transferring electronic records – EPA has set up a Microsoft OneDrive folder with access limited to the inspection participants.
- Discussed the inspection process – the inspection will be conducted October 4 through 7, 2022. The participants will meet at the facility at 9:30am each day to conduct the onsite portion of the inspection and discuss the findings of the ongoing records review. The records review will be conducted by the inspectors independently offsite throughout the week. Daily summaries will be provided by the inspectors at the end of each day to ensure a clear communication of questions and findings. The meeting Friday, October 7, 2022 will be reserved for a closing conference, where EPA will summarize the overall findings of the inspection to that point and provide a plan for concluding any unfinished evaluation.
- Initial request for compliance records, including:
 - Hazardous waste notification form: 8700-12 or equivalent (NOR)
 - A current Hazardous Waste Contingency Plan including records of distribution
 - Facility Maps identifying solid waste management units, if available
 - A facility process diagram if available
- Facility waste profiles for any solid waste generated since 2019. Include documentation relevant to the waste determination made for each waste (i.e. analytical reports or documentation to support generator knowledge)

- o Any Hazardous Waste Manifests since 2019 not previously uploaded to E-manifest
- o Any currently effective contract or agreement between the facility and any waste management company or TSDF
- o Facility SOPs related to the generation or management of hazardous waste
- o RCRA Unit inspection records since 2019 for tanks and container storage areas
- o Currently effective CAA Title V and NSR permits for hazardous waste management units

- Facility Walkthrough
 - Control Room and Laboratory
 - o No waste present
 - WMU 036
 - o One Vacuum box containing zeolite waste
 - Requested Texas waste code and profile number
 - WMU 001
 - o One 55-gallon drum quench oil rags with benzene
 - Requested Texas waste code and profile number
 - WWTU
 - o No significant observations
 - o No waste present
 - WMU 023
 - o No significant observations
 - WMU 037
 - o No hazardous waste present
 - WMU 038
 - o No hazardous waste present
 - SAA -1
 - SAA-5
 - o No significant observations
 - SAA-4
 - o No significant observations
 - No significant observations

Region 6 - Enforcement & Compliance Assurance Division

INSPECTION REPORT

- Catalyst building
 - Building listed in NOR as a tank. Need to review for applicability of Containment building standards
 - 2 rolloff containers of chromium ppe
 - Need profile and Texas waste code
 - Process uses screens to separate metal bearing catalyst from inert clay catalyst beads
 - Facility has conducted chemical analysis of these materials and will provide documents for review
- Unknown container
 - Identified on container with unknown contents near vessel 4022-JB in the effluent structure
- **Departed Facility at approximately 3:00pm**

Topics for discussion on September 21, 2022

- o Waste Profile Review
- o Facility Process discussion

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From: [Penland, John](#)
To: benji.maxwell@invista.com; [Pham, Elizabeth](#); [Thapa, Sandesh](#); [Talton, Adolphus](#)
Subject: Daily Summary for FY2022 RCRA CEI - Invista Houston, TX (TXD096035274) - October 5, 2022
Date: Wednesday, October 5, 2022 11:45:31 PM

All, Here is a summary of my notes from today's inspection. If there are any errors or omissions please let me know.

Inspection Attendees:

NAME	TITLE	REPRESENTING	PHONE	EMAIL
John Penland	Lead Inspector	US EPA Region 6	214-665-9717	Penland.john@epa.gov
Adolphus Talton	Asst. Inspector	US EPA Region 6		Talton.adolphus@epa.gov
Sandesh Thapa	Asst. Inspector	US EPA Region 6		Thapa.sandesh@epa.gov
Elizabeth Pham	Asst. Inspector	US EPA Region 6		Pham.elizabeth@epa.gov
Benji Maxwell	Environmental Manager	Invista	903-309-8407	Benji.maxwell@invista.com
John Swanson		Invista		
Nikesh Patel Tricia James Erin Thornton		Invista Invista Invista		

Daily Summary

- Inspection Start – 1000
- Review of Daily Summary from October 4, 2022
 - Unmarked drum from effluent structure is class 2 liquid waste
- Facility Process Overview
 - Propane Dehydrogenation process
 - Spent Catalyst is generated from the reactors
 - Catalyst has a 3 year lifespan
 - Consists of Chromium catalyst beads, alumina chips, and support media
 - Spent due to decreased reactivity
 - Molecular sieve drying agent from Liquid and Gas Dryers
 - 10 year lifespan
 - Class 1 non-hazardous waste.
 - WWTU
 - Spent Carbon

