U.S. Environmental Protection Agency Region 4
61 Forsyth Street Atlanta, GA 30303
Emergency Planning and Community Right-to-Know Act (EPCRA) Inspection Report

Company Name *Lanxess Corporation - Memphis* SIC/NAICS *32518*

Lead Inspector Name *Jordan Noles* Inspection Date *10/27/2022*

Inspection Team Members *Bethany Terpin*

1. Record names and titles of the facility representatives participating in the inspection.

Name/Title *Eric Brantley/ Site Manager* Phone: *(919) 924-9443*

Name/Title *Cathey Barnes/ HSE Manager* Phone: *(901) 493-9520*

2. Obtain exact name and address of the facility being inspected, as well as any Parent Company information.

Facility Name: *Lanxess Corporation-Memphis*
Address: *2571 Fite Rd, Oxone Spot 26, Memphis, Tennessee 38127*
County: *Shelby*
Owner/Operator/Parent Company (Name, Address, Phone): *Lanxess Corporation*
111 RIDC Park West Drive, Pittsburgh, PA 15275
How long owned/operated, recent sale of facility (date)? *Since 1959*

3. Obtain/review facility description.

a. Officers' names and titles: *Eric Brantley, Site Manager*
b. Incorporation date and location: *Memphis, TN*
c. Other facilities owned by the company:
d. Number of employees: *36*
e. Annual Corporate Sales: *N/A*
f. Process Description and Process Diagrams: *Lanxess Corporation uses oleum to produce a substance called Oxone. Oxone is used in a myriad of ways, including oxidizing powder, disinfectants, swimming pool shock oxidizers, etc. The final product is sold to end users in 5 kg., 25 kg., and 1,000 kg. packages.*

g. Jurisdictional Fire Department: *Memphis Fire Department*

4. Compliance Review by Statute:

Section 312

a. Obtained chemical inventory list	**Y**	N	N/A
b. View purchase records (where applicable)	**Y**	N	N/A
c. Tier II reports to SERC, LEPC, fire dept (Haz. Chem ≥ 10,000 lbs)?	**Y**	N	N/A
d. Tier II reports to SERC, LEPC, fire dept (EHSs ≥ 500 lbs or TPQ)?	**Y**	N	N/A
e. Reviewed documentation of maximum daily amounts stored?	**Y**	N	N/A
f. Reviewed MSDSs?	**Y**	N	N/A
g. Reviewed documentation of submissions?	**Y**	N	N/A
h. Verified that each report from the past 3 years was submitted by March 1?	**Y**	N	N/A

Section 313

i. Form R/A to State and EPA for Toxic Chemicals: Manufactured, Processed ≥ 25,000lbs, Otherwise Used ≥ 10,000 lbs	**Y**	N	N/A
j. Obtained list of 313 chemicals MPOU at the facility	**Y**	N	N/A
k. Obtained documentation of submissions?	**Y**	N	N/A
l. Verified that each report from the past 3 years was submitted by July 1?	**Y**	N	N/A

Additional Observations:_____

Report Prepared By:

Name (Printed): Jordan Noles

Title: Lead Inspector, North Air Enforcement Section

Signature: JORDAN NOLES Digitally signed by JORDAN NOLES Date: 2022.12.12 09:05:03 -05'00'

Report Authorized By:

Name (Printed): Jason Dressler

Title: Chief, North Air Enforcement Section

Signature: JASON DRESSLER Digitally signed by JASON DRESSLER Date: 2022.12.12 11:33:15 -05'00'