UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region 1
5 Post Office Square, Suite 100
Boston, MA 02109-3912

September 6, 2024

Jon Reid, Environmental, Health, and Safety Manager
Americas Styrenics, LLC
1761 Route 12
Gales Ferry, CT, 06335

Re: U.S. EPA-Region 1 Inspection Report of Americas Styrenics, July 9-10, 2024

Dear Mr. Reid:

In accordance with current policy, I am providing you with a copy of the final inspection report summarizing observations made during the July 9-10, 2024, Compliance Evaluation Inspection (CEI) of your facility.

This inspection was conducted under the authority of RCRA.

Please contact me at 617-918-1309 or **maisano.ryan@epa.gov** if you have any questions.

Sincerely,

RYAN MAISANO
Digitally signed by RYAN MAISANO
Date: 2024.09.06 15:34:03 -04'00'

Ryan Maisano, Physical Scientist
EPA Inspector, Waste and Chemical Compliance Section

cc: Joesph Schiavone, CT DEEP

Disclaimer: Unless otherwise noted, this report describes conditions at the facility/property as observed by EPA inspector(s), and/or through records provided to and/or information reported to EPA inspector(s) by facility representatives and as understood by the inspector(s). This report may not capture all operations or activities ongoing at the time of the inspection. This report does not make final determinations on potential areas of concern. Nothing in this report affects EPA's authorities under federal statutes and regulations to pursue further investigation or action.

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RCRA Compliance Inspection of:

Americas Styrenics
1761 Rte 12
Gales Ferry, CT 06335

July 9-10, 2024
Date of Inspection

RYAN MAISANO
Digitally signed by RYAN MAISANO
Date: 2024.09.06 15:34:32 -04'00'

Ryan Maisano, Physical Scientist
Waste and Chemical Compliance Section

September 6, 2024
Date Inspection Report Approved

O'Donnell, Mary Jane
Digitally signed by O'Donnell, Mary Jane
Date: 2024.09.06 12:02:28 -04'00'

Mary Jane O'Donnell, Manager
Waste and Chemical Compliance Section

September 6, 2024
Date Inspection Report Finalized

September 6, 2024
Date Inspection Report Transmitted to Facility

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RCRA HAZARDOUS WASTE INSPECTION REPORT

Date: **September 6, 2024**

From: **Waste and Chemical Compliance Section**

Thru: **Lisa Papetti, Senior Enforcement Coordinator**
Waste and Chemical Compliance Section

To: **RCRA Enforcement File**

Subject: Environmental Protection Agency ("EPA") Resource Conservation and Recovery Act ("RCRA") Inspection of Americas Styrenics.

I. GENERAL INFORMATION

Facility Name:	Americas Styrenics
Facility EPA Identification Number:	CTD001159730
Type of Inspection *(CEI, FCI, CSI, etc.):*	Compliance Evaluation Inspection
Name(s) of inspector(s):	Ryan Maisano Drew Meyer
Date(s) of inspection:	July 9-10, 2024

II. SITE INFORMATION

Site Name:	Americas Styrenics, LLC
Complete Street Address:	1761 Route 12 Gales Ferry, CT 06335
Complete Mailing Address:	1761 Route 12 Gales Ferry, CT 06335

Contact(s) *(Name, Title, Phone Number, Email)*	Jon A. Reid EH&S Engineer 840-440-7862 jreid@amsty.com
Date of latest Notification of Hazardous Waste Activities *(per RCRAInfo)*:	02/29/2024
Date of first Notification of Hazardous Waste Activities *(per RCRAInfo):*	01/01/1980
Date established at present location:	Americas Styrenics around 2008. Facility was owned by Dow Chemical from 1950s.
NAICS Code:	325211 Plastics Material and Resin Manufacturing
Current Property Owner:	Cashman Dredging & Marine Contracting Co., LLC
Current Operator:	Americas Styrenics, LLC
Waste codes generated *(per most recent Biennial Report)*:	D-Codes: D001 D003 D004 D022 F-Codes: F001 F002 F003

