

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
RCRA Enforcement Section
61 Forsyth Street, SW
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2) Facility Information

SNF Flocryl, Inc.-Acrylate
674 Chemical Plant Road
Riceboro, Georgia 31323

EPA ID # - GAR 000 004 325
NAICS #: 325998 - ALL OTHER
MISCELLANEOUS CHEMICAL PRODUCT AND
PREPARATION MANUFACTURING
325199 - ALL OTHER BASIC ORGANIC
CHEMICAL MANUFACTURING
2/28/2021 LQG

SNF Chemtall
1 Chemical Plant Road
Riceboro, Georgia 31323

EPA ID # - GAD 045 469 160
NAICS #: 325998 - ALL OTHER
MISCELLANEOUS CHEMICAL PRODUCT AND
PREPARATION MANUFACTURING
11/17/202 SQG

SNF Flocryl-CM Plant
One Chemical Plant Road
Riceboro, Georgia 31323

EPA ID # - GAR 000 092 528
NAICS #: 325998 - ALL OTHER
MISCELLANEOUS CHEMICAL PRODUCT AND
PREPARATION MANUFACTURING
6/2/2022 SQG

SNF Flocryl, Inc.-Acrylamide
3 Chemical Plant Road
Riceboro, Georgia 31323

EPA ID # - GAR 000 022 764
NAICS #:325199 - ALL OTHER BASIC ORGANIC
CHEMICAL MANUFACTURING
6/2/2022 SQG

3) Responsible Officials

Jonathan Byrd
Waste & Environmental Manager
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Quality & Regulatory Compliance
Manager
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4) Inspection Participants

Ian Hutcheson, GA EPD
Brooke York, US EPA
Jonathan Byrd, SNF Holding Company
Emily Lenceski, SNF Holding Company
Jessica Jager, SNF Holding Company
Chad Relaford, SNF Holding Company

Brandon Hampton, SNF Holding Company
Jeremy Locke, SNF Holding Company
Shakeya Biggs, SNF Holding Company
Patrick McTeer, SNF Holding Company
Daniel Faison, SNF Holding Company

5) Date of Inspection

March 12-13, 2024

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, 278, & 279; and Georgia Hazardous Waste Management Act, Ga. Code Ann. § 12-8-60 et seq., and Georgia Hazardous Waste Management Rules, Ga. Comp. R. and Regs. 391-3-11.01 to 391-3-11.18 (2016 and 2018).

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.02(1) [40 C.F.R. § 260.10], a large quantity generator of hazardous waste (LQG) 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-.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 total of universal waste (batteries, pesticides, mercury-containing equipment, lamps, or aerosol cans, calculated collectively) at any time.

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. § 262.16(b) or § 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

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.

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-.08(1) [40 C.F.R. § 262.16]), SQG may accumulate hazardous waste on-site for 180 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. § 262.16] (hereinafter referred to as the “SQG Permit Exemption”).

7) Purpose of Inspection

The purpose of this inspection was to conduct an unannounced compliance evaluation inspection (CEI) to determine SNF Holding Company (SNF-Riceboro) compliance with, the applicable requirements of RCRA and the corresponding Georgia regulations. This was an EPA lead inspection.

The purpose of this CEI was to determine the compliance status of SNF Flocryl – Acrylates, SNF Flocryl Inc – Acrylamide, SNF Flocryl – CM Plant, and SNF Chemtall Inc, also collectively referred to in this report as SNF - Riceboro with the applicable requirements of the Act and Rules.

8) Facility Description

Four SNF facilities, listed in the Facility Information Section above, are included as part of this inspection. The four facilities are located adjacent to each other on contiguous properties.

The Flocryl facilities manufacture acrylamides and acrylates, which are then transferred to the Chemtall facility for polymerization into various products.

The most recent Notification of Hazardous Waste Activity filed by the facilities indicated that the SNF Flocryl, Inc.-Acrylate facility is a large quantity generator of hazardous waste and the Chemtall, CM Plant, and Acrylamide facilities are small quantity generators of hazardous wastes. Hazardous wastes generated by the facilities included D001 and D002 characteristic hazardous wastes and F002 and F003 listed hazardous wastes.

SNF-Riceboro operates as a chemical manufacturer that produces products for BASF, and other competitors. The chemical products produced at SNF-Riceboro are primarily used for wastewater treatment plants as a flocculant. The chemical products are also used for other various applications such as oil and gas recovery, cosmetics, papermaking, agriculture, mining dust mitigation, flocculants for ores, and separating oil from sand. The facility employs approximately one thousand (1000) personnel which includes some contractors. The facility is operational 24/7 primarily working on 12-hour shifts. The site consists of four EPA ID numbers,

each have their own labs and Central Accumulation Areas (CAAs). There are laboratories associated with the facility.

Facility Process and Hazardous Waste Generation

SNF-Riceboro manufactures monomers, which are sent on-site to Chemtall to produce polymers for various applications. Hazardous waste from SNF Flocryl – Acrylates primarily consists of waste catalyst residue from batch distillation (D001), wash methanol for cleaning up polymer build-up and to dewater equipment (D001, F003), and decanter bottoms (intermediate process stream transferred for temporary storage) (D001). Some hazardous waste is also produced from various lab waste, PPE, and Flammable liquids. The CM-Plant hazardous waste consists of dimethyl sulfate filters (U103) and various lab waste. SNF Flocryl Inc – Acrylamide hazardous waste consists of filters that contain acrylamide (U007) and various lab waste. SNF Chemtall Inc waste consists of formaldehyde filters (U122), monomer (D001), acrylamide waste (U007), and various lab waste.

