

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8
RESOURCE CONSERVATION AND RECOVERY ACT**

BASIC INFORMATION

Facility Name: Chemtrade Refinery Services Inc. **Facility Location:** 140 Goes in Lodge Road, Riverton, Wyoming

RCRA ID: WYD042634865 **Facility Contact:** Jenar Jasso, EHS Supervisor
307-851-6923

Notification Status: Large Quantity Generator (LQG)

Date of Inspection: August 17, 2021 **Arrival Time:** 9:00 a.m.
Departure Time: 3:45 p.m.

Lead Inspector: Annette Maxwell, U.S. EPA Resource Conservation and Recovery Act (RCRA) Inspector

Other Attendees:

1. Cindy Schafer, RCRA and Clean Air Act (CAA) Inspector, U.S. EPA
2. Steve Babits, Environmental Scientist, Northern Arapaho Natural Resource Office
3. Jenar Jasso, EHS Supervisor, Chemtrade Refinery Services Inc.
4. Naveen Rajkumar, Operations Manager, Chemtrade Refinery Services Inc.

Type and Purpose of Inspection: Compliance Evaluation Inspection

Facility Type: Sulfuric Acid Manufacturing, NAICS 32518 - Other Basic Inorganic Chemical Manufacturing

Applicable Regulations to Inspection: 40 CFR 260 - 279

Inspection Type: Unannounced Inspection

OPENING CONFERENCE

☒ Credentials Presented

☒ CBI warning to facility provided

General Facility and Process Description

The following information was verbally obtained during the inspection or from EPA files:

Chemtrade Refinery Services (Facility) is a manufacturing facility for sulfuric acid. The Facility generates 93% sulfuric acid primarily for the power plant industry; ultrapure 96% sulfuric acid for the semiconductor industry; and 99% sulfuric acid primarily for the refinery industry. Operations are conducted in two plants at the site. Plant 1 generates sulfuric acid from sulfur and produces 93%, ultrapure 96%, and 99% sulfuric acid. Plant 2 generates sulfuric acid from spent sulfuric acid from the refinery industry and produces 93% and 99% sulfuric acid. Chemtrade Refinery Services, Inc. is based

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out of Toronto, Canada. It includes approximately 60 locations including multiple locations in the United States.

The Facility operates 24 hours per day, seven days per week, and it employs approximately 28 people. Operations at this location began in 1957. Raw materials, including molten sulfur for use in Plant 1 as well as products produced by the Facility, are transported by tanker truck. The Facility does not have railroad service.

The Facility operates a wastewater treatment system with a surface water discharge. It operates under EPA-administered National Pollution Discharge Elimination System (NPDES) permit #WY0034207 issued under the Clean Water Act. Based upon the permit's Statement of Basis, treatment consists of mixing, neutralization, settling, and non-biological aeration.

TOUR INFORMATION

Upon arrival at the Facility on August 17, 2021, we met with Jenar Jasso, EHS Supervisor, and Naveen Rajkumar, Operations Manager, (Facility representatives). We discussed the inspection scope, and the Facility representatives provided a description of the Facility's processes and operations, including waste generation and management. We then proceeded with a site tour and records review.

All photographs are included in Attachment 1 – Photo Log.

Facility Areas Toured

- UPA Warehouse
 - In this area I observed universal waste including:
 - light bulbs, closed metal 55-gallon drum, labeled universal waste light bulbs with accumulation start date 7/12/2019 (see photos 1425 and 1426);
 - one closed white bucket, labeled Universal Waste, Alkaline Batteries with accumulation start date 11/7/2019 (see photos 1427 and 1428);
 - one closed white bucket, labeled Universal Waste Lead Acid Batteries with accumulation start date 10/24/2019 (see photos 1427 and 1429); and
 - one closed box labeled Universal Waste Fluorescent Light Bulbs with accumulation start date 7/9/2019 (see photos 1431 and 1432).
 - The labels on all of the above-listed universal waste containers indicated that the accumulation of universal wastes had exceeded the one-year limit specified in 40 CFR § 273.15; however, the containers were picked up by Clean Harbors before the end of the inspection (the Facility representatives stated the pickup had been scheduled before today).
- Maintenance shop
 - In this area, I observed a parts washer labeled "Safety-Kleen Model 30 Solvent Parts Washer" (see photo 1433). I did not observe any concerns related to the parts washer.
- Used oil storage located outside of maintenance shop
 - In this area, I observed six containers on a secondary/spill containment pallet, all of which appeared to be in good condition and not leaking:

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- one 55-gallon drum labeled “used oil filters”;
 - one 55-gallon drum labeled “antifreeze”;
 - one 55-gallon drum labeled “used oil rags”;
 - one 55-gallon drum labeled “oil soaked absorbent”; and
 - two 55-gallon drums labeled “used oil”.
- “Waste Corral” 90-day central accumulation area (see photo 1441 for an overview of this area).
 - The area used for central accumulation of hazardous waste is located outdoors in the southeast portion of the Facility, east of the northern end of the wastewater ponds. The majority of waste is stored within fencing and a spill containment drum shed capable of holding a small number of drums is located inside the fencing.
 - Outside of the fencing were:
 - Five supersacks set on pallets and awaiting disposal.
 - The five supersacks were labeled “Hazardous Waste”, “waste spent catalyst (chromium)”, and with Hazard Class 9; however, the five containers were not marked with an accumulation start date. (See photos 1441, 1442, 1443, 1444, 1447, 1448, 1449, and 1450.)
 - One yellow salvage drum labeled “Hazardous Waste” and “neutralized acid, cold heat”, but it was not labeled with an indication of the hazards or with an accumulation start date. (See photos 1441, 1445, 1446, and 1447.) The Facility representatives stated that this container was initially labeled “hazardous waste”, but it was subsequently found to be non-hazardous following receipt of analytical data.
 - One black 55-gallon drum with a hazardous waste label; the Facility representatives stated this container had also been determined to be non-hazardous following placement of the hazardous waste label. (See photo 1447.)
 - One black poly drum labeled “non-hazardous waste” and “boiler ash”. This drum was incorrectly labeled, it is hazardous waste. The Facility representatives stated that a new employee had incorrectly labeled this container non-hazardous waste. (See photos 1451 and 1452.) The label was replaced with a hazardous waste label before the inspectors left the site, though the Facility representatives could not mark the label with the accumulation start date because it was not known. (See photo 1467.)
 - Inside the fencing located in the southeast corner of the Waste Corral were ten drums labeled “hazardous waste” and with the hazard class, but none of the ten were marked with the accumulation start date. Following the viewing of this area, the Facility representatives stated that these ten containers were removed by Clean Harbors before the end of the inspection, but after the inspectors had left this area.
 - One of these drums was labeled “tower packing fiberglass chevron/sulfuric acid”.
 - Eight drums were labeled boiler ash, three of which were in yellow salvage drums.
 - One of these drums was labeled “paint stripping solvent – halogenated”.

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- Inside a drum shelter in this fenced area.
 - One drum was labeled “hazardous waste” and “boiler fly ash” and with an accumulation start date of 2/2/21, which indicates this hazardous waste had been accumulated and stored in this container for longer than the 90-days allowable for a Facility with LQG status based on the LQG conditions for exemption from RCRA permit requirements. In addition, the label was not marked with an indication of the hazards. (See photos 1453, 1459, and 1460.)
- In the next fenced area to the west within the Waste Corral, I observed stained soil. The Facility representatives stated it was used oil and used oil storage was no longer in this area. I requested a photo of the area showing the spill had been cleaned up.
- In other sections of the Waste Corral and outside of the fencing on the west side of Waste Corral, additional drums were stored that the Facility representatives stated were non-hazardous waste. (See photos 1468-1471.) I was not able to view all of the labels on these containers as there was not aisle space, which is not required for non-hazardous waste. I did observe the following:
 - On one pallet, four drums were labeled used oil (see photos 1468-1469).
 - One drum outside of the fencing was marked with two labels, one with the wording “hazardous waste” and the second label with the wording “non-hazardous waste”. The Facility representatives stated that this was in fact a non-hazardous waste, specifically neutralized spent acid, and the hazardous waste label had been improperly applied. (See photos 1470-1471.)
- Wastewater ponds
 - Facility representatives stated that soda ash is used for pH and a blower is used to add dissolved oxygen. At the outfall they stated that operators sample the outfall every four hours and lab samples are taken every Monday. (See photos 1472 – 1476.)
- Dredged material pile from wastewater ponds
- Primary sump
- Non-hazardous sulfur waste drum
- #2 Boiler room satellite accumulation area (SAA)
 - One 55-gallon drum labeled “hazardous waste” and “boiler ash”, but it was not labeled with an indication of the hazards.
- Compressor building
 - One 55-gallon drum labeled “used oil”.
- Main boiler room
 - Spill kit.
- Sulfur tank
 - Observed spill residue in the vicinity of this tank. The Facility representatives stated the spill was from a gasket leak and the spilled material was non-hazardous.

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Records Review

The following records were reviewed as part of the inspection.

- Biennial Report pulled from RCRAInfo prior to the inspection
 - Prior to the inspection, I pulled the 2019 Biennial Report and attempted to pull the 2017 and 2015 Biennial Reports. However, the 2017 and 2015 Biennial Reports were not available, and they appear not to have been submitted. RCRAInfo did not indicate any change to the Facility's generator status within this timeframe. LQGs are required to provide re-notification by March 1 of every odd-numbered year for activities pursuant to 40 CFR 262.18, and Biennial Reports per the same schedule as required pursuant to 262.41. Small Quantity generators are required to provide re-notification every four years beginning September 1, 2021. EPA Form 8700-12 must be used by facilities to submit notification of updates to generator status.
- E-manifest information was pulled from RCRAInfo prior to the inspection.
- Hazardous waste manifest 013821911FLE copy was provided to me for further review.
- Summary of required training copy was provided to me for further review.
- Solid and Hazardous Waste management Plan dated July 5, 2017 copy was provided to me for further review.
- Analytical results: neutralization spent acid and soil copy was provided to me for further review.
- Analytical results: pond sludge and tower sample copy was provided to me for further review.
- Mekor 70 Clean Harbors waste profile copy was provided to me for further review.

