

RCRA Inspection Report

1) EPA Inspector and Author of the Report

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2) Facility Information

Channel Chemical Corporation
14373 Seaway Road
Gulfport, Mississippi 39503
EPA ID# MSD122687064
NAICS: 325998 - All Other Chemical Product and Preparation Manufacturing
SIC Code: 2899 – Chemical and Chemical Preparation

3) Responsible Official

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4) Inspection Participants

Mr. Joseph Beall, Environmental Manager, Channel Chemical Corporation
Mr. Raj Aiyar, U.S. EPA Region 4, Inspector
Mr. Brad Justice, MDEQ Inspector

5) Date of Inspection

November 16, 2021, 09:00

6) Applicable Regulations

Mississippi Hazardous Waste Management Regulations (MHWMR), 11 Miss. Admin. Code Pt. 3, R. 1.1-1.24

Section 17-17-1 *et seq.* of the Mississippi Code of 1972, Miss. Code Ann. § 17-17-1 *et seq.*

Section 17-17-27 of the Mississippi Code of 1972, Miss. Code Ann. § 17-17-27

Pursuant to 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.10], a Large Quantity Generator (LQG) is a generator who generates greater than or equal to 1,000 kilograms (2200 lbs.) of non-acute hazardous waste in a calendar month.

Pursuant to 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.17], a LQG may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status, as required by Section 17-17-27(4) of the Mississippi Code of 1972, Miss. Code Ann. § 17-17-27(4) [Section 3005 of RCRA, 42 U.S.C. § 6925], provided that the generator complies with the conditions listed in 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.17] (hereinafter referred to as the “LQG Permit Exemption”).

Pursuant to 11 Miss. Admin. Code Pt. 3, R. 1.3 [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 17-17-27(4) of the Mississippi Code of 1972, Miss. Code Ann. § 17-17-27(4), and without complying with 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.16(b) or § 262.17(a)], except as required in 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.15(a)(7) and (8)], provided that the generator complies with the satellite accumulation area conditions listed in 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.15(a)] (hereinafter referred to as the “SAA Permit Exemption”).

7) Purpose of Inspection

The purpose of this inspection was to conduct an announced RCRA compliance evaluation inspection (CEI) due to Covid-19 at the Channel Chemical Corporation (hereinafter, “Channel” or the “facility” to determine the facility’s compliance status with the applicable RCRA regulations and the corresponding MDEQ regulations. This was an EPA lead inspection.

8) Facility Description

Channel Chemical Corporation is located at 14373 Seaway Road in Gulfport, Mississippi, Harrison County. Channel is a toll chemical manufacturer using customer’s supplied technology, raw materials, and packaging. As a result, the site operation includes bulk storage containers and transfer areas not associated with a loading/unloading rack. Channel provides equipment, manpower, and energy to produce their clients’ products. The Channel Chemical property encompasses approximately 12-acres. The structures at the property consist of office, employee,

and lab buildings, covered containment structures housing reactors, tank farms, warehouse, and maintenance sheds. The facility has been in operation at the same site since 1982. Channel currently employs approximately 23 employees and operate two shifts, Monday through Friday, 7:30 am to 3:30 pm and Monday through Thursday 3:00 pm – 1:30 am.

Channel has an onsite stormwater retention pond to contain any spill that exceeds secondary containment around reactors and is located directly before the stormwater outfall (SW001) to prevent any uncontrolled releases to the environment.

Channel registered with MDEQ as a large quantity generator of hazardous waste in February 2021. The hazardous waste generated by Channel includes D001, D002, D006, D007 and F003. The facility does not generate any acute hazardous waste onsite. Channel uses Clean Harbors White Castle LLC (EPA ID LAD982549636) to pick up their Nonhazardous waste and Ecoflo Inc. (EPA ID NCD 980842132) for disposing their hazardous waste. Besides hazardous waste, Channel also generates used oil and spent “green-tip” lamps.

Channel is a minor source for air emissions and does not have a Title V air emissions permit. The facility has an active industrial stormwater permit issued by MDEQ in November of 2020.

9) Previous Inspection/Compliance History

Channel was last inspected by the EPA and MDEQ on June 15, 2017. Several violations were observed during the inspection including failure to label a used oil container, failure to mark hazardous waste containers, failure to make a waste determination, an open hazardous waste container and storing hazardous waste over 90-days. The matter was referred to MDEQ as a significant non-complier (SNC). The facility returned to compliance on June 17, 2017.