The hazardous waste generated by SNF Flocryl - Acrylates is transported by Industrial Waste Services (SCR000762245) and is disposed of by Geocycle LLC (SCD003368891) or Giant Cement Company (SCD003351699).

The hazardous waste generated by SNF Flocryl – CM Plant is transported by Clean Harbors Environmental Services, Inc. (MAD039322250) and is disposed of by Clean Harbors Deer Park (TXD055141378), GRR Atalla, Inc (ALD070513767), or EQ Detroit (MID980991566).

The hazardous waste generated by SNF Flocryl Inc - Acrylamide is transported by MCF Environmental Services Inc. (GAR000061664) and is disposed of by GRR Altalla Inc. (ALD070513767) or US Ecology Tampa, Inc. (FLD981932494).

The hazardous waste generated by SNF Chemtall Inc is transported by Freehold Cartage, Inc. (NJD054126164), Stat Incorporated (NCD980799142), EQ Industrial Services (MIK435642742), or MCF Environmental Services, Inc. (GAR000061564), and is disposed of by ECOFLO, Inc. (NCD980842132), Us Ecology Tampa, Inc. (FLD981932494), Elemental Environmental (ARD006354161), or Clean Earth of Alabama, Inc. (ALD981020894).

9) Previous Inspection History

GAEPD has conducted RCRA CEIs, the dates and results of the most recent inspections are summarized below.

SNF Flocryl - Acrylates

Last inspection date: July 20, 2016

Violations identified in last inspection: 265.195(b)(3), 262.34(a)(1)(ii), 265.195(a)

Return to compliance date, if applicable: February 16, 2017, March 13, 2017

Most recent 8700-12 date: Ferbruary 28, 2022

Notification status: Large Quantity Generator

Hazardous waste codes listed on notification form: D001, D002, F002, F003, U154

Other permits: Pretreatment Permit No. GAP050246

SNF Flocryl Inc - Acrylamide
Last inspection date: July 19, 2016
No violations identified.
Most recent 8700-12 date: June 2, 2022
Notification status: Small Quantity Generator
Hazardous waste codes listed on notification form: U007
Other permits: Pretreatment Permit No. GAP050246

SNF Chemtall Inc
Last inspection date: July 19, 2016
No violations identified.
Most recent 8700-12 date: November 17, 2023
Notification status: Small Quantity Generator
Hazardous waste codes listed on notification form: D001 D002 U007 U122
Other permits: Pretreatment Permit No. GAP050246

SNF Flocryl – CM Plant
Never previously inspected.
Most recent 8700-12 date: June 2, 2022
Notification status: Small Quantity Generator
Hazardous waste codes listed on notification form: D001 D002 U103
Other permits: Pretreatment Permit No. GAP050246

10) **Opening Conference**

On March 12, 2024, EPA inspector, Brooke York, accompanied by Ian Hutcheson, GAEPD inspector, arrived at SNF Riceboro at approximately 9:30 am. John Arbo, Process Safety Manager, received the inspectors. John Arbo, and the inspectors were joined by Jonathan Byrd, Emily Lenceski, and Jessica Jager, and Karen Dorman (by phone, remotely), for the opening conference. The inspectors introduced themselves, showed their credentials to John Arbo, Jonathan Byrd and Jessica Jager, and explained the purpose of the visit. The sign in sheet for the Opening Conference can be seen in Attachment 2.

The inspectors described the anticipated use of equipment digital camera during the inspection and provided a request for records. The EPA inspector explained that the Small Business Regulatory Enforcement Fairness Act's classification of a "small business" is generally set by the Small Business Administration using the business' SIC/NAICS code and annual receipts or number of employees. A copy of the EPA's information sheet for small businesses can be found at <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 company did not assert a business confidentiality claim on any photographs taken by the inspectors and insisted that the facility representative take all photos necessary to document any findings.

Karen Dorman provided an overview of the facility's history and current operations, and a brief discussion of the relationship between the SNF facilities during the opening conference. The

inspection participants also discussed health and safety protocols and required personal protective equipment before Facility representative led the inspectors on a tour of the Facility operations.

Following the opening conference the inspectors were escorted to the security building where they watched a safety training video and received visitors' badges.

11) Inspection Observations

SNF Flocryl – Acrylates

The facility walk-through began in Acrylates South Plant and AD6. Brandon Hampton, an operator of the process, explained the process.

SNF Flocryl - Acrylates operates one (1) CAA, located in the southeast corner of the Warehouse. It also operates three (3) hazardous waste tanks, and one (1) tank that potentially contains hazardous waste (methanol wash). All of the tanks are located in the southeast corner of the facility.

Acrylates CAA

At the time of the inspection, the Acrylates CAA did not contain any hazardous waste.

The inspectors observed the secondary containment for the process and waste vessels. The secondary containment was observed to be damaged and eroded by the condensate from T-345 (Figure 1).

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.17], which incorporates Ga. Comp. R. and Regs. 391-3-11-.10(1) [40 C.F.R. § 265.193(e)(1)(iii)] and is a condition of the LQG Permit Exemption, a generator managing hazardous waste in tanks must ensure that the secondary containment system is free of cracks and gaps.

The inspectors observed the Hazardous Waste Tank T-090, labeled with the words "Hazardous Waste" and an indication of the hazard of the contents (Figures 2-4). The secondary containment that was damaged, as discussed above.

The inspectors observed a tanker container in the area of T-090 (Figure 5). The facility representative explained that this tanker container is used to ship the waste residues from T-090 (and other hazardous waste tanks onsite) off-site for disposal. At the time of the inspection, the facility representatives could not determine if there was waste present in the tanker container. However, they did explain that once waste is loaded into the tanker container a sample is taken from the tanker container to the North Plant Lab. At that time, the flashpoint of the waste is determined. If the flashpoint is below 140 degrees Fahrenheit (°F) then the waste is sent offsite as hazardous waste, if the flashpoint is above 140 °F then it is sent as nonhazardous waste on a uniform hazardous waste manifest (UHW). This is not the point of generation of the waste.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.11], a person who generates a solid waste, as defined in Ga. Comp. R. and Regs. 391-3-11-.07(1) [40 C.F.R.

