RCRA Compliance Evaluation Inspection Report

1) Inspector and Author of Report

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2) Facility Information

Jones Chemical, Incorporated (JCI)
1433 Talleyrand Avenue
Jacksonville, Florida 33206-5435
Latitude: 30.341440
Longitude: -81.627370
EPA ID Number: FLD004071890

Primary NAICS - 325998 – All Other Miscellaneous Chemical Product and Preparation Manufacturing

3) Responsible Official

Ken Solomon, Environmental, Health & Safety Manager

4) Inspection Participants

Daryl R. Himes U.S. EPA, Region 4
Bonnie Bradshaw, Florida Department of Environmental Protection (FDEP)
Ken Solomon (JCI)
Heather Glass (JCI)

5) Date of Inspection

December 15, 2021, 9:00 a.m.

6) Applicable Regulations

Resource Conservation and Recovery Act (RCRA) Sections 3002, 3005 and 3007 (42 U.S.C. §§ 6922, 6925 and 6927), and the regulations promulgated pursuant thereto at 40 Code of Federal Regulations (C.F.R.) Parts 260-270, 273 and 279.

Florida Statutes (F.S.) Chapter 403.702 et seq., and the regulations promulgated pursuant thereto and set forth at the Florida Administrative Code (F.A.C.), Chapters 62-710 and 62-730.

As the State's authorized hazardous waste program operates in lieu of the federal RCRA program, the citations of those authorized provisions alleged herein will be to the authorized State program; however, for ease of reference, the federal citations will follow in brackets.

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.15(a)], a generator may accumulate as much as 55 gallons of non-acute hazardous waste in containers at or near the point of generation where wastes initially accumulate, which is under the control of the operator of the process generating the waste, without a permit or without having interim status, as required by Section 403.722 of the Florida Statutes, Fla. Stat. § 403.722 [Section 3005 of RCRA, 42 U.S.C. § 6925], and without complying with Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.16(b) or §262.17(a)], except as required in Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.15(a)(7) and (8)], provided that the generator complies with the satellite accumulation area conditions listed in Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.15(a)] (hereinafter referred to as the "SAA Permit Exemption").

Pursuant to Fla. Admin. Code Ann. r. 62-730.185(1) [40 C.F.R. § 273.9], a "Small Quantity Handler of Universal Waste" (SQHUW) is a Universal Waste handler who does not accumulate 5,000 kilograms or more of Universal Waste (batteries, pesticides, mercury-containing equipment, or lamps, calculated collectively) at any time.

JCI notified as a large quantity generator (LQG) of hazardous waste on January 16, 2020. JCI subsequently notified as a small quantity generator of hazardous waste on January 19, 2021.

7) Purpose of Compliance Evaluation Inspection

On December 15, 2021, Bonnie Bradshaw, Florida Department of Environmental Protection (FDEP), and Daryl Himes, EPA, conducted a routine compliance evaluation inspection of JCI in Jacksonville, Florida (JCI or the facility) to determine the facility's compliance with state and federal hazardous waste regulations. This was an EPA lead inspection. Jones Chemical was represented by Ken Solomon, EH&S Manager and Heather Glass, Office Manager. Upon being let into the facility through a security gate, the inspectors parked at the facility's office trailer and were met immediately by Mr. Solomon and Ms. Glass. The inspectors introduced themselves, showed their credentials and explained the purpose of the visit and a description of the facility's process was discussed.

8) Facility Description

JCI manufactures sodium hypochlorite bleach and repackages chlorine for commercial and municipal customers. The facility utilizes city water for its operational needs and does not

generate, treat, or discharge any industrial wastewaters to the city sewer system. The facility consists of a Rail Car Off-Loading Area, Bleach Manufacturing Area, QC Lab, Chlorine Repackaging Areas, Valve Refurbishing Area, Maintenance Shop, Storage Room, Universal Waste Area, and Outside Storage Area. Chlorine tank filling and maintenance activities are performed in two buildings on-site.

9) Inspection Findings

Opening Conference

An opening conference was then performed with each of the inspection participants within the facility's office trailer (Building One). During the opening conference, the inspectors discussed operations performed by the facility prior to performing a walk-through inspection in order to identify potential solid and hazardous waste generation points. The inspectors also tried to determine the facility's current hazardous waste generation status. Previous notifications of hazardous waste activity, filed during 2020 and 2021, identified the facility as both a large (January 16, 2020) and subsequently a small quantity generator of hazardous waste (January 19, 2021).

