

RCRA Inspection Report

1) Inspector and Author of Report

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2) Facility Information

InChem – Rock Hill, LLC EPA ID# SCD981014780
800 Cel-River Road
Rock Hill, South Carolina 29730

3) Responsible Official

Mr. Brian Hamel, Vice President of Engineering and Compliance
bhamel@inchemcorp.com

4) Inspection Participants

Brian Hamel, InChem Alaina Holst, SCDHEC
Audra Henderson, InChem Laurie Benton DiGaetano, U. S. EPA

5) Date of Inspection

April 13, 2021

6) Applicable Regulations

Resource Conservation and Recovery Act (RCRA) Sections 3002 (42 U.S. Code – Annotated U.S.C.A. 6925 and 6927), South Carolina Hazardous Waste Management Regulations (SCHWMR) R.61-79, 260 through 270, 273, 278, & 279; and 40 Code of Federal Regulation (C.F.R.), Parts 260 - 270, 273, 278, & 279.

Pursuant to 25 S.C. Code Ann. Regs. 61-79.262.17 [40 C.F.R. § 262.17], a large quantity generator may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status, as required by Section 44-56-60(a)(2) and (b)(3) of the SCHWMA, S.C. Code Ann. § 44-56-60(a)(2) and (b) [Section 3005 of RCRA, 42 U.S.C. § 6925], provided that the generator complies with the conditions listed in 25 S.C. Code Ann. Regs. 61-79.262.17 [40 C.F.R. § 262.17] (hereinafter referred to as the “LQG Permit Exemption”).

Pursuant to 25 S.C. Code Ann. Regs. 61-79.273.9 [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 total 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 InChem – Rock Hill, LLC’s compliance with the applicable requirements of RCRA and the corresponding SCDHEC regulations. This was an EPA lead inspection.

8) **Previous Inspection History**

SCDHEC has conducted three RCRA CEIs at the subject facility in the past ten years and found violations of RCRA container management and recordkeeping requirements during each inspection, including the most recent inspection, which was conducted on 10/16/2018. On 04/16/2013, SCDHEC issued a formal enforcement action for violations observed during an inspection on 09/04/2012.

9) **Facility Description**

InChem – Rock Hill, LLC (InChem) provides custom manufacturing of specialty chemicals for chemical companies of all sizes. InChem’s services include multi-step synthesis, distillations, silane and siloxane chemistry, and toll manufacturing for products such as elastomers, specialty polymers, composites, coatings, adhesives, and films. The subject facility includes a small pilot plant with one 5-gallon and one 30-gallon reactor for experimental production, one 250-gallon reactor to scale up production, and seven production chemical reactors ranging in size from 1,800 to 6,000 gallons. The facility also operates wipe-film evaporators and short-path distillation equipment.

InChem began operations at this location in 1994, and the current facility includes only a portion of InChem’s previous operations here. In 2005, InChem sold one production building to Solvay, where carbon fibers are currently manufactured by Cytec Engineered Materials, Inc. In 2015, InChem sold the phenoxy resin portion of the facility to Gabriel Performance Products, LLC. The three companies share the plant entrance and security office, which is staffed twenty-four hours per day, seven days per week, and the common fire suppression system. InChem also provides steam and compressed air to Gabriel Performance Products, LLC, but all other manufacturing, laboratory, maintenance, utilities, and warehousing operations are kept separate for each of the three companies.

The subject facility is currently the only location owned or operated by InChem – Rock Hill, LLC. Operations run twenty-four hours per day from 7:00 am on Monday until Friday night at midnight using three eight-hour shifts. InChem has approximately forty employees at the facility, which includes about twelve chemical operators and twenty-nine laboratory, maintenance, warehouse, and administrative personnel. The facility operates under the NAICS Code 325211 for Plastics Material and Resin Manufacturing.

