



REGION 10

SEATTLE, WA 98101

Clean Air Act - Risk Management Program – Section 112(r)
Emergency Planning Community Right-to-Know Act – Sections 302, 311 and 312
On-site Compliance Inspection Report
Avantor Sciences, VWR International

PURPOSE

The purpose of this On-site Compliance Inspection was to determine compliance with the Clean Air Act Section 112(r) Risk Management Program and the Emergency Planning and Community Right to Know Act Sections 302, 311, and 312.

CAA Section 112(r) requires facilities that hold chemicals over threshold quantities to have a Risk Management Program. EPCRA Section 311 requires facilities that hold chemicals above the reporting threshold to submit copies of the SDSs or a list of these chemicals to the State Emergency Response Commission, the Local Emergency Planning Committee, and the local fire department. EPCRA Section 312 requires the Annual Chemical Inventory Reports (Tier II) for the current calendar year to be submitted by March 1 of the following year. The Tier II is required to be submitted to the SERC, LEPC, and fire department. EPCRA Section 302 requires any facility that has any EHS above the threshold planning quantities to notify the SERC and LEPC. LEPCs should also include the EHS(s) in their emergency response plans. Facilities covered under EPCRA Section 312 are required to indicate on the Tier II if they are subject to EPCRA Section 302 emergency planning requirements.

COMPANY INFORMATION

Name: Avantor Sciences
Mailing Address: 12350 SW Tualatin Rd. #B
Tualatin, OR, 97062
Website: aventorsciences.com

FACILITY INFORMATION

Name: VWR International, LLC.
Mailing Address: 12350 SW Tualatin Rd. #B
Tualatin, OR, 97062
Latitude/Longitude: 45.387681; -122.802810
RMP Facility ID#: 1000 0023 1661
EPCRA Tier II ID#: 62200
FRS ID#: 110018492031
EJ Concerns: Yes (94%)

CONTACT INFORMATION (RMP Implementation)

Name: Matt Lyster
Title: Service Center Manager
Phone Number: 503-404-2211
E-mail: matthew.lyster@aventorsciences.com

EMERGENCY CONTACT INFORMATION

Name: Matt Lyster
Title: Service Center Manager
Phone Number: 503-550-0410
E-mail: matthew.lyster@aventorsciences.com

INSPECTION DETAILS

Inspection Date: 3/15/2024
Inspection Time: 0850 hours – 1120 hours
Inspectors: Mhara Coffman, US EPA R10, Lead RMP/EPCRA Inspector
Terry Garcia, US EPA R10, RMP/EPCRA Inspector
Peter Phillips, US EPA R10, RMP/EPCRA Inspector
Edward Johannes, US EPA R10, RMP/EPCRA Inspector
Thomas Vroman, CIH, Weston Solutions, Inc., EPA START Contractor

On March 1, 2024, EPA emailed a Notice of Inspection Letter to the facility informing them of a planned RMP and EPCRA inspection. The letter included CAA Section 112(r)(6)(L) requirement that facility employees and employee representatives, such as a union representative, have the right to participate in the RMP inspection. A copy of the letter must be provided to the employee representatives and the letter posted in a manner accessible to employees in the facility.

- Is the facility unionized? Yes ☐ No ☒
If yes, name of union:
- Was an employee representative present during the inspection? Yes ☐ No ☒
If yes, name/title:

GENERAL INFORMATION

The facility is regulated under the Risk Management Program as a Program Level 2 facility and is owned and operated by Avantor Sciences. There are eight full-time employees on site. VWR International, LLC is a warehousing and distribution company, that receives, stores, and loads RMP-regulated chemicals for delivery to customers. The two RMP-regulated chemicals at the facility are hydrofluoric acid (HF) (concentrations over 50%), and hydrochloric acid (HCl) (anhydrous). These covered chemicals are stored in a segregated Corrosive Room with other non-RMP-regulated corrosives.

