

RCRA Inspection Report

1) Inspector and Author of Report

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U.S. Environmental Protection Agency, Region 4
Enforcement and Compliance Assurance Division
Chemical Safety and Land Enforcement Branch
61 Forsyth Street, S.W.
Atlanta, Georgia 30303

2) Facility Information

PCS Nitrogen Fertilizer LP
1460 Columbia Nitrogen Drive
Augusta, Georgia 30901
Richmond County

EPA ID# GAD057281958

3) Responsible Officials

John McKinnon
Manager, Environmental/Lab/Quality
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4) Inspection Participants

John McKinnon	PCS Nitrogen Fertilizer, L.P.
Jamie Powell,	PCS Nitrogen Fertilizer, L.P.
Andrew Neidlinger	PCS Nitrogen Fertilizer, L.P.
Andrea B. Kemberling	GAEPD
Raj Aiyar	US EPA

5) Date of Inspections

October 19, 2023, 9:00 a.m.

6) Applicable Regulations¹

Resource Conservation and Recovery Act (RCRA) Sections 3002 (42 U.S. Code – Annotated U.S.C.A. 6925 and 6927), and 40 Code of Federal Regulation (C.F.R.) Parts 260 - 270, 273 & 279; Georgia Hazardous Waste Management Act (GHWMA), Ga. Code Ann. § 12-8-60 *et seq.*, and

¹ As the State's authorized hazardous waste program operates in lieu of the federal RCRA program, the citations of those authorized provisions will be to the authorized State program. However, for ease of reference, the federal citations will follow in brackets.

Georgia Hazardous Waste Management Rules, Ga. Comp. R. and Regs. 391-3-11.01 to 391-3-11.18 (2016 and 2018); and Hazardous Waste Permit # HW-26(T&CA)-3

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.02(1) [40 C.F.R. § 260.10], a large quantity generator (LQG) of hazardous waste is a generator who generates greater than or equal to 1,000 kilograms (2,200 pounds) of non-acute hazardous waste in a calendar month.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [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 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 without having interim status, as required by Section 12-8-66 of the GHWMA, Ga. Code Ann. § 12-8-66 [Section 3005 of RCRA, 42 U.S.C. § 6925], and without complying with Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.17(a)], except as required in Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.15(a)(7) and (8)], provided that the generator complies with the satellite accumulation area conditions listed in Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.15] (hereinafter referred to as the “SAA Permit Exemption”).

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.17], an LQG may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status, as required by Section 12-8-66 of the GHWMA, Ga. Code Ann. § 12-8-66 [Section 3005 of RCRA, 42 U.S.C. § 6925], provided that the generator complies with the conditions listed in Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.17] (hereinafter referred to as the “LQG Permit Exemption”).

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.18 [40 C.F.R. § 273.9], a “Small Quantity Handler of Universal Waste” (SQHUW) is a Universal Waste handler who does not accumulate 5,000 kilograms or more of Universal Waste (batteries, pesticides, mercury-containing equipment, or lamps, calculated collectively) at any time.

7) Purpose of Inspection

The purpose of this inspection was to conduct an unannounced compliance evaluation inspection to determine the compliance status of PCS Nitrogen Fertilizer L.P. with the applicable requirements of RCRA and the corresponding Georgia Environmental Protection Division (GAEPD) regulations. This was an EPA lead inspection.

8) Facility Description

PCS Nitrogen Fertilizer L.P. (PCS Nitrogen) is located adjacent to the Savannah River in East Augusta, Georgia. The facility began operation in 1964. PCS Nitrogen is one of Nutrien Corporation’s nitrogen facilities. PCS Nitrogen merged as Nutrien in 2018 however, continues to operate as PCS Nitrogen. Natural gas, air and water are used to synthesize nitrogen compounds, including ammonia, urea, ammonium nitrate and nitric acid. These compounds are used in

making agricultural and industrial products. The plant operates 24/7 and has approximately 170 employees and 230 contractors. The 162-acre facility includes an ammonia plant, urea plant, pastille plant, nitric acid plant, ammonium nitrate plant, product storage structures, quality control laboratories, machine shops, maintenance shops, and administrative buildings.

Facility Process and Hazardous Waste Generation

In its most recent notification under 8700-12 dated February 22, 2022, PCS Nitrogen notified as a large quantity generator (LQG) of hazardous waste with the following waste codes: D001, D002, D004-D010, D018, D022, D035, D038, F002 and U228.

Some of the hazardous waste generated onsite includes lab waste from the quality control labs and spent aerosol cans from the various repair and maintenance shops on-site. The facility has one 90-day central accumulation area (CAA), one universal waste accumulation area and two used oil areas. Hazardous waste generated on site has been disposed of by Michigan Disposal Waste Treatment (EPA ID# MID000724831), Environmental Enterprises (EPA ID# OHD083377010), Chemtron Corporation (EPA ID# GAD057281958 and EQ Detroit (EPA ID# MID980991566).