InChem's chemists, chemical engineers and other professional experts can design, engineer, improve or modify customer processes in a laboratory setting, scale those processes up in the pilot plant and then move them to commercial production. Other customers may enlist InChem in custom or toll manufacturing of chemicals while the customer is installing new equipment to ramp up production or is repurposing equipment to ramp down production at the customer site. Some customers provide their own formulas and process specifications to be carried out at the InChem facility, while other customers specify the desired end product and InChem chemists and technicians reverse-engineer a solution to manufacture that product. Because InChem is manufacturing products or processing materials for other companies, they do not own the raw materials or end products related to those services. However, the company does take responsibility for wastes that are generated on-site.

InChem manages five hazardous waste satellite accumulation areas (SAAs) and one hazardous waste central accumulation area (CAA) at the subject facility. Hazardous waste flammable solvents generated in the distillation unit or during floor cleaning activities in the distillation room are accumulated in a SAA in the distillation area; hazardous waste flammable solvents generated from draining process lines and sampling material in the process units are accumulated in a SAA in the West Plant; hazardous waste flammable solvents generated in laboratory testing of on-site samples are accumulated in a SAA in the Research & Development Laboratory; and hazardous waste flammable solvents generated in laboratory testing of on-site samples are accumulated in two SAAs in the Quality Control Laboratory. Other hazardous wastes may be generated on-site during or following a specific campaign, and those materials are accumulated at the point of generation and immediately taken to the CAA for on-site storage. The CAA is located in the facility warehouse.

InChem has been operating as a large quantity generator (LQG) of hazardous waste at this location for approximately twenty years. The company most recently notified as an LQG of hazardous waste as part of the biennial report on 01/01/2019. Hazardous wastes identified in the report include:

D001 / D002 ethanol water sodium hydroxide	D001 dowlanol PMA acetate
D001 / D035 / F005 MEK butanol water	D002 sodium hydroxide and water
D001 / D003 / F003 / F005 lean waters	D001 methyl methacrylate
D001 / F003 / F005 solvents water sludge	D002 phosphoric acid
D001 / D002 / D003 / F005 lab packs	D009 waste mercury
D001 / D035 / F003 / F005 nonhalogenated solvent	D001 spent filters with naptha
D001 / F005 phenoxy resins and solvents	D001 carbon w/ butanol and toluene
F003 / F005 absorbent and solvents F listed	D001 sodium methylate solution
F003 Y525K filters with xylene	U201 resorcinol
D001 AG distillate	D002 butyric acid
D001 / F003 ethyl acetate	D002 / P028 benzoyl chloride
D001 dimethyl carbonate	D002 formate bottoms
D001 / D007 water / methanol / chrome	D001 xylene and water
D001 3-3013 / 6-3444 resin	D001 / D002 diethylamine
D002 potassium hydroxide solution	D001 5552 distillate

D001 / D003 toluene diisocyanate wash	D001 / D018 hexodiense
D001 / D003 toluene diisocyanate wash	D001 / D002 head tank wash
U188 waster wash with phenol	D002 acetic acid and water
D001 / F005 toluene wash with formic acid	D001 6940 siliane and methanol
D002 / U190 dibasic acid	D003 carbinol fluid 5562
D003 sodium sulfide salts with water	D002 dibutyl maleate phenol
D001 / D002 3 aminopropyldimethylamine and water	

10) **Opening Conference**

On April 13, 2021, EPA inspector Laurie Benton DiGaetano, accompanied by SCDHEC inspector Alaina Holst, arrived at the InChem – Rock Hill, LLC (InChem) facility at approximately 10:00 a.m. Mr. Brian Hamel, Vice President of Engineering and Compliance, and Ms. Audra Henderson, Environmental and Safety Coordinator, immediately received the inspectors. The inspectors introduced themselves, showed their credentials to Mr. Hamel and Ms. Henderson, and explained the purpose of the visit.