Ongoing generation of hazardous waste on a routine basis appeared to only occur at the facility as a result of their use of a glass bead blast machine used within the facility's Valve Refurbishing Area. Two episodic hazardous waste generation events appeared to occur on August 15, 2019 (four 275-gallon portable tanks of D001 and two 275-gallon portable tanks of D001/D002) and on February 25, 2021, fourteen 275-gallon portable tanks of D002 characteristic hazardous waste from cleaning operations performed on tanks managing sodium hydroxide within the sodium hypochlorite manufacturing equipment.

Manifests for the facility's generation of spent bead blast media indicated that the facility was currently operating as a very small generator of hazardous waste.

A walk-through inspection of the facility was then performed with the JCI representatives. Below is a description of the observations made in the various areas of the facility inspected.

Rail Car Off-Loading Area

The facility receives chlorine gas and liquid sodium hydroxide that is transported via rail car to a railroad spur that is located on the south side of the manufacturing area. The sodium hydroxide is pumped from a rail car to a pipe on the north side of the unloading area. A spill of sodium hydroxide in this area on March 28, 2012 resulted in ongoing cleanup operations of groundwater in this area. The most recent removal of contaminated soil and groundwater from this area occurred in January of 2019. Thirty-two drums of contaminated soil and fifteen drums of contaminated groundwater were collected at this time and manifested off-site as nonhazardous wastes. Sampling performed on the groundwaters collected were sampled and analyzed. A review of these documents indicated that the liquids collected were nonhazardous by having a pH of less than 12.5. No spills or areas of concern were observed in this area at the time of the inspection.

Outside Area

Cylinders (chlorine containers which manage 150-lbs of gas), Tons (chlorine containers which manage one ton of chlorine gas), and other equipment are stored in the outside area of the facility buildings. No wastes were observed in this area (Photos 1-4)

Bleach Manufacturing Tank Farm Area

In the Bleach Manufacturing Area located in a tank farm (Photo 5), sodium hydroxide is diluted from 50% to 18%. Residual chlorine from the chlorine cylinders that are returned to the facility is pumped into the sodium hydroxide to form sodium hypochlorite bleach. Tanks 1 and 2 are used as bleach manufacturing tanks. The finished product bleach is placed into Tank 4. Adjacent to the bleach manufacturing area is the tanker truck load out area. This is where the facility loads and off-loads tanker trucks of caustic. Liquid within the secondary containment of the loading pad was sampled for pH at the time of the inspection and found to be nonhazardous with a pH of approximately 7.

Valve Refurbishing Area (Building 3)

JCI removes and refurbishes cylinder valves that have been removed from the cylinders. The valves are blasted in a small glass-media blast unit (Photo 6) to remove corrosion resulting from the cylinders management of chlorine. The valves subsequently receive a reconditioned stem and new parts as necessary. The valves are then reassembled, tested, and taken back to the chlorine cylinder area to be placed on a cylinder. Waste glass blast media resulting from reconditioning the valves is managed as D006/D008 hazardous waste. The facility generates approximately one 55-gallon drum of this waste stream every six months to one year. There was one drum of this waste stream accumulating on-site at the time of the inspection (Photo 7). The drum was labeled with a "Hazardous Waste" label and closed at the time of the inspection. Spent glass media from the media blast machine is initially collected in a metal pail (Photo 8) positioned beneath the base of the machine under a port which allows spent media to be discharged. The pail is emptied at the end of each shift by personnel working in this area. Less than an inch of spent glass media blast waste was observed in the pail at the time of the inspection. **It was recommended that facility personnel put a "Hazardous waste" label on the pail to properly identify its contents.**

Chlorine Repackaging Area – "Tons" (Building 3)

The facility repackages chlorine into Ton containers in this area. The volumes of the Ton containers is approximately 250 gallons. After chlorine is added to the Ton containers, they are subsequently painted with gray latex paint. The non-hazardous waste rollers are thrown into the trash when spent. The Tons may also be stenciled with ink (Photo 11) using rollers for identification purposes. Two types of black aerosol paint cans (Photos 9 and 10) were observed for use in this area for use in stenciling if the ink is not available. A clearcoat is sprayed over the ink or paint used for stenciling. Spent aerosol paint cans were observed within an open 55-gallon container used to collect trash which would be added to a solid waste dumpster on the facility property. One of the cans within the drum was not empty.

Mr. Solomon was advised that the paint cans, containing paint liquids, must not be placed into the facility's solid waste dumpster. The cans must be managed as Universal Waste or Hazardous Waste.

