

U.S. Environmental Protection Agency Region 4
61 Forsyth Street Atlanta, GA 30303
Emergency Planning and Community Right-to-Know Act (EPCRA) Inspection Report

Company Name Arclin USA, LLC SIC/NAICS 35199, 325211
Lead Inspector Name Amy Federoff Inspection Date 04/18-20/23
Inspection Team Members Mark Briggs

1. Record names and titles of the facility representatives participating in the inspection.

Name/Title Andy Smith/ HSE Manager Phone: (334) 222-7581

2. Obtain exact name and address of the facility being inspected, as well as any Parent Company information.

Facility Name: Arclin USA, LLC
Address: 14139 US Highway 84, Andalusia, Alabama
County: Covington
Owner/Operator/Parent Company (Name, Address, Phone): Arclin USA, LLC, 1000
Hotcomb Woods Pkwy Suite 342 Atlanta, GA 30076, 678-781-4410
How long owned/operated, recent sale of facility (date)? N/A

3. Obtain/review facility description.

- a. Officers' names and titles: Dan Cox/ Plant Manager
- b. Incorporation date and location: N/A
- c. Other facilities owned by the company: 12 in US and Canada
- d. Number of employees: 27
- e. Annual Corporate Sales: N/A
- f. Process Description and Process Diagrams: Resin is manufactured as a batch process in four separate kettles inside the resin manufacturing building where various chemicals including formaldehyde, phenol, urea and anhydrous ammonia are blended to create a product that can then be trucked off-site for distribution. Formaldehyde used for resin production is manufactured in a continuous on-site process located in an outdoor area separate from the resin manufacturing building. To manufacture formaldehyde, methanol is combined with oxygen (air) and a catalyst in a heated reactor. Formaldehyde formed in the reactor is cooled and diluted with water to create a 52 percent (%) solution that is then stored on site in one of four formaldehyde storage tanks ranging in size from 30,000 gallons to 50,000 gallons. The formaldehyde can also be sold directly to formaldehyde distributors. Anhydrous ammonia is delivered to the facility via tank truck and stored in a

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13,600-gallon horizontal storage tank before being pumped to an ammonia vaporizer and then into one of the resin manufacturing kettles. Other chemicals including methanol, urea and phenol are delivered to the facility by rail and all resin products are shipped off-site by truck.

g. Jurisdictional Fire Department: Andalusia FD

4. Compliance Review by Statute:

Section 312

a. Obtained chemical inventory list	<u>Y</u>	N	N/A
b. View purchase records (where applicable)	<u>Y</u>	N	N/A
c. Tier II reports to SERC, LEPC, fire dept (Haz. Chem $\geq$ 10,000 lbs)?	<u>Y</u>	N	N/A
d. Tier II reports to SERC, LEPC, fire dept (EHSs $\geq$ 500 lbs or TPQ)?	<u>Y</u>	N	N/A
e. Reviewed documentation of maximum daily amounts stored?	<u>Y</u>	N	N/A
f. Reviewed SDSs?	<u>Y</u>	N	N/A
g. Reviewed documentation of submissions?	<u>Y</u>	N	N/A
h. Has each report from the past 3 years been submitted by March 1?	<u>Y</u>	N	N/A

Section 313

i. Form R/A to State and EPA for Toxic Chemicals: Manufactured, Processed $\geq$ 25,000lbs, Otherwise Used $\geq$ 10,000 lbs	Y	N	<u>N/A</u>
j. Obtained list of 313 chemicals MPOU at the facility	Y	N	<u>N/A</u>
k. Obtained documentation of submissions?	Y	N	<u>N/A</u>
l. Has each report from the past 3 years been submitted by July 1?	Y	N	<u>N/A</u>

Additional Observations: _____

Report Prepared By:

Name (Printed): Jordan Noles

Title: Inspector

Signature: **JORDAN NOLES** Digitally signed by JORDAN NOLES
Date: 2023.07.05 14:42:12 -04'00'

Report Authorized By:

Name (Printed): Jason Dressler

Title: Chief, North Air Enforcement Section

Signature: **JASON DRESSLER** Digitally signed by JASON
DRESSLER
Date: 2023.07.05 17:52:32 -04'00'