Mr. Hamel and Ms. Henderson provided an overview of the facility’s history and current operations during the opening conference. It appears that the company may meet the Small Business Regulatory Enforcement Fairness Act’s classification of a “small business,” which is generally set by the Small Business Administration using the business’ SIC/NAICS code and annual receipts or number of employees. Although the EPA inspector did not provide a copy of the agency’s information sheet for small businesses, this sheet can be found at <https://www.epa.gov/sites/production/files/2017-06/documents/smallbusinessinfo.pdf>.

Mr. Hamel and Ms. Henderson provided the inspectors with a brief safety orientation, and advised that hard hats, safety glasses, steel toed boots, long pants, and long sleeves are required to tour the facility operations. The inspectors described the anticipated use of a digital camera during the inspection, and discussed the company’s ability, pursuant to 40 C.F.R. §2.203, to assert a business confidentiality claim for information submitted to the EPA. The company did not assert a business confidentiality claim. Mr. Hamel and Ms. Henderson then led the inspectors on a tour of the facility operations.

11) **Findings**

Distillation Area SAA: InChem manages one SAA in the distillation area for managing hazardous waste flammable solvents generated in this building. The inspectors observed an emergency shower and a fire extinguisher in this room, and one 55-gallon drum in the SAA (Photo 1). The drum was located near the exit door with a 5-gallon spill kit bucket. The drum was closed, labeled D001 / D035 hazardous waste flammable liquids (MEK), and identified with a flammable liquid DOT hazard placard. Between campaign runs, employees clean the floors using a shop vacuum, and the liquids accumulated by the vacuum are poured into this accumulation drum.

The inspectors also observed an empty 5-gallon bucket labeled “cold trap” and identified with a flammable liquid DOT hazard placard. Mr. Hamel explained that the distillation equipment is put

under vacuum pressure during operation, and the solvent vapors are condensed into liquid form by passing them through a cold trap heat exchanger. The condensed solvents are periodically drained from the distillation unit into this 5-gallon bucket. The contents of the bucket are then either placed back into the distillation system for use in the next run, or they are poured into the 55-gallon accumulation drum located in the distillation area SAA.

InChem also generates used oil from vacuum pumps and blowers used in this area. The inspectors observed one 55-gallon used oil accumulation drum along the wall opposite the SAA. The drum was closed, and it was labeled “used oil.”

West Plant SAA: InChem manages one SAA in the West Plant K5/K6 area for managing hazardous waste flammable solvents generated in the West Plant. The waste is generated from draining process lines, and sampling material in the process units. The inspectors observed one 55-gallon drum in this SAA (Photo 2). The drum was located on a wooden pallet next to the wall beneath a pipe and valve, which can drain material from the upper level of the West Plant. The drum was closed, labeled D001 / F003 hazardous waste flammable liquid (methanol / ethanol) cleaning alcohols, and identified with a flammable liquid DOT hazard placard. The inspectors observed a fire extinguisher in the West Plant.

Research & Development (R & D) Laboratory SAA: Mr. Hamel stated that InChem built a new R & D laboratory inside the warehouse building after selling the portion of the facility which contained the old R & D laboratory. InChem manages one SAA in the new R & D Laboratory for managing hazardous waste flammable solvents generated in laboratory testing of on-site samples. The inspectors observed one 3-gallon flammable can in this SAA. The container was located under a laboratory hood. The container was closed, labeled D001 / F003 hazardous waste flammable liquids (methanol / ethanol), and identified as UN1993 (flammable liquid). The inspectors observed a spill kit and emergency shower in the laboratory.

Warehouse CAA: InChem manages a hazardous waste CAA in the warehouse. The area is on a concrete floor, and it is surrounded on three sides with a concrete berm (Photo 3). The fourth side is equipped with a concrete hump to allow for forklift travel. Yellow lines have been painted on the floor in this area to designate six rows for storing waste containers with adequate aisle space. The area was identified with a sign which read “caution, hazardous and non-hazardous waste storage area.” InChem manages ignitable waste in this CAA, and the inspectors observed a “No Smoking” sign on the steel beam in the middle of the entrance to this area.