NOTIFICATION IN RCRAInfo:

☒ TSDF
☒ LQG
☐ SQG
☐ VSQG
☐ Universal Waste Handler (circle one): SMALL/LARGE
☐ Burner/Blender
☐ Transporter
☐ Receiving waste from off-site (if so, describe):
☐ Generator of State Waste
☐ Non-Notifier
☐ Other:

Facility Operating Status if different from above: N/A

III. IN-BRIEF

Credentials Presented: Yes ☒ No ☐
Attendees (*names/titles*):

EPA:
Ryan Maisano, Physical Scientist
Drew Meyer, Environmental Scientist

Americas Styrenics:
Jon Reid, EH&S Engineer
Steven Lake, Plant Manager

During the inspection in-brief the EPA inspection team provided an overview of the inspection locations and requested paperwork to be reviewed. The EPA inspection team provided the Small Business Resources Information Sheet to the facility personnel. The inspection team briefly discussed handling Confidential Business Information (CBI). The inspection team requested to be advised if or when any CBI was provided. Representatives from Americas Styrenics stated most of the areas hazardous waste was located did not have areas of CBI.

Jon Reid, EH&S Engineer and Steven Lake, Plant Manager provided an overview of the facility's history, process, waste generation, training of personnel, and personal protective equipment (PPE) required while in the facility.

Number of Employees:	31 employees
Size of Facility:	Total Property 158 Acres Americas Styrenics Leases 31 Acres
Length of Facility at Location:	Americas Styrenics began operating at this site around 2008
Operating Hours:	24 hours a day
Number of Shifts:	2-twelve-hour shifts. 4 groups of employees rotate shifts.
Primary Emergency Coordinator:	Steven Lake-Plant Manager
Alternate Emergency Coordinator:	Jon Reid-EH&S Engineer
Type of Operation:	Polystyrene manufacturer

Facility Description*:*

America's Styrenics is a manufacturer of polystyrene and styrene monomers. The company was originally founded as a joint venture between The Dow Chemical Company and Chevron Philips. America's Styrenics was transferred the EPA ID number when it leased land from Dow Chemical in 2008. In 2010, Dow Chemical sold the site to Styron, LLC. In 2022, the site was purchased by Cashman Dredging and America's Styrenics has leased the land since 2008. Cashman Dredging operates their offices on the property.

America's Styrenics manufactures plastic polystyrene pellets to sell to various companies that produce plastic spoons, water bottles, lab products, takeaway containers, CD/DVD jewel cases, etc.

The facility operates one, HWAA (hazardous waste accumulation area) and 5 SAAs (satellite accumulation area). The HWAA is located outside and under cover. Universal waste is stored in the Warehouse and includes batteries, e-waste, and bulbs.

The facility holds a RCRA permit issued by Connecticut Department of Energy and Environmental Protection because the site includes a hazardous waste tank and a boiler and industrial furnace (BIF). The current permit is in effect until September 25, 2027.

In October 2020, a spill of styrene was reported to CT DEEP. The spill was from loose packing on a valve on E-Train.

Veolia Environmental Services is used by the facility to transport and pick up hazardous and non-hazardous waste.

Process Description:

America's Styrenics has two manufacturing plants("trains") labeled by the facility as the E-Train and G-Train. Both trains produce polystyrene plastic pellets for the plastics industry. This is mainly done by compounding and heating. The biggest difference between the two trains is the E-Train can accept recycled plastic.

E-Train:
The E-Train process starts with styrene storage tanks delivered either by train, truck, or boat. The E-Train can also accept used polystyrene that has been shredded as raw material in the process. This is accepted at the facility in the form of used clothes hangers. The facility includes a dock which can receive chemicals. The product then goes through PCR filters to a feed tank. The feed tank is used to feed the three reactors that heat the product to 120° C in the first reactor, 140° C in the second reactor, and 160 C in the third. These three reactors are in sequence. Once the product flows through the three reactors it travels to two de-volatilizers that are in sequence. The first de-volatilizer is held at a temp of 150° C to 170° C and the second de-volatilizers is held to 280° C. From the de-volatilizers, the material is then cooled in a water bath. After the material is cooled it is then cut and screened. The material is then stored in silos waiting for pickup by truck or train.