§ 261.2], must determine if that waste is a hazardous waste following the methods articulated in Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.11].

During the review of UHWM the inspectors observed that the TSD receiving the waste was routinely returning the tanker containers with a sizable heel present. The TSD was unable to remove all the material from the container, therefore the load was partially rejected or returned to the generator. Once the container arrives at SNF, the container is not managed in a CAA, dated or managed as hazardous waste until new waste is added to the tanker container. Once waste is added to the tanker, the waste is sampled to determine the flashpoint and the process begins again.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [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 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”).

The inspectors observed the Hazardous Waste Tank T-50, to be labeled with the words “Hazardous Waste” and an indication of the hazard of the contents (Figure 6 and 10). LDAR tags 51415, 51416, and 51418 were observed. T-50 is a pressure vessel, details of the tank’s design and installation were provided.

At the time of the inspection five (5) totes of Blow Down Wastewater were observed near the T-50 tank. A waste profile was requested for the totes. A PDF file of an email stated a flashpoint of greater than 150 and a pH of 8.72.

The Acrylates Plant used to generate a sodium polyacrylate based waste stream that was managed as a hazardous waste. At the time of the inspection, the facility was managing the material as a co-product, Floslove-001. This material is sold to a third party.

The inspectors observed the Hazardous Waste Tank V-550, to be labeled with the words “Hazardous Waste” and an indication of the hazard of the contents (Figures 11-14). The secondary containment serving V-550 had a wall moved. The inspectors observed, a large crack and gap in the secondary containment as seen in Figures 15 and 16.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.17], which incorporates Ga. Comp. R. and Regs. 391-3-11-.10(1) [40 C.F.R. § 265.193(e)(1)(iii)] and is a condition of the LQG Permit Exemption, a generator managing hazardous waste in tanks must ensure that the secondary containment system is free of cracks and gaps.

Near tank V-550 in SNF Flocryl – Acrylates, open totes filled with packing for distillation columns were immersed in a solution of a teal-colored liquid (Figure 18). One of the totes was labelled Alumabrite Packing Wash/Degreaser (Figure 19). Waste profiles were requested.

At the time of the inspection, the facility representative informed the inspectors that ADAM Train 2 and 3 have been down, Train 4 has been down for several months. *Manufacturing process units that are shut down and the material they contain, may become subject to RCRA regulation 90 days following the shut down period.*

AD6 Plant Lab SAA

At the time of the inspection, the AD6 Plant Lab SAA consisted of one (1) 0.5-gallon jug of basic lab waste, one (1) container of MeOH waste, and one (1) 0.5-gallon jug of RCRA Sharps. The containers were closed and labeled with the words “Hazardous Waste” with an indication of the hazards of the contents.

Acrylates North SAA #1 & #2

At the time of the inspection, the Acrylates North SAA #1 & #2 consisted of one (1) 55-gallon drum of basic waste, and one (1) 55-gallon drum of acetic acid waste. The drums were fitted with a funnel top lid and were closed and labeled with the words “Hazardous Waste” and an indication of the hazards of the contents.

Acrylates South SAA #3 & #4

At the time of the inspection, the AD6 Plant Lab SAA#1 & #2 consisted of one (1) 55-gallon drum of basic lab waste and one (1) 55-gallon drum of acidic lab waste. The drums were fitted with a funnel top lid and were closed and labeled with the words “Hazardous Waste” and an indication of the hazards of the contents. The SAA was not at or near the point of generation.

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 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(a)].

CM Plant

SNF Flocryl – CM Plant operates one (1) CAA, located in the eastern side of the facility. At the time of the inspection, the CM Plant CAA did not contain any hazardous waste.

CM Plant Lab SAA

At the time of the inspection, the CM Plant Lab SAA consisted of one (1) 55-gallon jug of acid lab waste (acetic acid, acetone methanol, hydranol composite). The drum was fitted with a funnel top lid and was closed and labeled with the words “Hazardous Waste” and an indication of the hazards of the contents. The SAA was not at or near the point of generation.

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 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(a)].

Acrylamide

SNF Flocryl Inc - Acrylamide operates one (1) CAA, located near the center of the facility.

At the time of the inspection, the Acrylamide CAA did not contain any hazardous waste (Figure 33).

Acrylamide Lab SAA

At the time of the inspection, the Acrylamide Lab SAA consisted of one (1) gallon jug of acrylamide lab waste (D001, D002, D011, F003). The container was closed and labeled with the words "Hazardous Waste" with an indication of the hazards of the contents. (Figure 28)

Acrylamide Waste SAA

At the time of the inspection, the Acrylamide waste SAA consisted of one (1) 55-gallon drum of acrylamide waste. The container was closed and labeled with the words "Hazardous Waste" and an indication of the hazards of the contents (Figures 29 and 30).

The facility's use of HMIL/HMIS for labelling the indications of hazards of the contents is an area of concern.

Acrylonitrile SAA

At the time of the inspection, the Acrylonitrile SAA consisted of one (1) 55-gallon drum of acrylamide waste. The container was closed and labeled with the words "Hazardous Waste" and an indication of the hazards of the contents (Figure 31 and 32).

Chemtall

SNF Chemtall Inc operates two (2) CAA, one located in the northeast corner of the facility, and one in the R&D Lab.

