

Region 6 - Enforcement & Compliance Assurance Division
INSPECTION REPORT

Inspection Date(s):	10/03-04/2022	
Media Program:	RCRA Compliance Evaluation Inspection	
Regulatory Program(s)	RCRA Large Quantity Generator	
Company Name:	Albemarle Co.	
Facility Name:	Albemarle Corp. Process Development Center (PDC)	
Facility Physical Location:	1201 Gulf States Utilities Rd	
(city, state, zip code)	Baton Rouge, LA 70805	
Mailing address:	same	
(city, state, zip code)	same	
County/Parish:	East Baton Rouge	
Facility Phone Number	+1 (800) 535-3030	
Facility Contact:	Jacob Krzystowczyk	EHS Manager
	jacob.krzystowczyk@albemarle.com	
FRS Number:	110000606602	
Identification/Permit Number:	0840-00150-05	
Media Identifier Number:	EPA ID # LAD000757286	
NAICS:	325199 - ALL OTHER BASIC ORGANIC CHEMICAL MANUFACTURING	
SIC:	n/a	
Personnel participating in inspection:		
Erin Young-Dahl	EPA R6/ECD-SR	Inspector
Bill Mansfield	EPA R6/ECD-SR	Sr. Inspector
Debra Pandak	EPA R6/ECD-SR	Sr. Inspector
Terry Dedon	LDEQ	Sr. Environmental Scientist
Jenifer Kidd	LDEQ	Environmental Scientist
Connor Gruntz	LDEQ	Environmental Scientist
Adam Ramachandran	LDEQ	Environmental Scientist
Jacob Krzystowczyk	Albemarle	EHS Manager
Boyd Ourso	Albemarle	Plant Manager
EPA Lead Inspector Signature/Date		
	Erin Young-Dahl	Date
Supervisor Signature/Date		
	Jeffrey Yurk	Date

Section I – INTRODUCTION**PURPOSE OF THE INSPECTION**

During the week of October 3, 2022, I, Erin Young-Dahl, conducted an unannounced inspection of the Albemarle Corporation Process Development Center (“Albemarle”), located at 1201 Gulf States Utilities Rd in Baton Rouge, Louisiana, for compliance with the Resource Conservation and Recovery Act (RCRA). I was assisted on this inspection by Environmental Protection Agency (EPA) inspectors Bill Mansfield and Debra Pandak, along with Louisiana Department of Environmental Quality (LDEQ) inspectors Terry Dedon, Jenifer Kidd, Connor Gruntz, and Adam Ramachandran. The inspection included a walkthrough of the facility’s production process and waste generation and management units as well as a review of the facility records related to hazardous waste management.

The Albemarle facility was targeted for inspection as part of Environmental Justice and Regional and National investigation initiatives to evaluate facilities subject to RCRA Subpart AA, BB, CC regulations related to air emissions from hazardous waste management units.

We concluded the inspection of the Albemarle facility on October 4, 2022, with a closing conference where we presented our provisional areas of concern.

This report serves as documentation of all onsite activities and observations during the inspection of the Albemarle facility. Photographs taken during the inspection to document onsite observations are included as Appendix 1. A summary of all areas of concern identified during the inspection is provided in Section III.

FACILITY DESCRIPTION

The Albemarle facility was issued the EPA ID # LAD000757286. Albemarle is operating as a Large Quantity Generator and has done so since March 1, 1990. The facility is operating under LDEQ-issued Air Permit No. 0840-00150-05.

The Albemarle facility manufactures a brominated flame retardant and an anionic polystyrene product. Facility production operations include a bromine staging and unloading area, multiple product washes, a neutralization unit, and product tanks. Both processes involve a solvent swap with the Albemarle Magnolia facility in Arkansas.

Section II - OBSERVATIONS

Bill Mansfield, Debra Pandak, Terry Dedon, Jenifer Kidd, Connor Gruntz, Adam Ramachandran, and I conducted the onsite inspection during normal business hours on October 3 through 4, 2022. During the inspection, the facility was conducting normal operations and all areas of the facility were in use. Throughout the inspection, we visited each of Albemarle’s waste generation, accumulation, and

management areas and reviewed the operating records pertaining to Albemarle's RCRA applicability and compliance requirements.

This section provides an abbreviated description of our daily activities (see Appendix 2). Appendix 1 provides photographs of these observations. Unless otherwise specified, the statements cited in this section reflect those claims made by facility personnel or documents reviewed during the inspection.

October 3, 2022

I, Erin Young-Dahl, along with Bill Mansfield, Debra Pandak, Terry Dedon, Jenifer Kidd, Connor Gruntz, and Adam Ramachandran, entered the facility at 0910 hrs. At the W.R. Grace/Albemarle shared guardhouse, we presented identification and inspector credentials to on-duty security officers, and the inspection team received visitor safety training.

Following the safety training, we met Mr. Jacob Krzystowczyk (EHS Manager) and informed him that we were there to conduct an inspection of the facility under the authority of Section 3007 of RCRA. I explained the right of Albemarle to assert a Confidential Business Information claim for records requested by the EPA, followed by a presentation of EPA Region 6's Confidentiality Notice (40 C.F.R. § 2.203). I then conducted an opening briefing at 0930 hrs. with Jacob Krzystowczyk and Boyd Ourso (Plant Manager).