10) Findings

Opening Conference

On November 15, 2021, MDEQ hosted a conference call with the facility to discuss the EPA’s and MDEQ’s plans to conduct a RCRA Hazardous Waste CEI and to ensure everyone could adhere to the Centers for Disease Control and Prevention COVID-19 guidance. On November 16, 2021, the EPA and MDEQ inspectors arrived at the facility at approximately 9:00 a.m. and met with Mr. Joseph Beall, Environmental Manager for Channel. The inspectors presented their credentials to Mr. Beall and explained that the purpose of the visit and discussed the scope of the inspection which included health and safety protocols, use of a camera for the purpose of inspection, areas to be covered during the inspection and the list of records to be reviewed as part of the recordkeeping. Mr. Beall provided the facility’s brief history and current operation onsite. Mr. Beall later accompanied the inspectors on the site visit.

Channel has two bulk tank farms for storing raw materials and finished products. In addition, the production area also contains bulk storage tanks for storing raw materials and finished products.

North Tank Farm

The diked area contains 18 bulk storage tanks used for storing raw materials and finished products. The tank capacity ranges from 5,200 gallons to 12,000 gallons. The storage tanks are marked with National Fire Protection Association (NFPA) placards. There were no leaks or spills observed in the diked area. No hazardous waste is generated in this area.

Chemical Drum and Tote Storage

The inspector observed containers of various sizes including totes containing products and new raw material. The containers were observed to be closed and intact. There were no leaks or spills observed in the storage area. No hazardous waste is generated in this area.

South Tank Farm

The South Tank Farm comprises of four tanks in a diked area. The inspectors observed three tanks containing Baker Nonhazardous Process Water (BPW1, BPW2 and BPW3) having a total tank capacity of 20,000 gallons. The fourth tank (BT1) is a cut-off tank having a tank capacity of 2,500 gallons. There were no leaks or spills observed inside the diked area. The Baker Nonhazardous Process water is picked up by Clean Harbors White Castle LLC. No hazardous waste is generated in this area.

Channel has four production areas. All the production areas may contain raw materials or finished products in drums, totes or in reactors that fall into flammables, corrosives, and toxic hazard class. All production areas are equipped with fire extinguishers.

Production Area 1

The Production Area includes the Northside and Production Dock which utilizes reactors of various sizes up to 1,000 gallons. There was no ongoing production at the time of inspection in this area. There were no leaks and spills observed in the diked area. Mr. Beall stated that no hazardous waste is generated in this area.

Production Area 2

This area contains four 2,500-gallon reactors. Reactor (R4) was observed to be out of service. There was no ongoing production at the time of inspection. The manufacture of MD 2736D occurs in Production Area 2 in Reactor (R6). After the product has cooled down, salt crystals are added to the product which causes separation of water from the product. The water settles to the bottom with the lighter product above it. The water is removed from the product by gravity and pumped into 275-gallon totes. The pH of the MD2736PW has a pH < 2.0. The inspectors observed Channel staging a product at the time of inspection. The unlabeled 275-gallon tote containing the process water was determined to be hazardous waste stored near the Production Area #2. The inspectors requested Mr. Beall to label the tote with a hazardous waste label and hazard indication (Photo-1) and to move the tote to the 90-day Central Accumulation Area (CAA). Mr. Beall stated that the existing Process Water Tote Storage would be used as a 90-day Central Accumulation Area (CAA) located adjacent to the Stormwater Retention Pond.

Pursuant to 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.17], a LQG may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status, as required by Section 17-17-27(4) of the Mississippi Code of 1972, Miss.

Code Ann. § 17-17-27(4) [Section 3005 of RCRA, 42 U.S.C. § 6925], provided that the generator complies with the conditions listed in 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.17] (hereinafter referred to as the “LQG Permit Exemption”).

Pursuant to 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.17(a)(5)(i)], which is a condition of the LQG Permit Exemption, a generator must mark or label its containers with the following: the words “Hazardous Waste”; an indication of the hazards of the contents; and the date upon which each period of accumulation begins clearly visible for inspection on each container.