At the time of the inspection, the Chemtall CAA contained:

- One (1) 55-gallon drum of lab waste (flammable solid, organics, contains acrylamide)
- One (1) 250-gallon tote of paraformaldehyde and water (U122)
- Twenty (20) 5-gallon jugs of CAT Monomer waste
- Seven (7) 5-gallon jugs of Residual ACM waste
- One (1) 55-gallon drum of Formaldehyde filters / bags (U122)
- One (1) 55-gallon drum of Hazardous Paint equipped with a paint can puncturing system

The containers were closed and properly labeled with the words “Hazardous Waste” and an indication of the hazards of the contents, and the accumulation start date. At the time of the inspection, the oldest date observed on any of the containers in the Chemtall CAA was November 5, 2023 (129 days). This is an area of concern; Chemtall had notified as a SQG, however, the SNF-Riceboro Plant operates as a LQG and all the CAAs should only manage hazardous waste for 90 days or less.

At the time of the inspection, the inspectors observed that the twenty (20) 5-gallons jugs of CAT Monomer Waste were stored on a palette without adequate aisle space. (Figures 39 and 40)

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.16(b)(8)(v)], and is a condition of the SQG Permit Exemption, a generator is required to maintain aisle space to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment to any area of facility operation in an emergency, unless aisle space is not needed for any of these purposes.

Chemtall Research and Development Lab

At the time of the inspection, the inspectors observed multiple containers in SAAs in the lab, which were all labeled with the words “Hazardous Waste” and an indication of the hazards of the contents.

At the time of the inspection, the Chemtall R&D CAA contained one (1) 55-gallon drum of lab waste (flammable solids, organic, contains acrylamide). The container was dated, closed, labeled with the words “Hazardous Waste,” and an indication of the hazards of the contents.

WWTP SAA

At the time of the inspection, the WWTP SAA consisted of one (1) 55-gallon drum of lab vial waste. The container was closed and labeled with the words “Hazardous Waste” and an indication of the hazards of the contents (Figure 34).

Chemtall R&D Lab (Liquids lab, Powders Lab, Quality Control Lab, Monomer Lab)

At the time of the inspection, the Chemtall Labs SAAs consisted of three (3) 2-gallon jugs of pipettes waste, one (1) 5-gallon jug of polyacrylamide waste, one (1) 5-gallon jug of formaldehyde waste, two (2) 5-gallon jugs of residual ACM waste, and one (1) 5-gallon jug of CAT monomer waste. The containers were closed and labeled with the words “Hazardous Waste” and an indication of the hazards of the contents.

Chemtall Formaldehyde SAA

At the time of the inspection, the Chemtall Formaldehyde SAA consisted of one (1) 55-gallon drum formaldehyde filters. The container was closed and had an indication of the hazards of the contents but was not labeled with the words “Hazardous Waste”.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.15(a)(5)], which is a condition of the SAA Permit Exemption, a generator is required to mark or label its containers

(i) with the words “Hazardous Waste” and (ii) with an indication of the hazards of the contents.

The facility occasionally generates universal waste lamps and batteries during regular facility and equipment maintenance.

At the time of the inspection, the Chemtall CAA contained eight (8) cardboard containers of fluorescent universal waste lamps. One container was not properly sealed and some of the containers had no labels and dates (Figures 47 and 48). The tight storage location made the containers difficult to inspect.

Pursuant Ga. Comp. R. and Regs. 391-3-11-.18 [40 C.F.R. § 273.13(d)(1)], a SQHUW must contain any lamp in containers or packages that are structurally sound, adequate to prevent breakage, and compatible with the contents of the lamps. Such containers and packages must remain closed and must lack evidence of leakage, spillage or damage that could cause leakage under reasonably foreseeable conditions.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.18 [40 C.F.R. § 273.14(e)], a SQHUW must label or mark each lamp or container of lamps clearly with one of the following phrases: “Universal Waste-Lamp(s),” or “Waste Lamp(s),” or “Used Lamps.”

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.18 [40 C.F.R. § 273.15(c)], a SQHUW may accumulate universal waste no longer than one year and must to be able to demonstrate the length of time that the universal waste has accumulated from the date that it became a waste or was received.

Universal waste is transported by Lighting Resources LLC (EPA ID Number FLR000070565) to Lighting Resources LLC (EPA ID Number FLR000070565).

The facility generates used oil during regular maintenance of facility equipment. At the time of the inspection, the used oil accumulation area near the Chemtall CAA contained one (1) 500-gallon tote of used oil.

At the time of the inspection, the Chemtall CAA contained (1) 250-gallon drum of Centurion C6 3% AR-AFFF PFAS.

Oil & Gas Lab

The Oil & Gas Lab operates one (1) CAA, located in a building southeast of the main chemical plant on Jones St.

At the time of the inspection, the CAA contained four (one) 55-gallon drum of Residual Crude Oil and Residual ACM (flammable). The container was dated, closed, labeled with the words “Hazardous Waste,” and an indication of the hazards of the contents. The drum was labelled with Chemtall’s EPA ID number.

Enhanced Oil Recovery Lab SAA

At the time of the inspection, the Enhanced Oil Recovery Lab SAA consisted of one (1) 5-gallon jug of crude oil and toluene, and one (1) 2-gallon jug of crude oil and toluene. The containers were closed and labeled with the words “Hazardous Waste” and an indication of the hazards of the contents.

Chemistry and Synthesis Lab SAA

At the time of the inspection, the Enhanced Oil Recovery Lab SAA consisted of one (1) 5-gallon jug of monomer, and one (1) 2-gallon jug of residual monomer. The containers were closed and labeled with the words “Hazardous Waste” and an indication of the hazards of the contents.

