

# REPORT OF RCRA COMPLIANCE EVALUATION INSPECTION

At

**Univar USA Inc<sup>1</sup> [sic]  
2646 Metro Boulevard  
Maryland Heights, Missouri 63043**

**EPA ID Number: MOD006323349**

On

March 22, 2022

By

**U.S. ENVIRONMENTAL PROTECTION AGENCY  
Region 7**

**Environmental Enforcement and Compliance Assistance Division**

## 1.0 INTRODUCTION

I performed a Resource Conservation and Recovery Act (RCRA) compliance evaluation inspection (CEI) at Univar USA Inc, (Univar) located in Maryland Heights, Missouri, on March 22, 2022. I conducted the RCRA inspection under the authority of RCRA Section 3007(a), as amended. During the inspection, I collected the information and data necessary to determine compliance with the applicable RCRA regulatory and statutory requirements. This report and attachments present the results of the inspection. Univar was last inspected for compliance with RCRA on December 17, 2018, by the Missouri Department of Natural Resources (MDNR). The findings as the result of the MDNR RCRA CEI included:

- Generator registration information updates
- Container management (aisle spacing)
- Manifest exception reporting
- Contingency plan updates

## 2.0 PARTICIPANTS

Missouri Department of Natural Resources  
Brandon Backus, Environmental Specialist

Environmental Protection Agency Region 7  
Kenneth Herstowski, Environmental Engineer, ECAD/CB/RCRA (Lead Inspector)

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<sup>1</sup> As entered into RCRAInfo

## INSPECTION PROCEDURES

March 22, 2022

Prior to arriving at Univar, I rallied with Mr. Backus at an offsite location. At about 12:58, we arrived at Univar. A drive-by visual observation was completed from Towne Court and the facility appeared to be inactive. No other findings were made from the drive by review. We proceeded to the Univar administration building (photograph 1, attachment 1). The building appeared to be unoccupied (photograph 2, attachment 1). I did not observe any contact information posted at the building entrance. I observed the facility above ground storage tank farm and warehouse from outside the facility security fencing. The above ground storage tanks had been removed and the warehouse appeared to be empty (photographs 3 and 4, attachment 1). Mr. Backus and I then departed from Univar.

### 3.0 FINDINGS AND OBSERVATIONS

#### 3.1 General Information/Facility Description

Univar is located in Maryland Heights, Missouri, in an area zoned for commercial use. Residences are approximately 0.25-mile<sup>2</sup> east and 0.5-mile northwest of the facility. The site is approximately 4 acres. The site has two buildings (attachment 3). One approximately 4,000 square foot building contains offices, the second approximately 45,000 square foot building is a warehouse for product storage. The site has one tank farm for bulk product storage. The operations portion of the facility is surrounded by security fencing with locked access gates.

The following site operational description is from the MDNR RCRA CEI report.

Univar generates hazardous waste from unloading operations, filling/mixing/blending operations, discarded sample retains, off-spec, rejected or expired products, and excess material taken for samples from incoming materials. Hazardous waste is generated in the following four sections of the main operations building: Truck Off-Loading Area, Fill Room, Covered Dock, and Drum Room. Chemicals arrive on site in bulk either by tanker truck or rail car. The chemicals are then unloaded into the on-site aboveground storage tanks or sometimes directly off-loaded from a tanker truck via two pumps to be transferred into 55-gallon drums or the larger totes. Product that is not salvageable becomes hazardous waste in the truck unloading area either at the troughs and drip trays, the pumps and pails, the direct pumps and pails, or from truck cleaning operations (which may generate up to 15 gallons of water waste through steam cleaning of the tanks). Product is then moved from the storage tanks through dedicated lines into the Fill (mixing/blending) Room. Additional hazardous waste is generated from unsalvageable product generated at the mixing/blending stations.

#### 3.2 RCRA Status

The Notification Acknowledgement/Verification Report (attachment 4) indicates that Univar is a large quantity generator of hazardous waste. The form shows EPA Waste Codes D001 D002 D035. I obtained an eManifest report for 2021. The report shows the facility shipped approximately 151 tons of ignitable hazardous waste, EPA Waste Code D001.