The area is equipped with an emergency alarm pull station capable of sounding an immediate emergency alarm for facility personnel. Employees carry hand-held two-way radios in this area, which can be used to alert the guard station and summon emergency assistance from local police departments, fire departments, or state or local emergency response teams. The area is equipped with portable fire extinguishers and spill control equipment, and it is equipped with automatic sprinklers.

The first row in the CAA contained overpack containers which are ready for use, as necessary.

The second row in the CAA contained seven totes, which were labeled as nonhazardous waste Kemina 654016.

The third row in the CAA contained four 55-gallon drums on a wooden pallet. The drums were all labeled nonhazardous 6920 filters.

The fourth row in the CAA contained a total of eighteen 55-gallon drums, which were staged on a row of wooden pallets. The row started near the wall with one set of wooden pallets containing four 55-gallon drums stacked above a second wooden pallet containing four more 55-gallon drums, the next set of pallets also contained four 55-gallon drums stacked above four more drums, and the last pallet contained two 55-gallon drums.

The fifth row in the CAA contained a total of fifteen 55-gallon drums, which were staged on a row of wooden pallets. The row started near the wall with one set of wooden pallets containing four 55-gallon drums stacked above a second wooden pallet containing four more 55-gallon drums, the next pallet contained four 55-gallon drums, and the last pallet contained three 55-gallon drums.

The hazardous wastes observed in rows four and five included twenty-nine drums of hazardous waste flammable liquids: nine drums of D001 wastes containing xylene; four drums of D001 / F003 wastes containing methanol and ethanol; two drums of D001 / D035 wastes containing MEK; five drums of D001 / D035 / F003 / F005 wastes containing acetone and MEK; four drums of D001 / F003 waste containing heptane; four drums of D001 waste DOW 5562 distillate; and one drum of D001 waste. The drums were all closed, labeled as hazardous waste, identified with a flammable liquid DOT hazard placard, and marked with an accumulation start date. The oldest drum was dated 03/12/21.

Rows four and five also included three 55-gallon drums of hazardous waste flammable solids: two drums of F003 / D001 waste containing heptane and one drum of D001 waste organics. The drums were all closed, labeled as hazardous waste, identified with a flammable solid DOT hazard placard, and marked with an accumulation start date. The oldest drum was dated 03/23/21.

Finally, row four included one 55-gallon drum of D002 hazardous waste corrosive basic sodium hydrochloride liquid. The drum was closed, labeled as hazardous waste, identified with a corrosive DOT hazard placard, and marked with an accumulation start date of 03/18/21.

The sixth and last row of the CAA contained four totes of D001 hazardous waste flammable liquid containing xylene. The totes were all closed, labeled as hazardous waste, identified with a flammable liquid DOT hazard placard, and marked with an accumulation start date. The oldest tote was dated 03/12/21.

The inspectors also observed one 55-gallon drum on a wooden pallet to the left of the six rows of containers (Photo 4). The container was labeled as the "QC lab and R & D lab hazardous waste pour-up drum." It was equipped with a closed funnel in the bung; labeled as D001 / F003

hazardous waste flammable liquids (methanol / ethanol); and identified with a flammable liquid DOT hazard placard.

Quality Control (QC) Laboratory SAA: InChem's QC Laboratory is located on the second floor of the warehouse building. To reach the entrance of the laboratory, inspection participants climbed the metal stairs located on the outside of the warehouse building. InChem manages two SAAs in the QC Laboratory for managing hazardous waste flammable solvents generated in laboratory testing of on-site samples. The inspectors observed one 55-gallon drum in the first SAA (Photo 5). The drum was located on a wooden pallet just outside of the laboratory door. The container was equipped with a closed funnel lid; it was labeled D001 / F003 hazardous waste flammable liquids; and it was identified as UN1993 (flammable liquid).

