



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

FEB 04 2019

Mr. Brad Hodges
Environmental Manager
Weyerhaeuser NR Company, Philadelphia Facility
1016 Weyerhaeuser Road
Philadelphia, Mississippi 39350

SUBJ: Compliance Evaluation Inspection
Weyerhaeuser Company Offsite Area
EPA ID No.: MSR000004838

Dear Mr. Hodges:

On October 30, 2018, a compliance evaluation inspection (CEI) was conducted by the U.S. Environmental Protection Agency and the Mississippi Department of Environmental Quality (MDEQ) at Weyerhaeuser Company Offsite Area, located in Philadelphia, Mississippi, to determine the facility's compliance status with the Resource Conservation and Recovery Act (RCRA). This RCRA CEI was an EPA-lead inspection.

Enclosed is the EPA RCRA inspection report, which indicates deficiencies of the RCRA regulations were discovered at the time of the inspection. A copy of this report has been forwarded to the MDEQ for follow-up.

If you have any questions regarding this matter, please contact William Kappler, of my staff, by phone at (404) 562-8498, or by email at kappler.william@epa.gov.

Sincerely,

A handwritten signature in blue ink, reading "Alan A. Annicella", is positioned above the typed name.

Alan A. Annicella
Chief, Hazardous Waste Enforcement and
Compliance Section
Enforcement and Compliance Branch

Enclosure



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

FEB 04 2019

Ms. Krista Caron, P.E., BCEE
Manager, Hazardous Waste Branch
Mississippi Department of Environmental Quality
Office of Pollution Control
Environmental Compliance and Enforcement Division
515 East Amite Street
Jackson, Mississippi 39201

SUBJ: Compliance Evaluation Inspection
Weyerhaeuser Company Offsite Area
EPA ID No.: MSR000004838

Dear Ms. Caron:

On October 30, 2018, a compliance evaluation inspection (CEI) was conducted by the U.S. Environmental Protection Agency and the Mississippi Department of Environmental Quality (MDEQ) at Weyerhaeuser Company Offsite Area, located in Philadelphia, Mississippi, to determine the facility's compliance status with the Resource Conservation and Recovery Act (RCRA). This RCRA CEI was an EPA-lead inspection.

Enclosed is the EPA RCRA inspection report, which indicates deficiencies of the RCRA regulations were discovered at the time of the inspection. Please follow-up with Weyerhaeuser Company Offsite Area, to ensure the deficiencies have been addressed.

If you have any questions regarding this matter, please contact William Kappler, of my staff, by phone at (404) 562-8498, or by email at kappler.william@epa.gov.

Sincerely,

A handwritten signature in blue ink that reads "Alan A. Annicella".

Alan A. Annicella
Chief, Hazardous Waste Enforcement and
Compliance Section
Enforcement and Compliance Branch

Enclosure

RCRA Inspection Report

1) Inspector and Author of Report

William Kappler
Physical Scientist
Enforcement and Compliance Branch
Environmental Protection Agency, Region 4, AFC - 10th Floor
61 Forsyth Street
Atlanta, Georgia 30303
(404) 562-8498

2) Facility Information

Weyerhaeuser Company Offsite Area
County Road Number 541
Philadelphia, Mississippi 39350
Neshoba County
EPA ID No.: MSR000004838

Mailing Address

Weyerhaeuser NR Company, Philadelphia Facility
1016 Weyerhaeuser Road
Philadelphia, Mississippi 39350

3) Facility Contact

Mr. Brad Hodges
Environmental Manager
(601) 650-7204
Brad.Hodges@Weyerhaeuser.com

4) Inspection Participants

Brad Hodges, Weyerhaeuser NR Company, Philadelphia Facility
Brad Justice, Mississippi Department of Environmental Quality
William Kappler, Environmental Protection Agency, Region 4

5) Date and Time of Inspection

October 30, 2018 at 11:00 a.m.

6) Applicable Regulations

Mississippi Code of 1972, Miss. Code Ann. § 17-17-1 *et seq.* [Resource Conservation and Recovery Act (RCRA), Sections 3005 and 3007 (42 U.S.C.A. §§ 6925 and 6927)] and the

Mississippi Department of Environmental Quality, Office of Pollution Control, Mississippi Hazardous Waste Management Regulations (MHWMR), 11 Miss. Admin. Code Pt. 3, R. 1.1-1.24, which adopts and incorporates by reference 40 C.F.R. Parts 260-270, 273, and 279 [40 Code of Federal Regulations (C.F.R.) Parts 260-270, 273, and 279].

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

7) **Purpose of Inspection**

On October 30, 2018, inspectors from the U.S. Environmental Protection Agency, Region 4, and the Mississippi Department of Environmental Quality (MDEQ) conducted an unannounced compliance evaluation inspection (CEI) at Weyerhaeuser Company Offsite Area, (hereinafter, "WCOA" or the "facility") to determine its compliance status with the RCRA and the State of Mississippi regulations. This was an EPA-lead inspection. Inspectors arrived at Weyerhaeuser Offsite and were greeted by facility staff. Inspectors were escorted to a conference room for an entrance briefing. The inspectors introduced themselves, showed their credentials, provided business cards, and explained the purpose of the visit.

8) **Facility Description**

The facility is located at County Road Number 541, Philadelphia, Neshoba County, Mississippi. The property consists of several acres and is owned by Weyerhaeuser Company. The facility employs approximately 180 people and operates 24 hours per day, 7 days per week. The facility consists of a Remediation Building and is surrounded by a chain-link fence and locked entrance gate. Potable water is supplied by the City of Philadelphia and domestic waste service is provided by the City of Philadelphia. The primary NAICS code for the facility is 321113. WCOA was inspected as a large quantity generator (LQG) of hazardous waste.