After the opening briefing, we conducted a walkthrough of the Albemarle facility production and associated waste management areas. The facility walkthrough began at the Central Accumulation Area at approximately 1030 hrs. We were accompanied by Jacob Krzystowczyk and Boyd Ourso.

Central Accumulation Area

The Albemarle Central Waste Accumulation Area is located outdoors and shares space with the W.R. Grace Central Accumulation Area. Albemarle operates its portion of the area for the accumulation of hazardous and non-hazardous waste and labels their containers with standardized orange labels. All containers I inspected were correctly labeled with an applicable hazardous waste description, profile number, hazard description, and start/fill dates. All dates were within the 90-day storage timeline. The area was clean, containers were neatly stacked two high on pallets with labels facing outward, and aisle spacing was adequate.

Three containers were marked as waste "profiles pending." When requested, Albemarle was able to provide safety data sheets for the profiles in question.

Filter and Sample Collection Areas

I then inspected the neutralization unit used in the brominated flame retardant process. Materials from this unit were said to be high-pH water mixed with sulfuric acid and are pumped to W.R. Grace. Albemarle stated that material from this unit is tested for total organics and is non-hazardous.

I then saw filter points for the two facility production process lines. I observed that both filter points had some spray from the lines that occurred during filter changes. The facility stated that neither line was in hazardous waste service.

North Sump Area

Albemarle uses this area as a satellite accumulation area serving the brominated flame retardant and anionic polystyrene production lines. I observed four partially full drums of hazardous waste, each with a closed and secured funnel and a drum air vent. Containers appeared to be in good condition with appropriate labels, included a marking that identified the drums as satellite accumulation containers.

T-807 Area

In this area, I observed two satellite drums containing hazardous waste serving the polystyrene process tank. One drum collected samples from the tank to be incinerated, and the other collected PPE contaminated with materials from this process. I noticed visible deterioration of the metal PPE drum; the container was corroded on the hinge, and solvent odors were present in the area.

We departed the facility at approximately 1430 hrs after a brief daily wrap-up meeting.

October 4, 2022

On this day, we did a walkthrough of the lab spaces operated by Albemarle and reviewed facility records.

Lab Spaces

The lab space walkthrough included 14 lab spaces in three buildings. Each lab is dedicated to a specific purpose and contains multiple satellite accumulation points for lab workers to place their contaminated PPE. All satellite accumulation containers were found near the point of generation: each lab station. I observed locked padlocks on two 55-gallon containers as additional security measures.

All satellite accumulation containers, with three notable exceptions, were correctly labeled and in good condition. One container was cracked, though I was told Albemarle was already in the process of ordering a replacement when I mentioned this. In a different lab, two jugs were labeled using an incorrect version of the Albemarle standardized label and the two jugs, which contained hazardous waste, were not labeled with the words "hazardous waste." The labels were promptly replaced upon identification.

Storage containers outside of the laboratory buildings were all marked and labeled appropriately. I observed that all drums were in good condition, and each was placed in single-drum secondary

containment. Lab spaces were generally clean and tidy, and all lab containers in use were closed and labeled on shelves and, as appropriate, in fume hoods.

Following the lab walkthrough and records review, I, Erin Young-Dahl, facilitated a closeout meeting at 1330 hrs to review my observations and outstanding document requests. We departed the facility at approximately 1415 hrs.

Section III – AREAS OF CONCERN

I observed no areas of concern at the time of the inspection.

Section IV – FOLLOW UP

The following information was received by EPA on October 4-6, 2022, after exiting the facility on October 4:

- Inspection records for the Central Accumulation Area
- Air permit
- Facility SOPs on hazardous waste management
- Safety data sheets for select wastes
- Training records for select employees

Section V – LIST OF APPENDICES

Appendix 1 – Photo Log

Appendix 2 – Daily Summaries

Appendix 1

Photograph Log



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 1

Location: Albemarle Process and Development Center		
City: Baton Rouge	County/Parish: East Baton Rouge	State: Louisiana



Photo File Name: PA030002.jpg	Date of Photo: 10/03/2022	Time: 1035 hrs
Photographer: Debra Pandak, EPA Inspector		
Witness: Bill Mansfield, EPA Inspector		
Description: Overview of less than 90-day storage area. Area shared with W.R. Grace. Orange labels are Albemarle waste containers.		



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 2

Location: Albemarle Process and Development Center		
City: Baton Rouge	County/Parish: East Baton Rouge	State: Louisiana



Photo File Name: PA030003.jpg	Date of Photo: 10/03/2022	Time: 1040 hrs
Photographer: Debra Pandak, EPA Inspector		
Witness: Bill Mansfield, EPA Inspector		
Description: Side view showing aisle spacing of less than 90-day storage area. Containers belong to Albemarle as denoted by orange labels.		



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 3

Location: Albemarle Process and Development Center		
City: Baton Rouge	County/Parish: East Baton Rouge	State: Louisiana



Photo File Name: PA030004.jpg	Date of Photo: 10/03/2022	Time: 1048 hrs
Photographer: Debra Pandak, EPA Inspector		
Witness: Bill Mansfield, EPA Inspector		
Description: Beginning of the 7010 process where bromine and styrene enter the production process.		