G-Train:

The G-Train has a similar process to the E-Train and produced the same plastic pellets. It was not engineered to receive the recycled shredded clothes hangers. The G-Train starts with the same product storage tanks as the E-Train. The first step is the boiling reactor that reaches a temperature of 40 C. From there the product goes to a de-volatilizer which is at 170° C and then another de-volatilizer at 280° C. Dyes are then added, if required. The product is then cooled by water bath, cut, and screened. Finally, the pellets are stored in silos for pickup by truck or train.

Tank V-1910 and BIF:
The Tank V-1910 is the hazardous waste storage tank that is used to store spent Ethylbenzene/styrene mix called tar. This tank stores the tar that does not go back into the process. Tar, along with heat, is used to start the reaction to create the polystyrene pellets. Tank V-1910 is 2,700 gallons and directly feeds one of the two BIFs. The other BIF is fueled by natural gas. The heat from the BIFs is used in the process of the plastic pellet manufacturing.

CT DEEP RCRA Part B Permit Number DEEP/HWM-072-001

Waste Management Units Covered by Permit	Observations
Hazardous Waste Storage Tank V-1910	The hazardous waste storage tank has an operating capacity of 2,700 gallons. It has a design capacity of 3,000 gallons.
BIF-Boiler Unit A	Struthers Wells Boiler is permitted to burn 53.6 gallons per hour. The BIF is used to burn the excess process styrene waste. The BIF has the capacity to burn natural gas and uses it as a startup fuel and to maintain temperatures needed for the styrene reactions, if not waste feed.
Comments:	The BIF and hazardous waste storage tank appears to meet the operating conditions of the CT DEEP Part B Permit. The permitted waste codes managed by the tank and BIF are D001 and D018.

QC Lab:
The QC Lab is located in the G-Train building and conducts various analyses of raw material and finished plastic pellets. Waste generated in the lab includes used PPE, cleaning rags, and contaminated glassware. SAAs in the QC Lab includes drums for PPE and small containers in the fume hood for liquid waste.

Types of Waste Handled:

☒ Ignitable (D001) ☒ F or K listed wastes ☒ Used Oil
☐ Corrosive (D002) ☐ P or U listed wastes ☐ State Regulated Wastes
☒ Reactive (D003) ☐ Precious Metals ☐ Unknown Wastes
☒ TCLP (D004 – D043) ☐ Hazardous Scrap Metals
☒ Universal Wastes (Types: Spent mercury-containing lamps, used electronics, and various types of batteries)
☐ Other (specify):

Comments (descriptions and constituents if known):
Handling/Management Methods:

☒ Containers
☐ Wastewater Treatment ("WWTU")
☐ Drip pads
☒ Tanks – aboveground
☐ Tanks – underground
☐ Containment building
☒ Hazardous Waste Storage Areas(s) (HWSA(s))
☒ Satellite Accumulation Areas (s) (SAA(s))
☒ Other-hazardous waste fuel is burned in a BIF unit.

Comments:

IV. PHYSICAL INSPECTION

The walkthrough started on July 9, 2024, the EPA inspection team was led around the facility by Jon Reid and Steven Lake from the facility. The inspection team donned safety glasses, hard hats, and fire-resistant bib overalls.