Process Water Tote Storage

The inspectors observed six 275-gallon totes of MD2736 process water staged in this area. The totes were observed to be closed and unlabeled with no hazard indication. According to Mr. Beall the totes were staged for pH neutralization prior to being shipped as nonhazardous waste. The inspectors told Mr. Beall until pH neutralization is completed, the totes containing MD2736 process water staged in the Process Water Tote Storage are considered hazardous waste (Photo-2). Hence the Process Water Tote Storage should be used as a 90-day CAA. The inspectors further reiterated that all the containers containing MD2736 process water should be marked as hazardous waste with hazard indication and dated until such time that MD2736 process water is neutralized (Photo-2). The inspectors also told Mr. Beall to conduct weekly inspections of the CAA for leaking containers.

Pursuant to 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.17(a)(5)(i)], which is a condition of the LQG Permit Exemption, a generator must mark or label its containers with the following: the words “Hazardous Waste”; an indication of the hazards of the contents; and the date upon which each period of accumulation begins clearly visible for inspection on each container.

Pursuant to 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.17(a)(1)(v)], which is a condition of the LQG Permit Exemption, a generator is required to, at least weekly, inspect central accumulation areas looking for leaking containers and for deterioration of containers caused by corrosion or other factors.

On December 2, 2021, Mr. Beall provided a photo of the 90-day Storage for MD2736 totes, a photo of a tote marked with a “Hazardous Waste” label and a hazard indication, accumulation start date and a copy of the weekly inspection log as attachment in his email (Photo-3). Mr. Beall further responded via email stating that since the MD2736 Process Water totes were neutralized, the hazardous waste labels and hazard indication labels were removed from the MD2736 Process Water totes that were put on after generation. Mr. Beall said that the pH of the MD 2736 Process Water ranged from 1-2 before neutralization and the pH after neutralization was determined to be in the range of 5-7. Mr. Beall also mentioned that the neutralized process water totes were staged to be moved to a shipping and receiving area with secondary containment until a shipment can be arranged for shipping out as nonhazardous waste. Mr. Beall stated that Channel would be prioritizing neutralization of the Process Water totes as they are generated and have them neutralized within two weeks of generation. On December 14, 2021, Mr. Beall provided a copy of the neutralized MD2736 process water.

Production Area #3

This area contains four 5,000-gallon reactors. There was no ongoing production at the time of inspection. The inspectors observed waste liquid and white solid debris inside the secondary containment of the Production Area #3. The inspectors observed open drip pans with liquid in the secondary containment (Photos-4-6). The inspectors observed chipped dike walls (Photo-7). The inspectors observed staining on the external walls and piping associated with the reactors (Photos-8-9).

Pursuant to 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.17(a)(6)], which incorporates 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.251], and is a condition of the LQG Permit Exemption, a generator is required to maintain and operate its facility to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment.

On December 6, 2021, Mr. Beall responded via email regarding the observations made by the inspectors during the inspection along with the photos in response to the observation made by the inspectors in Production Area 3 regarding leaks and spills in the secondary containment of the production area, chipped diked walls and stains on the reactor walls and the piping associated with reactors, and open drip pans containing waste liquid.

Mr. Beall stated that the photos taken during the inspection showed the presence of a small quantity of clear liquid within the secondary containment dike wall around the large reactors. According to Mr. Beall, small amounts of water may enter the dike wall area from various sources including Reactor condensation from steam and chilled water used in the reactor jackets drips down to the diked floors. Mr. Beall also stated that although the large reactor area has a canopy, occasionally stormwater does enter inside the diked area if it is blown by wind. In addition, some of their products require a water charge through a gallon gauge to the reactor and there are occasional water leaks in this process. Mr. Beall also stated that there is also a water hydrant near the top of the reactors that is used for rinsing and cleaning the reactors. This hydrant hose occasionally loses water into the dike area.

Mr. Beall further mentioned that another source of water dripping inside the diked area was from a pipe coming from the bottom of one of the reactor leg bracings (Photo-10). The pipe is from the reactor jacket and drains cooling water or steam condensate from the jacket. A hose is connected to the pipe to drain the water from the reactor over the dike wall to drain to the retention pond. The gasket in the hose coupling had failed and as a result non-contact water leak would drip into the containment area any time the reactor jacket is drained. Mr. Beall stated that this would be corrected and should help in minimizing the amount of water that collects in the containment area.