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 4

Location: Albemarle Process and Development Center		
City: Baton Rouge	County/Parish: East Baton Rouge	State: Louisiana



Photo File Name: PA030005.jpg	Date of Photo: 10/03/2022	Time: 1048 hrs
Photographer: Debra Pandak, EPA Inspector Witness: Bill Mansfield, EPA Inspector		
Description: Beginning of the 7010 process where bromine and styrene enter the production process		



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 5

Location: Albemarle Process and Development Center		
City: Baton Rouge	County/Parish: East Baton Rouge	State: Louisiana



Photo File Name: PA030006.jpg	Date of Photo: 10/03/2022	Time: 1051 hrs
Photographer: Debra Pandak, EPA Inspector		
Witness: Bill Mansfield, EPA Inspector		
Description: Tank 262 – neutralization tank for wastewater from HP7010 process.		



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 6

Location: Albemarle Process and Development Center		
City: Baton Rouge	County/Parish: East Baton Rouge	State: Louisiana

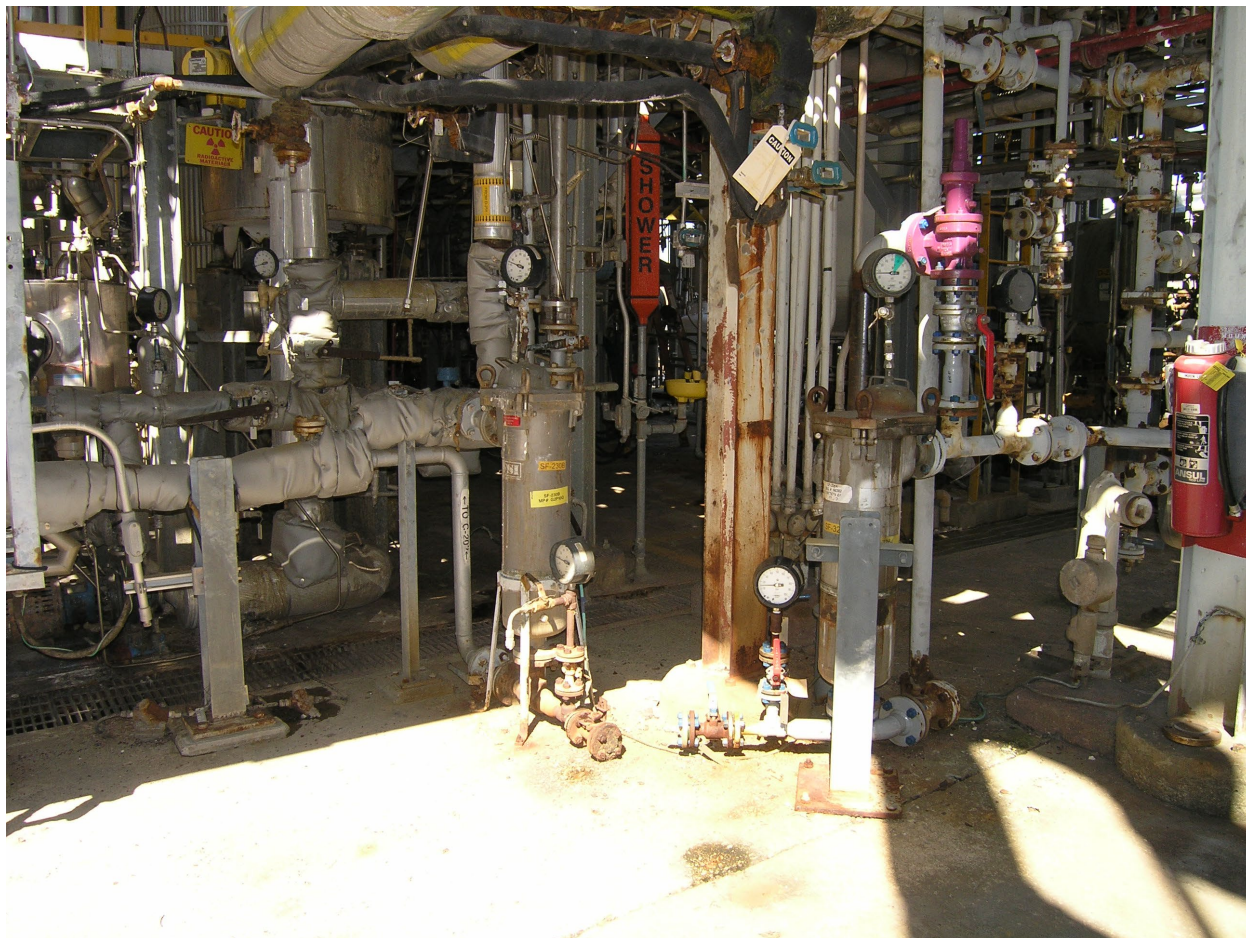


Photo File Name: PA030007.jpg	Date of Photo: 10/03/2022	Time: 1105 hrs
Photographer: Debra Pandak, EPA Inspector		
Witness: Bill Mansfield, EPA Inspector		
Description: Filter units where bag filters are changed. Some waste material observed around clamps where changes occur.		