WASTES OBSERVED:

Waste Stream	EPA/State Waste Code	Container	Location	Comments
Waste Flammable Liquid, UN1993, Styrene, 3, II, RQ 6/13/2024	D001	55-gallon white drum	HWAA	
Waste Flammable Liquid, UN1993, Styrene, 3, II, RQ 6/25/2024	D001	55-gallon white drum	HWAA	
Non-Regulated Non-DOT Used Oil 6/27/2024		55-gallon white drum	HWAA	Container is marked with words "used "oil.
Universal Waste-E-Waste 6/3/2024		1 CY cardboard box	Warehouse	
Universal Waste-batteries		6-white buckets	Warehouse	
Spent mercury-containing lamps		2-cardboard boxes	Warehouse	Dates 4/3/2024-4/13/2024
Tar-Styrene/Ethylbenzene	D001, D018	V-1910 White 2,700-gallon tank	Outside	
Hazardous Waste	F001, F002	30-gallon	Lab	

Solid, NA3077 Lab contaminated PPE (methylene chloride, methanol), 9, II		black drum		
Hazardous Waste Empty Aerosols, Flammable, UN1950	D001	20-gallon blue drum	Lab	
Hazardous Waste Flammable Liquid, Toxic, UN1992, Styrene, methanol, chrome, 6.1, II	D001, F002	5-gallon clear container	Lab	In Lab Hood
Hazardous Waste, Waste Flammable liquid, Tetrahydrofuran, mineral oil, 3, II	D001, F002	5-gallon clear container	Lab	In Lab Hood
Hazardous Waste, Waste Organic Peroxide Type F Solid, Tert-butylperoxy cyclohexane, 5.2	D003, D001	25-gallon blue drum	Initiator Building 38	
Hazardous Waste, Waste Flammable liquid, UN1993, Styrene, Ethyl Benzene, 3, II	D001, D018	55-gallon white drum	Tank Farm	
Hazardous Waste, Waste Solids containing flammable liquid, UN3175, Styrene, Ethyl Benzene, 4.1, II	D001	30-gallon black drum	Tank Farm	
Hazardous Waste Solid, NA3077 methylene chloride, methanol, 9, II	F001, F002	25-gallon blue drum	Tank Farm	
Waste Flammable Liquid, UN1993, Styrene, 3, II	D001	55-gallon white drum	Tank Farm	

HAZARDOUS WASTE DETERMINATIONS

Requirements	**Observations *(Yes/NO/NA-Explain if needed)***
Determination conducted for all waste streams, by what method	Yes
Determination updated, as needed (documentation on-site)	Yes, most recent determination was done for all hazardous waste was 4/15/2024.
Comments:	EPA inspectors were provided a Waste Determination log that includes the name of the waste stream, tracking number, process, results, date of most recent determination, and person making the determination.

IGNITABLES/REACTIVES/INCOMPATIBLES

Requirements	**Observations *(Yes/No/NA-Explain if Needed)***
Ignitable & reactive wastes separated from sources of ignition or reaction	Yes
No smoking signs (for ignitable & reactive wastes)	Yes, "No Smoking" signs are posted in the hazardous waste accumulation area.
Separation of all incompatibles (either incompatible wastes or wastes with incompatible containers)	Yes
Storage > 50 feet from property line	Yes
Comments:	

PREPAREDNESS & PREVENTION

Requirements:	**Observations *(Yes/No/NA-Explain if Needed)***
Wastes handled in a manner to minimize the potential for a fire, explosion or a release	Yes
Arrangements with local authorities	Yes
Immediate accessible to internal communications/alarm systems	Yes
Telephone/hand-held two-way radio	Yes
Emergency equipment (fire extinguishers, spill control decontamination equipment)	Yes
Equipment maintenance	Yes
Access to emergency equipment	Yes
Adequate aisle space (each area)	Yes
Adequate source of water in the event of a fire (federal regulations)	Yes
Comments:	Financial assurance and closure costs were reviewed during the records review. The last

	financial was completed on February 29, 2024, by Deloitte. Closure costs are estimated to be around $226,409. Financial assurance for closure was also performed by Deloitte and the mechanism was a financial test.