The inspectors observed one 1-gallon jar at the second QC Laboratory SAA. This container was hooked up to a HPLC testing machine and it was set inside a secondary containment bucket. The container was labeled as hazardous waste, and Mr. Hamel explained that the contents of the container are poured into the 55-gallon hazardous waste pour-up drum, which is located in the warehouse CAA.

Bulk Loading / Unloading Area: Mr. Hamel explained that line draining from the bulk loading and unloading area is accumulated as clean raw material for reuse on-site or as finished product to be sent off-site with the next load. The inspectors observed three 5-gallon buckets in the bulk loading / unloading area. Each bucket was clearly labeled for the specific material to be accumulated and transferred for use.

Universal Waste Management Area: InChem manages universal waste lamps inside the warehouse on the second floor of the building. The inspectors observed three boxes of used lamps in this area during the inspection (Photo 6). The boxes were all closed, labeled as universal hazardous waste, and dated. The two-foot box of lamps was dated 02/23/21 and the four-foot box was dated 11/18/20. The eight-foot box was dated 12/20/18, which is over two years prior to the inspection. No records of universal waste shipments were provided during the inspection.

Pursuant to 25 S.C. Code Ann. Regs. 61-79.273.15(a) [40 C.F.R. § 273.15(a)], a small quantity handler of universal waste may accumulate universal waste for no longer than one year from the date the universal waste is generated.

Contingency Plan: The actions that facility personnel should take in response to an emergency are described in the facility's Contingency Plan, which was last updated in January 2020. The plan describes actions facility personnel must take in response to fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water at the facility. The plan describes arrangements agreed to with the Rock Hill Police Department, the Rock Hill Fire Department, A & D Environmental Services, and the York County Emergency Management. The plan lists the names and emergency telephone numbers for persons identified as emergency coordinators. Mr. Brian Hamel is listed as the primary emergency coordinator, and the two other individuals are listed in the order in which they will assume responsibility as alternates. The plan includes a list of all emergency equipment at the facility, a brief outline of its capabilities, and a map showing the location of each item on

the list. The list includes fire extinguishers, fire hydrants, safety shower / eyewash stations, spill kits, squeegees, absorbent materials, shovels, and alarm system pulls. The plan includes an evacuation plan for personnel; it describes signal(s) to be used to begin evacuation; and it includes a map showing the evacuation routes and alternate evacuation routes.

A copy of the Contingency Plan (and its quick reference guide) was most recently submitted to the Rock Hill Police Department, the Rock Hill Fire Department, A & D Environmental Services, Piedmont Medical Center, and the York County Emergency Management in June 2019, which was approximately six months prior to the most recent update of the plan.

Pursuant to 25 S.C. Code Ann. Regs. 61-79.262.17(a)(6) [40 C.F.R. § 262.17(a)(6)], which incorporates 25 S.C. Code Ann. Regs. 61-79.262.262(a) [40 C.F.R. § 262.262(a)], and is a condition of the LQG Permit Exemption, a generator is required to submit a copy of the contingency plan and all revisions to all local emergency responders. This document may also be submitted to the Local Emergency Planning Committee, as appropriate.

The quick reference guide includes the types/names of hazardous waste in layman's terms and the associated hazard associated with each hazardous waste present at any one time; the estimated maximum amount of each hazardous waste that may be present at any one time; the identification of any hazardous wastes where exposure would require unique or special treatment by medical or hospital staff; a map of the facility showing where hazardous wastes are generated and accumulated and routes for accessing these wastes; a map of the facility in relation to surrounding businesses, schools and residential areas; the locations of water supply; the identification of on-site notification systems; and the name of the emergency coordinator and emergency telephone number.

Training Records: The inspectors reviewed facility job descriptions and employee names that were provided for the Vice President of Engineering and Loss Prevention and for the Health, Safety and Environmental Coordinator. Each description included the requisite skill, education, or other qualifications, the duties of facility personnel assigned to that position, and the requirement for these individuals to receive RCRA hazardous waste training. The records of training for these positions documented Hazardous Waste Management Training, provided by the Environmental Resource Center, was completed in January of 2019, 2020 and 2021, and that these individuals provided hazardous waste management training to facility personnel (with the exception of administrative staff) in December 2020.

