

RCRA Compliance Branch INSPECTION REPORT

Inspection Date(s):	09/01/2023	Inspection Announced: No
Facility or Site Name:	Amrex Chemical Co., Inc.	
Facility/Site Physical Location:	117 E. Frederick Street P.O. Box 642	
(city, state, zip code)	Binghamton, New York 13902	
Mailing address (if different from above):		
(city, state, zip code)		
Facility/Site Contact:	Pamela J. Rexer	V.P./ Director of Safety and Regulatory Affairs
	pam@amrexchemical.com	
	(607) 772-8786	
RCRA ID Number:	NYR000055327	
Facility/Site Personnel Participating in Inspection:		
Nermin Veletanlic	General Manager	N/A
Inspector(s):		
William Chernes	WILLIAM CHERNES Digitally signed by WILLIAM CHERNES Date: 2023.11.06 11:03:37 -05'00'	
Supervisor:		
Derval Thomas	DERVAL THOMAS Digitally signed by DERVAL THOMAS Date: 2023.11.03 12:36:40 -04'00'	

SECTION I – INTRODUCTION

Purpose of the Inspection Objective

The purpose of the inspection was to determine the facility's compliance with the Resource Conservation and Recovery Act. The inspection was conducted by EPA RCRA inspector William Chernes.

Opening Conference

EPA Region 2 RCRA inspector William Chernes arrived at the Amrex Chemical Co., Inc. facility on September 01, 2023, for an unannounced inspection. I met with Mr. Nermin Veletanlic, General Manager, at the opening conference of the inspection. I presented my credentials to Mr. Veletanlic and informed him that this was an EPA inspection to determine the facility's compliance with RCRA. The scope of the inspection a compliance evaluation inspection (CEI).

Facility/Site Description

Amrex Chemical Co., Inc. is a chemical repackager and distributor located in Binghamton, New York. The facility buys various chemicals in bulk and repackages into smaller containers for resale. The majority of non-hazardous and hazardous wastes generated on-site are from off-spec materials or expired/unusable products. There is an elementary neutralization unit and a dechlorination unit used on-site for various wastes streams to reduce waste generation from overspills from the tank farm and sodium hypochlorite fill stations. There are multiple container storage areas on-site. The facility stated to be a very small quantity generator (VSQG) of hazardous waste at the time of the inspection.

The facility operates Monday to Friday from 7:00AM – 3:30PM.

SECTION II – OBSERVATIONS

Outdoor Facility Drum Storage

The facility maintains an outdoor empty drum storage area. The outdoor storage drums are from customer returns. Mr. Veletanlic stated that these drums are thoroughly inspected and cleaned out prior to storing and reuse. Additionally, any drum that gets filled with rainwater will be tested for hazardous waste and the wastewater will be sent to the elementary neutralization unit.

Drum Clean-Out Area

The area contains two drum cleaning apparatuses. All clean-out residual water gets collected in the sump system and sent to the elementary neutralization area.

Tank Farm

The tanks are used to store bulk virgin materials, primarily acids and bases. The materials are separated by berms to meet storage compatibility, and the entire tank farm is within secondary containment.

Sodium Hypochlorite Fill Station

The fill area is used to repackage bulk sodium hypochlorite into smaller 5-gallon containers. All spillage and overflow is sent to the elementary neutralization system.

Neutralization Chemical Storage Area

This area contained the raw materials used to neutralize wastes within the neutralization and dechlorination units. The secondary containment area contained incompatible hazardous waste storage from spillage of the raw materials containers. The container spillage of concern were the Sulfuric Acid and Caustic Soda Ash releases that were mixed within the secondary containment tray.

Neutralization Tanks

The neutralization tank and dechlorination tank were located in the basement area of the facility. The stairway and area looked confined, so the inspector did not inspect this area.

Various Chemical Storage Area

Many 1-gallon containers of various chemicals stored in this area. Several of the containers seemed to be visibly dated and past viable use, however the facility stated they still have a market for the technical grade materials. The storage racks showed severe signs of degradation and rust. One 5-gallon container of unknown material was corroded severely and showed signs of leaking and wet material contents on the outside of the corroded container. The contents could not be identified due to the corrosion of the label. The facility representative stated the material was identified as E-14-5, follow-up regarding the identification and actions taken to remediate and contain this material will be included in EPA follow-up.