PRE-TRANSPORT REQUIREMENTS

Requirements:	**Observations *(Yes/No/NA-Explain if Needed)***
Packaging	Yes
Labeling (if applicable, DOT hazard class)	Yes
Marking (words "Hazardous Waste", generator information if being shipped)	Yes
Contents described	Yes
Proper DOT shipping name	Yes
Comments:	

SATELLITE ACCUMULATION

Requirements:	**Observations *(Yes/No/NA-Explain if Needed)***
Approximate number of satellite accumulation areas	Five
Amount of waste per waste stream per satellite accumulation area (describe each area)	See wastes observed list.
Appropriate amount of waste storage in SAA	Yes
Containers labeled and marked with contents described	Waste from instruments in lab was not labeled as hazardous waste (See Photo #26).
SAA at or near point of generation	Yes
Containers closed when not actively adding or removing waste	All containers observed were closed
Condition of containers	All containers observed appeared to be in good condition
Impermeable base	Yes
Secondary Containment	Yes, secondary containment in Tank Farm appears to not be sealed
Spill Control material	Yes
Comments:	

CONTAINER STORAGE – HWSA

Requirements:	**Observations *(Yes/No/NA-Explain if Needed)***
Number of container storage areas	One
Location(s)	Outside

Containers marked and contents described	Yes
Containers marked with accumulation start date	Yes
Approximate number & sizes of containers: Description:	Two-55-gallon,Hazardous waste drums-Waste Styrene D001, One non-hazardous waste drum-Waste Oil
Floor drains/sumps	None observed
Containers closed when not actively adding or removing waste	Yes
Condition of containers (leaks, ruptures, dents, corrosion, heat, pressure)	Containers appeared to be in good condition
Impermeable base	Yes
Secondary Containment	Yes
Incompatibles separated by e.g., dike/wall	Yes
Storage less than 90 days or 180 days for SQG (hazardous waste)	Yes, all dates observed were within 90 days.
Spill Control material	Yes, spill control equipment was observed.
Comments:	

WASTE TANKS

Requirements:	**Observations *(Yes/No/NA-Explain if Needed)***
Tank inventory/description (note type - above/underground, location, age, construction (materials), ancillary equipment, capacity & waste type(s)	Yes, V1910(spent tar/styrene) tank is managed as hazardous waste
Adequate secondary containment for tanks and ancillary equipment. Adequate leak detection system (including ancillary equipment).	Yes
Describe corrosion protection system	N/A
Special requirements for ignitable and reactive waste	Yes, flammable and no smoking signs were observed. See Photos 15 and 17.
Labeling - Hazardous waste tanks, words "Hazardous Waste" and description of contents	Yes, see Photo 15
Tanks marked with accumulation start date, Storage less than 90 days	Storage is less than 90 days. Tank feeds BIF
Overflow/High Level alarms	Yes
Flow cut-off equipment	Yes
Certification of major repairs to tank	Yes. Tank was replaced in 2000. PE certification was reviewed.
Evidence of releases/leaks, describe	No
Release reported, date (if known)	None per facility
Any out of service tanks, describe	No
Existing Tank Systems (installed before July 14, 1986) - written tank integrity assessment on-site (P.E. certified)	Old and new tank integrity assessment was reviewed by the inspection team.

Does assessment address all the required items	Yes
New Tank Systems (installed after July 14, 1986) - written tank design, construction/installation assessment on-site (P.E. certified)	P.E. certification for new tank was reviewed by the inspection team
Does assessment address all required items	Yes
Documented installation & tightness test on-site	Yes
Comments:	Stainless steel tank (V1910) and associated piping is inspected daily.