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<sup>2</sup> Distances and areas estimated using Google Earth Pro

### **Preliminary Finding #1 – 10 CSR 25-5.262(2)(A)3.B: Facility status and information not updated.**

This preliminary finding has not been transmitted to Univar in a Notice of Preliminary Finding form. The requirements for hazardous waste generators in Missouri are found in Title 10 of the Code of State Regulations, Division 25, Chapter 5 (10 CSR 25-5), Rules Applicable to Generators of Hazardous Waste. The regulation at 10 CSR 25-5.262(2)(A)3.B is a Missouri requirement which requires in pertinent part “*A person required to register shall also complete and file an updated generator registration form if the information filed with the Department changes.*” I observed the facility was not in operation and no personnel appeared to be stationed onsite. The entrance to the administration building did not have contact information for the facility. I was able to contact Mr. Gregory Heard, Regional Regulatory Manager, of Univar Solutions on March 28, 2022. I discussed with Mr. Heard the status of the Univar Maryland Heights facility. Mr. Heard stated that the staffing of the facility ended approximately June 16, 2021. Products and materials at the facility were transferred to two other Univar Solutions facilities in Saint Louis. The tanks and appurtenances were cleaned and removed by September or October of 2021. Mr. Heard indicated that he is the current contact for the Univar Maryland Heights facility. I discussed with Mr. Heard the Missouri requirement to update facility information when the status changes.

### **3.3 Biennial Report**

#### **Potential Finding – 40 CFR 262.41: 2021 Biennial Report not submitted by March 1, 2022**

The State of Missouri has adopted by reference the EPA’s requirements for generators of hazardous waste found at 40 Code of Federal Regulations (CFR) Part 262<sup>3</sup>. The requirement at 40 CFR 262.41 specifies that “*A generator who ships any hazardous waste off-site to a treatment, storage or disposal facility within the United States must prepare and submit a single copy of a Biennial Report to the Regional Administrator by March 1 of each even numbered year.*” I obtained an eManifest report from the EPA RCRAInfo database for Univar hazardous waste shipments in 2021 (attachment 5). The report lists nine manifests for shipments of ignitable hazardous waste to Veolia ES Technical Solutions, Sauget, Illinois, RCRA ID# ILD098642424, totaling approximately 151 tons. Prior to my site visit on March 22, 2022, I requested Biennial Report information from the filing that was due on March 1, 2022. The data team contacted Mr. David Green with the Missouri Department of Natural Resources who responded that Univar had not submitted a Biennial Report for 2021. I rechecked the submittal status on March 28, 2022, and the Biennial Report had not been submitted as of that date.

I was able to contact Mr. Gregory Heard, Regional Regulatory Manager, of Univar Solutions on March 28, 2022. I discussed with Mr. Heard that status of the Biennial Report for the Univar Maryland Heights facility. At that time Mr. Heard indicated that as a small quantity generator the Univar Maryland Heights facility was not subject to Biennial Report submittals. I discussed with Mr. Heard my information regarding the shipments of 151 tons of ignitable hazardous waste in 2021. Mr. Heard indicated that he would have to do additional research into the matter. I also discussed that an extension to file a Biennial Report can be requested by contacting Mr. David Green with the Missouri Department of Natural Resources. As of the writing of this report, I cannot confirm that the Biennial Report has been submitted or that an extension to file has been granted.

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<sup>3</sup> See 10 CSR 25-5.262, Standards Applicable to Generators of Hazardous Waste, incorporating by reference the requirements in 40 CFR Part 262, July 1, 2013.

## 4.0 SUMMARY

I conducted an inspection of Univar as a large quantity generator of hazardous waste. The following preliminary finding is noted as discussed above:

**Preliminary Finding #1 – 10 CSR 25-5.262(2)(A)3.B: Facility status and information not updated.**

**Potential Finding – 40 CFR 262.41: 2021 Biennial Report not submitted by March 1, 2022**

Other than the items noted above, no other preliminary findings were noted. These items have not been transmitted to Univar with a Notice of Preliminary Findings form. However, the EPA may review my findings further after the inspection, which may change or add to my findings.

**KENNETH HERSTOWSKI** Digitally signed by KENNETH  
HERSTOWSKI  
Date: 2022.03.31 12:23:11 -05'00'

Kenneth Herstowski  
Environmental Engineer

Date

**AMBER WHISNANT** Digitally signed by AMBER WHISNANT  
Date: 2022.04.23 15:40:38 -05'00'

Amber Whisnant  
Chief, RCRA Section, Chemical Branch  
Enforcement and Compliance Assistance Division

Date

### Attachments

1. Inspection [6] Photographs (7 pages)
2. Photograph Log (1 page)
3. Univar Aerial Photographs (3 pages)
4. Notification Acknowledgement/Verification Report (1 page)