12) Records Review

The following records were requested for review: Most recent Biennial Report and Waste Reduction Plan, uniform hazardous waste manifests from the last three years, land disposal restrictions, bills of lading, waste profiles, most recent contingency plan, personnel training records, documentation of weekly inspections, and copies of all applicable permits. All documents were available and appeared to be in order except for:

Documentation of Daily Inspections of Hazardous Waste Tanks

Files were provided that showed dates of inspections and the inspectors, but examples of actual inspection logs were not provided for T-090, V-550, and V-50.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.17(a)(2)], which incorporates Ga. Comp. R. and Regs. 391-3-11-.10(1) [40 C.F.R. § 265.195], a condition of the LQG Permit Exemption, a generator accumulating hazardous waste in tanks must conduct daily inspections of its operating tanks.

Personnel Training Records

Personnel Training records were not managed for each independent facility. Training records were managed as Flocryl, and Chemtall. This is an area of concern; training records should be maintained and available for review at the facility. The Personnel Training records did not include job titles for employees that handle hazardous waste.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.17(a)(7)(iv)], which is a condition of the LQG Permit Exemption, (iv) 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 description for each position; a written description of the type and amount of both introductory and continuing training that will be given to each person filling a position; and records documenting that the training required has been given to and completed by Facility personnel.

Contingency Plan

The Contingency Plan was for SNF-Riceboro, one plan for all four (4) EPA ID numbers, was not up to date. The list of emergency coordinators contained staff that were no longer working on site. The Contingency Plan and quick reference guide were missing locations of where hazardous waste is generated, emergency control equipment and Plant AD-6. The Contingency Plan was missing proof of arrangements with local authorities. The revised Contingency Plan was sent to the inspectors on April 2, 2024.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.17(a)(6)], which incorporates Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.261 (d)], and is a condition of the LQG Permit Exemption, [insert description of the relevant requirements of the subpart, e.g., (d) the contingency plan must list names and emergency telephone numbers of all persons qualified to act as emergency coordinator, and this list must be kept up to date; (e) the contingency plan must include a list of all emergency equipment at the facility where this equipment is required, and this list must be kept up to date; (f) the contingency plan must include an evacuation plan for generator personnel where there is a possibility that evacuation could be necessary.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.17(a)(6)], which incorporates Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.262(b)] and is a condition of the LQG Permit Exemption, an LQG that is amending its contingency plan must at that time submit a quick reference guide of the contingency plan to the local emergency responders. The quick reference guide must include the types/names of hazardous wastes in layman's terms and the associated hazard associated with each hazardous waste present at any one time.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.17(a)(6)], which incorporates Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.256], and is a condition of the LQG Permit Exemption, a generator must: (a) attempt to make arrangements with the local authorities identified, as appropriate for the type of waste handled at the Facility and the potential need for the services of these authorities, and (b) maintain records documenting the arrangements made.

EPA ID Numbers

Even though SNF – Riceboro is managing its recordkeeping and permitting as one or two facilities in some cases, the facility uses four EPA ID numbers for one contiguous property for its management of hazardous waste. A generator is by site and contiguous property in most instances should have only one EPA ID number. A generator is not required to obtain separate ID numbers for multiple structures within the same contiguous property. The facility also does not provide clear delineation on where one site begins, and one site ends in the Contingency Plan. The SNF-Riceboro Plant has been issued a Pretreatment Permit and Title V Permit which covers the entire facility/SNF-Riceboro Plant.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.08(1) [40 C.F.R. § 262.13] a generator must determine its generator category. A generator's category is based on the amount of hazardous waste generated each month and may change from month to month. This section

sets forth procedure to determine whether a generator is a very small quantity generator, a small quantity generator or a large quantity generator for a particular month, as defined in 40 C.F.R. § 260.10 of this chapter.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.02(1) [40 C.F.R. § 260.10], “generator” means any person, by site, whose act or process produces hazardous waste identified or listed in part 261 of this chapter or whose act first causes a hazardous waste to become subject to regulation.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.11 [40 C.F.R. § 270.2], “site” means the land or water area where any facility or activity is physically located or conducted, including adjacent land used in connection with the facility or activity.

Pursuant to Ga. Comp. R. and Regs. 391-3-11-.02(1) [40 C.F.R. § 260.10], “facility” means:(1) All contiguous land, and structures, other appurtenances, and improvements on the land, used for treating, storing, or disposing of hazardous waste, or for managing hazardous secondary materials prior to reclamation. A facility may consist of several treatment, storage, or disposal operational units (e.g., one or more landfills, surface impoundments, or combinations of them). (2) For the purpose of implementing corrective action under 40 C.F.R. § 264.101 or 267.101, all contiguous property under the control of the owner or operator seeking a permit under Subtitle C of RCRA. This definition also applies to facilities implementing corrective action under RCRA Section 3008(h). (3) Notwithstanding paragraph (2) of this definition, a remediation waste management site is not a facility that is subject to 40 C.F.R. § 264.101, but is subject to corrective action requirements if the site is located within such a facility.

13) Closing Conference

The inspectors conducted the exit meeting at 4 PM with those listed in Attachment 2. During this meeting, the inspectors stated their preliminary conclusions of the inspection. Emily Lenceski agreed to provide records requested within two (2) weeks. On April 2 and May 28, 2024, Emily Lenceski and Karen Dorman provided the additional records requested in an email to Brooke York and Ian Hutcheson.

14) List of Attachments

Attachment 1 – Photo Log

Attachment 2 – Opening Conference Sign-in Sheet

Attachment 3 – Closing Conference Sign-in Sheet

15) Signed

BROOKE YORK Digitally signed by BROOKE YORK
Date: 2025.01.10 15:30:10 -05'00'

Brooke York
Environmental Engineer

16) Concurrence

BROOKE YORK Digitally signed by BROOKE YORK
Date: 2025.01.10 15:30:37 -05'00'

Brooke York
Acting Chief, RCRA Enforcement Section

Attachment 1 – Photo Log

64 Photos taken on: March 12 - 13, 2024



Figure 1: IMG_3244.jpg – Damage to secondary containment at T-345.