The facility currently has a corrective action order, Order No. EPD-HW-1251 issued by GAEPD effective since October 9, 1996. Some of the other Permits issued to PCS Nitrogen include NPDES Permit and an Underground Injection Well Permit. The North American Industrial Classification System (NAICS) for PCS Nitrogen is 32511- Nitrogenous Fertilizer Manufacturing

9) Previous Inspection History

A Desk Audit was conducted on October 29, 2021, by GAEPD. There were no violations found during the Audit. There was no prior inspection by EPA at this facility.

10) Opening Conference

On October 18, 2023, EPA Inspector, Raj Aiyar accompanied by GAEPD Inspector, Andrea B. Kemberling arrived at the PCS Nitrogen facility at approximately 9:00 a.m. Facility Representative John McKinnon, Manager, Environmental/Lab/Quality immediately received the inspectors escorted the inspectors to a conference room. The inspectors were joined by Jamie Powell and Andrew Neidlinger. The inspectors introduced themselves, showed their credentials, stated the purpose of the visit. The inspectors discussed the scope of the inspection and described the anticipated use of equipment, a digital camera during the inspection. The inspectors later requested a list of records to be reviewed as part of the inspection.

The Small Business Regulatory Enforcement Fairness Act's (SBREFA) classification of a "small business" is generally set by the Small Business Administration. A copy of the EPA's information

sheet for small businesses can be found <https://www.epa.gov/sites/production/files/2017-06/documents/smallbusinessinfo.pdf>.

The EPA inspector also discussed the company's ability, pursuant to 40 C.F.R. §2.203, to assert a business confidentiality claim for information submitted to EPA. The facility did not assert a business confidentiality claim.

The facility representatives provided an overview of the facility's history and current operations during the opening conference. The inspection participants discussed the health and safety protocols and the required personal protective equipment. The facility representatives later led the inspectors on a tour of the facility's operations.

11) Inspection Observations

Satellite Accumulation Areas (SAAs)

Seventeen satellite accumulation areas (SAAs) are distributed across the facility property near the hazardous waste generation locations. The SAA containers are stored in separate areas in sheds.

The SAA shed floor is comprised of a concrete pad, approximately 6 ft x 6 ft, which includes spill containment. The concrete pad is raised approximately one foot above the ground. The sides and the roof of the shed is comprised of corrugated metal walls with a chain link gate at the front. Each SAA is visible through the chain link gate. Each SAA is marked with a placard that states "Hazardous Waste" and identified with SAA number and the hazardous waste generator location (e.g., lab, control room). Please see Photo-1 in the photo log at the end of the document.

Pipe Shop SAA#1

At the time of the inspection, the inspectors observed one 55-gallon closed SAA drum on a wooden pallet. The SAA drum contained waste aerosol cans. The drum was labeled with the words "Hazardous Waste," and an indication of hazards of the contents as "Flammable".

Ammonia/Urea Control Room SAA #2

At the time of the inspection, the inspectors observed one 55-gallon closed SAA drum on a wooden pallet. The SAA drum contained waste aerosol cans. The drum was labeled with the words "Hazardous Waste," and an indication of hazards of the contents as "Flammable".

Ammonia Nitrate Control Room SAA #3 & SAA #8

At the time of the inspection, the Ammonia Nitrate Control Room had two SAAs present. The first SAA #3 was comprised of one 55-gallon closed drum on a plastic pallet, containing waste aerosol cans. The drum was labeled with the words "Hazardous Waste," and an indication of hazards of the contents as "Flammable".

The second SAA #8 was a 55-gallon drum stored on a plastic pallet, containing Lab Reagent Waste.

The closed drum was labeled with the words “Hazardous Waste,” and an indication of the hazards of the contents as “Flammable Liquid” and “Corrosive”.

Acid Plant Control Room SAA #4

At the time of the inspection, the Acid Plant Control Room had one SAA present. The SAA #4 comprised of one 55-gallon closed drum on a wooden pallet, containing waste aerosol cans. The drum was labeled with the words “Hazardous Waste,” and an indication of hazards of the contents as “Flammable”.

Ammonia Nitrate Shipping Area SAA #5

At the time of the inspection, the Ammonia Nitrate Shipping Area had one SAA. The SAA #5 comprised of one 55-gallon closed drum on a plastic pallet, containing waste aerosol cans. The drum was labeled with the words “Hazardous Waste,” and an indication of hazards of the contents as “Flammable”.