DATE AND PROGRAM LEVELS OF SUBMITTED RMP

Initial Submission Date: March 28, 2016

Date of Latest Update: March 26, 2021

- Has the facility been inspected in the past 5 years? Yes ☒ No ☐
If yes, date of last inspection: Homeland Security inspection on February 20, 2020
- Is the facility High Risk? Yes ☐ No ☒

Process (as reported in the RMP)

Process ID	Description	Process Chemical ID	NAICS Code	Program Level	Chemical Name CAS Number	Quantity (lbs.)
1000115437	Warehouse	1000144325		2	7664-39-3	15,000
1000115437	Warehouse	1000144326		2	7647-01-0	30,000

CAA TITLE V AIR PERMIT

- Does the facility have a CAA Title V Permit? Yes ☐ No ☒
If yes, permit number:

EMERGENCY RELEASE / ACCIDENT HISTORY

- Did an RPM reportable release occur in the past 5 years? Yes ☐ No ☒
- Did a CERCLA/EPCRA reportable release occur in the past 5 years? Yes ☐ No ☒
If either yes, date and description of release:

EPCRA 312 – TIER II REPORT

- Was the 2023 Tier II report submitted to the SERC? Yes ☒ No ☐
If yes, date Tier II was submitted: February 15, 2024
- Was the 2023 Tier II submitted to the LEPC/fire department? Yes ☒ No ☐
If yes, date Tier II was submitted: February 15, 2024
- Is the facility subject to EPCRA Section 302? Yes ☒ No ☐
If yes, is it correctly checked on the Tier II? Yes ☒ No ☐
- Is the subject to RMP correctly checked on the Tier II? Yes ☒ No ☐
- Is RMP facility ID correct on the Tier II? Yes ☒ No ☐

EPCRA CHEMICALS OVER THRESHOLD

According to the most recent Tier II, the facility stores the following hazardous chemicals over the reporting threshold. See the attached Tier II, Attachment C, for inventory amounts.

Chemical Name	EHS (Yes or No)	CAS Number
Chloroform	Yes	67-66-3
Hydrochloric Acid Solution	Yes	7647-01-0
Hydrofluoric Acid	Yes	7664-39-3
Sulfuric Acid	Yes	7664-93-9

EPCRA 311 – SDSs

EHS onsite are chloroform, hydrochloric acid solution, hydrofluoric acid, and sulfuric acid. See Attachment B for SDSs and chemical information on each EHS stored over the reporting threshold at the Facility.

EPCRA 302 – LEPC Coordination

VWR Inc. last contacted the LEPC in 2022.

LEPC

Agency: Washington County LEPC
Program Contact: Chad Oyler
Title: Chair
Address: 1400 SW Walnut Street Suite 241, MS 30
Hillsboro, Oregon 97123
Phone Number: (510) 857-7982
Email: Chad.oyler@lamresearch.com
Website: <https://www.oregon.gov/osfm/pages/default.aspx>

INSPECTION ENTRY

Mhara Coffman led the inspection entry. The inspection team met with Marc Gonzales at the VWR International LLC facility in Tualatin, OR. The team arrived at the facility at 0900 hours and was joined by the following facility personnel:

Name	Title
Marc Gonzales	EHS Manager
Matt Lyster	SC Manager
Steve Mayhew (virtual attendee)	Regulatory Manager
Ralph Garcia (virtual attendee)	Distribution Director
Maria Cedillo (virtual attendee)	Distribution Manager
Vik Lakhan (virtual attendee)	Inventory Manager

- Were any SERC, LEPC or fire department representative present? Yes ☒ No ☐
If yes, names and titles of representatives: Mary Ann Christian, Office of State Fire Marshall
LEPC Coordinator
- Is the facility a first responder? Yes ☐ No ☒

If no, responding agency: Tualatin Vally Fire and Recure

The inspection team was escorted to a conference room. Introductions were made by Mhara Coffman, who provided a summary of the risk management program and explained the purpose of the visit. Each team member presented their credentials.

EPA requested an explanation of the facility's operations and any additional safety measures that should be taken during the site tour. Facility representatives informed the inspection team that they would be required to wear a high-visibility vest and closed-toed shoes.

FACILITY TOUR / ON-SITE OBSERVATIONS

The facility tour was conducted from approximately 0930 hours to 1000 hours. The inspection team was escorted by Matthew Lyster and Marc Gonzales. The inspection team observed the Corrosive Room where the facility stores RMP-regulated chemicals on shelves (Photo 1). The Corrosive Room stores containers of HCl product (Photos 2 and 3), HF product (Photo 4), and non-RMP-regulated corrosive products (Photo 5) and is equipped with a ventilation system on a backup generator. The Corrosive Room includes a hazardous waste disposal staging area (Photo 6), an emergency shower and eye wash (Photo 7) and posted checklists for corrosive inventory (Photo 8) and hazardous waste disposal (Photo 9). EPA observed spill control supplies (Photo 10) and NFPA placarding (Photo 11) immediately outside the Corrosive Room. The Corrosive Room does not have any chemical sensors or alarm systems.