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 7

Location: Albemarle Process and Development Center		
City: Baton Rouge	County/Parish: East Baton Rouge	State: Louisiana



Photo File Name: PA030008.jpg	Date of Photo: 10/03/2022	Time: 1113 hrs
Photographer: Debra Pandak, EPA Inspector		
Witness: Bill Mansfield, EPA Inspector		
Description: North Sump satellite drum area.		



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 8

Location: Albemarle Process and Development Center		
City: Baton Rouge	County/Parish: East Baton Rouge	State: Louisiana



Photo File Name: PA030009.jpg	Date of Photo: 10/03/2022	Time: 1113 hrs
Photographer: Debra Pandak, EPA Inspector		
Witness: Bill Mansfield, EPA Inspector		
Description: North Sump satellite drum area.		



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 9

Location: Albemarle Process and Development Center		
City: Baton Rouge	County/Parish: East Baton Rouge	State: Louisiana



Photo File Name: PA030010.jpg	Date of Photo: 10/03/2022	Time: 1114 hrs
Photographer: Debra Pandak, EPA Inspector		
Witness: Bill Mansfield, EPA Inspector		
Description: Closeup of drums in North Sump satellite area showing labeling on drums.		



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 10

Location: Albemarle Process and Development Center		
City: Baton Rouge	County/Parish: East Baton Rouge	State: Louisiana

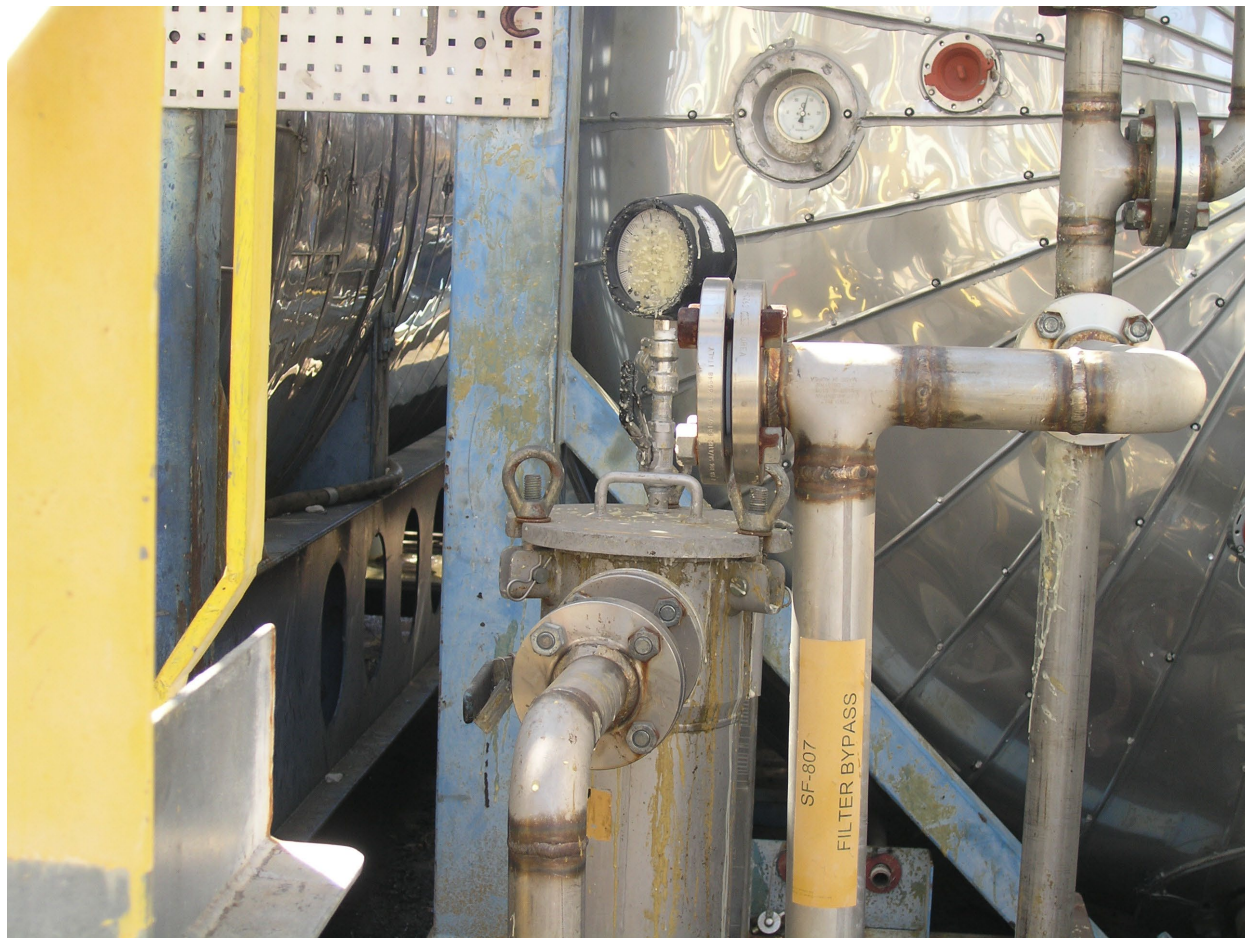


Photo File Name: PA030011.jpg	Date of Photo: 10/03/2022	Time: 1122 hrs
Photographer: Debra Pandak, EPA Inspector Witness: Bill Mansfield, EPA Inspector		
Description: Cartridge filters at Fire retardant production area. Material is an intermediate at this area. Note material on pressure gauge and on filter housing.		