Reforming & Purification “R&P” SAA #6 and Maintenance Shop SAA #10

At the time of the inspection, the R&P SAA #6 had one SAA present, The SAA #6 was comprised of one 55-gallon closed drum on a wooden pallet. The SAA drum contained Lab Reagent Waste. The drum was labeled with the words “Hazardous Waste,” and an indication of hazards of the contents as “Flammable Liquid” and “Corrosive”.

Adjacent to the R&P SAA, the Maintenance Shop had one SAA comprised of one 55-gallon closed drum on a wooden pallet. The SAA drum contained waste aerosol cans and was labeled with the words “Hazardous Waste” and an indication of the hazards of the contents as “Flammable Gas”.

Nitric Acid Control Room/Boiler House SAA #7

At the time of the inspection, the Nitric Acid Control Room/Boiler House had one SAA present, The SAA #7 comprised of one 55-gallon closed drum on a wooden pallet. The SAA drum contained Lab Reagent Waste. The drum was labeled with the words “Hazardous Waste,” and an indication of hazards of the contents as “Flammable Liquid” and “Corrosive”.

Urea Shipping Area SAA #9

At the time of the inspection, the Urea Shipping Area had one SAA present. The SAA #9 was comprised of one 55-gallon closed drum on a wooden pallet. The SAA drum contained waste aerosol cans and was labeled with the words “Hazardous Waste” and an indication of the hazards of the contents as “Flammable Gas”.

Railroad Yard SAA #11

At the time of the inspection, the Railroad Yard had one SAA present. The SAA #11 was comprised of one 55-gallon closed drum on a wooden pallet. The SAA drum contained waste aerosol cans and was labeled with the words “Hazardous Waste” and an indication of the hazards of the contents as “Flammable Gas”.

Pastille Plant SAA #12 and SAA #13

At the time of the inspection, hazardous waste was not stored at the Pastille Plant. The following three SAAs #14, #15 and #16 were enclosed by a metal cage raised approximately two inches off the ground (Photo-2).

Maintenance Shop SAA #14

In this shop, maintenance and repair of pumps, motors, turbines, and welding is conducted. At the time of the inspection, the maintenance shop had one SAA present. The SAA #14 was comprised of aerosol can puncturing device mounted on a 55-gallon container. The unit was not in operation at the time of inspection. The SAA drum container was labeled with the words "Hazardous Waste" and an indication of the hazards of the contents as "Flammable Gas".

A Crystal Clean parts washer unit was observed in the shop. It was not in use at the time of inspection. The waste generated by the parts washer was determined to be nonhazardous based on the review of the Safety Data Sheet (SDS).

Contractor Building SAA #15

At the time of the inspection, the Contractor Building had one SAA present. The SAA #15 was comprised of one 55-gallon closed drum. The SAA drum contained waste aerosol cans and was labeled with the words "Hazardous Waste" and an indication of the hazards of the contents as "Flammable Gas".

Automotive Maintenance Shop SAA #16

At the time of the inspection, the Automotive Shop had one SAA present. The SAA #16 was comprised of one 55-gallon closed drum. The SAA drum contained waste aerosol cans and was labeled with the words "Hazardous Waste" and an indication of the hazards of the contents as "Flammable Gas".

Process Main Lab SAA #17

At the time of the inspection, the Process Main Lab had one indoor SAA and one outdoor SAA. The indoor SAA comprised of one closed 2.5-gallon SAA container labeled with the words "Hazardous Waste" and an indication of the hazards of the contents as "Flammable Liquid" and "Corrosive". The outdoor SAA was a 55-gallon SAA drum stored on a wooden pallet. The drum contained Lab Reagent Waste. The drum was closed, labeled with the words "Hazardous Waste," and an indication of the hazards of the contents as "Flammable Liquid" and "Corrosive".

Central Accumulation Area (CAA)

The facility operates one CAA. This 90-day CAA is enclosed on the three sides by corrugated metal walls and a corrugated roof (Photo-3). It has a chain link locked gates at the front. The floor of the storage area is concrete with a raised concrete barrier around the edge that serves as a secondary containment. A corrugated metal barrier exists within the CAA creating two separate areas. At the time of the inspection, one side was labeled "Empty Container Storage Area". The

other side was labeled as “Hazardous Storage Area”. There was signage for “No Smoking”. The CAA was equipped with an eye wash station, safety shower and a fire extinguisher. There were 11 55-gallon plastic containers and one 275-gallon Intermediate Bulk Container (IBC) tote (Photo-4). All the containers including the IBC tote were observed to be closed, labeled with the words “Hazardous Waste,” an indication of the hazards of the contents, and with an accumulation start date (Photo-3 and Photo-4). There were no leaks and spills observed in the CAA.