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.14(a)(5)], provided a very small generator (VSG) meets all the conditions for exemption listed in this section, hazardous waste generated by the very small quantity generator is not subject to the requirements of parts 124, 262 (except §§ 262.10 through 262.14) through 268, and 270 of this chapter, and the notification requirements of section 3010 of RCRA and the very small quantity generator may accumulate hazardous waste on site without complying with such requirements. One of the conditions for exemption are as follows: (5) A very small quantity generator that accumulates hazardous waste in amounts less than or equal to the limits in paragraphs (a)(3) and (4) of this section must either treat or dispose of its hazardous waste in an on-site facility or ensure delivery to an off-site treatment, storage, or disposal facility.

Quality Control (QC) Lab Room (Building 3)

JCI maintains a small Quality Control Lab (Photo 12). Products are analyzed using titration tests to ensure the bleach is at the correct strength. The QC Lab uses acetic acid, sodium thiosulfate, potassium iodide and hydrogen peroxide in small amounts to check the manufactured bleach. After analysis QC samples are added back into the manufacturing process. No hazardous waste is generated in this area.

Storage Room (Building 3)

Five metal cabinets were observed in a storage room in Building 1. The cabinets held various coatings, paints, and miscellaneous materials. Mr. Solomon could not identify which of the materials were still in use at the time of the inspection. A significant portion of the paints observed appeared to be water-based (Photos 14-17).

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.11], a person who generates a solid waste, as defined in Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 261.2], must make an accurate determination as to whether that waste is a hazardous waste in order to ensure wastes are properly managed according to applicable RCRA regulations articulated in Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.11].

One drum of used oil was also observed in this room (Photo 13). The drum was labeled with the words "Used Oil."

Chlorine Repackaging Area – Cylinders (Building 2)

JCI also repackages chlorine into smaller cylinders managing approximately 150 lbs. of chlorine. This process is performed in Building 2 (Photo 19). Once filled in this area, the cylinders are also painted with the gray or blue latex paint (depending on customer specifications) and stenciled with ink. No hazardous waste is generated in this area.

Universal Waste Area – Cylinders (Building 2)

One eight-foot box of spent fluorescent lamps was observed in Building 2 to be open and unlabeled and undated at the time of the inspection (Photo 20).

Pursuant Fla. Admin. Code Ann. r. 62-730.185(1) [40 C.F.R. § 273.13(d)], a SQHUW must manage universal waste lamps in a way that prevents releases of any universal waste or component of a universal waste to the environment.

Pursuant to Fla. Admin. Code Ann. r. 62-730.185(1) [40 C.F.R. § 273.14(e)], a SQHUW must label or mark each lamp or container of lamps clearly with one of the following phrases: "Universal Waste-Lamp(s)," or "Waste Lamp(s)," or "Used Lamps."

Pursuant to Fla. Admin. Code Ann. r. 62-730.185(1) [40 C.F.R. § 273.15(a) and (c)], a SQHUW may accumulate universal waste no longer than one year and must to be able to demonstrate the length of time that the universal waste has accumulated from the date that it became a waste or was received.

Record Review

A review of the facility's electronic continency plan did not find any discrepancies. The plan was checked specifically for its evacuation routes and current emergency coordinators.

A review of the facility's hazardous waste training requirements did not find any discrepancies.

A review of the facility's hazardous waste manifests did not find any discrepancies.

At the time of the inspection, the facility appeared to be operating as a very small quantity generator and was not performing weekly inspections of its hazardous waste.

Closing Conference

At the conclusion of the walkthrough inspection and record review, a brief closing conference was conducted with each of the facility participants identified above. During the conference, the areas of concern identified during facility walkthrough were identified and discussed.

10) **Signed**

DARYL HIMES Digitally signed by DARYL HIMES Date: 2022.01.04 23:12:16 -05'00'

Signature Date

Daryl Himes
Inspector and Author of Report

11) **Concurrence and Approval**

ARACELI CHAVEZ Digitally signed by ARACELI CHAVEZ Date: 2022.01.19 22:03:40 -05'00'

Signature Date

Araceli B. Chavez
Chief
RCRA Enforcement Section

ATTACHMENT A

Jones Chemical, Inc.