Waste Manifest Records: The inspectors reviewed available hazardous waste manifest records and land disposal restriction forms for shipments of hazardous waste sent in 2018 and 2020. Hazardous waste manifest records show that containers of hazardous waste are shipped to Clean Earth of Calvert City (KYD985073196) about once every two-three months; one tanker truck of D001 hazardous waste flammable liquid (MEK / methanol) is shipped to Geocycle (SCD003308891) about once every two-three months; one shipment of hazardous waste was shipped to Clean Harbors Deer Park (TXD055141378); two shipments of D002 hazardous waste corrosive liquid (formic acid) were shipped to Univar Solutions (NCD061263315); and two shipments of nonhazardous wastewater solids were shipped to the Richland County Landfill.

Hazardous waste shipped to Clean Earth of Calvert City included D001 waste flammable liquid, D001 waste flammable liquid (acetone wash), D001 waste flammable liquid (DOW 5552 distillate), D001 waste flammable liquid (DOW Corning 6376 Silane), D001 waste flammable liquid (xylene / ethylbenzene) (DOW Corning 3-3013-crude), D001 waste isoprene, D001 waste alcoholates solution (magnesium methylate), D001 waste flammable liquids (methacrylate, styrene monomer), D001 waste flammable liquid (toluene), D001 waste flammable liquid (xylene), D001 / F003 waste flammable liquid (methanol / ethanol), D001 / D035 waste flammable liquid (MEK), D001 / D035 / F005 waste flammable liquids (toluene butanol) (flammable resin filters), D001 / D035 / F003 / F005 waste flammable liquid (acetone / MEK), D001 / D002 waste flammable liquid, corrosive (acrylic acid, dimer), D002 waste ammonia solution (aqua ammonia), D002 waste corrosive liquids acidic, organic (5-chloro-2-methyl-4-isothiazolin-3-one), D002 waste dicyclohexylamine, D002 waste corrosive liquid acidic inorganic (dimethyl phosphite), D003 waste magnesium alloys, and U080 waste dichloromethane (methylene chloride).

Hazardous waste shipped to Clean Harbors Deer Park included D001 waste sodium persulfate, D001 methacrylic acid, and D002 waste corrosive liquid, acidic, organic (2-propenoic acid, 2-methyl, 2-hydroxyethyl ester, phosphate).

Although InChem had received the return copy of hazardous waste manifest number 021840242JJK for a shipment of D002 waste corrosive liquid (formic acid) to Univar Solutions (NCD061263315) on 06/16/2020, the returned manifest did not include the handwritten signature of the owner or operator of the designated facility. No records were provided to show that InChem contacted the transporter or the owner or operator of the designated facility to determine the status of this waste, and InChem did not submit exception reports for the manifest with the missing signature.

Pursuant to 25 S.C. Code Ann. Regs. 61-79.262.42(a)(1) and (2) [40 C.F.R. § 262.42(a)(1) and (2)], an LQG who does not receive a copy of the manifest with the handwritten signature of the owner or operator of the designated facility within 35 days of the date the waste was accepted by the initial transporter must contact the transporter and/or the owner or operator of the designated facility to determine the status of the hazardous waste, and must submit an Exception Report to the EPA Regional Administrator for the Region in which the generator is located if he has not received a copy of the manifest with the handwritten signature of the owner or operator of the designated facility within 45 days of the date the waste was accepted by the initial transporter.

Inspection Records: The inspectors reviewed InChem's available records of inspections of the hazardous waste central accumulation area (CAA) during calendar years 2018, 2019 and 2020. The inspection log includes a checklist to record observations about leaking containers and for deterioration of containers caused by corrosion or other factors. Inspectors can use the checklist to record observations about accumulation dates, aisle spacing and storage, drum condition, sealed drums, labeling, lighting, and the spill kit. The records include the date and time of the inspection and the name of the employee conducting the inspection.

