United States Environmental Protection Agency
Office of Enforcement and Compliance Assurance
Office of Criminal Enforcement, Forensics and Training

National Enforcement Investigations Center

NEIC

NEICVP1481E01

NEIC CIVIL INVESTIGATION REPORT
Honeywell UOP LLC
Chickasaw, Alabama

Investigation Dates:
September 19-20, 2022

Digitally signed by LAWRENCE LUTZ
Date: 2022.11.18 08:10:39 -07'00'

Craig Lutz, Project Manager, NEIC

Authorized for Release by:

MARTHA HAMRE

Digitally signed by MARTHA HAMRE
Date: 2022.11.18 08:14:44 -07'00'

Linda TeKrony, Acting Field Branch Chief, NEIC

Report Prepared For:
EPA Region 4
Araceli Chavez
61 Forsyth Street, SW # 9
Atlanta, Georgia 30303

NATIONAL ENFORCEMENT INVESTIGATIONS CENTER
P.O. Box 25227
Building 25, Denver Federal Center
Denver, Colorado 80225

CONTENTS

INVESTIGATION OVERVIEW 3
PROJECT OBJECTIVE 3
FACILITY CONTACT INFORMATION 3
FACILITY OVERVIEW 3
FACILITY OPERATIONS SUMMARY 4
FIELD ACTIVITIES SUMMARY 5
INVESTIGATION OBSERVATIONS 6

TABLES

Table 1. PROJECT TEAM MEMBERS 3
Table 2. FACILITY CONTACT INFORMATION 3
Table 3. APPLICABLE NAICS CODES 4

APPENDICES (*NEIC-created)

A NEIC Photolog (4 pages)* CONTAINS Company-Claimed CBI
B Wastewater Flow Diagram from October 19, 2012, Permit Application (1 page)
C LIMS Reports (Barium Tanks 25001 and 25004, September 2021-September 2022 (18 pages)
D Caustic and Salt Pond Solids Analytical, May 29, 2018 (22 pages)
E Master Purchase Agreement, Honeywell International Inc. and Southern Ionics Incorporated (27 pages) CONTAINS Company-Claimed CBI
F List of Electronic Documents (1 page)*
G pH Probe Data - Wastewater Trench (1,119 pages)

This Contents page shows all the sections contained in this report and provides a clear indication of the end of this report.

INVESTIGATION OVERVIEW

PROJECT OBJECTIVE

At the request of U.S. Environmental Protection Agency (EPA) Region 4 (Region), EPA's National Enforcement Investigations Center (NEIC) conducted a Resource Conservation and Recovery Act (RCRA) compliance investigation of the Honeywell UOP, LLC (Honeywell-UOP) facility, located at 1 Linde Drive, Chickasaw, Alabama. The facility was targeted under the national compliance initiative for reducing hazardous air emissions from hazardous waste facilities. The objective of the inspection was to determine Honeywell-UOP's compliance with the RCRA regulations.

Table 1 lists the project team members.

Table 1. PROJECT TEAM MEMBERS		
Team Member	**Organization**	**Project Role**
Craig Lutz	NEIC	Project manager
Laura Kanopkin	NEIC	Field team member
Zach Schlachter	NEIC	Field team member
Meagan Weaver	NEIC	Field team member
REGIONAL AND OTHER CONTACTS		
Raj Aiyar	EPA Region 4	Regional field team member
Laurie Digaetano	EPA Region 4	Regional field team member
Lanny Sasser	Alabama Department of Environmental Management (ADEM)	State inspector

FACILITY CONTACT INFORMATION

Table 2 lists the primary facility contact.

Table 2. FACILITY CONTACT INFORMATION		
Name, Title	**Phone No.**	**Email Address**
Derrick Newman, HSE Manager	(251) 222-4616	Derrick.Newman@Honeywell.com

FACILITY OVERVIEW

The Honeywell-UOP facility in Chickasaw, Alabama, is a catalyst and adsorbent manufacturer. It is located on 305 acres, currently employs approximately 400 employees, and operates 24 hours a day, 7 days a week.

According to the facility's most recent notification of regulated waste activity, Honeywell-UOP identified as a large quantity generator of hazardous waste, a used oil generator, and a small quantity handler of universal waste. Honeywell-UOP reported generating 202 tons of hazardous waste in its 2019 RCRA biennial waste report.