CLOSING CONFERENCE

During the closing conference I discussed concerns regarding the following:

- labeling, specifically in regard to accumulation start dates on 90-day waste containers, and indication of the hazards labeling on SAA containers;
- the spilled used oil in the waste corral (requested a photo post-cleanup and a description of how the contaminated soil would be managed);
- universal waste storage greater than one year, noting that the waste was removed from the site by Clean Harbors prior to the end of the inspection; and
- a drum labeled non-hazardous that did contain hazardous waste, noting that a hazardous waste label had been applied prior to the end of the inspection.

Requested documents: As part of the inspection, I requested the following records:

- list of staff who manage hazardous waste and their training records and
- weekly central accumulation area inspection logs.

INSPECTION FOLLOW-UP

Jenar Jasso submitted the following documentation by email on August 24, 2021.

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- A document describing EPA concerns indicated during the inspection and/or closing conference, and corrective actions taken in response:
 - a photo of a hazardous waste container label that includes the accumulation start date;
 - a photo of the SAA container showing an indication of the hazards was added, a procedure change description regarding staff training, and a training log sheet;
 - photos and a description of tasks performed for cleanup of the spill in the waste corral;
 - a statement that the universal waste was shipped off-site by Clean Harbors on August 17, 2021; and
 - a statement that a hazardous waste label was applied over the non-hazardous label for the improperly labeled drum.
- A copy of a hazardous waste storage area and SAA weekly inspection form for July 1, 6, 14, 21, and 29, 2021 noting the time the inspection was done and the name of the person performing it.
- Three files that include training content for DOT training.
- A certificate of completion for DOT training.
- A spreadsheet containing records for DOT training.

ADDITIONAL INFORMATION NEEDED

Additional information is needed to complete the evaluation of Facility compliance.

- Please provide receiving Facility-signed manifests for the following wastes that were on-site at the time of the inspection:
 - supersacks;
 - drum of boiler ash waste that had been labeled non-hazardous;
 - drums containing hazardous waste in and near the waste corral with no accumulation start date; and
 - Universal wastes
- Provide documentation of the status of the drum located in the drum shelter inside of the waste corral. If this drum was shipped for disposal, please provide a copy of the hazardous waste manifest. If it is awaiting disposal, provide a description of the steps to be taken for its disposal as well as a description of procedures to be implemented to avoid future exceedance of the LQG 90-day storage time limit.
- Provide a copy of hazardous waste determination documentation for the sulfur tank spill material and residue.
- Please provide copies of Biennial Reports submitted for 2017 (which would have reflected 2016 data) and 2015 (which would have reflected 2014 data). If no Biennial Reports were submitted for these periods, please provide an explanation. If this was due to a lesser generator status, please describe future procedures to be taken to provide notification to update generator status using EPA Form 8700-12.
- For the dredged material from the wastewater ponds, please provide a description of how samples were collected to ensure that the samples were representative or provide a sampling plan and schedule for re-sampling. Representative samples are required for hazardous waste determinations made to identify whether the waste is hazardous for any of the hazardous

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characteristics of 40 CFR § 261 Subpart C. Information regarding representative sampling can be found at: <https://www.epa.gov/hw-sw846/sampling-guidance-documents-sw-846-compendium> or <https://www.epa.gov/hw-sw846/sampling>.

- Waste determination documentation demonstrating how the determination was made that the wastes in the yellow salvage drum and black 55-gallon drum located outside of the waste corral during the inspection and shown in photos 1447 were non-hazardous.
- When wastes may be hazardous at the point of generation, analytical or process knowledge must confirm it; facilities commonly follow good practices regarding the placement of hazardous waste labels on containers and management of the waste as hazardous while awaiting final hazardous waste determination results to ensure compliance with requirements. Waste that is hazardous but is not managed accordingly because it is awaiting hazardous waste determination results may be subject to enforcement actions by EPA or other enforcement agencies. Thus, this common good practice is encouraged by EPA as it avoids the potential for mismanagement of hazardous waste during that period of pending determination should the waste be confirmed to be hazardous. However, once a determination is made that the waste is not hazardous, procedures should be implemented to correct the labeling in a timely manner to maintain the integrity of labeling and management programs and prevent the potential for containers labeled hazardous waste to be mistaken for non-hazardous waste. Furthermore, it is important to accurately adjust labels to avoid enforcement actions on the basis that the waste is labeled as such and, therefore, may be interpreted by EPA or other enforcement agencies to be subject to hazardous waste regulation under RCRA. Please provide a description of procedures to follow when waste that has been labeled hazardous while awaiting hazardous waste determination (a recognized good practice) is subsequently identified by analytical data, etc., to be non-hazardous so that the containers are properly labeled as rapidly as practicable.
- Training information
 - Pursuant to 40 CFR 262.17(a)(7), Facility personnel must successfully complete certain training and records of that training must be maintained. Please provide records of training that meets the requirements of this section, including the information required under 40 CFR § 262.17(a)(7)(iv).
- Contingency plan
 - Please provide a copy of the Facility's updated Contingency Plan, including the currently designated emergency coordinators. The plan must include all contents specified in 40 CFR § 262.261.
 - Quick reference guide
 - When contingency plans are amended, a quick reference guide of the contingency plan must be prepared and provided to local emergency responders alongside the contingency plan. The requirements for quick reference guides are laid out in 40 CFR 262.262(b). Please provide a copy of the current quick reference guide.
- Arrangements with local authorities
 - Please provide a copy of records documenting arrangements with the local fire department as well as any other organization necessary to respond to an emergency as required under 40 CFR § 262.256.

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SIGNATURE

Lead Inspector: **ANNETTE MAXWELL** Digitally signed by ANNETTE MAXWELL
Date: 2021.10.14 18:09:06 -06'00'

RCRA/OPA Enforcement Branch Chief: **JANICE PEARSON** Digitally signed by JANICE PEARSON
Date: 2021.10.15 08:00:16 -06'00'

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ATTACHMENT 2 – PHOTO LOG

Photographer: Annette Maxwell

Camera Model and ID: Nikon Coolpix, B00227

Photo 1425: DSCN1425.jpg, photo of universal waste light bulbs in a closed metal drum labeled with accumulation start date 7/12/2019. The containers in this area, including the two universal waste battery containers visible on the table to right, were staged and prepared for pickup by Clean Harbors.

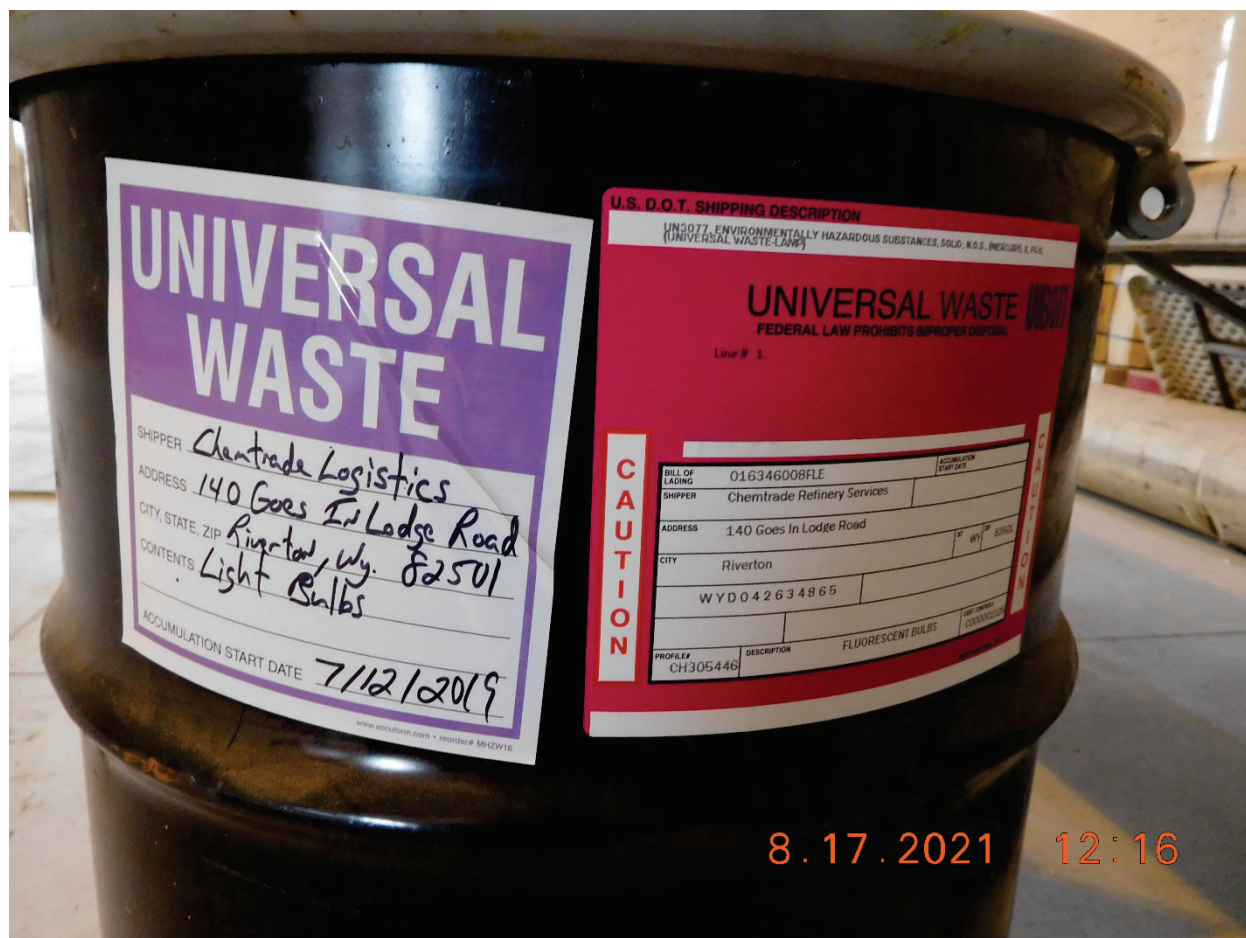


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Photo 1426: DSCN1426.jpg: close-up of the same drum as that shown in photo 1425.