12) **Closing Conference**

The inspectors conducted the exit meeting at 3:10 pm with Mr. Hamel and Ms. Henderson. During this meeting, the inspectors stated their preliminary conclusions of the inspection.

13) **Inspection Findings**

Based on the observations made during the inspection, InChem was apparently deficient with the following RCRA requirements:

- Pursuant to 25 S.C. Code Ann. Regs. 61-79.262.17(a)(6) [40 C.F.R. § 262.17(a)(6)], which incorporates 25 S.C. Code Ann. Regs. 61-79.262.262(a) [40 C.F.R. § 262.262(a)], and is a condition of the LQG Permit Exemption, a generator is required to submit a copy of the contingency plan and all revisions to all local emergency responders. This document may also be submitted to the Local Emergency Planning Committee, as appropriate.
- Pursuant to 25 S.C. Code Ann. Regs. 61-79.262.42(a)(1) and (2) [40 C.F.R. § 262.42(a)(1) and (2)], an LQG who does not receive a copy of the manifest with the handwritten signature of the owner or operator of the designated facility within 35 days of the date the waste was accepted by the initial transporter must contact the transporter and/or the owner or operator of the designated facility to determine the status of the hazardous waste, and must submit an Exception Report to the EPA Regional Administrator for the Region in which the generator is located if he has not received a copy of the manifest with the handwritten signature of the owner or operator of the designated facility within 45 days of the date the waste was accepted by the initial transporter.
- Pursuant to 25 S.C. Code Ann. Regs. 61-79.273.15(a) [40 C.F.R. § 273.15(a)], a small quantity handler of universal waste may accumulate universal waste for no longer than one year from the date the universal waste is generated.

14) **List of Appendices**

Appendix 1 – Photo Log:

6 Photos taken on: April 13, 2021

Photos taken by: Laurie Benton DiGaetano

Photos taken with: Panasonic DMC TS-5 Digital Camera

EPA Property Tag: S09533

15) **Signed**

Laurie Benton DiGaetano
Senior Enforcement and Compliance Specialist

Date

Concurrence

Araceli B. Chavez
Chief
RCRA Enforcement Section

Date



Photo 1: One 55-gallon drum and a 5-gallon spill kit bucket located in the Distillation Area SAA. The drum was closed, labeled D001 / D035 hazardous waste flammable liquids (MEK), and identified with a flammable liquid DOT hazard placard.

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RCRA CEI Photographs
Laurie Benton DiGaetano, USEPA



Photo 2: One 55-gallon drum located in the West Plant SAA. The drum was closed, labeled D001 / F003 hazardous waste flammable liquid (methanol / ethanol) cleaning alcohols, and identified with a flammable liquid DOT hazard placard.

InChem – Rock Hill, LLC
RCRA CEI Photographs
Laurie Benton DiGaetano, USEPA



Photo 3: Warehouse CAA on concrete floor surrounded on three sides with a concrete berm and a concrete hump on the fourth side. Yellow lines are painted on the floor to designate six rows for storing waste containers with aisle spacing. The area was identified with signs which read “caution, hazardous and non-hazardous waste storage area,” and “no smoking.”

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Photo 4: Warehouse CAA 55-gallon QC and R & D lab hazardous waste pour-up drum.



Photo 5: One 55-gallon drum located in one of the QC Laboratory SAAs. The drum was equipped with a closed funnel; it was labeled D001 / F003 hazardous waste flammable liquids; and it was marked as UN 1993 (flammable liquid).

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Photo 6: Three boxes of used fluorescent lamps inside the warehouse on the second floor of the building. All boxes were closed and labeled universal waste lamps. The two-foot box was dated 02/23/21, the four-foot box was dated 11/18/20, and the eight-foot box was dated 12/20/18.