Jacksonville, Florida

COMPLIANCE EVALUATION INSPECTION

FLD004071890

December 15, 2021

Photos taken by Daryl R. Himes
Photos taken with Canon Power Shot Elph 360 HS

Photo 1 – Outside Area

Photo 2 - Outside Area with ton container storage

Photo 3 - Outside Area with Ton and 150-pound container storage

Photo 4 – One Ton Container observed in the Outside Area

Photo 5 – Tank farm and bleach manufacturing area

Photo 6 – Glass bead media blast unit

Photo 7 - Glass bead media blast unit hazardous waste container

Photo 8 - Glass bead media blast unit

Photo 9 – Aerosol paint used by facility

Photo 10 - Aerosol paint used by facility

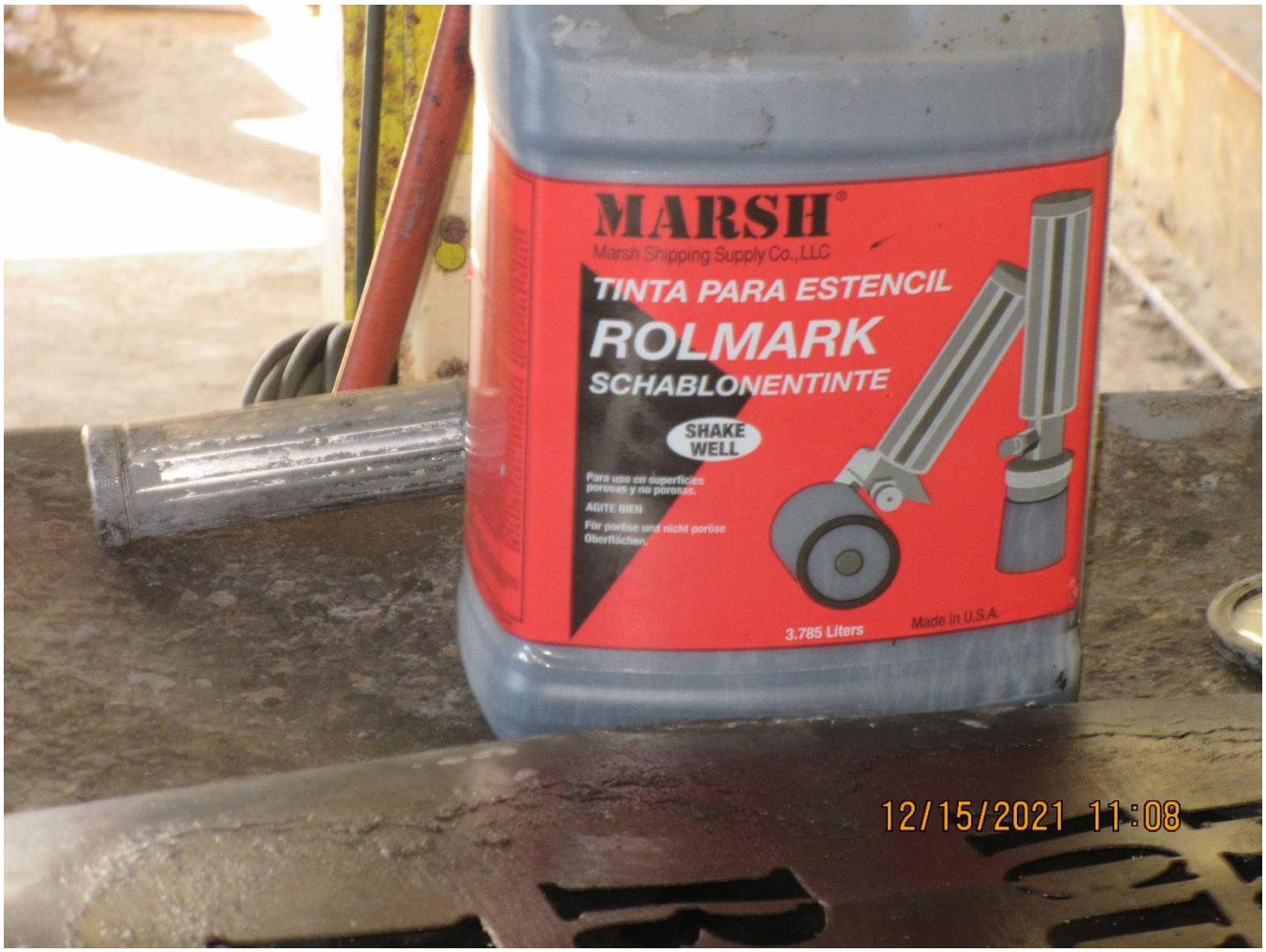

Photo 11 – Stencil Ink for Ton Containers of Chlorine

Photo 12 – QC Lab Area

Photo 13 – Used oil from condenser blowdown

Photo 14 – Cabinet of Paints

Photo 15 - Cabinet of Paints

Photo 16 - Cabinet of Paints, Cleaners and Miscellaneous Products

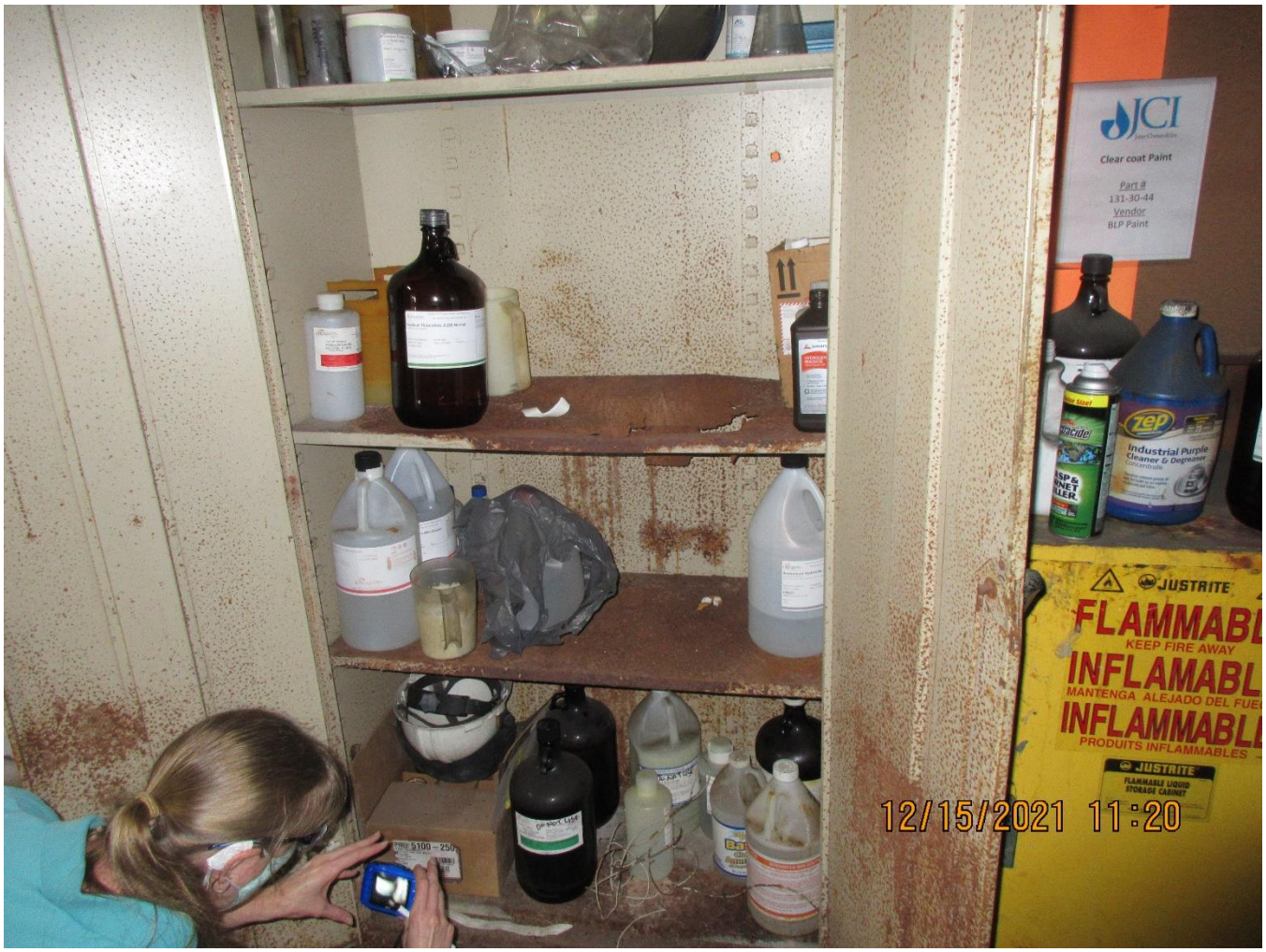

Photo 17 - Cabinet of Miscellaneous Materials

Photo 18 – Railcar Off-Loading Area

Photo 19 – 150 Pound Chlorine Containers

Photo 20 – Box of Universal Waste Fluorescent Lamps in the Building 2 Universal Waste Area