According to the EPA Envirofacts database, this facility has the following North American Industry Classification System (NAICS) codes (**Table 3**):

Table 3. APPLICABLE NAICS CODES	
NAICS Code	**Description**
32512	Industrial gas manufacturing
325188	All other basic inorganic chemical manufacturing
32518	Other basic inorganic chemical manufacturing

FACILITY OPERATIONS SUMMARY

Honeywell-UOP manufactures zeolite adsorbents and catalysts. Zeolites are crystallized claylike substances made from aluminum, caustic soda, and silicates. The zeolites absorb or trap certain molecules based on the molecular size. Various chemicals can be added to affect the size of the pore opening and/or enhance the catalytic properties. The inorganic synthesis process includes mixing, activation, ion exchange, crystallization, filtration, forming, calcination, pre-drying and drying kilns, and packaging. Wastes associated with manufacturing zeolite catalysts that contain barium or silver, along with off-specification or outdated products from these catalysts, account for most hazardous waste reported by the facility.

Honeywell-UOP operates an on-site wastewater treatment system with a permitted National Pollution Discharge Elimination System (NPDES) outfall. The wastewater treatment system consists of both tank and surface impoundment units. Honeywell-UOP generates barium-containing wastewater and high-pH wastewater streams that are treated and discharged into surface impoundments.

The high-pH wastewater stream is treated in a lined trench (**Appendix A**, photos 5, 6, and 7). Sulfuric acid is added in the trench (**Appendix A**, photo 7) to lower the pH. The amount of sulfuric acid added is controlled by a single pH meter downstream (**Appendix A**, photo 5) of the acid addition. The adjusted-pH wastewater stream is discharged into the wastewater treatment system at the 1-acre equalization (EQ) basin surface impoundment (**Appendix A**, photo 6). This flow is depicted in magenta in **Appendix B**.

Honeywell-UOP collects the barium-containing wastewater from the production areas in two wastewater holding tanks (tanks 25001 and 25004) (**Appendix A**, photo 1). Honeywell-UOP adds sodium sulfate (Na_2SO_4) to the tanks to form barium sulfate ($BaSO_4$), which is insoluble in water. Before releasing the wastewater containing barium sulfate into the wastewater treatment system, Honeywell-UOP collects a sample from the tanks and tests for soluble barium. If the sample test result is less than 5 parts per million (ppm) of soluble barium, the wastewater is released from the tanks into a wastewater line that discharges into the salt pond surface impoundment (**Appendix A**, photo 8). This flow is depicted in yellow in **Appendix B**. If

the sample test results are over 5 ppm barium, the wastewater is retreated and tested again before it is released to the salt pond. The salt pond discharges through a permitted Clean Water Act outfall into the Chickasaw Creek. The analytical results for the wastewater in the tanks from one year are in **Appendix C**. **Appendix C** includes the results for the samples that indicated the wastewater needed further treatment before it could be released into the wastewater system. Honeywell-UOP collected a sample in May 2018 for a hazardous waste determination of the sludges in the salt pond (**Appendix D**, pages 9 and 10).

Honeywell-UOP generates weak caustic solution during the manufacturing process that is considered a spent material. The weak caustic is piped to a neighboring facility, Southern Ionics, for reclamation. **Appendix E** is the contract covering the recycling.

FIELD ACTIVITIES SUMMARY

The NEIC field team was joined by Raj Aiyar and Laurie Digaetano of EPA Region 4 and Lanny Sasser from ADEM. NEIC inspectors arrived on-site on September 19, 2022, to conduct the inspection. At the opening meeting, the inspector credentials were presented to Derrick Newman, the Honeywell-UOP health, safety and environmental manager.

NEIC performed the following activities to accomplish the investigation objectives.

- Met with facility personnel to discuss process operations, including manufacturing processes, solid waste generation, hazardous waste management, and wastewater operations.
- Conducted a walk-through tour of the facility to observe manufacturing processes, the wastewater treatment plant, hazardous waste storage areas, and laboratories.
- Reviewed and requested copies, as appropriate, of hazardous waste storage area inspection records, hazardous waste manifests, reclamation agreements with third parties and testing protocols, and the wastewater effluent flow diagram.
- Reviewed the following documents: pH data for the wastewater in the trench discharging to the 1-acre EQ basin and the testing data for the barium sulfate wastewater stream.

Appendix F contains a full list of the documents NEIC received during and following the inspection.

