

INSPECTION REPORT

Inspection Entry Date/Time	04/30/2024 09:05 AM (CT)	Announced: No		
Inspection Exit Date/Time	04/30/2024 04:18 PM (CT)	Access: Granted		
Regulatory Program	RCRA			
Type of Inspection	Compliance Evaluation Inspection (CEI)			
Facility or Site Name	Univar Solutions USA Inc			
Facility/Site Identifier	KSD057889313			
Facility/Site Physical Address	5420 Speaker Rd			
City, State, Zip Code	Kansas City, KS 66106			
County/Borough	Wyandotte County			
Generator Status	LQG			
NAICS	42469 424720			
Type of Operation	Chemical distribution, distribute for different suppliers, food-grade, fine-ingredients, solvents			
Geographic Coordinates	39.09493, -94.70446			
Permit Number (If Applicable)	KSD057889313			
Additional Persons Participating in Inspection:				
Name	Title	Organization	Email	Phone
Amy Thompson	Inspector	EPA REGION 7	Thompson.Amy@epa.gov	(913) 551-7384
Lead Inspector:				
Tiffany DeLong		TIFFANY DELONG Digitally signed by TIFFANY DELONG Date: 2024.05.17 09:11:20 -05'00'		
	[Signature]	EPA REGION 7	delong.tiffany@epa.gov	(913) 551-7729
Supervisor Review:				
Amber Whisnant		Whisnant, Amber Digitally signed by Whisnant, Amber Date: 2024.05.30 09:58:33 -05'00'		
	[Signature]	EPA REGION 7	whisnant.amber@epa.gov	

SECTION I – INTRODUCTION

Site Entry and Purpose of the Inspection

Type of inspection: Compliance Evaluation Inspection (CEI)

At the request of the Enforcement and Compliance Assurance Division, I conducted a Resource Conservation and Recovery Act (RCRA) unannounced compliance evaluation inspection (CEI) at Univar Solutions USA Inc. (the "Site" or "Facility"), located at 5420 Speaker Road, Kansas City, Kansas 66106, at 9:05 AM (CT) on 4/30/2024. I presented credentials to and informed Michael Titterington that this was an EPA Region 7 inspection to determine compliance with RCRA. The CEI was conducted under the authority of Section 3007(a) of RCRA, as amended. I collected the information and data necessary to determine compliance with the applicable

regulatory and statutory requirements. The inspection report and appendices present the results of the CEI. In addition, information gathered prior or subsequent to the Inspection from a review of USEPA, State, and public records may be included in this report.

The CEI consisted of a discussion of facility operations, waste generation, and waste management; a review of waste management records; and a visual inspection of waste generation and management areas. Document photocopies and photographs were collected as inspection documentation (Appendix 1-2). A total of 27 photographs were collected and a photolog was prepared (Appendix 1). I followed the inspection procedures discussed in the RCRA CEI Standard Operating Procedure (No. 2321.1D), unless noted differently. A drive-by observation of the facility was conducted prior to entering the building. No areas of concern were noted. I entered the building's office and was greeted by Michael Titterington who is listed as the site contact. I introduced myself as an EPA inspector to conduct a RCRA compliance inspection and provided my credentials. I was escorted to a conference room where we discussed the reason and general procedures of the inspection. Mr. Titterington also provided us an overview of the safety procedures and required personal protective equipment required at the facility. Mr. Titterington provided me with a form to sign that stated the safety procedures were discussed but I was unable to sign because the form stated that written permission must be obtained to take photographs and/or videos. Mr. Titterington understood my inability to sign the form and we continued with our discussion of the facility. The facility was last inspected for RCRA compliance on January 25-26, 2022, by the EPA. No violations were identified during that inspection.

Attendees

Title/Organization	Name	Phone	Email	Opening Conf.	Closing Conf.
Lead Inspector/EPA REGION 7	Tiffany DeLong	(913) 551-7729	delong.tiffany@epa.gov	Yes	Yes
Inspector/EPA REGION 7	Amy Thompson	(913) 551-7384	Thompson.Amy@epa.gov	Yes	Yes
Operations Manager/Univar Solutions	Michael Titterington	(913) 621-7492	michael.titterington@univarsolutions.com	Yes	Yes
Facility personnel/Univar Solutions	Mike Landis	n/a	n/a	No	No

Opening Conference

I explained the purpose and procedures of the inspection and presented Michael Titterington with a copy of RCRA Section 3007(a), which provides inspection authority. I explained my need to collect accurate information and presented a copy of Title 18 U.S. Code, Sections 1001 and 1002 regarding false statements and documents. I discussed their confidentiality rights and informed Mr. Titterington that a Confidentiality Notice would be provided at the end of the inspection to make a confidentiality claim, if desired.