EPCRA-regulated lead acid batteries power the facility's forklifts and are staged in a designated Battery Recharge Area of the facility (Photos 12 and 13).

An emergency eye wash station is located at the Warehouse Entry (Photo 14).

Photographs were taken of the warehousing and distribution operations. The photographs are included in Attachment A.

After touring the RMP-covered process areas and the EPCRA chemical storage areas, the inspection team returned to the conference room to review the RMP documentation. Upon completion of the document review, EPA provided a debriefing to Mark Gonzales and Matt Lyster.

INFORMATION COLLECTED FROM FACILITY

1. Warehouse Evacuation Routes Map
2. Administrative Offices Evacuation Routes Map
3. Hazard Review Revalidation: Recommended Actions section.

AREAS OF CONCERNS

The following is a list of areas of concern identified.

1. VWR International LLC did not provide documentation on the emergency coordination activities required by 68.93 that was in effect since September 21, 2018. [68.10(b)]. VWR International LLC did not conduct emergency coordination in 2021 and 2023.
2. VWR International LLC did not ensure that hazard review problems identified were resolved in a timely manner. [68.50(c)]. A 2021 hazard review finding 21HR01 recommended maintaining emergency coordination documentation with other RMP records. There were no emergency coordination records for 2021 and 2023 on file.

FOLLOW-UP DOCUMENTS REQUESTED

The following documents were unable to be located during the inspection by the facility representatives. The documents were requested to be sent to EPA by March 28, 2024. These documents were reviewed after the inspection to determine compliance with Section 112(r) of the Clean Air Act.

1. 2018 and 2021 Compliance Audit certification pages
2. Emergency Response Plan (particularly the date it was drafted and finalized)
3. Completed operator training form

ON-SITE INSPECTION REPORT CERTIFICATION

This is to certify that I, Mhara Coffman, as the lead inspector for the On-site Compliance Inspection and that I have verified the accuracy of the information in this report.

MAIGHDEAN COFFMAN Digitally signed by MAIGHDEAN COFFMAN
Date: 2024.11.14 15:02:13 -08'00'

Inspector Signature

JAVIER MORALES Digitally signed by JAVIER MORALES
Date: 2024.11.14 15:25:14 -08'00'

RMP Coordinator Signature

ERIN WILLIAMS Digitally signed by ERIN WILLIAMS
Date: 2024.11.14 15:22:50 -08'00'

EPCRA Coordinator Signature

**MATTHEW
QUARTERMAN** Digitally signed by MATTHEW
QUARTERMAN
Date: 2024.11.18 16:09:51 -08'00'

Land Enforcement Section Chief Signature

ATTACHMENTS

- A. Photographs (Photo Log and Layout)
- B. Tier II Report

Attachment A – Photo Log

Site Name: Avantor Sciences, VWR International LLC

City, State: Tualatin, OR

Photographer: Tom Vroman

File	Photo Layout ID	Date	Time	Description
Photo1.jpg	1	3/15/2024	9:40 AM	Corrosive Room ; Shelf storage of corrosives
Photo2.jpg	2	3/15/2024	9:40 AM	Corrosive Room ; HCl storage
Photo3.jpg	3	3/15/2024	9:40 AM	Corrosive Room ; HCl storage
Photo4.jpg	4	3/15/2024	9:41 AM	Corrosive Room ; HF storage (top left box)
Photo5.jpg	5	3/15/2024	9:44 AM	Corrosive Room ; Non-RMP-regulated corrosives
Photo6.jpg	6	3/15/2024	9:44 AM	Corrosive Room ; Hazardous waste disposal staging area
Photo7.jpg	7	3/15/2024	9:45 AM	Corrosive Room ; Emergency shower and eyewash
Photo8.jpg	8	3/15/2024	9:45 AM	Corrosive Room ; Corrosive room checklist
Photo9.jpg	9	3/15/2024	9:46 AM	Corrosive Room ; Hazardous waste disposal checklist
Photo10.jpg	10	3/15/2024	9:47 AM	Outside Corrosive Room ; Spill control supplies
Photo11.jpg	11	3/15/2024	9:47 AM	Outside Corrosive Room ; NFPA placard
Photo12.jpg	12	3/15/2024	9:48 AM	Battery Recharge Area ; Recharging for lead-acid batteries
Photo13.jpg	13	3/15/2024	9:49 AM	Battery Recharge Area ; Emergency shower and eyewash
Photo14.jpg	14	3/15/2024	9:49 AM	Warehouse Entry ; Emergency eyewash