Mr. Beall mentioned that their standard operating procedure of whenever liquid is present in the dike area entails a visual check to assess clarity and presence of contamination. A pH is also checked for the liquid in the diked area to ensure the clear liquid is within 6 to 9 pH range. If the liquid is determined to be water with no visible contamination and the pH is within range, the

water is then pumped out to the retention pond. However, if the liquid within the dike area is water showing signs of contamination due to color and/or odor or is out of the normal pH range of 6-9, then the process water is pumped to a process water tote which is then further evaluated and neutralized, if necessary. The totes are then pumped into a Non-hazardous Process Water holding tank until a shipment can be arranged for pickup.

Mr. Beall stated that to prevent contamination of this water and minimize generation of waste in the diked area, careful connection of pumps and hoses along with monitoring of the process transfers are in the works. In addition, the drip pans are used under pump connections to catch any drips that may occur during material transfers or when connecting/disconnecting hoses to the pump. Any liquid contained in the drip pan after the transfer are added to the process water totes.

In response to the uneven white layer in the floor of the containment area, Mr. Beall alleged that it is not solid debris, but rather concrete from a partial re-surfacing of the containment floor that occurred before the inspection (Photo-11). Some areas were smoothed using tools during the pouring of concrete, but other areas had a rough appearance. Mr. Beall sent pictures indicating that the chipped dike wall in Production Area #3 and Production Area #4 had been painted (Photo-12-13), the concrete flooring and all the Reactors in the Production Area #3 had a new coat of paint (Photo-14).

According to Mr. Beall, the brown stains on the Reactors and the piping that were visible in all three inspection photos were a result of the gasket failure incident on Reactor (R8) in Production Area #3 that produced overspray on surrounding reactors and piping.

Production Area #4

The Production Area #4 contained two Reactors (R14 and R15) and one 5,000-gallon tank used for storing either raw material or product (M2633). There was no ongoing production at the time of inspection in this area. There were no leaks and spills observed in the diked area. No hazardous waste is generated in this area. Mr. Beall sent photos of the painted diked wall of Production Area #4 (Photo-15).

GST Area/CANOPY AREA

The inspectors observed numerous containers of various sizes in the GST/Canopy Area. The containers included 275-gallon totes, 330-gallon totes and 55-gallon containers and overpacks (Photos-16-18). The inspectors observed approximately 20 55-gallon containers inside the containment of the Canopy and 22 275-gallon totes stored outside the Canopy Area (Photos-19-20). The inspectors observed that some of the containers were not labeled, some of the containers had improper markings on the totes and drums, some of the containers were observed to be open (Photos-21-22). The inspectors observed two 275-gallon totes containing used oil. One tote containing used oil was not clearly marked as "Used Oil" (Photo-23).

Pursuant to 15A NCAC 13A .0119 [40 C.F.R. § 279.22(c)(1)], containers and aboveground tanks used to store used oil at generator facilities must be labeled or marked clearly with the words "Used Oil."

Many of these containers showed evidence of leakage and were in poor condition, bulging and

rusting. According to Mr. Beall, the contents of the containers were not waste but were in-process material that was accumulated to be used later in their process. Mr. Beall also mentioned that the contents of the containers were known based on the Safety Data Sheets (SDS) The EPA requested a complete inventory of all the containers located in this area at the time of the inspection. The inspectors stated primary concerns regarding the housekeeping and management of the containers.

Pursuant to 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.11], a person who generates a solid waste, as defined in 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 261.2], must make an accurate determination as to whether that waste is a hazardous waste to ensure wastes are properly managed according to applicable RCRA regulations articulated in [40 C.F.R. § 262.11].

Pursuant to 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.17(a)(6)], which incorporates 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.251], and is a condition of the LQG Permit Exemption, a generator is required to maintain and operate its facility to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment.