I asked Mr. Titterington to review the EPA RCRA Handler Information Report (Appendix 2, "SiteVerification_Univar_FY24_KS.pdf"), which I provided during the inspection. According to the EPA RCRA Handler Information Report, Univar Solutions USA LLC operates as a Large Quantity Generator (LQG) of characteristic and listed hazardous wastes, a hazardous waste and used oil transporter and transfer facility. See site verification report (Appendix 2, "SiteVerification_Univar_FY24_KS.pdf") for EPA waste codes. He indicated that there were no changes to be made to the verification report. Univar is registered in the state of Kansas as a large quantity generator and based on my review of manifest data, Univar generates greater than 2,200 pounds

of hazardous waste per month and is therefore operating as an LQG. Additionally, Univar has a Hazardous Waste Management Facility Permit through the state of Kansas, effective July 19th, 2022, in accordance with 40 CFR Parts 124 and 260 through 270 as adopted by K.A.R. 28-31-4 through 28-31-279a.

See Process Description Section for discussion of their monthly hazardous and non-hazardous waste generation.

Facility/Site Information

Number of employees	11 operational personnel
Length of Facility at Location	Since 1968 where it has changed names multiple times since then
Operating Hours	Normal business hours are Monday through Friday, 8:00 a.m.- 4:30 p.m. Drivers do come in earlier or later than these times
Safety Training Provided to Inspector(s)?	Yes
Size of Facility	50,000 square feet under roof, 7-acre parcel

Process Description

Univar is a global chemical and ingredient distributor. Univar in Kansas City, Kansas fills product containers with various solvents such as ethylene, methanol, acetone, methyl-ethyl ketone (MEK), toluene, among many others, and glycols and distributes various fine ingredients to different facilities. They also provide waste transportation and storage services for both hazardous and non-hazardous waste. Univar also takes dirty/used solvent from parts washers from various facilities and provides new solvent in the same equipment. The solvent that is picked up from facilities is stored in their permitted hazardous waste storage area until there are enough containers to fill a truckload. This waste is then shipped to either their Saint Louis, Missouri; Cherryville, Kansas; or Wichita, Kansas locations for treatment or disposal.

During the opening conference, Mr. Titterington and I discussed the following Univar generated wastes:

Heavy Line Flush - Univar has 26 product tanks that store various product solvents. They also receive rail cars and tanker trucks of product. Filling occurs in the Fill Room/Drumming Room where product is piped from either product tanks, tanker trucks, or rail cars into product drums varying in size. When product is switched from one to another, the product lines are flushed with a solvent. Two flushes are used, heavy or light line flush, depending on the product being flushed. The light line flush is repackaged as a product which generates around 1-truckload of product line flush a month. The heavy line flush is determined to be a hazardous waste that cannot be resold based on its undesirable characteristics. Mr. Titterington stated that they generate around 4, 55-gallon drums a month of heavy line flush. See Appendix 2 for the waste determination/profile of the Heavy Line Flush ("OB 169-6831 Line Flush.pdf").

Contaminated rags, PPE, solids - Through the process of filling and packaging products and handling various hazardous materials, Univar generates contaminated solids such as rags and PPE that are discarded as a hazardous waste. Mr. Titterington stated that they generate around 2, 55-gallon containers a year of this waste. See Appendix 2 for the waste determination/profile of the contaminated solids ("OB 169-7149 Rags.pdf").

Miscellaneous waste -Throughout the course of business, products can become expired or contaminated. Waste determinations are made for these instances based on product knowledge and discarded to the appropriate waste vender. Mr. Titterington stated that the rate of generation for these types of wastes vary. Additionally, for wastes that were originally intended as transfer wastes but logistical reasons determine that the waste cannot be discarded at the originally intended destination facility, Univar then takes responsibility for

the waste as their own. See discussion in Observation [TD2-OB-006](#) for more information. I asked Mr. Titterington about maintenance or clean-outs of product tanks. He stated that the product tanks rarely need cleaned because they contain solvent and remain clean. He stated that the only time tank clean outs occur, which was approximately three years ago, is when a product tank is switched to a different product and must be cleaned to remove residue of the previously contained product. In these cases, Univar makes a waste determination on the tank bottoms/flush at the time the waste is generated, which can range anywhere from 2 to 500 gallons of tank heels/bottoms.

