

RCRA Inspection Report

1) Inspectors and Authors of Report

David Champagne, Physical Scientist
U.S. Environmental Protection Agency, Region 4
RCRA Enforcement Section
Chemical Safety and Land Enforcement Branch
Enforcement and Compliance Assurance Division
61 Forsyth Street, S.W.
Atlanta, Georgia 30303
(404) 562-9028
Champagne.David@epa.gov

2) Facility Information

Univar Solutions USA, Inc. (Univar)
701 Western Drive
Mobile, Mobile County, Alabama 36607
EPA ID Number: ALD059661454
NAICS Code(s): 424690
Telephone: (251) 753-9532
Website: univarsolutions.com

3) Responsible Official

Mr. Ryan Barker, Regulatory Manager
Phone: (801) 230-0817
Email: ryan.barker@univarsolutions.com

4) Inspection Participants

Mr. John Chapman, Branch Operations Manager – Univar
Mr. Walter Jenkins, Warehouse Lead – Univar
Mr. David Champagne, US EPA Region 4
Mr. Lanny Sasser, Alabama Department of Environmental Management (ADEM)

5) Date and Time of Inspection

June 15, 2021 at 9:00 a.m. CDT

6) Applicable Regulations

Subtitle C of the Resource Conservation and Recovery Act (RCRA) (42 U.S.C. §§ 6921 – 6939g), the Alabama Hazardous Waste Management and Minimization Act of 1978, Ala. Code § 22-30-1 *et seq.*; 40 Code of Federal Regulation (C.F.R.), Parts 260 - 270, 273 & 279, and rules 335-14-1 to 335-14-17 (2016 and 2018) of the ADEM Administrative Code (ADEM Admin. Code).

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 ADEM Admin. Code r. 335-14-3-.01(7) [40 C.F.R. § 262.17], a large quantity generator (LQG) may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status, as required by Section 22-30-12(b) of the AHWMMA, Ala. Code § 22-30-12(b) [Section 3005 of RCRA, 42 U.S.C. § 6925], provided that the generator complies with the conditions listed in ADEM Admin. Code r. 335-14-3-.01(7) [40 C.F.R. § 262.17] (hereinafter referred to as the "LQG Permit Exemption").

Pursuant to ADEM Admin. Code r. 335-14-3-.01(5)(a) [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 22-30-12(b) of the Alabama Hazardous Wastes Management and Minimization Act (AHWMMA), Ala. Code § 22-30-12(b) [Section 3005 of RCRA, 42 U.S.C. § 6925], and without complying with ADEM Admin. Code r. 335-14-3-.01(6)(b) or 335-14-3-.01(7)(a) [40 C.F.R. § 262.16(b) or § 262.17(a)], except as required in ADEM Admin. Code r. 335-14-3-.01(5)(a)7. and 8. [40 C.F.R. § 262.15(a)(7) and (8)], provided that the generator complies with the satellite accumulation area conditions listed in ADEM Admin. Code r. 335-14-3-.01(5)(a) [40 C.F.R. § 262.15(a)] (hereinafter referred to as the "SAA Permit Exemption").

7) Purpose of Inspection

The purpose of the inspection was to conduct an unannounced RCRA compliance evaluation inspection (CEI) to determine the Univar's compliance with the conditions of its Alabama Hazardous Wastes Management and Minimization Act (AHWMMA) permit and all applicable requirements of Division 14 of the ADEM Administrative Code (Subtitle C of the Resource Conservation and Recovery Act (RCRA)).

8) Facility Description

Nexeo Solutions, LLC's assets were transferred to Univar USA, Inc. on September 1, 2019, and its name changed to Univar Solutions USA, Inc. (Univar). Univar is a commercial chemical distribution center located in Mobile, Alabama. The facility receives large containers of chemical products via railcar and truck. These products are then repackaged into smaller containers to be shipped out to retailers via truck. Univar formerly generated a hazardous waste by flushing the lines of the pumping unit to evacuate the residual chemical (solvent) that was previously being transferred from a bulk container into a retail container. Recently, the facility has found a market for this solvent mixture in the auto body industry. Univar also operates as a hazardous waste transporter (OHR000162800) with a transfer facility located at the site. Univar currently employs 5 people and operates Monday – Friday from 8:00 a.m. to 5:00 p.m. According to the facility's most recent submittal of ADEM Form 8700-12 (received by the Department on January 19, 2021), Univar is a large quantity generator of hazardous waste and a permitted transporter and transfer facility of EPA hazardous waste codes: D001, D002, D035, U002, U080, U112, U154, U159, U220.