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Photo 1427: DSCN1427.jpg: photo of a closed lead acid battery universal waste container labeled with accumulation start date 10/24/2021 and an alkaline battery universal waste container labeled with accumulation start date 11/07/2019.

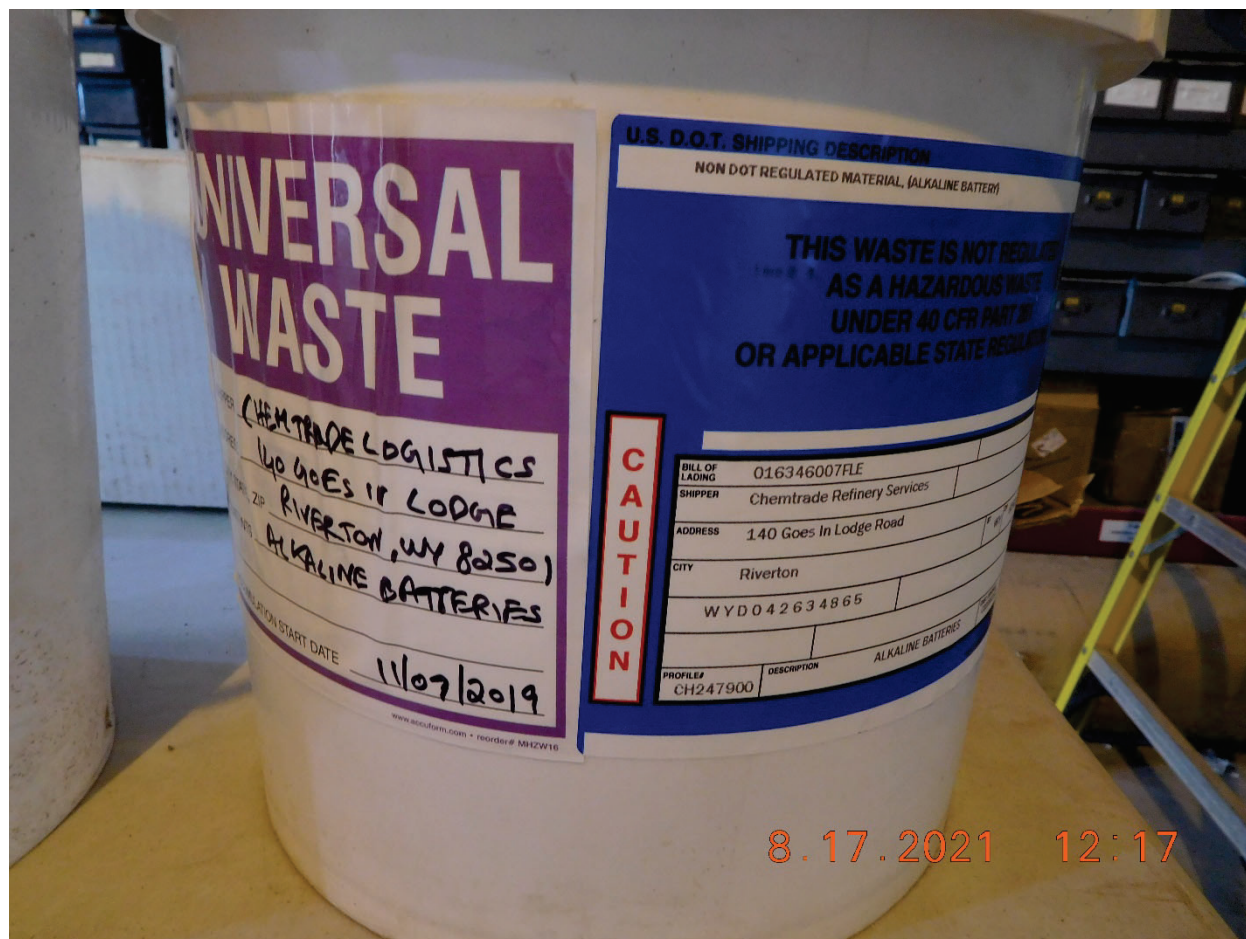


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Photo 1428: DSCN1428.jpg: close-up of the alkaline battery universal waste container shown in photo 1427.

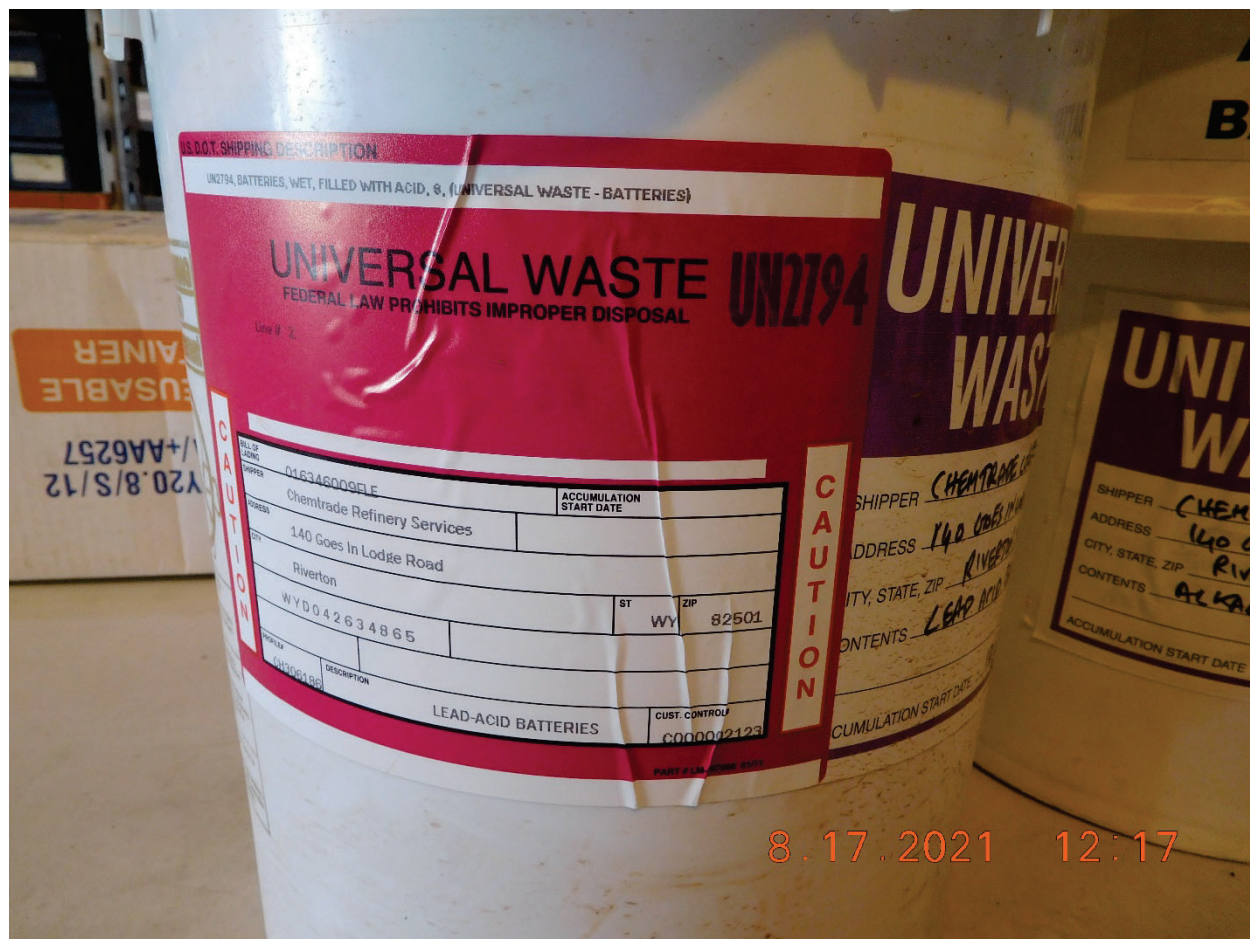


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Photo 1429: DSCN1429.jpg: photo of the lead acid battery universal waste container shown in photo 1427.



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Photo 1430: DSCN1430.jpg: photo of the universal waste accumulation area where universal wastes are accumulated; the containers shown in this picture were empty according to the Facility representatives.



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Photo 1431: DSCN1431.jpg: overview photo of the containers shown in photos 1425-1430 and 1432.