Universal Waste - Mr. Titterington stated that they do not generate much universal waste. He stated that many of their lights are fluorescent and they are slowly transitioning to LEDs for their lighting. He stated they also utilize sodium vapor lights in the drumming room and truck rack. Once a year, a maintenance contractor comes onsite and replaces the necessary lamps, around 10-12 fluorescent lamps and a couple of sodium vapor lamps as necessary. The maintenance vendor takes these items offsite for disposal. Mr. Titterington stated that they do receive universal waste from generators sometimes, in which case they handle and discard appropriately. I did not observe any universal waste during my inspection.

Used oil - Mr. Titterington stated Univar does not generate used oil because all maintenance services for trucks and trailers are performed offsite by KTTR - Kaw. I did not observe any used oil onsite during my inspection.

General trash and recycling - Mr. Titterington stated that an 8-cubic yard dumpster for general trash and a 6-cubic yard dumpster of recycling is picked up each week and hauled offsite.

Building(s)

Building→Area→Sub-area	Area of Concern
Main Building	
→ <10 Day Transfer Area	No
→ Drumming Room	No
→ S01 - Permitted Hazardous Waste Storage	No
→ Truck Rack	Yes
→ Warehouse	No
Outside	Yes

SECTION II – OBSERVATIONS

UNIVAR SOLUTIONS USA INC							
Observation #:	TD2-OB-001	Date:	04/15/2024	Contains AOC:	No	Contains CBI:	No
Person Interviewed:		Title:					
This observation was inadvertently added.							

Building: Main Building→Warehouse			
Observation #: TD2-OB-002	Date: 04/30/2024	Contains AOC: No	Contains CBI: No
Person Interviewed: Michael Titterington		Title:	
Univar has a designated area where product drums are placed if they are received damaged or not in good condition. Univar submits a claim for replacement or reimbursement of the damaged packaged product to the company that provided the product. While awaiting the processing of the claim, the inadequate or damaged			

packaged product is stored in the Quarantine area within the cGMP room. Mr. Titterington stated that most of the time the damaged packaged product is sent back to the product facility and a new product is sent back to Univar. Mr. Titterington stated that if the product company decided to deny the claim, Univar will then assess if the product can be used in their products or if it will become a waste. I did not note any concerns.

Photo(s)

1. [IMG-2024043010460546591048.jpg](#)

Building: Main Building→Warehouse**Observation #:** TD2-OB-003 **Date:** 04/30/2024 **Contains AOC:** No **Contains CBI:** No**Person Interviewed:** Michael Titterington **Title:**

I observed a trash can within the warehouse with an aerosol can inside. I asked Mr. Titterington if a waste determination has been made on the aerosol can. Mr. Titterington stated that a waste determination was made and that the can was empty and previously contained non-hazardous adhesive. He stated that typically aerosol cans are disposed of as scrap metal, but an employee accidentally put it in the trash. I noted no areas of concern.

Photo(s)

1. [IMG-2024043010590959987837.jpg](#)

Building: Main Building→<10 Day Transfer Area**Observation #:** TD2-OB-004 **Date:** 04/30/2024 **Contains AOC:** No **Contains CBI:** No**Person Interviewed:** Michael Titterington

I observed the less-than-10-day transfer area with both hazardous and non-hazardous waste awaiting transport to their respective destination facilities. The hazardous waste within the less-than-10-day transfer area from bay 1 (left) to bay three (right) included:

- Two pallets of hazardous waste from Sergeant's Pet Care Products (bay 1),
- Two boxes of hazardous waste from Sergeant's Pet Care Products (bay 1),
- One drum of hazardous waste Sergeant's Pet Care Products (bay 1)
- Two pallets of hazardous waste form South Dakota Soybean (bay 1)
- Seven metal intermediate bulk containers (IBC) of hazardous waste from Diamond Vogel Paint (bay 2),
- One plastic IBC of hazardous waste from South Dakota Soybean (bay 3),

An inventory list of these wastes with their respective manifest IDs are included in Appendix 2 ("HWInventory.pdf"). The pallet plan within "HWInventory.pdf" shows the location of each waste at the facility; the numbers in the pallet plan reference the profile numbers within the inventory list. I observed no areas of concern.