- Equova for regeneration
 - Zeolite
 - Contaminated with benzene due to presence of benzene in the C5+ product stream
 - Frequency?
 - Catalyst Reclamation
 - Alumina Chips
 - reclaimed and returned to process
 - Spent chromium catalyst beads
 - Disposed as hazardous waste
 - Tank Bottoms
 - Tank bottoms generated periodically from tanks 2302 and 2304
- HSM applicability discussion
 - Catalyst reclamation conducted under exclusion 40 CFR 261.4(a)(23)
 - Previously managed as hazardous waste
 - Notification submitted to TCEQ prior to each reclamation campaign (every 3 years)
 - Contained by means of containment building and cubic yard bags
- Review of document productions
 - Contingency Plan received – need distribution record and ERP sections incorporated by reference
 - Waste management SOP received
 - Waste profile records – will need rolling production. Timeline to be determined
 - Maps and diagrams received
 - Waste Unit Inspection records received
 - Discussed Training record review procedure – please refer to 40 CFR 262.17(a)(7)
 - A list of personnel will be provided on October 6
- Departed Facility at approximately 2:00pm

Topics for discussion on October 6, 2022

- Inspection of the Catalyst Reclamation Building
- Discussion of contingency plan
- Discussion of Waste Management related SOPs
- Discussion of Training Records request personnel list
- Discussion of Facility inspection Records

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From: [Penland, John](#)
To: [Pham, Elizabeth](#); [Talton, Adolphus](#); [Thapa, Sandesh](#); benji.maxwell@invista.com
Cc: [Yurk, Jeffrey](#)
Subject: Daily Summary for FY2022 RCRA CEI - Invista Houston, TX (TXD096035274) - October 6, 2022
Date: Friday, October 7, 2022 8:46:19 AM

All, here is a summary of my notes from today's inspection. If there are any errors or omissions, please let me know.

Inspection Attendees:

NAME	TITLE	REPRESENTING	PHONE	EMAIL
John Penland	Lead Inspector	US EPA Region 6	214-665-9717	Penland.john@epa.gov
Adolphus Talton	Asst. Inspector	US EPA Region 6		Talton.adolphus@epa.gov
Sandesh Thapa	Asst. Inspector	US EPA Region 6		Thapa.sandesh@epa.gov
Elizabeth Pham	Asst. Inspector	US EPA Region 6		Pham.elizabeth@epa.gov
Benji Maxwell	Environmental Manager	Invista	903-309-8407	Benji.maxwell@invista.com
Nikesh Patel		Invista		
Erin Thornton		Invista		
Sheli Muack	Process Engineer	Invista		

Daily Summary

- Inspection Start – 0945
- Review of Daily Summary from October 5, 2022
 - Zeolite batches changed every two months
- Catalyst Waste storage and reclamation
 - Waste management Unit 41
 - Supersacks and rolloff containers used for the storage of waste catalyst.
 - All containers labeled and dated
 - One small area of soil discoloration observed. Discoloration was yellow-green in color and located near a supersack with green discoloration evident on the bag. Since constituent of concern is chromium the facility will need to evaluate this as a potential spill of waste.
 - Supersacks of unprocessed waste catalyst present in area

- A lack of aisle spacing prevents full access to the supersacks for a complete evaluation
- Catalyst support media was seen on the ground in the area but we did not identify any catalyst
- Waste management unit 39
 - The containment building housing the reclamation process and catalyst blending units also serves as an accumulation location for supersacks of waste catalyst.
 - All containers were labeled, dated, and in good condition at the time of this inspection
- Containment building dust collection system
 - Dust from the catalyst process is controlled by a cartridge dust collector.
 - The dust is accumulated in an attached supersack
 - A small spill of dust was identified near the dust collector on the concrete pad
- Facility Inspection Records
 - The facility inspection records reviewed to date do not identify supersacks located in either unit 39 or 41. This includes dates where the catalyst process was ongoing and waste supersacks were evidently present in the units.
- Review of document productions
 - Contingency Plan received – may need additional references including SPCC plan. Specifically discussed references are related to emergency equipment descriptions and locations
 - Waste management SOP received
 - Waste profile records – will need rolling production. Timeline to be determined
 - Maps and diagrams received
 - Waste Unit Inspection records received
 - Discussed Training record review procedure – please refer to 40 CFR 262.17(a)(7)
 - Requested training records for specific employees
- Departed Facility at approximately 3:00pm

Topics for discussion on October 7, 2022

- Inspection closing conference

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