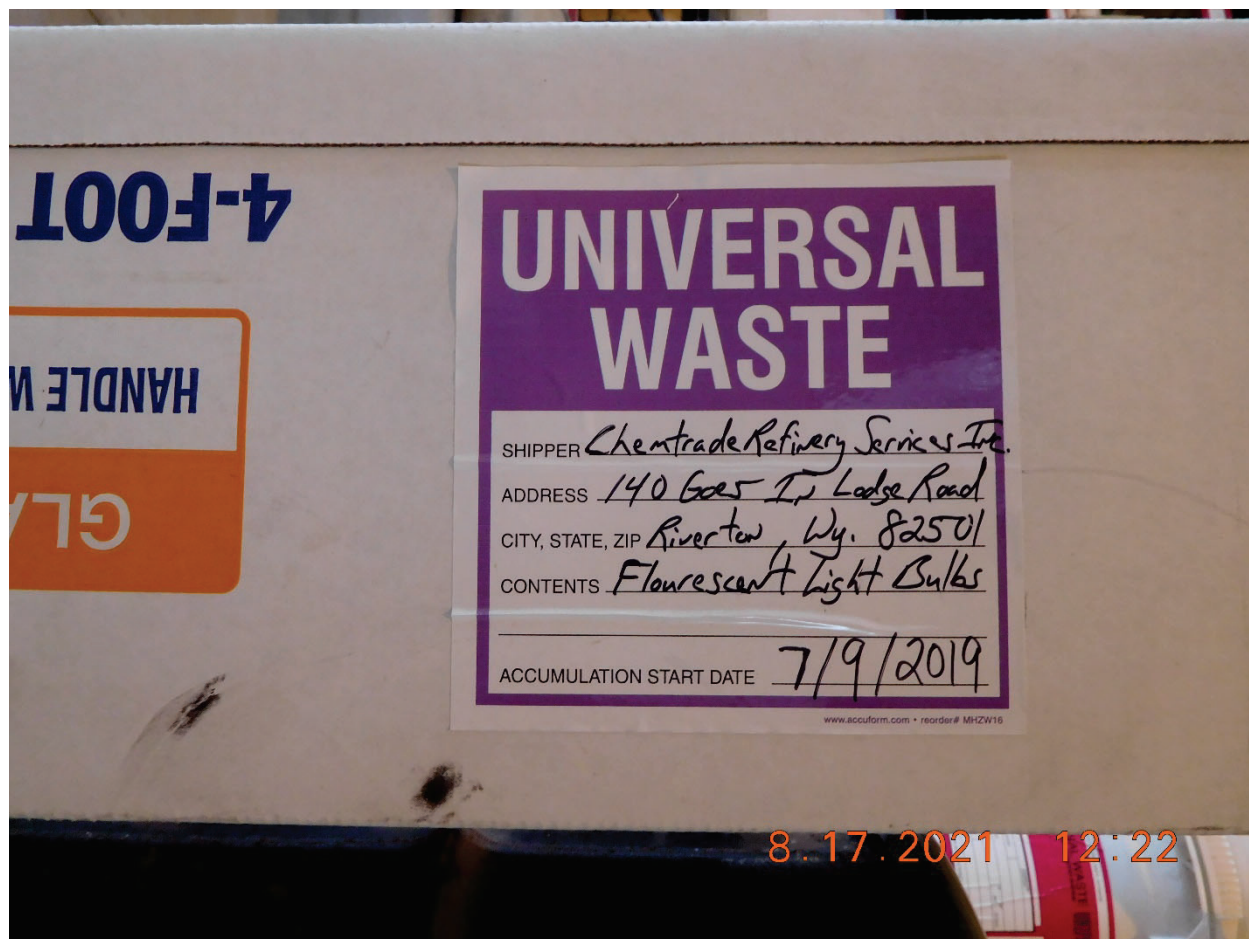


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Photo 1432: DSCN1432.jpg: photo of a universal waste fluorescent light bulb container labeled with accumulation start date 7/9/2019.



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Photo 1433: DSCN1433.jpg: photo of parts cleaner located in the maintenance shop and labeled “Model 30 Solvent Parts Washer”.



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Photo 1434: DSCN1434.jpg: overview photo of the used oil storage area located outside of the maintenance shop. No spills, leaks or other concerns were observed in this area.



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Photo 1435: DSCN1435.jpg: photo of a 55-gallon drum labeled “oil soaked absorbent”.



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Photo 1436: DSCN1436.jpg: photo of a 55-gallon drum labeled “used oil”.



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Photo 1437: DSCN1437.jpg: photo of a 55-gallon container labeled “used oil”.



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Photo 1438: DSCN1438.jpg: photo of a 55-gallon drum labeled “used oil filters”.



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Photo 1439: DSCN1439.jpg: photo of an approximately 55-gallon drum labeled “antifreeze”.



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Photo 1440: DSCN1440.jpg: photo of a 55-gallon drum labeled “used oil rags”.



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Photo 1441: DSCN1441.jpg: overview photo of the waste corral. Visible in the photo are supersacks containing hazardous waste, non-hazardous waste storage inside corral to right behind supersacks, and the hazardous waste pen located within the corral behind supersacks to left. Photo taken facing south/southwest.



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Photo 1442: DSCN1442.jpg: photo of label on first (northernmost) supersack shown in photo 1441. The label was missing an accumulation start date.

U.S. D.O.T. SHIPPING DESCRIPTION
HA3077, HAZARDOUS WASTE, SOLID, H.O.S., (CHROMIUM 9, PG II)

Line # 9

HAZARD CLASS

HA3077

HAZARDOUS WASTE
FEDERAL LAW PROHIBITS IMPROPER DISPOSAL
IF FOUND, CONTACT THE NEAREST POLICE, OR
PUBLIC SAFETY AUTHORITY, OR THE
U.S. ENVIRONMENTAL PROTECTION AGENCY

CAUTION

MANIFEST TRACKING #	016346007FLE	ACCUMULATION START DATE	
GENERATOR	Chemtrade Refinery Services		
ADDRESS	140 Goes In Lodge Road		
CITY	Riverton	ST	WY
		ZIP	82501
GENERATOR'S EPA IDENTIFICATION NUMBER	WYD042634865	EPA HAZARD NAME	TOXIC
WASTE CODES	DD07		
PROCESSED BY	CH2110484	DESCRIPTION	WASTE SPENT CATALYST (CHROMIUM)
		CONT. CONTROL #	0000002129

HAZARDOUS CONSTITUENTS

CONTAINS HAZARDOUS OR TOXIC WASTE

PART # LMHW300W Rev. 1

8.17.2021 12:44

Facility Name: Chemtrade Refinery Services

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Photo 1443: DSCN1443.jpg: photo of label on second supersack shown in photo 1441. The label was missing an accumulation start date.

U.S. D.O.T. SHIPPING DESCRIPTION
HA3077. HAZARDOUS WASTE, SOLID, N.O.S., CHROMIUM, 9. Po II

9
HAZARD CLASS

HA3077

HAZARDOUS WASTE
FEDERAL LAW PROHIBITS IMPROPER DISPOSAL
IF FOUND, CONTACT THE NEAREST POLICE, OR
PUBLIC SAFETY AUTHORITY, OR THE
U.S. ENVIRONMENTAL PROTECTION AGENCY

CAUTION

MANIFEST TRACKING #	016346007FLE		ACCUMULATION START DATE
GENERATOR	Chemtrade Refinery Services		
ADDRESS	140 Goes in Lodge Road		
CITY	Riverton		
GENERATOR'S EPA IDENTIFICATION NUMBER	ST	WY	ZIP 82501
WASTE CODES	WYD042634865		EPA HAZARD NAME TOXIC
PROPER NAME	DESCRIPTION	CUST. CONTROL#	
CH2110494	WASTE SPENT CATALYST (CHROMIUM)	C000002128	

HAZARDOUS CONSTITUENTS
CONTAINS HAZARDOUS OR TOXIC WASTE

PART # LMHW300W Rev. 1

8.17.2021 12:48

Facility Name: Chemtrade Refinery Services

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Photo 1444: DSCN1444.jpg: photo of label on third supersack shown in photo 1441. The label was missing an accumulation start date.

U.S. D.O.T. SHIPPING DESCRIPTION

HAZARD CLASS 9

HA3077

HAZARDOUS WASTE
FEDERAL LAW PROHIBITS IMPROPER DISPOSAL
IF FOUND, CONTACT THE NEAREST POLICE, OR
PUBLIC SAFETY AUTHORITY, OR THE
U.S. ENVIRONMENTAL PROTECTION AGENCY

CAUTION

MANIFEST TRACKING #	016346007FLE	ACCUMULATION START DATE	
GENERATOR	Chemtrade Refinery Services		
ADDRESS	140 Goes In Lodge Road		
CITY	Riverton	ST	WY
		ZIP	82501
GENERATOR'S EPA IDENTIFICATION NUMBER	WYD042634865	EPA HAZARD NAME	TOXIC
WASTE CODES	D007		
PROFILE #	CH2110484	DESCRIPTION	WASTE SPENT CATALYST (CHROMIUM)
		CUST. CONTROL #	C000002128

HAZARDOUS WASTE CONTAINS HAZARDOUS OR TOXIC WASTE

HAZARDOUS CONSTITUENTS

PART # LMHW300W Rev. 1

8.17.2021 12:49

Facility Name: Chemtrade Refinery Services

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Photo 1445: DSCN1445.jpg: photo of one yellow and one black drum (both at left of fence) located in between the five supersacks shown in photo 1441. Both drums were labeled with the words “Hazardous Waste”.

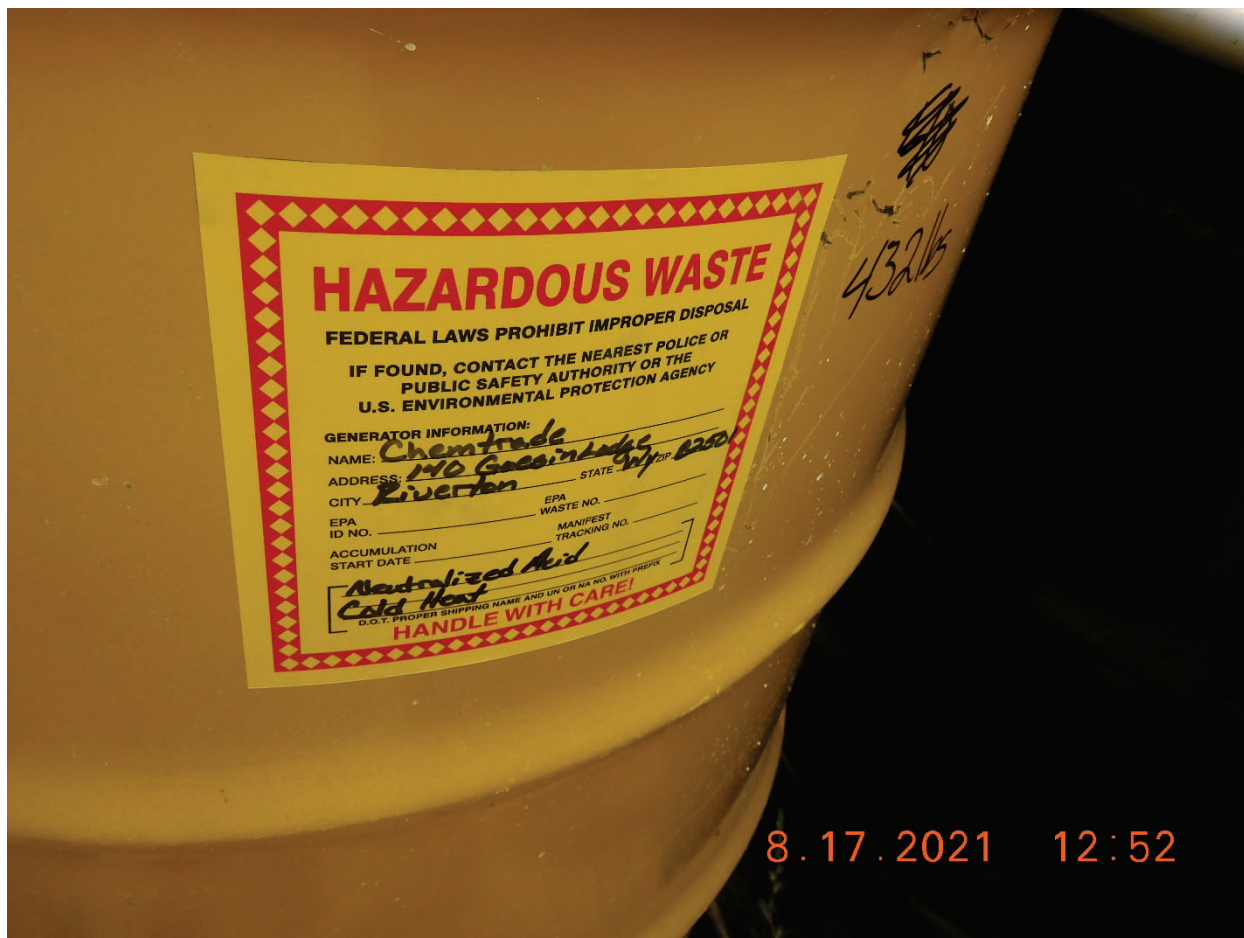


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Photo 1446: DSCN1446.jpg: close-up of the label on the yellow drum shown in photo 1445. The label included the words “Hazardous Waste” and “Neutralized Acid Cold Heat” but did not include an accumulation start date or indication of the hazards. The Facility staff stated that this drum and the black drum to right contained non-hazardous waste because subsequent analytical testing had determined that the contents were not hazardous.