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 11

Location: Albemarle Process and Development Center		
City: Baton Rouge	County/Parish: East Baton Rouge	State: Louisiana



Photo File Name: PA30012.jpg	Date of Photo: 10/03/2022	Time: 1123 hrs
Photographer: Debra Pandak, EPA Inspector		
Witness: Bill Mansfield, EPA Inspector		
Description: Cartridge filters at Fire retardant production area. Material is an intermediate at this area. Note material on pressure gauge and on filter housing.		



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 12

Location: Albemarle Process and Development Center		
City: Baton Rouge	County/Parish: East Baton Rouge	State: Louisiana



Photo File Name: PA030013.jpg	Date of Photo: 10/03/2022	Time: 1123 hrs
Photographer: Debra Pandak, EPA Inspector Witness: Bill Mansfield, EPA Inspector		
Description: Cartridge filters at Fire retardant production area. Material is an intermediate at this area. Note material on pressure gauge and on filter housing.		



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 13

Location: Albemarle Process and Development Center		
City: Baton Rouge	County/Parish: East Baton Rouge	State: Louisiana



Photo File Name: PA030014.jpg	Date of Photo: 10/03/2022	Time: 1124 hrs
Photographer: Debra Pandak, EPA Inspector Witness: Bill Mansfield, EPA Inspector		
Description: Satellite area for APS process located near final process tank.		



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 14

Location: Albemarle Process and Development Center		
City: Baton Rouge	County/Parish: East Baton Rouge	State: Louisiana



Photo File Name: PA030015.jpg	Date of Photo: 10/03/2022	Time:
Photographer: Debra Pandak, EPA Inspector		
Witness: Bill Mansfield, EPA Inspector		
Description: Satellite area for APS process located near final process tank. Close up of funnel and drum vent.		



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 15

Location: Albemarle Process and Development Center		
City: Baton Rouge	County/Parish: East Baton Rouge	State: Louisiana



Photo File Name: PA030016.jpg	Date of Photo: 10/03/2022	Time: 1127 hrs
Photographer: Debra Pandak, EPA Inspector		
Witness: Bill Mansfield, EPA Inspector		
Description: Satellite area for APS process located near final process tank. PPE drum with rusted top. Hole near hinge goes through the top.		



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 16

Location: Albemarle Process and Development Center		
City: Baton Rouge	County/Parish: East Baton Rouge	State: Louisiana



Photo File Name: PA030017.jpg	Date of Photo: 10/03/2022	Time: 1127 hrs
Photographer: Debra Pandak, EPA Inspector		
Witness: Bill Mansfield, EPA Inspector		
Description: Satellite area for APS process located near final process tank. PPE drum with rusted top. Hole near hinge goes through the top.		



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 17

Location: Albemarle Process and Development Center		
City: Baton Rouge	County/Parish: East Baton Rouge	State: Louisiana



Photo File Name: PA030019.jpg	Date of Photo: 10/03/2022	Time: 1128 hrs
Photographer: Debra Pandak, EPA Inspector Witness: Bill Mansfield, EPA Inspector		
Description: Satellite area for APS process located near final process tank. PPE drum with rusted top. Hole near hinge goes through the top.		



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 18

Location: Albemarle Process and Development Center		
City: Baton Rouge	County/Parish: East Baton Rouge	State: Louisiana



Photo File Name: PA040021.jpg	Date of Photo: 10/04/2022	Time: 0935 hrs
Photographer: Debra Pandak, EPA Inspector		
Witness: Bill Mansfield, EPA Inspector		
Description: Overview of satellite area outside behind Lab 340 and 350.		



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 19

Location: Albemarle Process and Development Center		
City: Baton Rouge	County/Parish: East Baton Rouge	State: Louisiana



Photo File Name: PA040022.jpg	Date of Photo: 10/04/2022	Time: 1016 hrs
Photographer: Debra Pandak, EPA Inspector		
Witness: Bill Mansfield, EPA Inspector		
Description: Red container for PPE marked 04/09/2021. Not marked satellite container.		