INVESTIGATION OBSERVATIONS

NEIC identified the following observations during the RCRA compliance inspection. NEIC field team members discussed all observations with facility representatives during the closeout meeting unless otherwise noted in the observation description.

These observations are not final compliance determinations. EPA Region 4 will make the final compliance determinations based on its review of this report and other technical, regulatory, and facility information.

Observation 1

Observation Summary: Honeywell-UOP failed to make a hazardous waste determination for the wastewater stream discharged into the 1-acre EQ basin.

Citation:

Alabama Administrative Code (AAC) 335-14-3-.01(2) [40 Code of Federal Regulation (CFR) § 262.11] Hazardous waste determination and recordkeeping. *A person who generates a solid waste, as defined in 335-14-2-.01(2), must make an accurate determination as to whether that waste is a hazardous waste in order to ensure wastes are properly managed according to applicable AHWMMA regulations. A hazardous waste determination is made using the following steps:*

> *(d) A person must also determine whether the waste exhibits one or more hazardous characteristics as identified in 335-14-2-.03 by following one or both of the following procedures:*
>
> > *1. The person must apply knowledge of the hazard characteristic of the waste in light of the materials or the processes used to generate the waste. Acceptable knowledge may include process knowledge (e.g., information about chemical feedstocks and other inputs to the production process); knowledge of products, by-products, and intermediates produced by the manufacturing process; chemical or physical characterization of wastes; information on the chemical and physical properties of the chemicals used or produced by the process or otherwise contained in the waste; testing that illustrates the properties of the waste; or other reliable and relevant information about the properties of the waste or its constituents. A test other than a test method set forth in 335-14-2-.03, or an equivalent test method approved under 335-14-1-.03, may be used as part of a person's knowledge to determine whether a solid waste exhibits a characteristic of hazardous waste. However, such tests do not, by themselves, provide definitive results. Persons testing their waste must obtain a representative sample of the waste for the testing, as defined in 335-14-1-.02.*
>
> > *2. When available knowledge is inadequate to make an accurate determination, the person must test the waste according to the applicable methods set forth in 335-14-2-.03 or according to an equivalent method approved by the Department under 335-14-1-.03 and in accordance with the following:*

Observation 1

(i) Persons testing their waste must obtain a representative sample of the waste for the testing, as defined in 335-14-1-.02.

(ii) Where a test method is specified in 335-14-2-.03, the results of the regulatory test, when properly performed, are definitive for determining the regulatory status of the waste.

AAC Code 335-14-2-.03 (3) [40 CFR § 261.22(a)] Characteristic of corrosivity.

(a) A solid waste exhibits the characteristic of corrosivity if a representative sample of the waste has either of the following properties:

1. It is aqueous and has a pH less than or equal to 2 or greater than or equal to 12.5, as determined by a pH meter using Method 9040C in "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods," EPA Publication SW-846, as incorporated by reference in 335-14-1-.02(2).

Evidence:
Appendix A: NEIC Photolog
Appendix B: Wastewater Flow Diagram from October 19, 2012, Permit Application
Appendix G: pH Probe Data - Wastewater Trench

Description of Observation: The high-pH wastewater streams from the manufacturing areas are collected in a lined trench, treated with sulfuric acid to adjust the pH (**Appendix A**, photo 7), and discharged into the 1-acre EQ basin (**Appendix A**, photo 6). This flow is depicted in magenta in **Appendix B**. The pH of the wastewater stream is measured in the trench before it discharges to the 1-acre EQ basin and downstream from the acid addition. No wastewater streams enter the trench downstream of the pH monitor and the discharge to the 1-acre EQ basin. The pH adjustment is the only treatment of the wastewater stream in the trench.

Honeywell-UOP provided 1 year of pH data from the trench (October 2, 2021-October 2, 2022). To limit the number of data points, NEIC requested the data as 10-minute averages. Based on the data, it appears that the pH of the wastewater was below 2.0 for 21 of the 10-minute averages. During these periods, the wastewater met the definition of a corrosive hazardous waste while being discharged to the EQ basin These periods are listed in the following table and highlighted in yellow in **Appendix G**. Honeywell-UOP did not provide documentation that a proper hazardous waste determination was made for the wastewater discharged into the 1-acre EQ basin.