9) **General Process Description**

WCOA is located approximately four miles from the Weyerhaeuser Company lumber production facility. The facility consists of a closed surface impoundment area for wood treating waste deposited by Weyerhaeuser mills during the 1960's and 1970's and a Remediation Building for the treatment of contaminated groundwater.

WCOA operates as an onsite groundwater remediation system. Groundwater is pumped from extraction wells and treated in the Remediation Building. Groundwater contaminated with Pentachlorophenol is treated in a two-stage oil/water separator, through two cartridge/bag filters, through two charcoal filters, and stored in a clear water tank, prior to its discharge to recharge trenches.

10) Previous Inspection History

WCOA was last inspected by MDEQ for compliance with the RCRA regulations on February 25, 2014. No apparent hazardous waste violations were noted during the inspection.

The EPA has never inspected WCOA for compliance with the RCRA regulations.

11) Findings

The information in this RCRA inspection report is based on the EPA's October 30, 2018, RCRA compliance evaluation inspection.

Groundwater Remediation Building

Groundwater is treated in this building. The treatment of the groundwater generates hazardous waste. The treatment system was not operating at the time of this inspection.

Mr. Hodges explained to the inspectors that they have not used the groundwater remediation system at this site in several years because the facility is unable to meet the iron limits outlined in the facility's NPDES permit. In October 2013, the facility drained and cleaned the tanks associated with the treatment process. The facility was not generating hazardous waste at the time of the inspection, but maintains its LQG status in the event a new monitoring well is installed.

A 90-Day or Less Accumulation Area is in this building. No hazardous waste was accumulating in this area at the time of the inspection. Inspectors observed spill control and clean up equipment stored in the building.

Inspectors observed all treatment tanks and equipment in the building. The gate to the area is kept locked as well as the door to the treatment building.

12) Waste Management Practices

It appears hazardous waste has not been generated since 2014.

WCOA used the following transporter in 2014 through 2018

None

WCOA used the following TSDF in 2014 through 2018

None

13) Record Review

Manifests

The facility explained to inspectors there were no hazardous waste manifests for review since 2014. The inspector accessed the E-Manifest Record System and found no manifests.

Contingency Plan

The facility maintains the same written contingency plan (plan) used for the Weyerhaeuser Company facility (MSD980557375). The plan was revised in April 2018. It appears Brad Hodges is the primary emergency coordinator. Greg Clemons, Kris Robertson, Michael Nolan, and Stan Webb are the alternate emergency coordinators. The emergency coordinator's work address and phone number are listed in the plan. The plan describes arrangements with the local and state authorities, spill control and emergency procedures, evacuation plan, emergency response equipment, preparedness and prevention requirements, and employee training.

90-Day or Less Weekly Container Inspection Records

It appears hazardous waste has not been accumulated since 2014.

Personnel Training

Inspectors reviewed the hazardous waste training records for Brad Hodges, Greg Clemons, Kris Robertson, Michael Nolan, and Stan Webb for 2016, 2017, and 2018. Mr. Hodges manages the hazardous waste program at the facility. Mr. Hodges was given training in contingency plan small spill response, hazardous waste communications (includes emergency response procedures), and DOT hazardous materials transportation. Inspectors reviewed the hazardous waste contingency plan training for Greg Clemons, Kris Robertson, Michael Nolan, and Stan Webb. It appears that Michael Nolan and Stan Webb were not given contingency plan training. The records describing the job titles and job descriptions for these employees were not maintained or not available for review at the time of this inspection.

¹Pursuant 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 (2016)] (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)(7)(iii)], which is a condition of the LQG Permit Exemption, facility personnel must take part in an annual review of the initial training required by this section.**

***Pursuant to 11 Miss. Admin. Code Pt. 3, R. 1.3 [40 C.F.R. § 262.17(a)(7)(iv)(A)(B)], which is a condition of the LQG Permit Exemption, the generator must maintain training records that include, among others: the job title for each position at the facility related to hazardous waste management, and the name of the employee filling each job; a written job**

¹ "MDEQ's newly adopted Generator Improvements Rule (GIR) regulations are currently under review by the EPA and have not yet been authorized. However, for ease of reference and for consistency with the State Inspection Report, this CEI Report will cite to the Mississippi and federal hazardous waste regulations as amended by the GIR. New requirements that have become effective pursuant to the GIR, but have not yet been authorized, are noted with an asterisk. These provisions are effective and enforceable as a matter of State law but are not federally enforceable. Until the State is authorized for the GIR, EPA will enforce the provisions of the federal generator regulations in effect prior to the adoption of the GIR."

description for each position.

Arrangements with Local Authorities

The facility revised the contingency plan in April 2018. It appears the facility made arrangements with the local authorities.

Annual Report

Inspectors reviewed the 2017 Annual Report.

Land Disposal Restriction Notice

Inspectors reviewed the land disposal restriction records.

14) Out-Briefing

Upon conclusion of the inspection, an out-briefing was conducted in the presence of Weyerhaeuser Company Offsite Area representatives. The facility was informed of the findings at the time of this inspection.

15) Sampling Overview

Sampling was not conducted at this facility.

16) Conclusion/Summary of Violations

Based on the compliance evaluation inspection conducted on October 30, 2018, Weyerhaeuser Company Offsite Area was inspected as a large quantity generator of hazardous waste. Deficiencies of the RCRA regulations were discovered at the time of the inspection.

17) Signed

for 

William Kappler
Physical Scientist

Hazardous Waste Enforcement and Compliance Section

2/4/19
Date

18) Concurrence



Alan A. Annicella

Chief, Hazardous Waste Enforcement and Compliance Section
Enforcement and Compliance Branch

2/4/19
Date