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Photo 1447: DSCN1447.jpg: overview of drums depicted in photos 1445 and 1446. Photo taken facing northwest.



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Photo 1448: DSCN1448.jpg: photo of the southernmost two supersacks shown in photo 1441 and a black drum to left, all three located east of the waste corral near the southeast corner. Photo taken facing west.



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Photo 1449: DSCN1449.jpg: close-up of supersack shown at right in photo 1448. The label was missing an accumulation start date.

U.S. D.O.T. SHIPPING DESCRIPTION
HA3077, HAZARDOUS WASTE, SOLID, R.O.S., (CHROMIUM), 9, PG III

9
HAZARD CLASS

HA3077

HAZARDOUS WASTE
FEDERAL LAW PROHIBITS IMPROPER DISPOSAL
IF FOUND, CONTACT THE NEAREST POLICE, OR
PUBLIC SAFETY AUTHORITY, OR THE
U.S. ENVIRONMENTAL PROTECTION AGENCY

CAUTION

HAZARDOUS WASTE TRACKING #	016346007FLE	ACCUMULATION START DATE	
GENERATOR	Chemtrade Refinery Services		
ADDRESS	140 Goes in Lodge Road		
CITY	Riverton	ST	WY
		ZIP	82501
GENERATOR'S EPA IDENTIFICATION NUMBER	WYD042634865	EPA HAZARD NAME	TOXIC
WASTE CODES	D007		
PROPER SHIPPER'S NAME	DESCRIPTION	WASTE SPENT CATALYST (CHROMIUM)	
CH2210498		CONTAINS HAZARDOUS OR TOXIC WASTE	

HAZARDOUS CONSTITUENTS

PART # 18079300W Rev. 1

8.17.2021 12:55

Facility Name: Chemtrade Refinery Services

Facility Location: 140 Goes in Lodge Road, Riverton, Wyoming

Dates of Inspection: August 17, 2021

Photo 1450: DSCN1450.jpg: close-up of supersack shown at left in photo 1448. The label was missing an accumulation start date.

U.S. D.O.T. SHIPPING DESCRIPTION

HAZARDOUS WASTE, SOLID, A.C.S., CHROMIUM, S. PG II

9

HAZARD CLASS

NA3077

HAZARDOUS WASTE

FEDERAL LAW PROHIBITS IMPROPER DISPOSAL
IF FOUND, CONTACT THE NEAREST POLICE, OR
PUBLIC SAFETY AUTHORITY, OR THE
U.S. ENVIRONMENTAL PROTECTION AGENCY

CAUTION

MANIFEST TRACKING #	016346007FLE	ACCUMULATION START DATE	
GENERATOR	Chemtrade Refinery Services		
ADDRESS	140 Goes in Lodge Road		
CITY	Riverton	ST	WY
ZIP	82501		
GENERATOR'S EPA IDENTIFICATION NUMBER	WYD042634865		
EPA HAZARD NAME	TOXIC		
WASTE CODES	D007		
PROPER SHIPPER'S HAZARD CLASSIFICATION	DESCRIPTION	CUST. CONTROL #	
CH2110484	WASTE SPENT CATALYST (CHROMIUM)	C000002127	

CONTAINS HAZARDOUS OR TOXIC WASTE

HAZARDOUS CONSTITUENTS

PART # LHMW300W Rev. 1

8.17.2021 12:55

Facility Name: Chemtrade Refinery Services

Facility Location: 140 Goes in Lodge Road, Riverton, Wyoming

Dates of Inspection: August 17, 2021

Photo 1451: DSCN1451.jpg: photo of drum shown at left in photo 1448. This drum was labeled “non-hazardous waste”, but it did contain hazardous waste (boiler ash).



Facility Name: Chemtrade Refinery Services

Facility Location: 140 Goes in Lodge Road, Riverton, Wyoming

Dates of Inspection: August 17, 2021

Photo 1452: DSCN1452.jpg: close-up of label on container shown in photo 1451.



Facility Name: Chemtrade Refinery Services

Facility Location: 140 Goes in Lodge Road, Riverton, Wyoming

Dates of Inspection: August 17, 2021

Photo 1453: DSCN1453.jpg: overview of hazardous waste stored inside the southwest pen of the waste corral.



Dates of Inspection: August 17, 2021

U.S. D.O.T. SHIPPING DESCRIPTION
NA3077, HAZARDOUS WASTE, SOLID, N.O.S., CHRONICALLY S, PG 18

Line #1: 9

HAZARD CLASS: NA3077

HAZARDOUS WASTE
FEDERAL LAW PROHIBITS IMPROPER DISPOSAL
IF FOUND, CONTACT THE NEAREST POLICE, OR
PUBLIC SAFETY AUTHORITY, OR THE
U.S. ENVIRONMENTAL PROTECTION AGENCY

CAUTION

MANIFEST NUMBER	016346007FLE		ACCOMMODATION	
GENERATOR	Chemtrade Refinery Services			
ADDRESS	140 Gales In Lodde Road			
CITY	Riverport	ST	WY	ZIP 82501
GENERATOR'S EPA IDENTIFICATION NUMBER	WY0042634865		ESTABLISHED NAME	LOCAL
WASTE CODES	10007		HAZARDOUS WASTE	UNRECORDED
DATE OF SHIPMENT	DESCRIPTION	ESTABLISHED	HAZARDOUS WASTE	UNRECORDED

HAZARDOUS WASTE
CONTAINS HAZARDOUS OR TOXIC WASTE

HAZARDOUS WASTE
DRUM

8.17.2021 12:59

Facility Name: Chemtrade Refinery Services

Facility Location: 140 Goes in Lodge Road, Riverton, Wyoming

Dates of Inspection: August 17, 2021

Photo 1455: DSCN1455.jpg close-up of a label on a second container shown in photo 1454 that includes the words “hazardous waste”, “boiler ash” and “hazard class 9”, but with no accumulation start date.



Facility Name: Chemtrade Refinery Services

Facility Location: 140 Goes in Lodge Road, Riverton, Wyoming

Dates of Inspection: August 17, 2021

Photo 1456: DSCN1456.jpg: close-up of a label on a third container shown in photo 1454 that includes the words “hazardous waste” and “hazard class 9”, but with no accumulation start date.



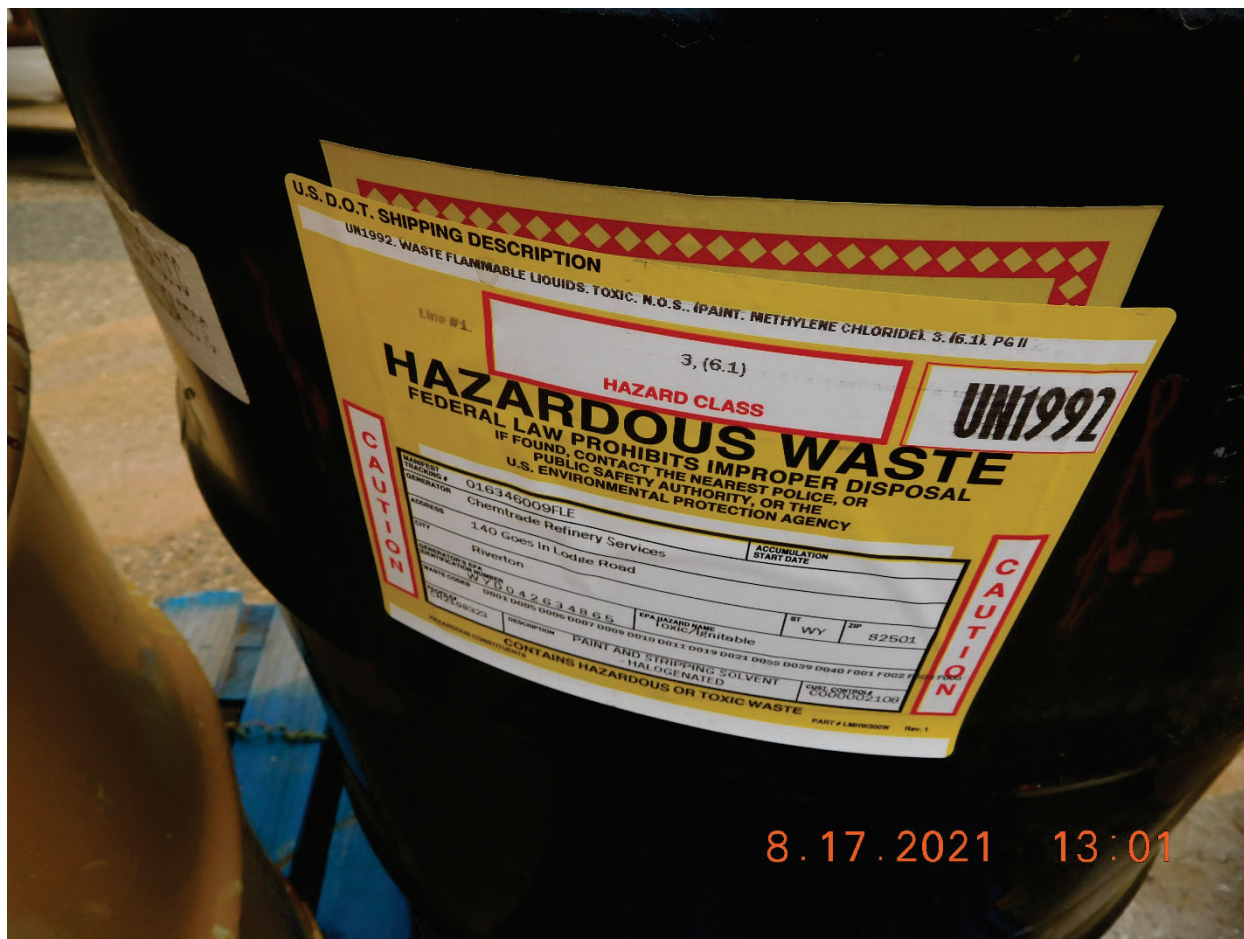
Facility Name: Chemtrade Refinery Services

