

U.S. Environmental Protection Agency Region 4
Enforcement and Compliance Assurance Division
Air Enforcement Branch
EPCRA Inspection Checklist/Inspection Report

Company Name Unilever SIC/NAICS 31152

Lead Inspector Name Bethany Terpin Inspection Date August 17, 2021

Inspection Team Members Jordan Noles _____

1. State purpose of the inspection and present credentials
2. Record names and titles of the facility representatives participating in the inspection
Name Sundi DiCarlo Phone (901) 867-6919

Name Jules Hinske Phone (269) 832-0125
3. Obtain exact name and address of the facility being inspected, as well as any Parent Company information
Facility Name: Unilever
Address: 2000 Hwy. 51 North
Covington, Tennessee 38019 County: Tipton
Owner/Operator/Parent Company (Name, Address, Phone): Conopco, Inc. d/b/a Unilever
800 Sylvan Avenue, Englewood Cliffs, New Jersey 07632 (201) 894-4996
How long owned/operated, recent sale of facility (date)? _____
4. Obtain/review facility description
 - a. Officers' names and titles Sundi DiCarlo, SHE Manager
Jules Hinske, PSM Manager- Corporate
 - b. Incorporation date and location _____
 - c. Other facilities owned by the company _____
 - d. Number of employees 800
 - e. Annual Corporate Sales _____
 - f. Process Description and Process Diagrams _____

g. Jurisdictional Fire Department _____

Inspection Identifier: BT.EPCRA.8.17.2021 Page 1 of 3

5. Compliance Review by Statute:

Section 302

1. EHSs present above TPQ?
2. Notification to SERC and LEPC of EHSs
3. Obtained list of inventories of EHSs

Yes	No	N/A
☒	☐	☐
☐	☐	☐
☒	☐	☐

Section 303 (if subject to 302)

1. Facility Emergency Coordinator Sundi DiCarlo
2. Date identified to LEPC? _____
3. Emergency Contingency Plan submitted (date)? _____
4. Obtained copies of notification letters and verified mail return receipts, where appropriate?

Section 304/CERCLA 103

1. Has facility had reportable emergency release?
2. Release reported to: NRC?
SERC/ Follow-up?
LEPC/Follow-up?
3. Obtained copy of facility's incident report

Section 311

1. MSDS to SERC, LEPC, fire dept (Haz. Chem $\geq$ 10,000 lbs)?
2. MSDS to SERC, LEPC, fire dept (EHSs $\geq$ 500 lbs or TPQ)?
3. Obtained documentation of submissions?

Section 312

1. Obtained chemical inventory list yes
2. View purchase records (where applicable)
3. Tier II reports to SERC, LEPC, fire dept (Haz. Chem $\geq$ 10,000 lbs)? yes
4. Tier II reports to SERC, LEPC, fire dept (EHSs $\geq$ 500 lbs or TPQ)? yes
5. Obtained documentation of maximum daily amounts stored? yes
6. Obtained MSDSs?
7. Obtained documentation of submissions? yes

Section 313

1. Form R/A to State and EPA for Toxic Chemicals:
Manufactured, processed, and caused to be imported $\geq$ 25,000lbs,
otherwise used $\geq$ 10,000 lbs
2. Obtained list of 313 chemicals MPOU at the facility
3. Obtained documentation of submissions?

Report Prepared By:

Name (Printed): Bethany Terpin

Title: Life Scientist, Inspector-In-Training

Signature: BETHANY TERPIN Digitally signed by BETHANY TERPIN
Date: 2021.10.15 12:04:18 -04'00' JORDAN NOLES Digitally signed by JORDAN NOLES
Date: 2021.10.15 12:32:11 -04'00'

Report Authorized By:

Name (Printed): Jason Dressler

Title: Chief, North Air Enforcement Section

Signature: JASON DRESSLER Digitally signed by JASON DRESSLER
Date: 2021.10.15 17:11:04 -04'00'