Photo(s)

1. [IMG-202404301110001002282169.jpg](#)
2. [IMG-2024043011115911592276013.jpg](#)
3. [IMG-202404301112061262149895.jpg](#)

Building: Main Building→<10 Day Transfer Area

Observation #: TD2-OB-005	Date: 04/30/2024	Contains AOC: No	Contains CBI: No
Person Interviewed:			
This observation was inadvertently added.			

Building: Main Building→S01 - Permitted Hazardous Waste Storage			
Observation #: TD2-OB-006	Date: 04/30/2024	Contains AOC: No	Contains CBI: No
Person Interviewed: Michael Titterington			
Univar has one permitted hazardous waste container storage area that is approximately 1500 square feet. This area is located outdoors on an elevated concrete structure with concrete containment curbing surrounding the entire storage area and covered with a roof/canopy. When entering the permitted hazardous waste container storage area, I observed liquid within bays 1 and 2. I asked Mr. Titterington what the liquid was within the containment area. He stated that it rained the previous day and night, and that the liquid was rainwater. He stated that they intend to vacuum out the water later in the day. The water within the containment had no sheen. No concerns were noted. The permitted hazardous waste storage area had nine containers of hazardous waste being stored within bay 3. There were seven, 55-gallon drums of hazardous waste from Arnette Polymers and two, 55-gallon drums of hazardous waste generated by Univar Solutions of hazardous waste line flush. The containers from Arnette Polymers were recently moved from the less-than-10-day transfer area into the permitted storage area because there were logistical issues with shipping the waste to the original intended receiving facility. Mr. Titterington explained that sometimes issues occur for various reasons where Univar will take transfer waste and/or hazardous waste that was originally generated elsewhere and switch to the waste being generated by Univar. When this happens, Univar corrects the manifest that was used for the original hazardous waste shipment and updates the destination facility to Univar in Kansas City, Kansas. When ready for shipment to the final destination facility determined by Univar, a new manifest is created for the new waste that has been generated by Univar and ships it off as their own waste for disposal. I noted no concerns regarding this process. All containers met all container management requirements, and I noted no concerns related to the storage of hazardous waste within the permitted hazardous waste storage area. Directly next to the permitted hazardous waste storage area was multiple aboveground tanks and secondary containment that was full of liquid surround these tanks. I asked Mr. Titterington what was in the tanks. He stated that the tanks used to hold product but have been decommissioned and are empty. I asked Mr. Titterington what the liquid was in the containment area, he stated that the liquid was rainwater from the recent large amount of rainfall. I asked if the containment area has a drain. Mr. Titterington stated that the secondary containment area did not have a drain. I then asked Mr. Titterington what they do with any liquid or debris that collects within the secondary containment area. Mr. Titterington stated that they first make a hazardous waste determination by doing a visual and olfactory inspection on the liquid and/or debris and determining if there is any sheen or scent present. If there is a sheen or scent present, Univar takes a sample of the liquid and sends it off for testing to determine if the wastewater is a hazardous waste. If there is no sheen, no smell, and if the liquid is not acidic or basic after testing with a pH meter, Univar pumps out the liquid as wastewater that is then sent to the local public wastewater treatment facility. I observed a sheen on the liquid and asked Mr. Titterington what they intend to do with the liquid within the secondary containment area. Mr. Titterington stated that they would take a sample of the water and send it offsite for analysis and dispose of it as appropriate, whether as a hazardous waste if the analysis deems it so, or as a non-hazardous wastewater. I did not note any concerns.			

Photo(s)

1. [IMG-2024043011201620161292449.jpg](#)
2. [IMG-2024043011204020401474003.jpg](#)
3. [IMG-2024043011205720571483435.jpg](#)
4. [IMG-2024043011211321131344751.jpg](#)
5. [IMG-2024043011212721271468760.jpg](#)

Building: Main Building→Drumming Room**Observation #:** TD2-OB-007**Date:** 04/30/2024**Contains AOC:** No**Contains CBI:** No**Person Interviewed:** Michael Titterington and Mike Landis

The drumming room is where Univar fills product into product containers that range in capacity and size. Product solvent is pumped in via piping from product tanks outside or tanker trucks. When one product is switched to another product, the line is flushed with solvent and then is discarded as a hazardous waste when it does not meet specifications for resale. I observed a satellite accumulation container of hazardous waste line flush within the drumming room. The satellite accumulation container met all container management requirements with no concerns noted.