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 20

Location: Albemarle Process and Development Center		
City: Baton Rouge	County/Parish: East Baton Rouge	State: Louisiana

Owner Information

Name: Red Robert

Supervisor / Engineer / Chemist: _____

Project Name: 240005

Project Number: _____

Haz-Comm

Health Hazard: 4 - Deadly, 3 - Extreme Danger, 2 - Dangerous, 1 - Slight Hazard, 0 - No Hazard

Fire Hazard: 4 - < 73°F, 3 - > 73°F & < 100°F, 2 - > 100°F & < 200°F, 1 - > 200°F, 0 - Will Not Burn

Reactivity Hazard: 4 - May Detonate, 3 - Explosive, 2 - Unstable, 1 - Normally Stable, 0 - Stable

Special Hazard: W - Water, OX - Oxidizer, RA - Radioactive

Material Information

Name and/or Description: WL-2 LAB 11/2 PPE, Solid Solvent

Additional Information: ☐ Satellite Area

Gross Wt.: _____ Tare Wt.: _____ Net Wt.: _____

Classification Number: 5

5 - Hazardous Waste
6 - Non-Hazardous Waste

Hazardous Waste Only:

Date Started: 4/07/21 Date Full: _____

pH: _____ Profile No.: 76134

Other Info: _____ LIMS No. or Label Above: _____

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Photo File Name: PA040023.jpg	Date of Photo: 10/04/2022	Time: 1016 hrs
Photographer: Debra Pandak, EPA Inspector		
Witness: Bill Mansfield, EPA Inspector		
Description: Closeup of red container with PPE showing label.		



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 21

Location: Albemarle Process and Development Center		
City: Baton Rouge	County/Parish: East Baton Rouge	State: Louisiana



Photo File Name: PA040024.jpg	Date of Photo: 10/04/2022	Time: 1020
Photographer: Debra Pandak, EPA Inspector		
Witness: Bill Mansfield, EPA Inspector		
Description: Less than 90-day area behind West Lab 2.		



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 22

Location: Albemarle Process and Development Center		
City: Baton Rouge	County/Parish: East Baton Rouge	State: Louisiana



Photo File Name: PA040025.jpg	Date of Photo: 10/04/2022	Time: 1030 hrs
Photographer: Debra Pandak, EPA Inspector		
Witness: Bill Mansfield, EPA Inspector		
Description: Less than 90-day storage area behind West Lab 2. Across road from lab. Not grounding of drum.		

Appendix 2

Daily Summaries

Young-Dahl, Erin

From: Young-Dahl, Erin
Sent: Monday, October 3, 2022 9:18 PM
To: Jacob Krzystowczyk; boyd.ourso@albemarle.com
Cc: Mansfield, William; Pandak, Debra; Terry Dedon; Jenifer Kidd; Adam Ramachandran; Connor Gruntz; Yurk, Jeffrey
Subject: Daily Summary 10-3-2022
Attachments: cbi form RCRA 2-19-20.pdf

Hi all,

Below please find my summary of today's inspection. If there are any errors or omissions, please let me know. See you all tomorrow.

Introduction

During the week of October 3, 2022, I, Erin Young-Dahl, will be conducting an unannounced inspection of the Albemarle Corporation PDC, located at 1201 Gulf States Utilities Rd in Baton Rouge, Louisiana for compliance with the Resource Conservation and Recovery Act (RCRA). I will be assisted on this inspection by Environmental Protection Agency (EPA) inspectors Bill Mansfield and Debra Pandak, and Louisiana Department of Environmental Quality investigators Terry Dedon, Jenifer Kidd, Connor Gruntz, and Adam Ramachandran. The inspection will include walkthroughs of the facility's hazardous waste generation and management units; a review of the facility records related to hazardous waste management; and a specific evaluation of the facility's compliance with the RCRA air pollution control requirements.

Purpose

The Albemarle facility was targeted for inspection as part of an ongoing National Compliance Initiative for air emissions from hazardous waste management units.

Inspection Attendees:

NAME	TITLE	REPRESENTING	PHONE	EMAIL
Erin Young-Dahl	Physical Scientist – Lead Inspector	US EPA Reg. 6	(214) 665-3166	Youngdahl.erin@epa.gov
Bill Mansfield	Environmental Scientist – Sr. Inspector	US EPA Reg. 6	(214) 665-8321	Mansfield.william@epa.gov
Debra Pandak	Environmental Scientist – Sr. Inspector	US EPA Reg. 6	(214) 665-7565	pandak.debra@epa.gov
Terry Dedon		LDEQ		dedon.terry@la.gov
Jenifer Kidd		LDEQ		kidd.jenifer@la.gov
Adam Ramachandran	RCRA Inspector	LDEQ		Ramachandran.adam@la.gov
Connor Gruntz	RCRA Inspector	LDEQ		gruntz.connor@la.gov
Jacob Krzystowczyk	Albemarle EHS Manager	Albemarle Corp. PDC	(225) 388-8961	Jacob.krzystowczyk@albemarle.com

Boyd Ourso	Plant Manager	Albemarle Corp PDC	(225) 388-7276	boyd.ourso@albemarle.com