HAZARDOUS WASTE MANAGEMENT IN OTHER TYPE(S) OF UNITS

Requirements	**Observations *(Yes/NO/NA-Explain if Needed)***
Describe any other type of unit not described above, which is used for the storage or treatment of hazardous waste(s). Provide details of the unit construction and operation, wastes managed, amounts, frequency, and relevant procedures	The facility uses a BIF to treat the tar (spent styrene waste). The heat from the BIF is used back into the process. Two heaters were observed during the inspection. One was fueled by tar and the other was fueled by natural gas (See Photo 14).
Does the operation of the unit listed above comply with all relevant RCRA standards	Yes
Comments:	

USED OIL

Requirements:	**Observations *(Yes/No/NA-Explain if Needed)***
Does the facility generate used oil	Yes
Is the generator's used oil mixed with other waste(s)	No, used oil is managed as non-hazardous waste and labeled with the words "used oil."
What type of waste(s) is used oil mixed with ☐ Listed ☐ Characteristic ☐ Non-hazardous waste	N/A
If mixture is with characteristic hazardous waste, is the combined waste tested for characteristics	N/A
Testing for rebuttable presumption	Yes
Total halogen content determination	Yes
Total halogen content determined by ☒ testing or ☐ generator knowledge	
Are the total halogens ☒ less than 1,000 ppm or ☐ greater than 1,000 ppm	
F-listed halogen constituents above 100 ppm	No
Used oil managed according to applicable standards	Yes
Is used oil accumulated on-site in: ☒ Container(s) ☐ Aboveground tank(s) ☐ Underground tank(s)	Used oil in managed in 55-gallon drums and stored near the HWAA at the time of the inspection (See Photo 5).

Describe type, method, and condition	Used oil was observed in white, 55-gallon drums. The condition of the drum was closed, and it appeared in good condition.
Comments:	

INSPECTION SCHEDULE AND LOG

Requirements:	**Observations *(Yes/No/NA-Explain if Needed)***
Does the facility claim inspections are conducted (tank and/or container inspections)	Yes, daily inspections.
Written inspection schedule	Yes
Inspection log (adequacy of contents: date, time, items inspected, corrective actions, identity of inspector, signatures, etc.)	Yes
Documentation	Yes, documentation is stored in a data base called Skybridge.
Appropriate tank inspections, including containment, level detection, ancillary equipment	Yes
Appropriate treatment equipment inspections	Yes
All loading/unloading areas subject to spills (when in use)	Yes
All hazardous waste storage areas (satellite and < 90 day where applicable), at all required frequencies	Yes
All Safety and emergency equipment (monthly) where necessary	Yes
Tanks cathodic protection (within six months, then yearly) where necessary	N/A
Comments:	

CONTINGENCY PLAN

Requirements:	**Observations *(Yes/No/NA-Explain if Needed)***
Plan on-site	Yes
Date of plan	January 2023
Emergency Coordinator(s) name, address, home, and office phone numbers	Contingency Plan lists “shift leaders” as emergency coordinators.
Number to call to report emergency (internal)	Yes
Plan to local authorities with proof of distribution (police, fire, hospital, emergency response teams)	Yes, recent plan update was submitted to local authorities.
Emergency procedures (fire, explosions, releases/spills)	Yes
Emergency coordinator(s) on-site or within a short driving distance of the company at all times	Yes

Emergency equipment list location, description, capabilities	Yes
Evacuation plan (signal, primary and alternate routes)	Yes
Has the contingency plan been amended	Yes
All remaining applicable requirements addressed	Yes
Comments:	Contingency plan does not list the hazardous waste tank as an area where hazardous waste is stored.

PERSONNEL TRAINING RECORDS

Requirements:	**Observations *(Yes/No/NA-Explain if Needed)***
All facility personnel that require training identified	Yes
All facility personnel that require training have been properly trained	Yes
New employees trained within 6 months and documentation of OST	Yes
Annual refresher training for all employees requiring training	Yes
Last annual training date for each employee	Yes
Written description of training course	Yes
Adequate training for all employees	Yes
Job title, job description, name of employee, and description of required training	Yes
Job duties related to hazardous waste	Yes
Records maintained on-site until closure or three years for former employees	Yes
Comments:	