Facility Location: 140 Goes in Lodge Road, Riverton, Wyoming

Dates of Inspection: August 17, 2021

DSCN1457.mov: inadvertently took a short video due to accidentally pushing the wrong button.

Photo 1458: DSCN1458.jpg: close-up of a label on a fourth container shown in photo 1454 that includes the words “hazardous waste”, “paint and stripping solvent - halogenated” and “hazard class 3, (6.1)”, but with no accumulation start date.



Facility Name: Chemtrade Refinery Services

Facility Location: 140 Goes in Lodge Road, Riverton, Wyoming

Dates of Inspection: August 17, 2021

Photo 1459: DSCN1459.jpg: photo of a drum located inside a drum shelter within the waste corral.



Facility Name: Chemtrade Refinery Services

Facility Location: 140 Goes in Lodge Road, Riverton, Wyoming

Dates of Inspection: August 17, 2021

Photo 1460: DSCN1460.jpg: close-up of the label on the drum shown in photo 1459. This drum was labeled with an accumulation start date of February 2, 2021 (marked 2-2-21) indicating that accumulation of hazardous waste in this container had exceeded 90 days.



Facility Name: Chemtrade Refinery Services

Facility Location: 140 Goes in Lodge Road, Riverton, Wyoming

Dates of Inspection: August 17, 2021

Photo 1461: DSCN1461.jpg: photo of a sixth drum located inside the waste corral that was labeled “hazardous waste”, but it was not labeled with an accumulation start date.

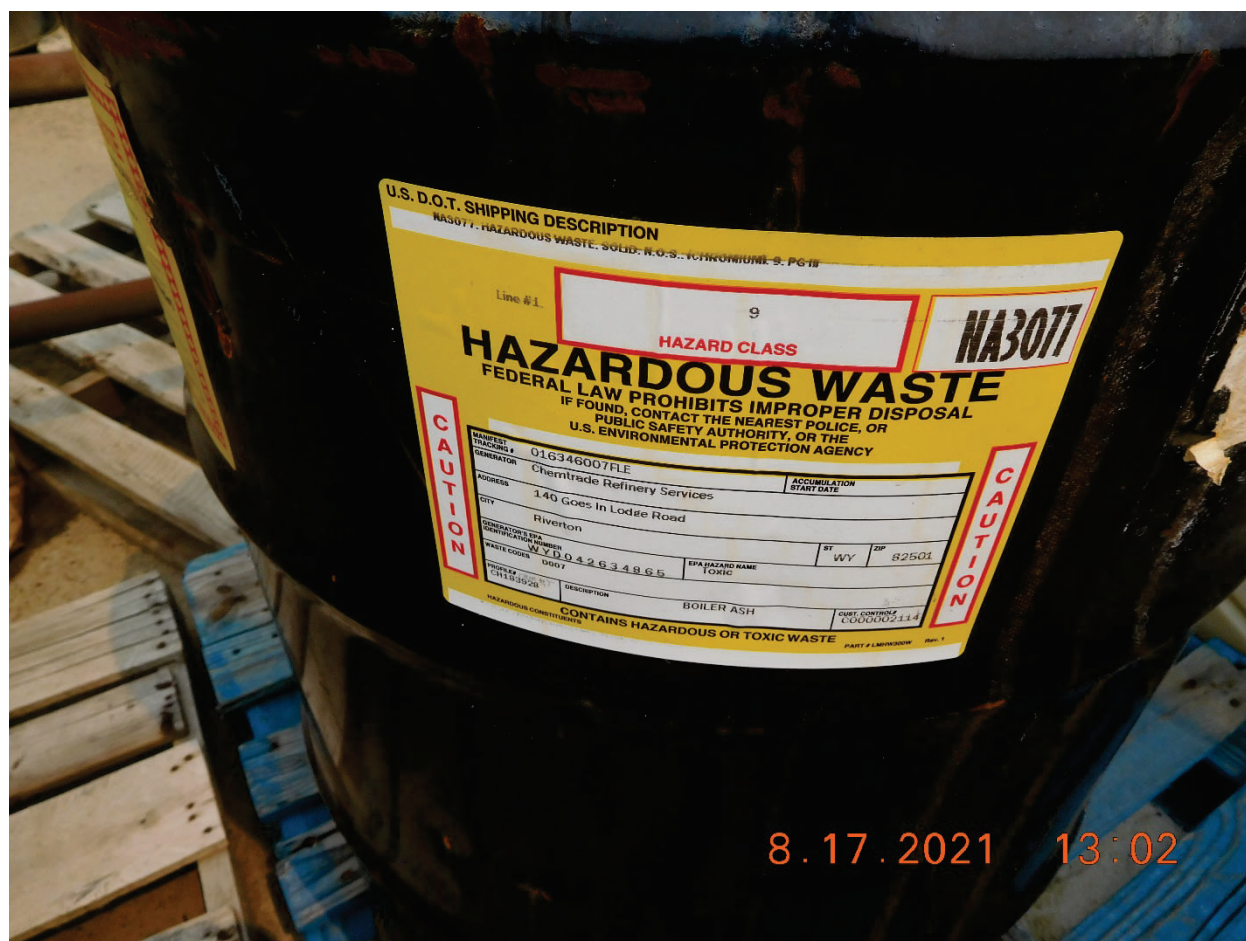


Facility Name: Chemtrade Refinery Services

Facility Location: 140 Goes in Lodge Road, Riverton, Wyoming

Dates of Inspection: August 17, 2021

Photo 1462: DSCN1462.jpg: photo of a seventh drum located inside the waste corral that was labeled “hazardous waste”, but it was not labeled with an accumulation start date.

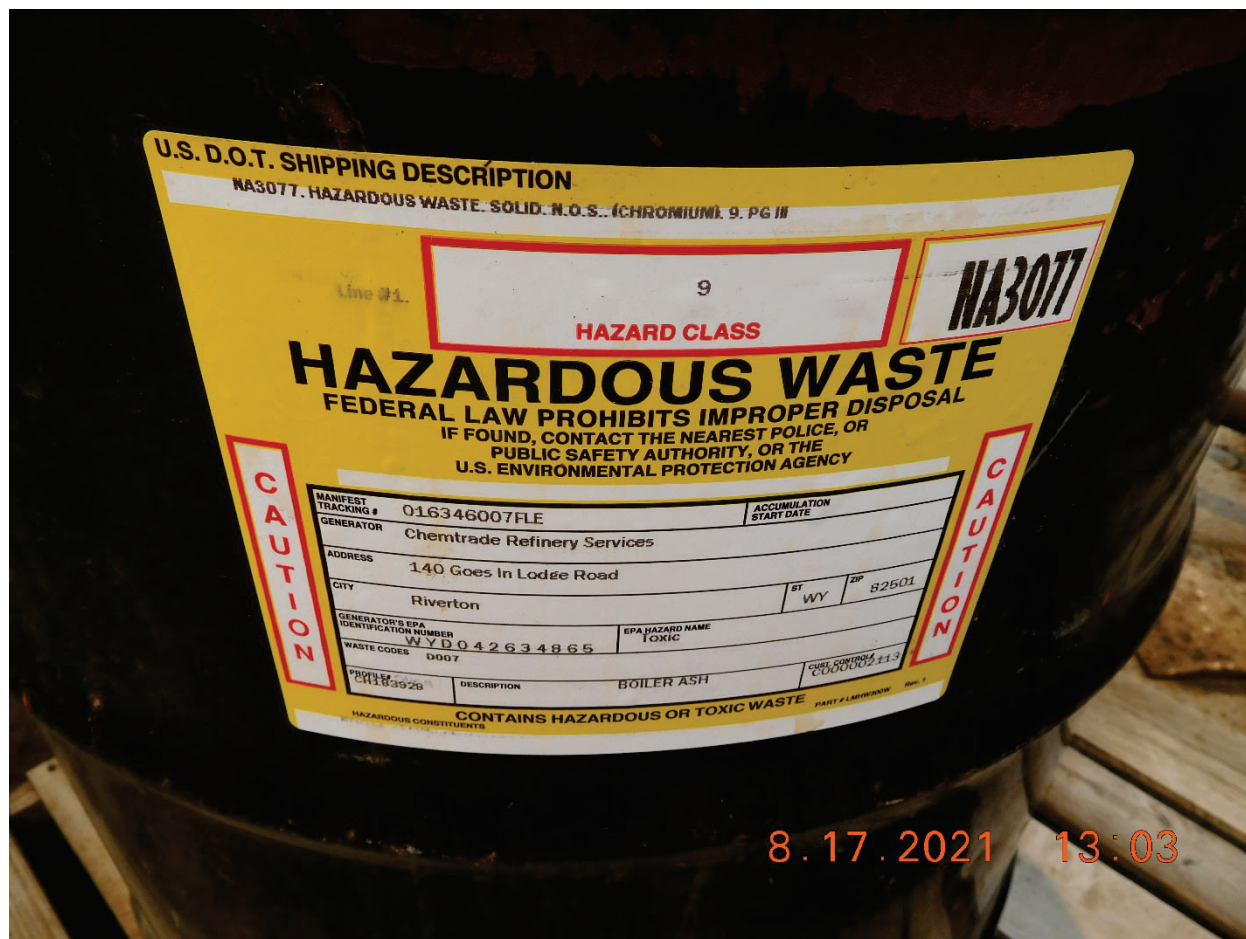


Facility Name: Chemtrade Refinery Services

Facility Location: 140 Goes in Lodge Road, Riverton, Wyoming

Dates of Inspection: August 17, 2021

Photo 1463: DSCN1463.jpg: photo of an eighth drum located inside the waste corral that was labeled “hazardous waste”, but it was not labeled with an accumulation start date.

