



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4

ATLANTA FEDERAL CENTER

61 FORSYTH STREET

ATLANTA, GEORGIA 30303-8960

SENT VIA ELECTRONIC MAIL

Ms. Lori Leffler
Vice President Health Environmental Safety Sustainability
KIK Custom Products - Biolab
1700 Old Covington Highway SW
Conyers, Georgia 30012
LLeffler@kikcorp.com

Dear Ms. Leffler:

Enclosed is a copy of the final Inspection Report (Enclosure A) generated by the U. S. Environmental Protection Agency's Region 4 Air Enforcement Branch for the partial compliance inspection of KIK Custom Products - Biolab located at 1700 Old Covington Highway SW, Conyers, Georgia 30012.

The EPA previously sent a copy of the draft inspection report in an email on December 14, 2021, allowing KIK Custom Products - Biolab to make any comments on the report and to claim any information contained in the report as confidential business information (CBI). In an email dated December 16, 2021, KIK Custom Products - Biolab notified EPA that certain information was being claimed as CBI. Those items have omitted from the final report.

Should you have any questions regarding this inspection report, please contact me at (404) 562-9198, or by email at Warrilow.Phyllis@epa.gov.

Sincerely,

Phyllis Warrilow, PE
Environmental Engineer
South Air Enforcement Section

Enclosure

ENCLOSURE A
INSPECTION REPORT

**United States Environmental Protection Agency (EPA) Region 4
Air Enforcement Branch**

I. GENERAL INFORMATION

Facility Name: KIK Custom Products - Biolab

Location (Address): 1700 Old Covington Highway SW, Conyers, Georgia

Inspection Date: November 15, 2021

Type of Inspection (Full or Partial Compliance Evaluation):

Partial Compliance Evaluation focused on the Clean Air Act Section 112 (r)(1) General Duty Clause requirements.

ICIS-Air Number: GA0000001324700009

EPA Region 4 Investigator(s)/Inspector(s):

1. Phyllis Warrilow PE, Environmental Engineer
2. Carrie Griffith, Environmental Engineer

State/Local Investigator(s)/Inspector(s):

1. Christina Jagonase, Georgia Environmental Protection Division

Person(s) Contacted at Facility (Name and Title):

1. Tom Wideman, Director Health Environmental Safety and Sustainability (HESS)
2. Brian Cobb, HESS Specialist
3. Lori Leffler, Vice President HESS

Report Prepared by: Phyllis Warrilow, PE

II. FACILITY INFORMATION

A. Facility and Permit Information

Facility and Permit Information	Comments
1. Type of facility (e.g., chemical plant, refinery, cement manufacturer, etc.).	KIK Custom Products Biolab is classified under NAICS code 325180 (Other Basic Inorganic Chemical Manufacturing).
2. Air permit number(s) and type of permit (e.g., Title V, PSD, Synthetic Minor, etc.).	Permit No. 2842 247-00009-S-03-0, Synthetic Minor
3. Air permit issuance date.	Issued January 4, 2018, Amended Sept. 18, 2018
4. Air permit expiration date.	September 18, 2022
5. Facility classification (Major, Synthetic Minor/Conditional Major, Minor).	Synthetic Minor
6. Major source pollutants (if applicable).	N/A
7. Applicable regulations (e.g., State Implementation Plan, MACT Subpart FFFF, NSPS Subpart EEEE, etc.).	CAA 112 (r)(1) General Duty Clause
8. Types of air emission points (e.g., tanks, process vents, boilers, etc.).	N/A
9. Types of air pollution control equipment (e.g., baghouse, scrubber, afterburner, etc.).	N/A

B. Process Description

KIK Custom Products Biolab (Biolab) is classified under NAICS code 325180 (Other Basic Inorganic Chemical Manufacturing). Biolab operates a Swimming Pool Chemicals

blending facility where large quantities of chlorine-based oxidizers are reformulated and stored. The facility covers approximately 56 acres of land and includes several office buildings, maintenance buildings and warehouses. Biolab operates two shifts a morning shift and an afternoon/evening shift. In peak season such as summer, the facility sometimes operates three shifts. The facility is typically unmanned except for security guards in the overnight hours.

The facility was purchased by KIK Custom Products from Chemtura in 2014.

III. INSPECTION ACTIVITIES

Activity	Yes No NA	Comments
Opening Meeting		
1. Date and time entered the facility.	Y	EPA Region 4 (R4) inspectors arrived at the Facility on November 15, 2021 at 9:25 AM EST.
2. Credentials presented to facility personnel (include name and title).	Y	All inspectors presented their credentials to Tom Wideman, Director HESS; Brian Cobb, HESS Specialist; Credentials were presented to Lori Leffler, VP HESS after she arrived at the meeting.
3. Conducted an opening meeting to explain the purpose and objectives of the inspection.	Y	Inspectors held an opening conference on November 15, 2021 at 9:37 AM EST during which the purpose and objectives of the inspection were explained. Lori Leffler joined via telephone as she was in route to the meeting.
4. Discussed safety issues.	Y	Inspectors discussed Facility-specific safety and emergency procedures, including procedures for COVID-19 safety during the inspection. Tom Wideman, Director HESS, advised of safety requirements for the site.