On the drumming line, I observed a bucket labeled "flush bucket" with liquid inside. I asked Mr. Titterington what was inside. He stated he did not know so he summoned Mike Landis, a facility operator. I asked Mr. Landis what was inside the flush bucket, and he stated that the bucket contained line flush that was awaiting to be put into a product container. He stated that any line flush that did not meet specifications would be discarded into the hazardous waste day can adjacent to the drumming line. I observed the day can and observed no concerns. This day can would then be emptied at the end of each shift into the adjacent satellite accumulation container of hazardous waste line flush. I observed the satellite accumulation container of hazardous waste line flush and it met all container management requirements.

I also observed a hazardous waste satellite accumulation container of waste solids within the drumming room. The hazardous waste satellite accumulation container met all container management requirements with no concerns noted.

Photo(s)

1. [IMG-2024043011321632161371243.jpg](#)
2. [IMG-2024043011345934591598601.jpg](#)
3. [IMG-202404301135053551503548.jpg](#)
4. [IMG-2024043011352235221479846.jpg](#)
5. [IMG-2024043011354935491430257.jpg](#)
6. [IMG-2024043011375537551345130.jpg](#)

Building: Main Building→Truck Rack**Observation #:** TD2-OB-008**Date:** 04/30/2024**Contains AOC:** Yes**Contains CBI:** No**Person Interviewed:** Michael Titterington and Mike Landis

The truck rack is where product is pumped from tanker trucks. Underneath this area is secondary containment

encompassing the entire truck rack area. I observed a large amount of liquid within the secondary containment underneath the truck rack. I asked Mr. Titterington what was within the secondary containment. He stated that the liquid within the secondary containment was rainwater from the previous days of heavy rainfall. I asked how the water is managed. Mr. Titterington stated that because of the processes occurring above the secondary containment, the liquid is always tested before disposing of the wastewater. If the wastewater is determined to be non-hazardous, it is hauled off via Liquid Environmental Solutions of Kansas (3349 Harvester Road, Kansas City, Kansas 66115 KSR000503789). Otherwise, it is shipped off as a hazardous waste.

Within the truck rack area was a satellite accumulation container of hazardous waste heavy line flush. When product being pumped is changed, the line is flushed to prepare for the new product and the heavy line flush is discarded as a hazardous waste. The hazardous waste satellite accumulation container met all container management requirements, and I observed no concerns.

Directly next to the satellite accumulation container of hazardous waste heavy line flush was a step can labeled "used rags". I opened the step can and observed that the can was completely full of used rags. I asked Mr. Titterington what the rags were used for. He stated that the rags are used during the process of pumping product solvents and contaminated with solvents and discarded as a hazardous waste. I asked Mr. Titterington when the step can was last emptied. He stated he did not know but stated that it is supposed to be emptied at the end of each shift into a satellite container of hazardous waste solids. I did not observe a satellite container of hazardous waste solids nearby. I then asked Mr. Landis when the container of hazardous waste rags was last emptied. Mr. Landis stated that the step can of hazardous waste rags was last emptied the previous Friday (04/26/2024) at the end of the day. According to the Kansas Department of Health and Environment, Bureau of Waste Management technical guidance document HW-2005-G1, generators of hazardous waste can utilize day accumulation containers of no more than 6-gallons so long as the following conditions are met:

1. Each container must be labeled or marked with the words "Hazardous Waste."
2. Each container must be kept securely closed when waste is not being actively added or removed (refer to the preceding section on "Closed Containers").
3. Each container must be in good condition and compatible with the waste placed in the container.
4. Each container must be emptied into an appropriate satellite accumulation container, storage container, or tank at the end of each workday, or each shift for continuous operations, regardless of whether the container is full or not.

If these conditions are not met, then the generator of hazardous waste must manage the hazardous waste container according to the provisions found at K.A.R. 28-31-262. The step can of hazardous waste did not have the words "hazardous waste" and was not emptied at the end of each workday and therefore did not meet the day accumulation container requirements and must be managed as a hazardous satellite accumulation container. **NOPF 1: K.A.R. 28-31-262(c)(7) - Failure to mark a satellite accumulation container with the words "Hazardous Waste".**

Photo(s)

1. [IMG-2024043011422142212139043.jpg](#)
2. [IMG-2024043011454045401957173.jpg](#)
3. [IMG-2024043011462146211727094.jpg](#)