Speculative Accumulation is defined as the accumulation of waste materials prior to recycling without sufficient amounts being recycled. A sufficient amount is defined as recycling at least 75 percent of the total quantity generated during a calendar year¹. Pursuant to 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 261.1(c)(8)], a material is “accumulated speculatively” if it is accumulated before being recycled. A material is not accumulated speculatively, however, if the person accumulating it can show that the material is potentially recyclable and has a feasible means of being recycled; and that during the calendar year (commencing on January 1)-the amount of material that is recycled, or transferred to a different site for recycling, equals at least 75 percent by weight or volume of the amount of that material accumulated at the beginning of the period. Materials must be placed in a storage unit with a label indicating the first date that the material began to be accumulated. If placing a label on the storage unit is not practicable, the accumulation period must be documented through an inventory log or other appropriate method. In calculating the percentage of turnover, the 75 percent requirement is to be applied to each material of the same type (e.g., slags from a single smelting process) that is recycled in the same way (i.e., from which the same material is recovered or that is used in the same way). Materials accumulating in units that would be exempt from regulation under §261.4(c) are not to be included in making the calculation. Materials that are already defined as solid wastes also are not to be included in making the calculation. Materials are no longer in this category once they are removed from accumulation for recycling, however.

In response to the primary concern stated by the Inspectors during the inspection regarding housekeeping and management of the containers, Mr. Beall responded in an email along with photos on December 9, 2021, regarding the corrective action taken at the GST/Canopy Area (Photo-24). Mr. Beall mentioned that all the containers including drums and totes were identified

and marked. The improper marking on the drums and totes were removed. Five one-gallon solidified waste paint and five poly totes in poor condition were disposed of consolidated drums containing used oil in the Used Oil totes, approximately nine xylene rinse totes were consolidated into two xylene rinse totes. The xylene rinse totes and other totes containing process material were sent back to the process for reuse. In addition, all containers of nonhazardous trash, debris and dirt accumulated in various containers were disposed of. Mr. Beall mentioned that Channel was in the process of developing and prioritizing a plan to manage the hazardous and non-hazardous items located in the area.

Outdoor Less than 90-day Central Accumulation Area (CAA)

This CAA is an outdoor storage located adjacent to the GST/Canopy Area. The inspectors observed a signage identifying the area as “Hazardous Waste Storage Area” (Photo-25). There was no waste stored at the time of inspection. There were no spill kits, eye wash station or fire extinguisher near the CAA. Mr. Beall in his email dated December 9, 2021, indicated that Channel had moved the 90-day area to the North Side storage area where the MD2736PW totes are stored until neutralized. In lieu of an eye wash station, Channel has placed eye wash bottles in the storage cabinet inside the Canopy Area (Photo-26).

Boiler Room

The inspectors observed one 275-gallon tote labeled as Dodecyl Phenol inside the boiler room leaking on the floor of the Boiler Room (Photos-27- 29). The inspectors observed residual liquid on top of the container. Dodecyl is a Marine Pollutant and requires Department of Transportation (DOT) label as “corrosive”. Mr. Beall sent an email on November 18, 2021, indicating that the leaking Dodecyl Phenol tote was contained to prevent any hazardous constituents from getting released into the environment, and the spill area was cleaned up. No hazardous waste is generated in this area.

Pursuant to 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.11], a person who generates a solid waste, as defined in 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 261.2], must make an accurate determination as to whether that waste is a hazardous waste to ensure wastes are properly managed according to applicable RCRA regulations articulated in [40 C.F.R. § 262.11].

Pursuant to 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.17(a)(6)], which incorporates 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.251], and is a condition of the LQG Permit Exemption, a generator is required to maintain and operate its facility to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment.

Record Review

Weekly Inspection Log - The weekly inspections logs from 2017 through 11/11/2021 were reviewed. The records appeared to be complete.

Hazardous Waste Reports - The annual reports and waste minimization plan for Channel

Chemical for 2017 through 2020 were reviewed. Due to the nature of the toll manufacturing process, waste minimization appears to be done by process rather than per waste stream since those change frequently.

Contingency Plan (Plan) and Quick Reference Guide (QRG) – The facility maintains a written contingency plan dated 10/17/2014. The Plan was revised on 10/25/2019. The amendment included new containment structure, hazardous waste storage location, hazardous waste personnel job description and fire extinguisher location. The inspectors requested that Channel amend the Plan since it included wastes that were no longer generated at the facility. Records were provided indicating that the revised Plan was sent to the Garden Park Medical Center, Police Department, Fire Department and to local Harrison County Emergency Management Agency. Based on the review of the QRG, the inspectors requested additional updated evacuation route maps. Mr. Beall provided an update on the Plan on 01/06/2022 and the updated QRG was provided on 01/11/2022 which included additional evacuation route maps. The Plan and QRG appeared to be complete.