Activity	Yes No NA	Comments
5. Discussed which records to be reviewed.	Y	EPA inspectors requested to review the details of the September 14, 2020, incident and current inventory records indicating quantities of chemicals stored in the location of the September 14, 2020, incident. EPA inspectors also asked for the facility to discuss the Emergency response and operational situation leading up to the September 14, 2020, incident.
6. Discussed the facility walk-through and the areas to be observed in the facility.	Y	Inspectors were interested in the storage areas where the September 14, 2020, incident took place.
7. Discussed facility policy regarding photographs or video (if applicable).	Y	EPA inspectors indicated that digital photographs may be taken during the walkthrough. See Appendix A – Photograph Log.
8. Discussed the use of the infrared camera, TVA, PID, and any other equipment.	N/A	Region 4 inspectors did not use an infrared camera, TVA, or other equipment.
9. Discussed CBI.	Y	EPA inspectors indicated that any documents claimed to be Confidential Business Information (CBI) would be treated in accordance with regulations.
Records Reviewed at the Facility		
10. The types of records reviewed, and the time period reviewed.	Y	Inventory records requested at the time of the inspection were sent to EPA as a follow-up. Other documents requested from the Facility via email communication were Emergency Response Procedures and written hazard assessments for those chemicals that could decompose and release Chlorine or generate Nitrogen Trichloride.
Facility Walk-Through Observations		

11. The process equipment observed and the associated operational rate observed (e.g., Furnace 1 production rate was 5 lbs/hr on 1/1/15, at 2:00 pm – permit requires max rate at 6 lbs/hr). Provide the date and time the information was recorded by the inspector. Identify the permit limit (if applicable). An attachment may be used for a large amount of information.	N/A	The EPA Region 4 inspectors focus for the inspection was the location of the September 14, 2020, chemical decomposition incident. The building is situated adjacent to Interstate 20 in an industrial setting and is used for dry blending and warehouse offices. The warehouse building was commissioned in 1977. The building is a one-story structure. At the time of the inspection, the facility was storing the same type of chemicals as had been stored during the September 14, 2020, incident. Super sacks of chemicals were lined up parallel to each other waiting to be reformulated into product. A previously removed domestic water (restroom) area had been located within the same open warehouse as the chemicals and had been located approximately 25 to 30 feet away from the super sacks. EPA requested the November 15, 2021, inventory for the warehouse. Biolab emailed the inventory list to EPA inspectors after the inspection. Inspectors were told that the quantity of chemicals observed during the inspection was much lower than in the summer months as demand for the chemicals is seasonal. EPA Inspectors asked Biolab officials to recall and walk through the situation of the September 14, 2020, incident. Biolab officials told Inspectors that on the day of the incident, employees arrived for the morning shift and found water on the floor. Biolab continued to state that maintenance crews had been called right away that morning, however water had mixed with the
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Activity	Yes No NA	Comments
		dry chemicals such that employees were quickly overwhelmed, and thus evacuated. The fire department was then called. The National Response Center was notified and DOT officials shutdown the adjacent roads including Interstate 20 until midafternoon on that day. The Inspectors were told that the building had been mostly gutted due to severe corrosion generated during the incident. The company stated that it was still in the process of rebuilding certain parts of the building. Inspectors observed that the bathroom (domestic water) equipment where the water leak originated was completely removed. The space previously housing the leaky domestic water line piping was empty. Blank walls remained. One wall still had yellowish paint from the restroom area. There was one perpendicular partial wall in the building which was the back wall of the domestic water area. Inspectors were told that water had possibly collected along this wall. Inspectors were told that drills with the fire department were conducted biannually but previously had been conducted quarterly.