Start Date and Time	End Date and Time	pH (10-minute average)	Page Number in Appendix G
28-Oct-21 16:16:30	28-Oct-21 16:26:30	1.637902737	80
17-Dec-21 23:46:30	17-Dec-21 23:56:30	1.987883528	234
07-Feb-22 02:56:30	07-Feb-22 03:06:30	1.874186695	391
10-Feb-22 07:56:30	10-Feb-22 08:06:30	1.910214649	401
11-Feb-22 13:16:30	11-Feb-22 13:26:30	1.902984341	405
11-Feb-22 13:26:30	11-Feb-22 13:36:30	1.94023788	405
12-Mar-22 22:36:30	12-Mar-22 22:46:30	1.74672087	495
12-Mar-22 22:46:30	12-Mar-22 22:56:30	1.714886844	495
12-Mar-22 22:56:30	12-Mar-22 23:06:30	1.73699067	495
12-Mar-22 23:06:30	12-Mar-22 23:16:30	1.925058981	495

Observation 1

12-Mar-22 23:26:30	12-Mar-22 23:36:30	1.545646767	495
08-Apr-22 20:26:30	08-Apr-22 20:36:30	1.7732536	577
08-Apr-22 20:46:30	08-Apr-22 20:56:30	1.490822275	577
22-Apr-22 08:46:30	22-Apr-22 08:56:30	1.963564873	618
07-May-22 04:16:30	07-May-22 04:26:30	1.761281868	664
10-Jul-22 19:06:30	10-Jul-22 19:16:30	1.585130215	862
06-Sep-22 03:06:30	06-Sep-22 03:16:30	1.990730246	1037
06-Sep-22 03:16:30	06-Sep-22 03:26:30	1.634697914	1037
23-Sep-22 21:26:30	23-Sep-22 21:36:30	1.699442645	1092
24-Sep-22 19:16:30	24-Sep-22 19:26:30	1.945975025	1095
24-Sep-22 19:26:30	24-Sep-22 19:36:30	1.846508423	1095

This finding was not discussed with facility representatives, as the pH data was provided following the closeout meeting.

Observation 2

Observation Summary: Honeywell-UOP did not follow hazardous waste land disposal restrictions because it disposed of wastewater with a pH less than 2 in a surface impoundment

Citation:
AAC 335-14-9-.01(1)

40 CFR § 268.1 Purpose, scope, and applicability (as published by EPA on November 7, 1986; June 4, 1987, and as amended on July 19, 1988; August 17, 1988; September 6, 1989; June 1, 1990; May 24, 1993; September 19, 1994; May 11, 1995; April 8, 1996; June 28, 1996; May 12, 1997; July 6, 1999; August 5, 2005; November 28, 2016; and December 9, 2019), excluding the provisions of § 268.1(c)(3).

40 CFR § 268.1 Purpose, scope, and applicability.

(a) This part identifies hazardous wastes that are restricted from land disposal and defines those limited circumstances under which an otherwise prohibited waste may continue to be land disposed.

(c) Restricted wastes may continue to be land disposed as follows:

(4) Wastes that are hazardous only because they exhibit a hazardous characteristic, and which are otherwise prohibited under this part, are not prohibited if the wastes meet any of the following criteria, unless the wastes are subject to a specified method of treatment other than DEACT in §268.40, or are D003 reactive cyanide:

(iv) The wastes no longer exhibit a prohibited characteristic at the point of land disposal (i.e., placement in a surface impoundment).

AAC 335-14-1-.02(274) [40 CFR § 260.10]
"Surface impoundment" or "impoundment" means a facility or part of a facility which is a natural topographic depression, man-made excavation, or diked area formed primarily of

Observation 2

earthen materials (although it may be lined with man-made materials) which is designed to hold an accumulation of liquid wastes or wastes containing free liquids, and which is not an injection well. Examples of surface impoundments are holding, storage, settling, and aeration pits, ponds, and lagoons.

Evidence:

Appendix A: NEIC Photolog

Appendix B: Wastewater Flow Diagram from October 19, 2012, Permit Application

Appendix G: pH Probe Data - Wastewater Trench

Description of Observation: The 1-acre EQ basin is a wastewater unit of earthen construction (**Appendix A**, photo 6) that meets the definition of a surface impoundment. Honeywell-UOP measures the pH of the wastewater discharged into the 1-acre EQ basin in the trench upstream of the discharge point and downstream of the acid addition shown in **Appendix B**. The facility's pH data (**Appendix G**), for October 2, 2021-October 22, 2022, indicates that corrosive hazardous waste with EPA hazardous waste No. D002 was land disposed in the 1-acre EQ basin 21 times during that period. Those events are summarized below and highlighted in yellow in **Appendix G**.