Nitric Acid Storage

This area is used for all bulk virgin nitric acid storage. There was one muriatic acid bulk container located here as well, the facility representative stated the material should have not been placed in this area and will be moved.

General Storage Area

This area is used for various 275-gallon tote bulk chemical storage. Two 275-gallon totes, one sulfuric acid, one caustic soda (10%), showed severe degradation around the steel outflow valves. One 275-gallon sulfuric acid (50%) tote had degraded and leaked sulfuric acid on to the facility floor. The facility representative stated they would be cleaning this spill immediately.

Hot Room

Many virgin chemicals of various volumes were stored in this area. The area contained a chemical storage rack with various 1-gallon containers of materials to be sold. The chemical

storage rack in this area was severely corroded as well. There were approximately eighteen 1-gallon containers of nitric acid stored in this area, the containers were stored in close proximity to containers hydrochloric acid as well as a container of 50% peroxide. The peroxide container did not have a manufacturing date, and the facility representative was unsure how long the material was stored for.

Hot Room In-Storage Area

The containers stored on the opposite side of the chemical storage rack were bulk chemicals in-use for consolidation and resale. This area contained ample amounts of free-standing water; the facility representative stated the water intrusion was from rainwater. There were several areas of chemical residues and powders observed on the floor and within the rainwater. (Figure 1-4) The facility stated it was going to sample the materials and determine if these materials were hazardous wastes. The facility also stated they are working to mitigate the rainwater intrusion from this area.

SECTION III – AREAS OF CONCERN

Regulatory Concerns

1. Pursuant to 6 NYCRR § 372.2(a)(2), Hazardous waste determination. A person who generates a solid waste must determine if that waste is a hazardous waste...
 - a. At the time of the inspection, the facility had hazardous waste sulfuric acid and caustic soda ash incompatibly mixed in the secondary containment tray of the neutralization chemical storage area. This mixed hazardous waste material was not remediated at or before the time of the inspection and was therefore not determined and handled properly as a hazardous waste.
 - b. At the time of the inspection, the facility had a 275-gallon tote of hazardous waste sulfuric acid (50%) that had leaked onto the floor of the facility. The totes showed severe signs of degradation and corrosion around the outflow valve that led the container to inevitably leak.
 - c. At the time of the inspection, the facility had a 5-gallon container of unknown material that had corroded and showed signs of leaking within the various chemical storage area. The corroded container was visibly wet at the bottom seal of the metal container.
 - d. At the time of the inspection, the hot room in-storage area contained ample amounts of free-standing water, the facility representative stated the water intrusion was from rainwater. There were several areas of chemical residues and powders observed on the floor and within the rainwater.

General Concerns

1. At the time of the inspection, there were approximately eighteen 1-gallon containers of nitric acid stored in the hot room, the containers were stored in close proximity to containers hydrochloric acid as well as a container of 50% peroxide. The peroxide container did not have a manufacturing date, and the facility representative was unsure how long the material was stored for. These chemicals were incompatibly

stored and in the event of a release could potentially lead to substantial harm to human health and the environment.

2. At the time of the inspection, the chemical storage racks in both the various chemical storage area and the hot room showed severe degradation. This degradation impacts the structural integrity of the storage area and can lead to various chemicals to fall if the chemical storage rack fails. This could lead to a potentially dangerous release and exposure.

Closing Conference

Inspector Chernes went over the compliance evaluation inspection that had just been conducted at the facility with Ms. Pamela Rexer, V.P./ Director of Safety and Regulatory Affairs, and Mr. Veletanlic and discussed the area of concerns that were observed at the time of the inspection. Ms. Rexer stated that she would remedy these concerns immediately.

Figures



Figure 1 – Freestanding water and various chemical residues and powders observed within the hot room in-storage area.



Figure 2 – Another photo of freestanding water and various chemical residues and powders observed within the hot room in-storage area.



Figure 3 - Another photo of freestanding water and various chemical residues and powders observed within the hot room in-storage area.



Figure 4 - Another photo of freestanding water and various chemical residues and powders observed within the hot room in-storage area.