Activity	Yes No NA	Comments
12. The type of process parametric monitoring observed and the associated value observed (e.g., Furnace 1 flux injection rate was 200 lbs/batch at 1/1/15, at 2:00 pm – permit requires max rate at 225 lbs/batch). Provide the date and time the information was recorded by the inspector. Identify the permit limit (if applicable). An attachment may be used for a large amount of information.	N/A	
13. If process equipment or parametric monitoring equipment was not operating, state the reason by facility personnel why the equipment was not operating.	N/A	

Activity	Yes No NA	Comments
14. The type of air pollution control equipment, the process equipment it is controlling, and the associated parametric monitoring value observed (e.g., baghouse pressure drop, temperature, scrubber flow rate, etc.). (For example - RTO 1 controlling furnace 1, 1,500 degrees F on 1/1/15, at 2:00 pm – permit requires 1,400 degree F or higher). Provide the date and time the information was recorded by the inspector. Identify the permit limit (if applicable). An attachment may be used for a large amount of information.	N/A	

Activity	Yes No NA	Comments
15. Continuous emissions monitoring devices and values observed. (e.g., CEMS, COMs, etc.). Provide the date and time the information was recorded by the inspector. Identify the permit limit (if applicable). An attachment may be used for a large amount of information.	N/A	The facility operates portable Chlorine detectors. During the inspection, EPA inspectors asked if the facility had plans to incorporate permanent fixed Chlorine detectors in the building which was involved in the September 14, 2020, chemical decomposition incident. Biolab responded that permanent fixed Chlorine detectors would be included as part of their rebuild.
16. If air pollution control equipment was not operating, state the reason by facility personnel why the equipment was not operating.	N/A	
17. Capture and collection system (enclosures and hoods) observations, if applicable (e.g., the magnitude and duration of emission escaping capture from the hood).	N/A	

Activity	Yes No NA	Comments
18. Ductwork transferring the emissions to the air pollution control device observations, if applicable (e.g., the magnitude and duration of emission escaping from the ductwork, holes or deterioration in ductwork, no deterioration observed, etc.).	N/A	
19. Any existing unpermitted emission points, new unpermitted emission points, or non-permitted construction activities observed. (if yes, describe in the comments field).	N/A	
20. Were any visible emissions observed? (if yes, identify the location and equipment).	N/A	
21. Was a Method 9 reading performed? (if yes, identify the location and equipment).	N/A	
22. Was the cause of the visible emissions investigated and the information documented?	N/A	

Activity	Yes No NA	Comments
23. Was a Method 22 performed for visible emissions? (if yes, identify the location and equipment).	N/A	
24. Identify the cause of the visible emissions as explained by facility personnel, if applicable.	N/A	
25. Was the infrared camera used? If so, attach the video log (which includes the equipment ID, and the date and time the video was recorded) and videos to this report.	N	
26. Was the TVA used? If so, identify the equipment monitored and the results. Provide the date and time the information was recorded by the inspector. Include actual instrument readings for each piece of equipment monitored above the leak definition and/or where the infrared camera identified a release. An attachment may be used for a large amount of information.	N	

Activity	Yes No NA	Comments
27. Was the PID used? If so, identify how the PID was used and the results. Provide the date and time the information was recorded by the inspector. An attachment may be used for a large amount of information.	N	
Closing Meeting		
28. Conducted a closing meeting.	Y	The closing conference was conducted on November 15, 2021, at 11:50 AM EST. Attendees were the same as were present for the opening meeting.
29. Summarize any additional information needed, if applicable?	Y	Facility personnel agreed to send additional documents to EPA. See Appendix A.
30. Accept a declaration of CBI, if applicable?	N/A	
31. Discussed observations.	Y	Inspectors thanked Facility personnel for their time. Inspectors observed that the bathroom (domestic water) equipment where the water leak originated was completely removed thus the source of the water which reacted with the stored chemicals on September 14, 2020, was eliminated. Inspectors were told that drills with the fire department were conducted biannually but previously had been conducted quarterly.

Activity	Yes No NA	Comments
32. Discussed next steps, if applicable?	Y	A final inspection report from EPA Region 4 will be sent to the company within a 60-day timeframe. Document requests were discussed (see Appendix A.2).
33. Date and time inspection concluded.		The inspection concluded with a closing conference at 12:05 AM EST on November 15, 2021.
Miscellaneous		
34. Include any additional observations, if applicable.	N/A	

EPA Investigator/Inspector Signature: _____

EPA Supervisor Signature & Title _____

Date Report Finalized: _____

APPENDICES AND ATTACHMENTS

Appendix A. 1. Photograph Log

**Photograph Log
KIK Custom Products - Biolab
November 15, 2021**

Image Number	File Name	Date	Time (EDT)	Description
1	128-1114.JPG	11/15/2021	Approx. 11:30 AM	Yellow area of wall where break room was located
2	128-1115.JPG	11/15/2021	Approx. 11:30 AM	Partition separating break room area from product storage

All photographs were taken by EPA inspector Carrie Griffith.

Appendix A. 2. Document Receipt Log

Documents were not obtained from Facility representatives during the on-site inspection but were emailed as a follow-up:

- 1) Plant 6 Inventory list 11 15 21.xlsb.
- 2) SOP-EHS-03-05 Consolidated Emergency Response Plan.
- 3) Storage and Handling of ACL Chlorinating Compositions.