Start Date and Time	End Date and Time	pH (10-minute average)	Page Number in Appendix G
28-Oct-21 16:16:30	28-Oct-21 16:26:30	1.637902737	80
17-Dec-21 23:46:30	17-Dec-21 23:56:30	1.987883528	234
07-Feb-22 02:56:30	07-Feb-22 03:06:30	1.874186695	391
10-Feb-22 07:56:30	10-Feb-22 08:06:30	1.910214649	401
11-Feb-22 13:16:30	11-Feb-22 13:26:30	1.902984341	405
11-Feb-22 13:26:30	11-Feb-22 13:36:30	1.94023788	405
12-Mar-22 22:36:30	12-Mar-22 22:46:30	1.74672087	495
12-Mar-22 22:46:30	12-Mar-22 22:56:30	1.714886844	495
12-Mar-22 22:56:30	12-Mar-22 23:06:30	1.73699067	495
12-Mar-22 23:06:30	12-Mar-22 23:16:30	1.925058981	495
12-Mar-22 23:26:30	12-Mar-22 23:36:30	1.545646767	495
08-Apr-22 20:26:30	08-Apr-22 20:36:30	1.7732536	577
08-Apr-22 20:46:30	08-Apr-22 20:56:30	1.490822275	577
22-Apr-22 08:46:30	22-Apr-22 08:56:30	1.963564873	618
07-May-22 04:16:30	07-May-22 04:26:30	1.761281868	664
10-Jul-22 19:06:30	10-Jul-22 19:16:30	1.585130215	862
06-Sep-22 03:06:30	06-Sep-22 03:16:30	1.990730246	1037
06-Sep-22 03:16:30	06-Sep-22 03:26:30	1.634697914	1037
23-Sep-22 21:26:30	23-Sep-22 21:36:30	1.699442645	1092
24-Sep-22 19:16:30	24-Sep-22 19:26:30	1.945975025	1095
24-Sep-22 19:26:30	24-Sep-22 19:36:30	1.846508423	1095

This finding was not discussed with the facility as the pH data was provided after the closeout meeting.

Observation 3

Observation Summary: Honeywell-UOP operated the 1-acre EQ basin as a hazardous waste disposal unit without applying for or obtaining a hazardous waste permit from ADEM.

Citation:

ADEM Administrative Code 335-14-8-.01 [40 CFR § 270.1(c)] General Information

Observation 3

(1) Purpose and scope.

(a) Coverage.

2. Unless they qualify for interim status under rule 335-14-8-.07, all owners and operators of hazardous waste treatment, storage, and disposal 335-14-8-.018-2 facilities and all transporters of hazardous waste must apply for and receive a permit from the Department before the construction of any facility or the transportation of any hazardous waste.

Evidence:
Appendix A: NEIC Photolog
Appendix G: pH Probe Data - Wastewater Trench

Description of Observation: The 1-acre EQ basin is a wastewater unit of earthen construction (**Appendix A**, photo 6) that meets the definition of a surface impoundment. The facility's pH data (**Appendix G**), for October 2, 2021-October 22, 2022, indicates that corrosive hazardous waste with EPA hazardous waste No. D002 was disposed in the 1-acre EQ basin 21 times during that period. Facilities that perform hazardous waste land disposal are required to have a hazardous waste permit authorizing the disposal activities. Honeywell-UOP does not have a hazardous waste permit issued by ADEM to operate as a treatment, storage, and disposal facility.

The disposal events into the 1-acre EQ basin are summarized below and highlighted in yellow in **Appendix G**.