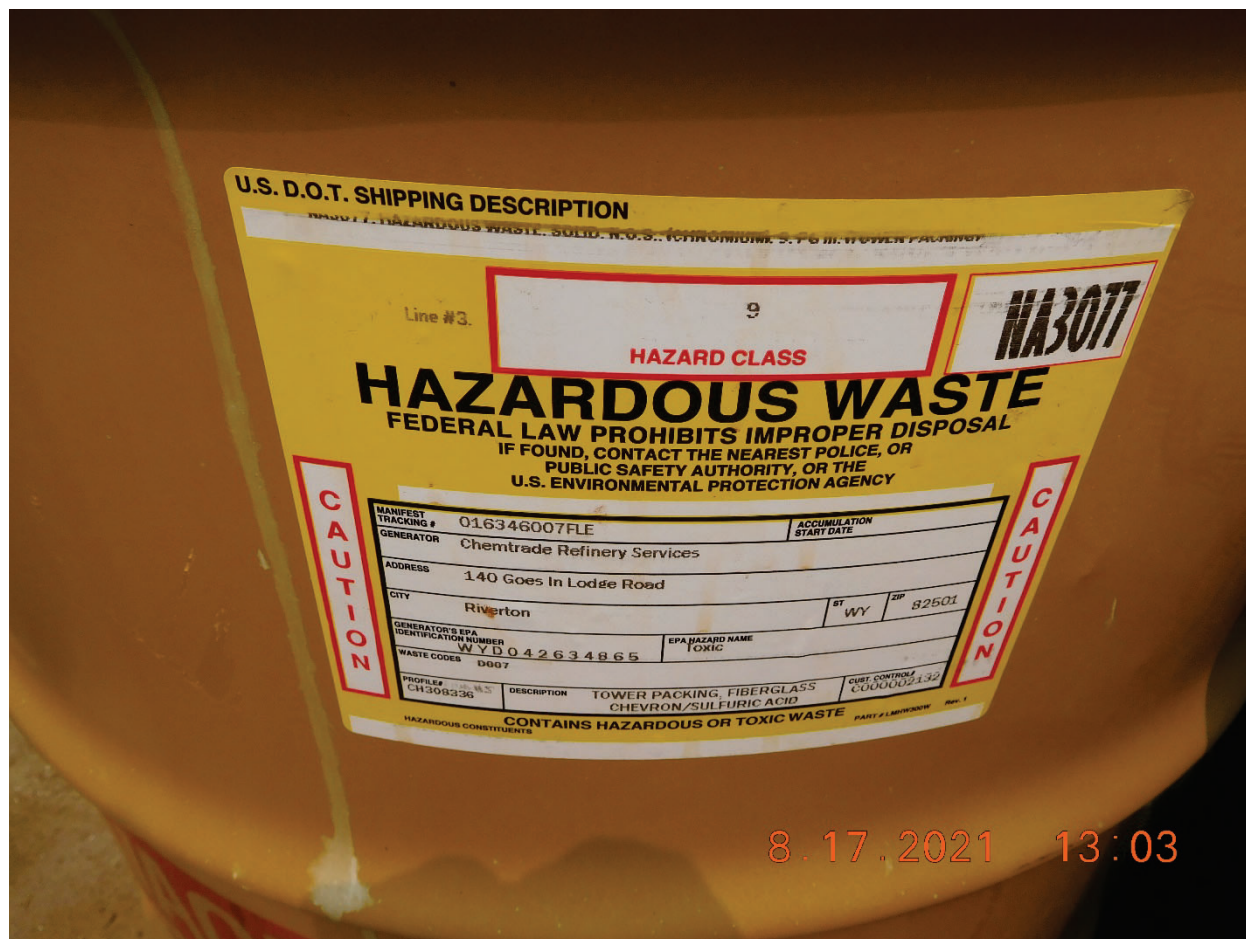


Facility Name: Chemtrade Refinery Services

Facility Location: 140 Goes In Lodge Road, Riverton, Wyoming

Dates of Inspection: August 17, 2021

Photo 1464: DSCN1464.jpg: photo of a ninth drum located inside the waste corral that was labeled “hazardous waste”, but it was not labeled with an accumulation start date.

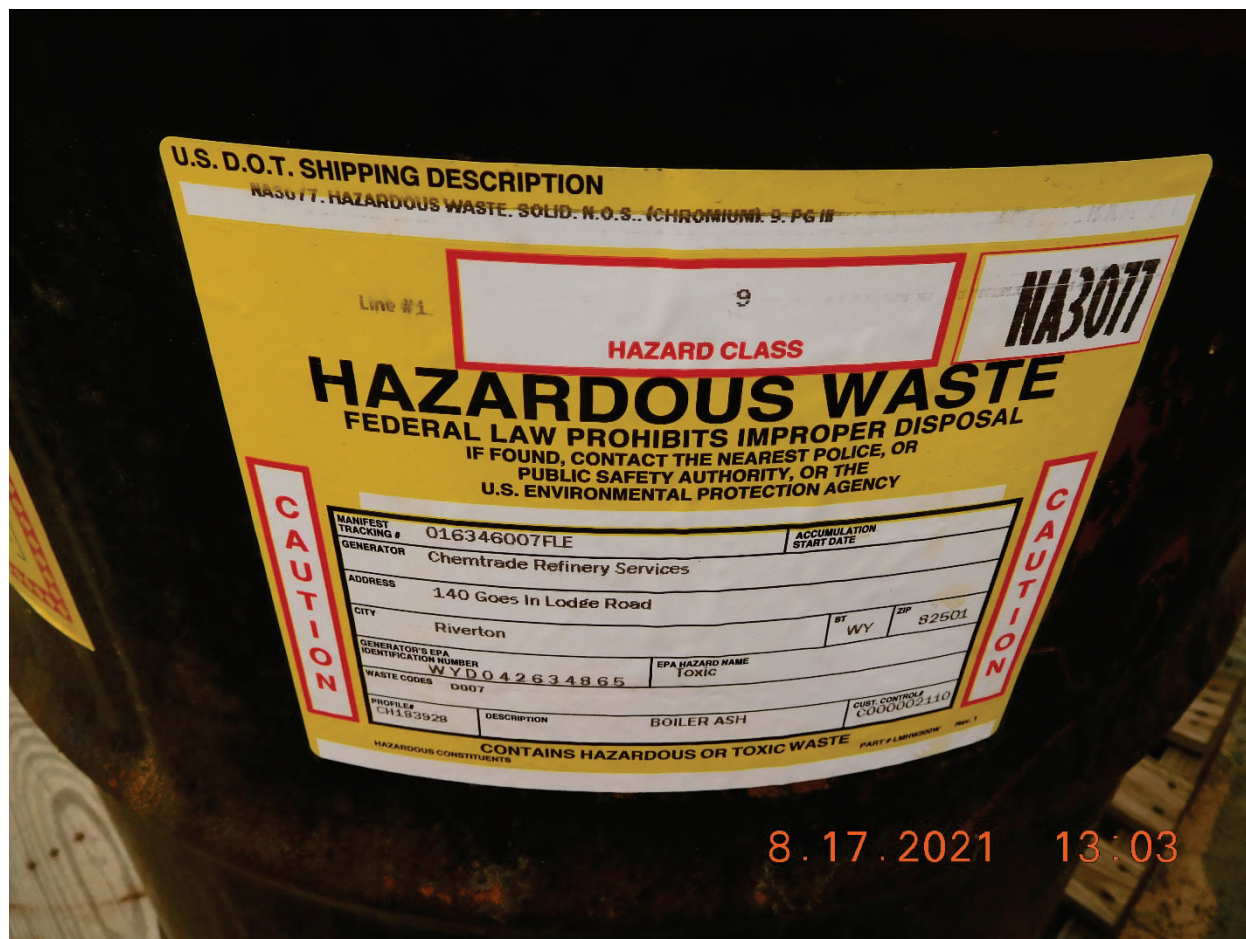


Facility Name: Chemtrade Refinery Services

Facility Location: 140 Goes in Lodge Road, Riverton, Wyoming

Dates of Inspection: August 17, 2021

Photo 1465: DSCN1465.jpg: photo of a tenth drum located inside the waste corral that was labeled “hazardous waste”, but it was not labeled with an accumulation start date.



Facility Name: Chemtrade Refinery Services

Facility Location: 140 Goes in Lodge Road, Riverton, Wyoming

Dates of Inspection: August 17, 2021

Photo 1466: DSCN1466.jpg: photo of a spill in the waste corral area. The Facility representatives stated that used oil had previously been stored in this area.



Facility Name: Chemtrade Refinery Services

Facility Location: 140 Goes in Lodge Road, Riverton, Wyoming

Dates of Inspection: August 17, 2021

Photo 1467: DSCN1467.jpg: photo of a new hazardous waste label placed onto the container shown in photos 1448, 1451 and 1452 that had been labeled non-hazardous.



Facility Name: Chemtrade Refinery Services

Facility Location: 140 Goes in Lodge Road, Riverton, Wyoming

Dates of Inspection: August 17, 2021

Photo 1468: DSCN1468.jpg: photo of non-hazardous waste stored to the west of the waste corral.