Figure 2: IMG_3245.jpg – Hazardous Waste Tank T-090

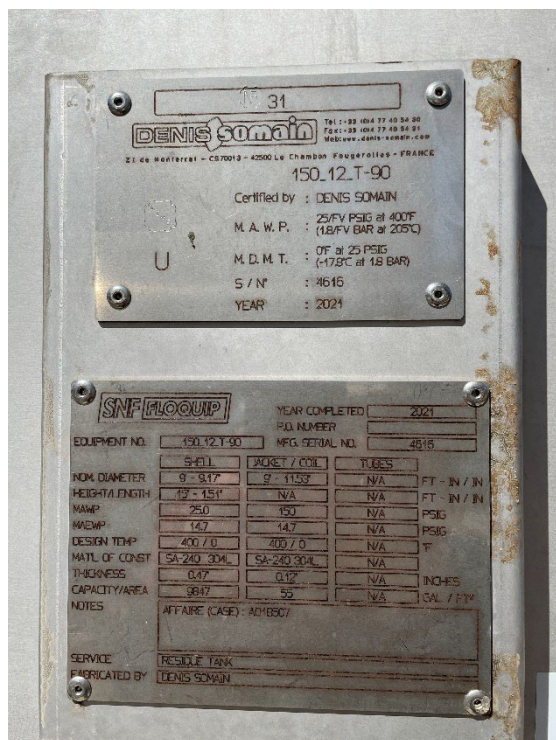


Figure 3: IMG_3246.jpg – Hazardous Waste Tank T-090



Figure 4: IMG_3247.jpg – Hazardous Waste Tank T-090



Figure 5: IMG_3248.jpg – Tanker Truck used to store and ship hazardous waste.