AIR EMISSIONS - SUBPART BB

Requirements:	**Observations *(Yes/No/NA-Explain if Needed)***
Does the generator have equipment (valves, pumps, compressors, flanges, pressure relief devices, sampling connection system, or open-ended valves or lines) that contacts hazardous waste with greater than 10% organic concentration (describe)	Yes, the hazardous waste tank, associated piping, and BIF all contact hazardous waste. All of this piping and tanks are tagged and monitored. See photos 19-21.
The facility maintains a Subpart BB plan	Yes
Does the generator claim that any of this equipment is exempt from Subpart BB	No
If an exemption is claimed, does the generator	N/A

have documentation to support this claim, in accordance with 265.1064(k)	
Does the facility have a list of each piece of equipment that is subject to Subpart BB with a listing of the type of service for each piece of equipment	Yes
All required equipment marked in such a manner that it can be distinguished readily from other pieces of equipment	Yes
Did the facility mark/label all compliance monitoring points	Yes
Pumps in light liquid service checked by visual inspection each calendar week for indications of liquids dripping from the pump seal	Yes
Air monitoring conducted in accordance with Reference Method # 21	Yes
Does the facility designate any pump, compressor or valve to be operating at no detectable emissions (i.e., less than 500 ppm above background)	Yes
Pumps, compressors, or valves operating in compliance with the requirements of 265.1052(e), 265.1053(i) and/or 265.1057(f)	Yes
Pumps or valves in light liquid service NOT designated as operating at no detectable emissions monitored monthly to detect leaks?	N/A
Records of monthly air monitoring inspections of each pump or valve in light liquid service present	N/A
Are leaks (<10,000 ppm) from each pump or valve repaired on the 5-day/15-day requirement	Yes
Describe any pumps that are exempt from 265.1052	N/A
Does the facility have a record of each leak detected under the requirements of 265.1052, 265.1053, 265.1057 and 265.1058	Yes
Describe any equipment in heavy liquid service	Hazardous waste tank(V1910), associated piping, and BIF all contact liquid hazardous waste
Compliance status of any equipment in heavy liquid service	Equipment is in compliance.
All associated records for the Subpart BB program maintained.	Yes
Comments:	

AIR EMISSIONS - SUBPART CC

Tanks:

Requirements	**Observations *(Yes/NO/NA-Explain if Needed)***
Generator manages hazardous waste with volatile organic concentration > 500 ppm/wt in tanks	Yes
Claims of any exemptions from the requirements of this subpart	No
Comments:	

If the facility manages hazardous waste with volatile organic concentrations equal or greater than 500 ppm/wt **in tanks**, complete the following table for the tanks managing the waste.

TANK ID	TANK CAPACITY (gallons)	WASTE TYPE	DESIGN (fixed or floating roof)	LEVEL OF CONTROL (1,2 or 3)
V1910	2,700	Sytrene, Ethylbenzene	Fixed	1

Tanks continued:

Requirements:	**Observations *(Yes/No/NA-Explain if Needed)***
Facility maintains a Subpart CC Plan	Yes
Facility has conducted appropriate waste determinations as required by 265.1084	Yes, waste determinations are updated annually. Last waste determinations were completed 4/15/2024
For a fixed-roof tank using Level 1 Controls, did the facility determine the maximum vapor pressure of the waste	Yes
Facility records of the results of the maximum vapor pressure determination	Yes
Did the facility inspect the fixed roof and its closure devices immediately upon putting the tank into service and at least once per year	Yes
In the event of a defect involving a tank system, did the facility make first repairs no later than 5 calendar days after detection and complete repairs no later than 45 calendar days after detection	Yes
If a floating roof tank is used, has the facility notified the Regional Administrator 30 days prior to a planned inspection and as soon as possible in the case of an unplanned inspection	N/A
Compliance with operating standards of 265.1085	Yes

Compliance with monitoring standards of Subpart CC	Yes
Compliance with record keeping standards of 265.1090	Yes
Comments:	

Containers:

