

TOXIC SUBSTANCES CONTROL ACT – NEW AND EXISTING CHEMICALS PROGRAM
COMPLIANCE MONITORING INSPECTION REPORT

Lintech International, LLC

**7705 NE Industrial Boulevard
Macon, Georgia 31216**

Inspection Date: November 2, 2021

Report Prepared By: Nicolas Haddad
U.S. Environmental Protection Agency, Region 4
TSCA Enforcement Section
61 Forsyth Street SW
Atlanta, GA 30303

Inspector:	Nicolas Haddad (Lead)	EPA Region 4, TSCA-NEC Inspector
	Gopal Timsina	EPA Region 4, TSCA-NEC Inspector

Report Date: December 30, 2021

1.0 Company Information:

- 1.1 Site Name: Lintech International, LLC
- 1.2 Parent Company Name: The Hinson Group
- 1.3 Number of employees at Macon: 79
- 1.4 Type of Ownership: Private
- 1.5 Year of last TSCA-NEC Inspection: 2008
- 1.6 Gross annual sales in 2019: \$12 million to \$120 million
- 1.7 Nature of Business: Chemical importer and distributor
- 1.8 Site Latitude and Longitude: 32.69808 and -83.66473

2.0 Representatives Present:

- 2.1 Lintech International, LLC: Randy Griffin, Director of Operations
- 2.2 U.S. Environmental Protection Agency: Nicolas Haddad, TSCA-NEC Inspector; Gopal Timsina, TSCA-NEC Inspector

3.0 Inspection Objectives: The inspection was conducted pursuant to Section 11 of the Toxic Substances Control Act (TSCA), 15 U.S.C. § 2610, to determine compliance with TSCA Sections 4, 5, 8, 12 and 13.

4.0 Inspection Notice:

- 4.1 Inspection Notice: On October 4, 2021, Nicolas Haddad contacted Mr. Randy Griffin, Director of Operations at Lintech International, LLC (Lintech) to schedule a “Neutral Scheme TSCA compliance monitoring inspection” to determine compliance with TSCA Sections 4, 5, 8, 12, and 13. Based on the discussions with Mr. Griffin, the inspection was scheduled for November 2, 2021 for the facility located at 7705 NE Industrial Boulevard, Macon, Georgia. During the initial telephone conversation, Mr. Griffin was informed that the inspection would focus on the chemical substances that were imported, processed, distributed, or exported at Lintech’s site located in Macon, Georgia.

Due to the COVID-19 pandemic, it was agreed that the EPA personnel would deliver the TSCA Notice of Inspection and TSCA Confidential Business Information documents for signature to Lintech personnel in person at the Macon site on November 2, 2021. The remainder of the TSCA compliance inspection would be conducted in a virtual setting using Microsoft Teams on November 2, 2021.

On October 18, 2021, the EPA Region 4, TSCA Enforcement Section emailed a notice of inspection (NOI) letter to Lintech confirming the inspection date/location and requesting certain records be made available for review.

5.0 Onsite Inspection

- 5.1 Office Entry: On November 2, 2021, at approximately 8:30 a.m., the EPA Inspector Nicolas Haddad arrived at Lintech's office located at 7705 NE Industrial Boulevard, Macon, Georgia. Upon entering the building, the inspector was greeted by Randy Griffin, Director of Operations. The EPA inspector presented his government-issued credentials and explained the purpose of the inspection to the Lintech representative. It was also reiterated that due to the COVID-19 pandemic, the remainder of the inspection will be virtual.

The EPA inspector presented the TSCA Notice of Inspection (Form 7740-3), and the Confidentiality Notice (Form 7740-4) to Mr. Griffin and explained both forms to him. Mr. Griffin signed the Notice of Inspection and a copy was provided.

Since Form 7740-4 contained more details as it relates to confidential business information (CBI), Mr. Griffin was given additional time to review the Confidentiality Notice. The EPA inspector told Mr. Griffin he could submit Form 7740-4 to the EPA when they submit the records. The EPA inspector informed Mr. Griffin that in order to ensure confidentiality of any CBI documents, the facility must make a TSCA-CBI claim when the documents are provided to the EPA. In addition, the inspector informed Mr. Griffin that all CBI submissions to the EPA should be mailed to the TSCA Document Control Officer based on the instructions referenced in the inspection notice letter. Mr. Griffin signed the Form 7740-4 and a copy was provided.

- 5.2 Opening Conference: On November 2, 2021, EPA and Lintech's representative met virtually via Microsoft Teams. At the beginning of the opening conference, the EPA inspector informed Lintech's representative that: (1) the inspection was being conducted pursuant to TSCA Section 11 to determine compliance with TSCA Sections 4, 5, 8, 12, and 13; and (2) the inspection target was based on Region 4's neutral scheme inspection targeting strategy.
- 5.3 Records Review: During the inspection, the EPA inspector used the NOI letter as a guide to review the records associated with the chemical substances that were manufactured, imported, used, processed, or exported by the facility.

The EPA inspector requested Lintech mail certain records to the EPA regarding Lintech's compliance with TSCA, including import and export records.

- 5.4 Plant Tour: Due to the COVID-19 pandemic, the inspectors did not conduct a facility tour.
- 5.5 Closing Conference: During the closing conference, the EPA inspector discussed with Lintech's representatives the need for the Non-CBI Records and CBI records. Lintech's representative submitted the Non-CBI and CBI records prior to the inspection.

The EPA inspector also provided instructions on the submission of CBI records. Lintech's representatives submitted the records to the EPA on October 27, 2021. Finally, the EPA inspector informed Lintech's representative that an inspection report will be provided to

Lintech within 60 days of the date of the inspection (November 2, 2021). The inspection concluded at approximately 10:45 a.m. on November 2, 2021.

6.0 Index of Attachments

1. TSCA Notice of Inspection (Form 7740-3)

REPORT APPROVAL

Report – Primary Author

Nicolas Haddad
TSCA Inspector-In-Training

Gopal Timsina
TSCA Inspector

Report - Approver

For

F. Bryce Covington
Chief
TSCA Enforcement Section