Figure 6: IMG_3249.jpg – Hazardous Waste Tank T50



Figure 7: IMG_3250.jpg – Blow down water in totes



Figure 8: IMG_3251.jpg – Blow down water in totes



Figure 9: IMG_3252.jpg – Ancillary Equipment to T50



Figure 10: IMG_3253.jpg – T50



Figure 11: IMG_3254.jpg – Hazardous Waste Tank V-550



Figure 12: IMG_3255.jpg – Hazardous Waste Tank V-550



Figure 13: IMG_3256.jpg – Hazardous Waste Tank V-550



Figure 14: IMG_3257.jpg – Hazardous Waste Tank V-550



Figure 15: IMG_3258.jpg - V-550 secondary containment

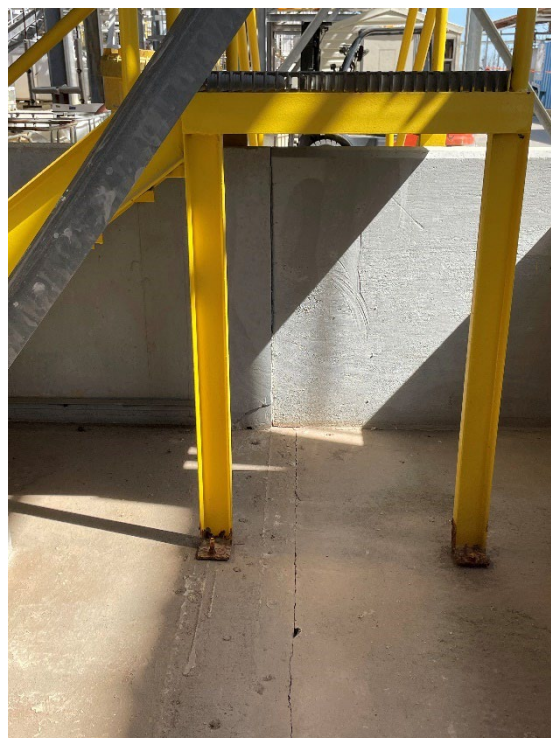


Figure 16: IMG_3259.jpg - V-550 secondary containment



Figure 17: IMG_3260.jpg – LDAR Tag on V-550



Figure 18: IMG_3261.jpg – Packing cleaning process



Figure 19: IMG_3262.jpg – Container labeled Alumibrite

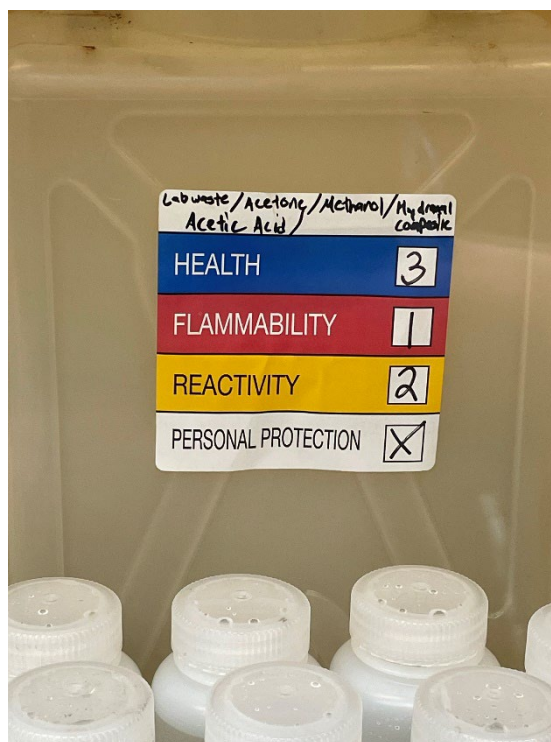


Figure 20: IMG_3263.jpg – Container in CM Lab SAA



Figure 21: IMG_3264.jpg – CAA CM Lab

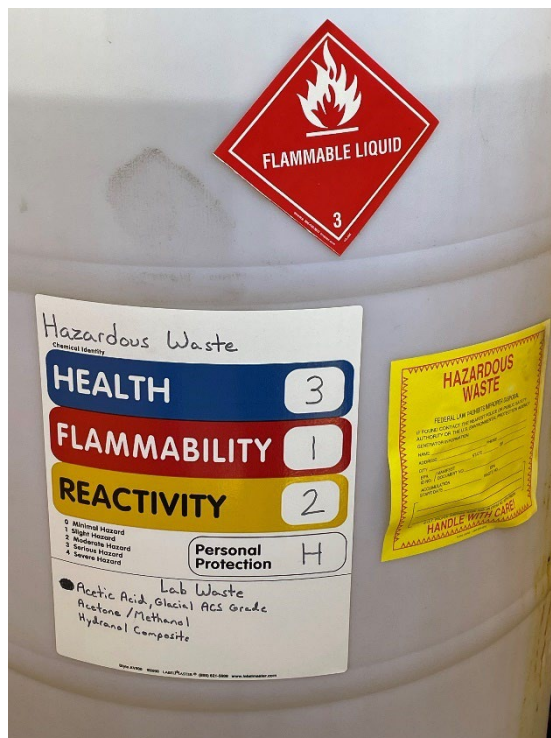


Figure 22: IMG_3265.jpg – Label on container in CAA at CM Acidic Lab



Figure 23: IMG_3266.jpg – Overview of the container in CM Acidic Lab CAA



Figure 24: IMG_3267.jpg – Picture of the piping on the container



Figure 25: IMG_3268.jpg – CAA



Figure 26: IMG_3269.jpg – Carbon Drum



Figure 27: IMG_3270.jpg – Carbon Drum



Figure 28: IMG_3271.jpg – Acrylamide Lab Waste Container



Figure 29: IMG_3272.jpg – Acrylamide SAA #1



Figure 30: IMG_3273.jpg – Acrylamide Waste Container



Figure 31: IMG_3274.jpg – Acrylonitrile SAA



Figure 32: IMG_3275.jpg – Acrylonitrile Waste Container



Figure 33: IMG_3276.jpg – Acrylamide CAA



Figure 34: IMG_3277.jpg – WWT Lab Vials Hazardous Waste Container in SAA

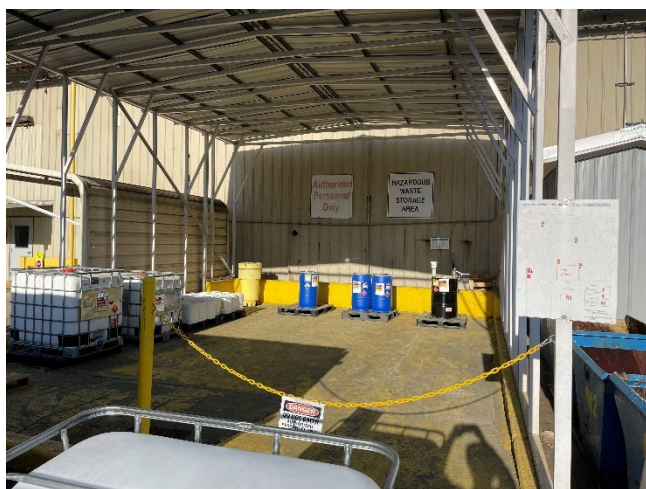


Figure 35: IMG_3278.jpg – Chemtall CAA



Figure 36: IMG_3279.jpg - Container in Chemtall CAA dated 12/4/2023



Figure 37: IMG_3280.jpg – Container of Paraformaldehyde and water (U122) dated 1/10/2024.



Figure 38: IMG_3281.jpg – Container of PFAS foam in storage



Figure 39: IMG_3282.jpg – Containers of cat monomer, hazardous waste



Figure 40: IMG_3283.jpg – Hazardous Waste stored without aisle space



Figure 41: IMG_3284.jpg – Container of Formaldehyde filter bags (U122) dated 12/13/2023



Figure 42: IMG_3285.jpg – Used aerosol cans



Figure 43: IMG_3286.jpg – Container used to puncture aerosol cans dated 12/13/2023