Daily Summary

- Initial Entry to the facility - 09:10am
- Opening meeting start – 9:30am
 - Watched visitor safety training briefing and signed in at guardhouse.
 - Presented credentials to Mr. Krzystowczyk and informed him that we were there to conduct an inspection of the facility under the authority of Section 3007 of the Resource Conservation and Recovery Act
 - Discussed the authority for the inspection – RCRA Section 3007 - For purposes of developing or assisting in the development of any regulation or enforcing the provisions of this chapter, any person who generates, stores, treats, transports, disposes of, or otherwise handles or has handled hazardous wastes shall, upon request of any officer, employee or representative of the Environmental Protection Agency, duly designated by the Administrator, or upon request of any duly designated officer, employee or representative of a State having an authorized hazardous waste program, furnish information relating to such wastes and permit such person at all reasonable times to have access to, and to copy all records relating to such wastes. For the purposes of developing or assisting in the development of any regulation or enforcing the provisions of this chapter, such officers, employees or representatives are authorized—
 - (1) to enter at reasonable times any establishment or other place where hazardous wastes are or have been generated, stored, treated, disposed of, or transported from;
 - (2) to inspect and obtain samples from any person of any such wastes and samples of any containers or labeling for such wastes.
 - Discussed the purpose of EPA’s inspection – Assessment of Albemarle’s compliance with its requirements under RCRA, including, but not limited to, the requirements for: waste determination and counting; waste marking; waste container management; use of the hazardous waste manifest; emergency planning; personnel training; and air pollution control requirements for hazardous waste units.
 - Discussed the right of Albemarle to assert a Confidential Business Information claim for records requested by EPA ([see attachment](#))
 - Discussed the process for transferring electronic records – EPA has set up a Microsoft OneDrive folder with access limited to the inspection participants ([FY23 ALBEMARLE RCRA CEI](#)). EPA will continue working to set up a GoAnywhere folder to work with Albemarle’s web security requirements.
 - Discussed the inspection process – the inspection will be conducted October 3 through October 7, 2022. The participants will meet at the facility at 9:00am each day to conduct the onsite portion of the inspection and discuss the findings of the ongoing records review. The records review will be conducted by the inspectors independently offsite throughout the week. Daily summaries will be provided by the inspectors at the end of each day to ensure a clear communication of questions and findings. The meeting Friday, October 7, 2022 will be reserved for a closing conference, where EPA will summarize the overall findings of the inspection to that point and provide a plan for concluding any unfinished evaluation.
- General Facility Process – The Albemarle Co. PDC facility manufactures a brominated flame retardant (HP 7010) and an anionic polystyrene (APS) product. Facility production operations include a bromine staging and unloading area, multiple product washes, a neutralization unit, and product tanks. Both processes involve a solvent swap with the Albemarle Magnolia, AR facility, which processes raw product (HBr and BCM from the Albemarle PDC) into elemental bromine (Br₂) for use by Albemarle PDC in its own production activities.

- Initial request for compliance records, including:
 - A current Hazardous Waste Contingency Plan including records of distribution (RECEIVED)
 - Facility Maps identifying solid waste management units, if available (RECEIVED)
 - Facility process diagrams, if available (RECEIVED)
 - Facility waste profiles for any selected waste generated since 2019. Include documentation relevant to the waste determination made for each waste (i.e. analytical reports or documentation to support generator knowledge)
 - Any currently effective contract or agreement between the facility and any waste management company or TSDF
 - Facility SOPs related to the generation or management of hazardous waste
 - RCRA Unit inspection records since 2019 for container storage areas
 - Currently effective CAA permits for hazardous waste management units
 - Safety Data Sheets for the HP 7010 product and APS product as well as hazardous wastes with “profile pending” (“Papi 27” and “Saytex Purshield”)

- Facility Walkthrough
 - Beginning at approximately 10:30am
 - Central Accumulation Area
 - Physically inspected the central accumulation area for container condition, labeling, etc.
 - All containers inspected were labeled as hazardous waste with applicable description, profile number, hazards, and start/fill dates. All dates were within the 90-day storage timeline. Three containers (2x “Papi 27” and 1x “Saytex Purshield”) were marked as “profiles pending.”
 - Area was clean, containers neatly stacked, labels facing outward. Containers appeared to be in good working condition. Aisle spacing was adequate.
 - Filter and Sample collection areas
 - Saw neutralization unit used in the HP 7010 process. Materials from this unit (said to be high-pH water mixed with sulfuric acid) are pumped to WR Grace. The material is tested for total organics.
 - Inspectors saw filter points for the APS and HP 7010 process.
 - Both filter points had some material in the immediate area that appeared to be a release that occurred during filter changes.
 - North Sump Area
 - Accumulation area serving the two facility processes. Treated as satellite accumulation.
 - 4 partially full drums of hazardous waste, each with a closed and secured funnel and a drum air vent.
 - Containers appeared to be in good condition with appropriate labels, including a checked box under “Satellite Accumulation” on the label itself.
 - T-807 area
 - 2 satellite drums containing hazardous waste serving the APS process tank. One drum collected samples from the tank to be incinerated, and the other collected PPE used for the APS process in the area.
 - The PPE drum was corroded on the hinge and visible deterioration of the drum was present. Solvent odors were present in the area.

- Daily Wrap up meeting
- Departed Facility at approximately 2:30 pm

Topics for discussion on October 4, 2022

- Follow-up on LDR testing
- Lab management and processes

--

Erin Young-Dahl

She/her/hers

Physical Scientist

RCRA Enforcement Section

U.S. Environmental Protection Agency, Region 6

E-mail: youngdahl.erin@epa.gov

Office: (214) 665-3166

Young-Dahl, Erin

From: Young-Dahl, Erin
Sent: Tuesday, October 4, 2022 4:58 PM
To: Jacob Krzystowczyk; boyd.ourso@albemarle.com
Cc: Mansfield, William; Pandak, Debra; Terry Dedon; Jenifer Kidd; Adam Ramachandran; Connor Gruntz; Yurk, Jeffrey
Subject: Daily Summary 10-4-2022

All,

Here is the daily summary from today's inspection. As before, please let me know if you spot any errors or omissions. Thanks!