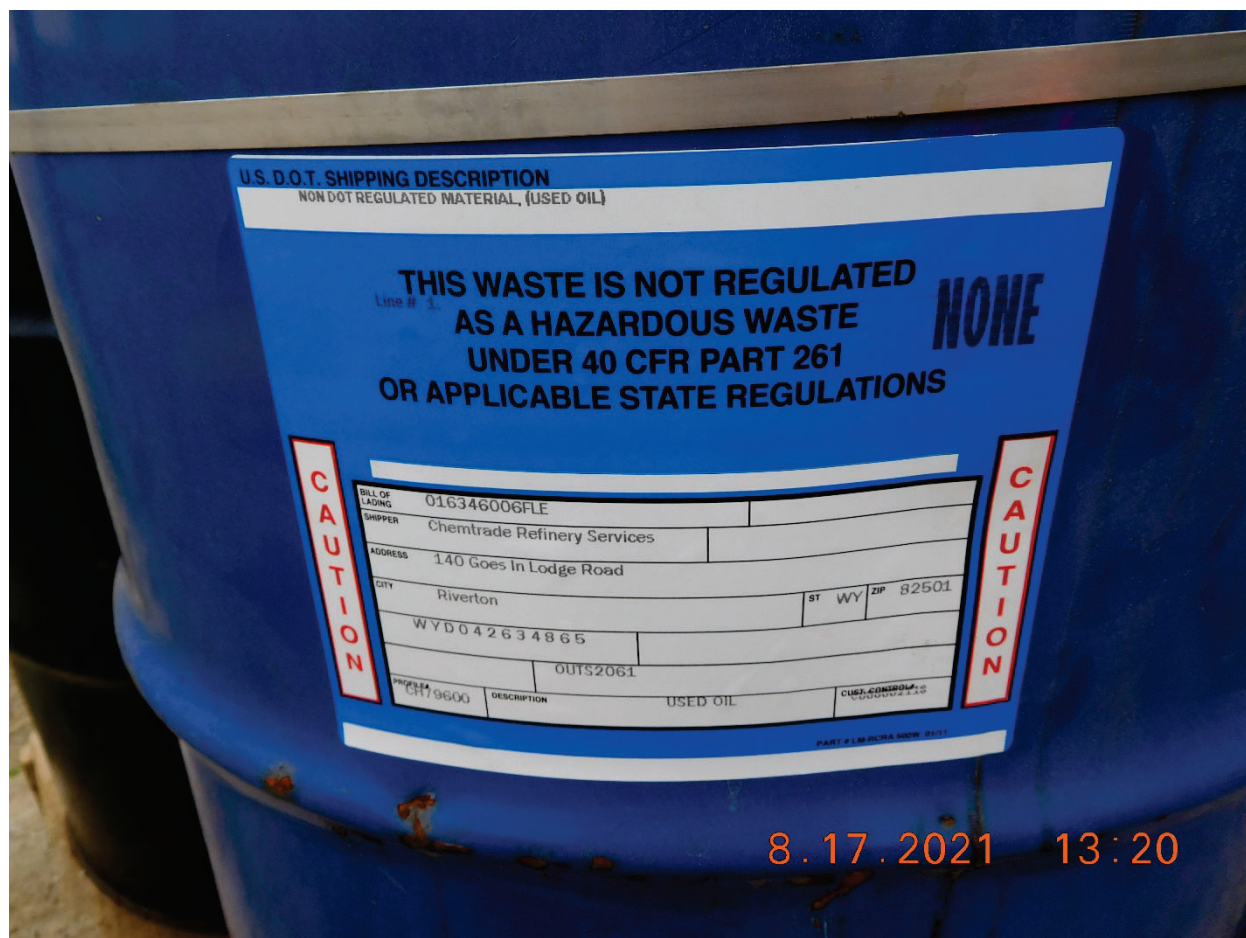


Facility Name: Chemtrade Refinery Services

Facility Location: 140 Goes in Lodge Road, Riverton, Wyoming

Dates of Inspection: August 17, 2021

Photo 1469: DSCN1469.jpg: close-up of a label on a non-hazardous waste container.



Facility Name: Chemtrade Refinery Services

Facility Location: 140 Goes in Lodge Road, Riverton, Wyoming

Dates of Inspection: August 17, 2021

Photo 1470: DSCN1470.jpg: photo of non-hazardous waste containers stored to the west of the waste corral. One container, center left, was labeled with both a hazardous waste label and also a non-hazardous waste label. The Facility personnel stated that the hazardous waste label had been incorrectly applied, and that the waste was non-hazardous.



Facility Name: Chemtrade Refinery Services

Facility Location: 140 Goes in Lodge Road, Riverton, Wyoming

Dates of Inspection: August 17, 2021

Photo 1471: DSCN1471.jpg: close-up of the hazardous waste label shown in photo 1470.



Facility Name: Chemtrade Refinery Services

Facility Location: 140 Goes in Lodge Road, Riverton, Wyoming

Dates of Inspection: August 17, 2021

Photo 1472: DSCN1472.jpg: overview of the wastewater pond area. Photo taken facing southwest.



Facility Name: Chemtrade Refinery Services

Facility Location: 140 Goes in Lodge Road, Riverton, Wyoming

Dates of Inspection: August 17, 2021

Photo 1473: DSCN1473.jpg: photo of aerator in one of the ponds.



Facility Name: Chemtrade Refinery Services

Facility Location: 140 Goes in Lodge Road, Riverton, Wyoming

Dates of Inspection: August 17, 2021

Photo 1474: DSCN1474.jpg: photo of blower used to add dissolved oxygen.



Facility Name: Chemtrade Refinery Services

Facility Location: 140 Goes in Lodge Road, Riverton, Wyoming

Dates of Inspection: August 17, 2021

Photo 1475: DSCN1475.jpg: photo of overview of ponds facing back toward the plant.

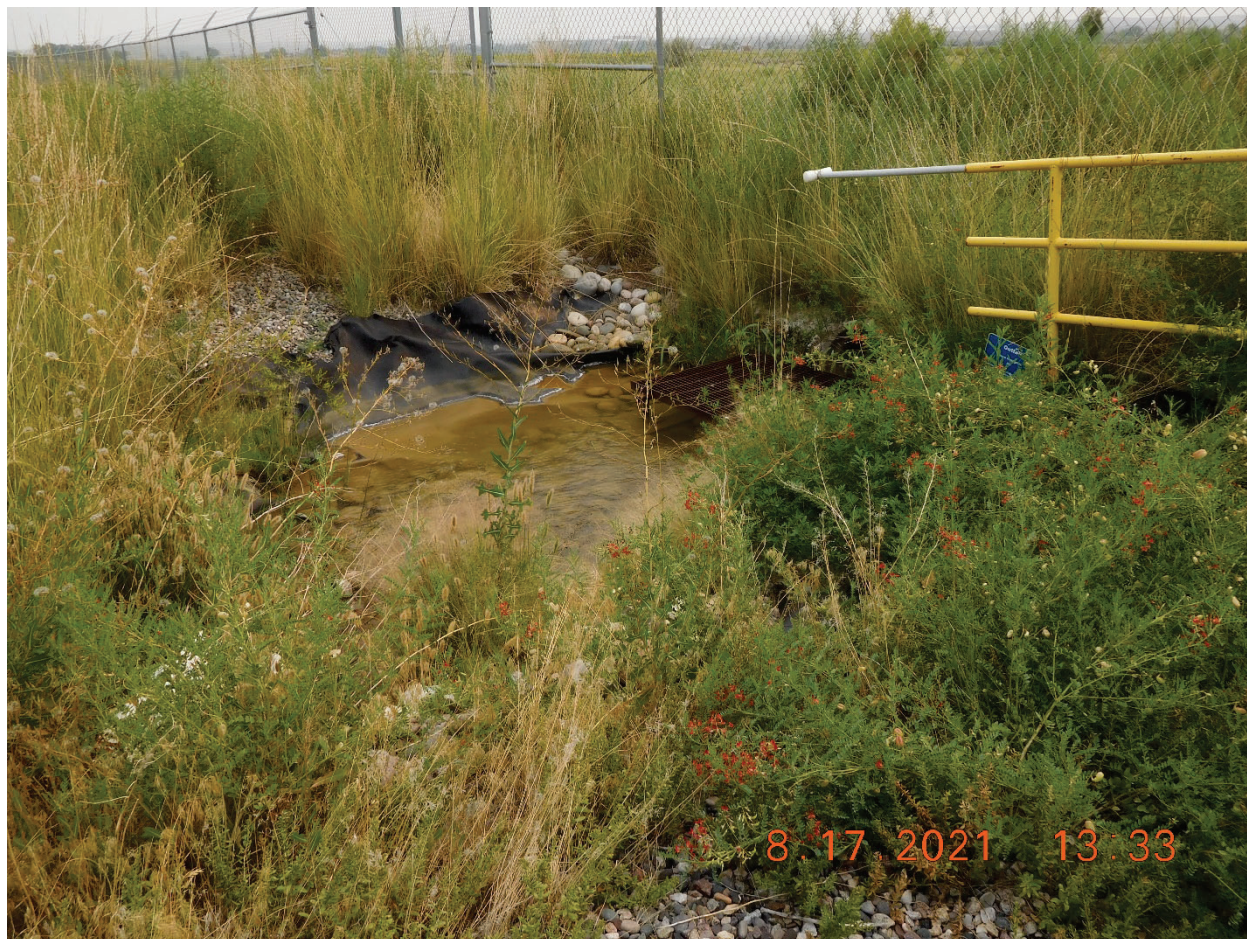


Facility Name: Chemtrade Refinery Services

Facility Location: 140 Goes in Lodge Road, Riverton, Wyoming

Dates of Inspection: August 17, 2021

Photo 1476: DSCN1476.jpg: photo of NPDES outfall and sampling location. The Facility personnel stated that lab samples are collected from this area every Monday and that internal samples are collected here every four hours.



Facility Name: Chemtrade Refinery Services

Facility Location: 140 Goes in Lodge Road, Riverton, Wyoming

Dates of Inspection: August 17, 2021

Photo 1477: DSCN1477.jpg: photo of a satellite accumulation container.



Facility Name: Chemtrade Refinery Services

Facility Location: 140 Goes in Lodge Road, Riverton, Wyoming

Dates of Inspection: August 17, 2021

Photo 1478: DSCN1478.jpg: close-up of the container shown in photo 1477. The label was not marked with an indication of the hazards.