Start Date and Time	End Date and Time	pH (10-minute average)	Page Number in Appendix G
28-Oct-21 16:16:30	28-Oct-21 16:26:30	1.637902737	80
17-Dec-21 23:46:30	17-Dec-21 23:56:30	1.987883528	234
07-Feb-22 02:56:30	07-Feb-22 03:06:30	1.874186695	391
10-Feb-22 07:56:30	10-Feb-22 08:06:30	1.910214649	401
11-Feb-22 13:16:30	11-Feb-22 13:26:30	1.902984341	405
11-Feb-22 13:26:30	11-Feb-22 13:36:30	1.94023788	405
12-Mar-22 22:36:30	12-Mar-22 22:46:30	1.74672087	495
12-Mar-22 22:46:30	12-Mar-22 22:56:30	1.714886844	495
12-Mar-22 22:56:30	12-Mar-22 23:06:30	1.73699067	495
12-Mar-22 23:06:30	12-Mar-22 23:16:30	1.925058981	495
12-Mar-22 23:26:30	12-Mar-22 23:36:30	1.545646767	495
08-Apr-22 20:26:30	08-Apr-22 20:36:30	1.7732536	577
08-Apr-22 20:46:30	08-Apr-22 20:56:30	1.490822275	577
22-Apr-22 08:46:30	22-Apr-22 08:56:30	1.963564873	618
07-May-22 04:16:30	07-May-22 04:26:30	1.761281868	664
10-Jul-22 19:06:30	10-Jul-22 19:16:30	1.585130215	862
06-Sep-22 03:06:30	06-Sep-22 03:16:30	1.990730246	1037
06-Sep-22 03:16:30	06-Sep-22 03:26:30	1.634697914	1037
23-Sep-22 21:26:30	23-Sep-22 21:36:30	1.699442645	1092
24-Sep-22 19:16:30	24-Sep-22 19:26:30	1.945975025	1095
24-Sep-22 19:26:30	24-Sep-22 19:36:30	1.846508423	1095

This finding was not discussed with facility representatives, as the pH data was provided following the closeout meeting.

Observation 4

Observation Summary: Honeywell-UOP failed to properly label four satellite accumulation containers containing corrosive waste and two satellite accumulation container containing toxic waste.

Citation:
AAC 335-14-3-.01 General [40 CFR § 262.15].

(5) Satellite accumulation area requirements for small and large quantity generators.

(a) A generator may accumulate as much as 55 gallons of non-acute hazardous waste...in containers at or near any 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 interim status...provided that all of the conditions for exemption in this section are met...The conditions for exemption for satellite accumulation are:

5. A generator must mark or label its container with the following:

(i) The words "Hazardous Waste" and

(ii) An indication of the hazards of the contents...

Evidence:
Appendix A: NEIC Photolog
Field logbooks

Description of Observation: NEIC inspectors toured Honeywell-UOP's quality assurance laboratories on September 20, 2022. In the "Wet Lab," inspectors observed a carboy connected to an instrument drain that was partially filled and not labeled (**Appendix A**, photograph 9). When asked about the contents of the carboy, a Honeywell-UOP chemist reported that it contained sulfuric acid with a pH of less than 2. The chemist conducted a pH test of the contents of the carboy and determined the pH was 1.2. Inspectors observed a second carboy similarly connected to an instrument drain; this container was empty. NEIC inspectors observed two additional instrument drain containers in an adjacent room (**Appendix A**, photograph 11). The Honeywell-UOP chemist stated that the contents of these drain containers were the same as the one tested for pH.

A hazardous waste generator may accumulate as much as 55 gallons of non-acute hazardous waste in containers at or near the point of generation. The waste generated from the instruments described above exhibits the characteristic of corrosivity, as indicated by a pH of less than 2. The instrument drain containers are satellite accumulation containers and must be labeled with the words "Hazardous Waste" and an indication of the hazards of the contents. At the time of the inspection, Honeywell-UOP did not properly label these satellite accumulation containers.

After these containers were identified, NEIC inspectors observed a Honeywell-UOP employee affixing "Hazardous Waste" labels and "Corrosive" stickers to the four instrument drain containers.

Observation 4

In the "Material Testing Service" (MTS) Lab, NEIC inspectors observed two containers of mercury waste (**Appendix A**, photograph 12). The mercury waste was stored in the two gray metal containers, as seen in the rear of the photo. The containers were not labeled with the words "Hazardous Waste" or a label to indicate that the contents were toxic. Facility representatives stated that the mercury storage containers are treated as hazardous waste satellite accumulation containers. Facility representatives also stated that the mercury waste is not from a process at the facility but accumulates due to density testing. Inspectors were told that once a container is full, the mercury is shipped to Waste Management for reclamation at Bethlehem Apparatus in Pennsylvania. Derrick Newman, Honeywell-UOP health, safety, and environmental manager, stated that labels were added to the waste containers while the inspectors were on-site, and, in the future, this area would be managed as a hazardous waste satellite accumulation area.

Satellite accumulation containers must be labeled with the words "Hazardous Waste" as well as an indication of the hazards of the contents. At the time of the inspection, Honeywell-UOP did not properly label these satellite accumulation containers.