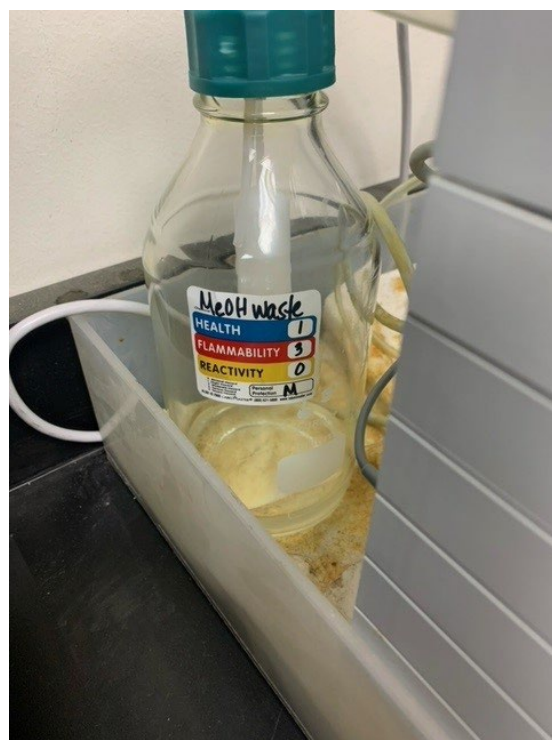


Figure 44: lab container.jpg – Methanol Hazardous Waste Container in SAA



Figure 45: IMG_3287.jpg – Used oil tank



Figure 46: IMG_3288.jpg – Tote Washing Station



Figure 47: Universal Lamp Storage



Figure 48: IMG_3290.jpg – Universal Waste Storage

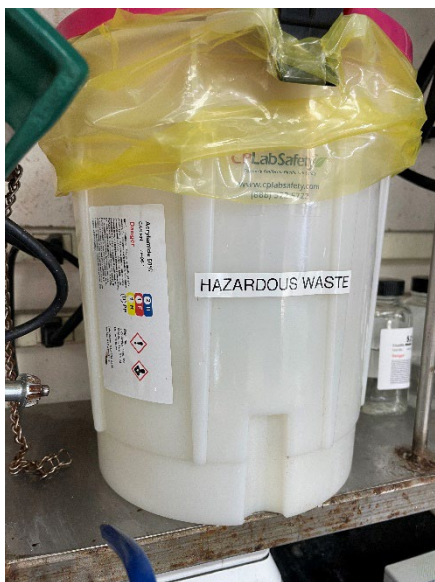


Figure 49: IMG_3292.jpg – Liquids Lab SAA



Figure 50: IMG_3293.jpg – Emulsions Lab SAA



Figure 51: Powder R&D HW Container in SAA



Figure 52: R&D Lab CAA



Figure 53: Totes of hazardous waste in Chemtall QC Lab



Figure 54: IMG_3301.jpg – Formaldehyde Filter SAA



Figure 55: IMG_3303.jpg – Hazardous waste container in R&D Lab

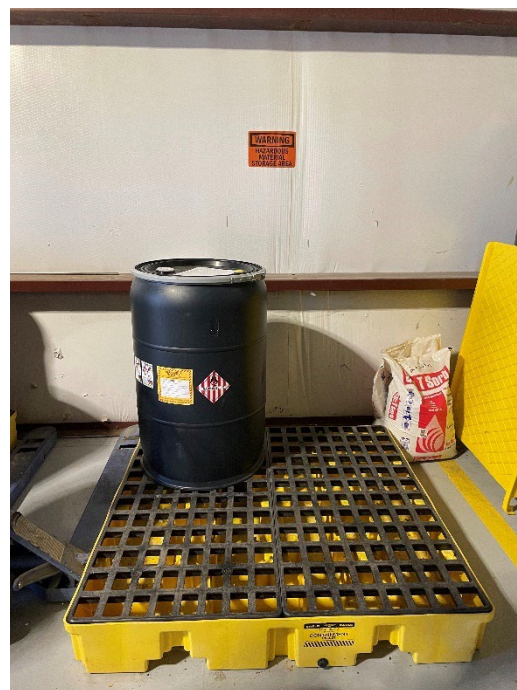


Figure 56: IMG_3307.jpg – Warehouse CAA



Figure 57: IMG_3309.jpg - North Plant SAA



Figure 58: IMG_3310.jpg – North Plant SAA #2



Figure 59: IMG_3311.jpg – North Plant SAAs #1&2



Figure 60:IMG_3315.jpg – South Plant Lab basic waste destined for SAA 2 or 4.



Figure 61: IMG_3317.jpg – SAA #3 &4



Figure 62: IMG_3321.jpg – Maintenance waste storage area



Figure 63: t306 1.jpg – Tank 306



Figure 64: t306 2.jpg – Tank 306

Attachment 2 – Sign-in Sheet

Opening Conference Sign-in Sheet: March 12, 2024

Facility: SNF Flocryl-Acrylates

Inspector Name: Brooke York

EPA ID Number: GAR000004325

Telephone Number: 404 502 8025

Date of Inspection: 3/12/2024

Email Address: york.brooke@epa.gov

Opening Conference Sign-in Sheet

Name	Affiliation	Email	Phone
Brooke York	EPA	york.brooke@epa.gov	404 502 8025
Ian Hutcheson	EPD	ian.hutcheson@epa.gov	470-990-1189
Jon Arso	SNF	jarso@snf.com	812-691-2564
Jonathan Bird	SNF	jbird@snf.com	843-817-2087
Jessica Jager	SNF	jjager@snf.com	803-707-5947
Karen Dorman By Phone	SNF		
Emily Lenczeski	SNF	elenczeski@snf.com	912-230-2064

Attachment 3 – Sign-in Sheet

Closing Conference Sign-in Sheet: March 13, 2024

Facility: SNF Inspector Name: Brooke York
 EPA ID Number: _____ Telephone Number: 404-502-8025
 Date of Inspection: 3/12-13/2024 Email Address: york.brooke@epa.gov

Closing Conference Sign-in Sheet

	Name	Affiliation	Email	Phone
	Brooke York	EPA	york.brooke@epa.gov	404 502 8025
	Ian Hutcheson	EPD	ian.hutcheson@dec.ny.gov	470-990-1189
	Jessica Jaeger	SNF	jjaeger@snf.com	803-707-5441
	Mark Shepherd	SNF	mshepherd@snf.com	912 880 2013
R	Karen Dorman	SNF	kdorman@snf.com	404 384 5775
R	Steve Simonsen	SNF	ssimonsen@snf.com	470 602 8205
R	Emily Lencieski	SNF	elencieski@snf.com	912 230 2004
R	Dana Walker Blair	SNF	dblair@snf.com	912 880 2440
	Kirk Thomas	SNF	kirk.t@snf.com	912 880 8035
	Jonathan Burd	SNF	jburd@snf.com	843 817-2887

R - Indicates that the participant participated remotely.