Inspection Attendees:

NAME	TITLE	REPRESENTING	PHONE	EMAIL
Erin Young-Dahl	Physical Scientist – Lead Inspector	US EPA Reg. 6	(214) 665-3166	Youngdahl.erin@epa.gov
Bill Mansfield	Environmental Scientist – Sr. Inspector	US EPA Reg. 6	(214) 665-8321	Mansfield.william@epa.gov
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Jenifer Kidd		LDEQ		jenifer.kidd@la.gov
Adam Ramachandran	RCRA Inspector	LDEQ		adam.ramachandran@la.gov
Connor Gruntz	RCRA Inspector	LDEQ		connor.gruntz@la.gov
Jacob Krzystowczyk	Albemarle EHS Manager	Albemarle Corp. PDC	(225) 388-8961	Jacob.krzystowczyk@albemarle.com
Boyd Ourso	Plant Manager	Albemarle Corp PDC	(225) 388-7276	boyd.ourso@albemarle.com

Daily Summary

- Initial Entry to the facility - 09:10am
- Review of daily summary from Monday, October 3, 2022. Corrections are added in red, omissions have strikethrough.
- Clarified the reasoning behind annual LDAR testing at the facility
 - 3rd party conducts LDAR testing for the whole property, W.R. Grace and Albemarle included. The Albemarle facility is not required to conduct LDAR testing.
- CORRECTION from 10/3/22:

- General Facility Process – The Albemarle Co. PDC facility manufactures a brominated flame retardant (HP 7010) and an anionic polystyrene (APS) product. Facility production operations include a bromine staging and unloading area, multiple product washes, a neutralization unit, and product tanks. Both processes involve a solvent swap with the Albemarle Magnolia, AR facility, ~~which processes raw product (HBr and BCM from the Albemarle PDC) into elemental bromine (Br₂) for use by Albemarle PDC in its own production activities.~~ **The Magnolia facility processes HBr from Baton Rouge into elemental bromine that is returned to the PDC facility. The Magnolia facility also reclaims BCM sent to them by the PDC facility and returns pure BCM for PDC use.**
- Facility Walkthrough
 - Lab Spaces: West Lab 1, 2, and 3.
 - Inspected 14 lab spaces:
 - 3 in West Lab 3 (350, 340, 330)
 - 10 in West Lab 2 (149, 142, 141, 148, 148A, 146, 145, 144, 143, 143A)
 - 1 in West Lab 1
 - Each lab is dedicated for a specific purpose, which includes but is not limited to materials testing and analysis, new product development, and precision measurement.
 - All lab spaces contained multiple satellite accumulation points for contaminated PPE. With the exception of Lab 350, satellite accumulation containers were found inside near the point of generation (at each lab station). Lab 350 satellite accumulation containers were placed outdoors just outside the lab exit due to limited lab space indoors. Locks were placed on two out of the five containers here.
 - Containers, with few exceptions (see below), were in good condition and correctly labeled
 - One waste container in Lab 148 was not marked as a satellite accumulation container, but inspectors were then told that all waste-accumulating containers in the labs are considered satellite accumulation containers.
 - In Lab 143A, one open, empty bucket had an old hazardous waste label on it with a “clean glassware” description. Inspectors were told that the container was mislabeled.
 - In Lab 143A, two jugs were labeled with a “5,” signifying the container holds hazardous waste. However, the labels did not otherwise indicate that a “5” meant hazardous waste. As a result, the containers did not have the words “hazardous waste” on the containers.
 - Storage containers outside of buildings were marked and labeled appropriately. All drums were in good condition and each was placed in single-drum secondary containment.
 - Lab spaces were clean and tidy, and waste containers were all closed and labeled on shelves and in fume hoods.
- Reviewed annual RCRA training, container management & labeling SOPs, quarterly training requirements, and 2022 central accumulation area inspection records.
- Document request list:
 - Waste profiles from wastes taken from units through sampling/testing
 - Training documents for the 5 specified employees – see 40 CFR §262.17 for required documentation
 - Service agreement between Albemarle and TSDF
 - SOPs for hazardous waste management, especially container management, and filter changes
 - Air permit
 - SDS for selected wastes (2 pending: “Papi 27” and “Saytex Purshield”) and products
 - Inspection records for storage areas (2019-2022)
 - Corrections photos
 - A current Hazardous Waste Contingency Plan including records of distribution (RECEIVED)
 - Facility Maps identifying solid waste management units, if available (RECEIVED)

- Facility process diagrams, if available (RECEIVED)
- Closeout meeting at 1:30 pm
- Departed Facility at approximately 2:15 pm

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Erin Young-Dahl

She/her/hers

Physical Scientist

RCRA Enforcement Section

U.S. Environmental Protection Agency, Region 6

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