Personnel Training - The RCRA Training records for 2018 and 2019 were available; however, RCRA Training since 2020 appeared to be missing including the 8-Hour refresher HAZWOPER Training. At the time of the inspection, it appeared that it had been almost two years since Channel had provided an annual refresher training to their employees or on-the-job training that teaches them to perform their duties in a way that ensures the facility's compliance with the regulations. On 12/09/2021, Mr. Beall sent an email confirming that 8-Hour HAZWOPER training was scheduled for 12/21/2021 with S.C.O.T.T. Safety. Mr. Beall also mentioned that all production, maintenance, shipping and receiving, safety and environmental personnel will be attending the training. On 01/04/2022, Mr. Beall emailed copies of the HAZWOPER Training Roster for refresher training taken in January 2020 and December 2021. On January 11, 2022, Mr. Beall provided training records that included an updated list of the employees, their job title and job description for each position at the facility related to hazardous waste management. The records were observed to be complete.

Hazardous Waste Manifests – Manifests for 2017-2021 were available and reviewed. No hazardous waste has been manifested in 2021. The inspectors requested a copy of the signed final manifest for two manifests, 009856321 FLE and 009856322 FLE which were not available at the time of the inspection. On December 2, 2021, the signed manifests were provided. The manifests records were observed to be complete.

11. Summary

After the inspection, the inspectors had an exit briefing with Mr. Beall and discussed the observations made during the inspection. The inspectors also discussed the necessary corrective action and additional information to be provided as part of the inspection meeting the deadlines were also discussed. Based on the review of the records and the site inspection, the facility appears to be a large quantity generator of hazardous waste.

12) Signed

RAJAGOPAL AIYAR Digitally signed by RAJAGOPAL AIYAR
Date: 2022.02.07 10:09:49 -05'00'

Raj Aiyar
Environmental Engineer

Date

13) Concurrence

ARACELI CHAVEZ Digitally signed by ARACELI CHAVEZ
Date: 2022.02.07 10:23:56 -05'00'

Araceli Chavez
Chief
RCRA Enforcement Section

Date

Attachment A
Photographs of Channel Chemical Corporation
EPA ID# MSD122687064
Camera Model: Samsung WB250F
By: Raj Aiyar and Brad Justice



Photo-1 Production Area #2, Labeled Tote containing Process Water



Photo-5 Production Area #3, Open drip pan and solid debris inside the containment area



Photo-2 Process Water Tote Storage, Unlabeled totes with no hazard indication



Photo-6 Production Area #3, Open drip pan and solid debris inside the containment area



Photo-3 Process Water Tote Storage, Labeled totes with hazard indication



Photo-7 Production Area #3, Chipped secondary containment wall



Photo-4 Production Area #3 Solid white color debris inside the containment area



Photo-8 Production Area #3, Stained walls of the Reactor



Photo-9 Production Area #3, Stained piping of the Reactor



Photo-13 Production Area #3, Chipped diked wall repainted



Photo-10 Production Area #3 Water dripping from one of the Reactor leg bracings



Photo-14 Production Area #3, Reactor and associated piping painted



Photo-11 Production Area #3 Partial Resurfacing of the containment Floor



Photo-15 Production Area #4, painted Diked Walls



Photo-12 Production Area #3 Partial Resurfacing of the containment Floor



Photo-16 Storage Inside the Canopy



Photo-17 Storage Inside the Canopy



Photo-21 Open totes containing unknown waste



Photo-18 Storage inside the Canopy



Photo-22 Unlabeled Corrosive Waste (D002)



Photo-19 Storage Outside the Canopy



Photo-23 Unlabeled Used Oil Tote



Photo-20 Storage Outside the Canopy



Photo-24 Housekeeping and Container Management addressed at the Canopy



Photo-25 No Waste Storage in the 90-day CAA



Photo-29 Waste Dodecyl Phenol Material on top of the tote



Photo-26 Eye Wash Bottles



Photo-27 Dodecyl Phenol Material in the Boiler Room



Photo-28 Leaking Waste Dodecyl Phenol Material in the Boiler Room