Requirements:	Observations *(Yes/No/NA-Explain if Needed)*
Does the generator manage in containers (>26 gallons in size, non-satellite) hazardous waste with volatile organic concentrations equal or greater than 550 ppm/wt	All hazardous waste is managed in SAAs, V1910/BIF, or HWAA.
Do the containers meet Department of Transportation("DOT") requirements	Yes
Are the containers closed	Yes

MANIFESTS

Requirements:	**Observations *(Yes/No/NA-Explain if Needed)***
Dates/months of shipping records reviewed	July 2022-July 2024
Manifests maintained for three years	Yes
Correct EPA ID numbers used	Yes, CTD001159730 used.
All required parts completed	Yes, all appropriate copies were provided.
Correct shipping names, numbers used	Yes
Copies distributed correctly	Yes
Exception reports filed, and available for review	Not observed
Manifests used for all hazardous waste shipments	Yes
Appropriate copy(ies) on-site:	Yes
Comments:	

LAND DISPOSAL RESTRICTIONS

Requirements:	**Observations *(Yes/No/NA-Explain if Needed)***
Generator has determined whether the waste meets treatment standard(s)	Yes
If the waste or contaminated soil **does not meet** the treatment standard(s), the generator has sent a one-time written notification (or subsequent notification(s) if the waste changes) to each receiving facility ***or*** the generator has sent individual notification(s) for each shipment of waste	Not observed
If the waste or contaminated soil **meets** the	Yes

treatment standard(s) at the original point of generation, the generator has sent a one-time written notification (or subsequent notification(s) if the waste changes) to each receiving facility	
The generator has identified all appropriate waste codes and/or underlying hazardous constituents (UHCs) on each shipment	Yes
The generator retained on-site a copy of each LDR documentation for 3 years	Yes
Comments:	

ANNUAL/BIENNIAL REPORT

Requirements:	**Observations *(Yes/No/NA-Explain if Needed)***
The company has completed an annual or biennial report, when/if it is required	Yes
Comments:	

UNIVERSAL WASTE

Requirements:	**Observations *(Yes/No/NA-Explain if Needed)***
Does the company/facility handle universal wastes	Yes
What universal wastes are handled/generated by the facility	Universal waste includes batteries, e-waste, and mercury containing spent bulbs.
Does the company/facility qualify as an LQH or SQH of universal waste	
Does the current handling of universal waste prevent breakage, leakage, spillage or damage that could cause leakage	Yes
Are the containers of universal waste structurally sound and compatible with the contents	Yes
Do the universal waste containers carry appropriate markings/labeling	Yes
Does universal waste meet the requirements for accumulation start date	Yes, all dates observed were less than one year.
Does the generator comply with the less than one year accumulation time limit	Yes
Is the universal waste item or container dated from the earliest receipt of the item or when first placed in the container	Yes
Does the company/facility keep appropriate manifests or shipping documents of universal wastes either received at or shipped from the	Yes

facility to a destination facility	
Are records kept for at least three years from date of receipt to or transfer from the facility	Yes
Comments:	Universal waste is located in the Warehouse.

OUT-BRIEF

List Attendees *(names/titles):*

EPA:
Ryan Maisano, Physical Scientist
Drew Meyer, Environmental Scientist

Americas Styrenics:
Jon Reid, EH&S Engineer
John Brownhill, Operations Manager

Summary of out-brief:
(include a list of areas of concern that were discussed)

The EPA inspection team provided information on RCRA inspection program process, inspection report timelines, and summary of enforcement options available to the EPA.

The out-brief was conducted on July 10, 2024, on-site before the inspection team left the facility. The inspection team provided an overview of the observations made including:

- Lab waste bottles/containers were not labeled as hazardous waste.
- Secondary containment in Tank Farm appears to not be sealed.
- Contingency plan lists emergency contacts as the "shift leaders."
- Contingency plan does not list the hazardous waste tank as an area where hazardous waste is stored.

See ATTACHMENT 1: Digital Images taken by EPA Region 1 during the inspection