Universal Waste

The facility generates universal waste lamps, batteries, and electronic waste during regular facility and equipment maintenance. Universal waste is stored in a shed which has a concrete floor surrounded on three sides by corrugated metal, a corrugated metal roof, and a chain link gate at the front (Photo-5). The universal waste storage was comprised of two separate areas labeled “Universal Waste Storage.”

At the time of the inspection, one area stored the following items on the pallets:

- six (6) closed containers of spent fluorescent lamps
- one (1) closed 55-gallon plastic drum of HID lamps.

The adjacent area stored the following items on the pallets:

- ten (10) Spent lead acid batteries
- one (1) computer
- one (1) closed 55-gallon plastic drum of electronic parts

All the containers were observed to be closed, labeled, and dated. Cleanlites Recycling South, LLC (EPA ID# SCR000767814) handles the facility’s universal waste recycling.

Used Oil

There was one used oil tank with a holding capacity of approximately less than 5000 gallons in secondary containment adjoining and oil/water separator was observed at the Utilities area. The tank was labeled as “Used Oil”.

Used oil Storage was observed adjacent to the CAA. There was one 3000-gallon tank and one 275-gallon plastic IBC tote (Photo-6). Both the tank and tote were closed and labeled as “Used Oil”. The 275-gallon tote is used for storage of recycled oil from the facility’s mobile equipment and the 3000-gallon used oil tank is used for collecting recycled oil from the facility’s pumps and compressors. The 275-gallon tote and the 3000-gallon used oil tank had a concrete secondary containment. The secondary containments were free of crack and gaps. The inspectors observed oily residue in the secondary containment of the 3000-gallon tank (Photo-7 and Photo-8). According to the facility personnel, the source of the leak was a leaking gasket from the used oil tank’s ancillary equipment. The facility personnel were monitoring the leak and that parts to fix the leak had been ordered for repairing it. The 275-gallon tote was observed to be intact and

nonleaking.

There were two roll-off dumpsters adjacent to the used oil storage. The dumpsters were used for storage of oily rags, booms, pads, and oil dry. Both dumpsters were covered with a tarp. The inspectors observed residual oil below the one of the dumpsters. The oily residue on the ground was cleaned up with oil dry the same day. The inspectors observed a 1000-gallon tank with secondary containment that was used to collect used oil from the Automotive maintenance shop #16 . The used oil storage tank and its secondary containment appeared to be in disrepair. There was a sign indicating “Used Oil” however, the sign was not clearly visible and faded. Safety-Kleen Systems, Inc. (EPA ID# SCD077995488) manages the facility’s used oil recycling program.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.17(1) [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.”

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.17(1) [40 C.F.R. § 279.22(d)], upon detection of a release of used oil to the environment, the facility must clean up and manage properly the released used oil and other materials.

Record Review

Once the inspectors completed the walkthrough of the facility, the inspectors were escorted to a conference room to conduct a review of the required documentation. The records reviewed for a three-year period included the following:

- Contingency Plan
- Personnel Training
- Weekly Hazardous Waste Inspection Log
- Hazardous Waste Manifests
- Waste Profiles
- 2021 Biennial Report
- Hazardous Waste Reduction Plan
- Documents showing emergency arrangement with local authorities
- Copies of all Applicable Permits

All records were available on site.

12) Closing Conference

An exit briefing was conducted at the conclusion of the inspection. John McKinnon, PCS Nitrogen, Jamie Powell, PCS Nitrogen and Andrew Neidlinger, PCS Nitrogen, Andrea B. Kemberling, GAEPD and Raj Aiyar, US EPA participated during the exit briefing. The observations made during the inspection were discussed and the inspection was concluded.

Based on the inspection, the facility appeared to be operating as a large quantity generator of hazardous waste.

13) **Signed**

RAJAGOPAL AIYAR

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AIYAR

Date: 2023.12.20 11:04:52 -05'00'

Raj Aiyar
Environmental Engineer

Date

Concurrence

ARACELI CHAVEZ

Digitally signed by ARACELI

CHAVEZ

Date: 2023.12.21 11:00:21 -05'00'

Araceli B. Chavez
RCRA Enforcement Section

Date

Attachment A
Photographs of PCS Nitrogen
EPA ID# GAD057281958
US EPA Kodak PixPro FZ53
By: Raj Aiyar, US EPA



Photo 1 SAA R&P Shack #6 and Maintenance Shop #10



Photo-2 SAA Automotive Shop #16



Photo-3 Central Accumulation Area (CAA) Exterior



Photo-4 CAA Interior



Photo-5 Universal Waste Storage Area



Photo-6 Used Oil Storage Area



Photo-7 Oily Residue in Secondary Containment



Photo-8 Oily Residue in Secondary Containment