9) **Previous Inspection History**

ADEM last conducted a RCRA compliance evaluation inspection (CEI) at Univar on August 26, 2015. No violations were identified.

10) **Observations**

On June 15, 2021, Mr. Champagne and Mr. Sasser arrived at Univar at approximately 9 AM CDT and made introductions with Mr. Chapman. The inspectors presented credentials and explained the purpose of the inspection. Mr. Chapman escorted us to his office where we were joined by Mr. Jenkins and conducted the opening conference. Following the opening conference, Mr. Chapman and Mr. Jenkins accompanied us on a tour of the facility where the following regulated units were inspected.

Central Accumulation Area (CAA) / 10 Day Transfer Area

The hazardous waste storage area is located on the loading dock of the warehouse. There was one 55-gallon container present in this area at the time of the inspection. The container was closed, labeled (labeled "Hazardous Waste" and with the indication of the hazardous contents) and dated. Adjacent to this area was the facility's 10-day hazardous waste storage area. There were six 55-gallon containers of non-RCRA related material present in the area. No areas of concern were observed in these areas.

Drum Line

This is a product transfer area. This area is where the bulk containers are staged while the content of each container is transferred into a smaller retail-friendly container. When the products are changed, the lines are flushed. The resultant mixture is sold to the auto body industry for cleaning paint guns and various other items. Three satellite accumulation area (SAA) 55-gallon containers were in this area at the time of the inspection. Each were closed and labeled. No areas of concern were noted during this part of the inspection.

Lab

Univar samples each incoming load for Quality Assurance/Quality Control. There was one 5-gallon SAA container present during the inspection. It was closed and labeled. No areas of concern were identified in this area.

Bulk Transfer

Incoming tanker trucks are staged here while their contents are pumped into one of the on-site product storage tanks. One 55-gallon SAA container was present in this area at the time of the inspection. The container was closed and labeled. No areas of concern were noted during this part of the inspection.

Universal Waste Storage

Located inside Univar's product storage warehouse, this area contained one container of universal waste (UW) lamps. Universal waste lamps were labeled, dated, and closed. Batteries are recycled. No areas of concern were noted during this part of the inspection.

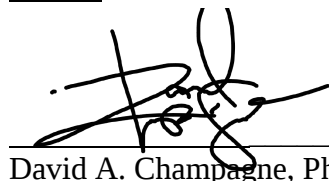
Records

After the facility tour, Mr. Chapman escorted us back into his office to perform the record review. The following documents were reviewed at the time of the inspection: CAA weekly inspections (2018-present); ADEM form 8700-12 Notification of Regulated Waste Activity; and 10-day transfer facility logs (2019-present). Additional records were emailed on June 22, 2021. These records included: Non-hazardous waste profiles; Univar's contingency plan along with proof it had been sent to local emergency responders; Hazardous waste training records; and Hazardous waste manifests. No areas of concern were noted during the record review.

11) Summary

At the conclusion of the CEI, the inspectors held a closing conference with Univar's representatives, Mr. Chapman and Mr. Jenkins. During the meeting, the inspectors presented the preliminary results of the inspection. Univar was inspected as a large quantity generator of hazardous waste. The facility appeared to be in compliance with RCRA.

12) Signed



David A. Champagne, Physical Scientist

07/09/2021

Date

Concurrence

ARACELI CHAVEZ

Digitally signed by ARACELI
CHAVEZ
Date: 2021.07.12 10:49:28 -04'00'

Araceli B. Chavez
Chief
RCRA Enforcement Section

Date