Building: Outside

Observation #: TD2-OB-009

Date: 04/30/2024

Contains AOC: Yes

Contains CBI: No

Person Interviewed: Michael Titterington

Outside I walked the perimeter of the fence. On the northwest of the property near the rail line, I observed

fencing that was approximately 4 feet in height due to sagging in about a 10-foot section of the fencing. I asked Mr. Titterington about the condition of the fencing. He stated that the permit requires the fencing to be 6 [sic] feet high and that they had observed the fencing was not in good condition and therefore has had a contractor come out to observe and provide a quote to fix the fencing. He stated that the ground in that area becomes very saturated during heavy rainfall and is unable to hold the weight of the fence and will require more substantial supports based on the assessment from the contractor. He stated that he has not yet received the quote from the contractor that will perform the work but has already started the process of repairing the fencing. **NOPF 2: permit section II.D referencing 40 CFR 264.14 and Part B permit application section F1.a.2.a - Failure to maintain fencing in good condition at 7-feet in height.**

On the east side of the building, I observed two semi-trailers that were labeled "Responsible Container". I asked Mr. Titterington what these semi-trailers are used for. He stated that Univar sometimes receives RCRA-empty containers from generators that are then shipped off for refurbishment to Responsible Container in St. Louis. When picking up containers from generators, he stated the driver is able to check the condition of the containers being loaded into the trailer, but sometimes generators do not allow the driver to observe or load the containers and the generator personnel load the containers into the semi-trailer. Mr. Titterington stated that all containers that are picked up for refurbishment are supposed to be RCRA-empty and generators are required to certify that their containers are RCRA-empty (see Empty Container Certification within Appendix 2, page 3 of "BillsofLading.pdf"). Mr. Titterington stated that containers have a production date stamped on the container and should only be used/re-used within 5 years from the production date. He also stated the poly drums and totes that Univar utilizes, in which hazardous materials were previously stored, are not refillable and are sent for disposal to their other Univar location in Omaha, Nebraska along with containers that have surpassed 5 years from the production date. He stated that Responsible Container pays Univar for containers that they drop off for refurbishment; Univar receives the least amount of compensation for poly or plastic containers, whereas metal containers provide more compensation.

When Univar receives enough containers for refurbishment, they then load up to trailers labeled "Responsible Container" which is then hauled to Responsible Container in St. Louis. This occurs approximately every six months.

I asked Mr. Titterington if a manifest is used when hauling these RCRA-empty containers. He stated that a manifest is not used because the containers are RCRA-empty. Instead, bills of lading are used when shipping RCRA-empty containers from generators to Responsible Container. See Appendix 2 - "BillsofLading.pdf", pages 1-4 for bills of lading that are used when containers are picked up from generators and pages 5-6 for bills of lading of Univar generated RCRA-empty containers.

I observed inside both trailers. One trailer was empty while the other trailer had multiple totes and drums inside. All containers appeared to be RCRA-empty and in good condition, with documentation on them stating they met RCRA-empty requirements, and no concerns were noted.

While outside, I also observed a 6-yard container of recycling that contained mostly cardboard and an 8-yard container of general trash. Mr. Titterington stated the recycling and trash are picked up weekly.

Photo(s)

1. [IMG-202404301156015612497825.jpg](#)
2. [IMG-2024043012164316432309371.jpg](#)
3. [IMG-20240430120607671422531.jpg](#)
[IMG-202404301206296291357504.jpg](#)
[IMG-202404301207167161311190.jpg](#)
[IMG-2024043012164316432309371.jpg](#)

SECTION III – RECORDS REVIEW

Record: Inspections		AOC: No
Ref #: TD2-RR-002	Reviewed By: Tiffany DeLong	Reviewed Date: 04/24/2024
I requested documentation of inspections for the permitted hazardous waste storage area within the last three years. Mr. Titterington provided me a binder that had documentation of weekly inspections of the permitted hazardous waste storage area, monthly inspections of emergency equipment, and monthly inspections of security devices as required by section II.E. of the permit. I reviewed all provided documentation and noted no areas of concern.		
Record: Personnel Training		AOC: No
Ref #: TD2-RR-003	Reviewed By: Tiffany DeLong	Reviewed Date: 04/30/2024
Personnel handling RCRA hazardous waste are to be trained as required by 40 CFR § 264.16(d) and (e) and section I.J.3 of the Permit. I requested documentation of training for all employees within the last three years. Univar provides most of their required training via computer software where it is conducted and tracked. Mr. Titterington showed me the training on his personal computer during the inspection. I requested this documentation be sent via email, which he provided on 5/2/2024. I noted no areas of concern.		
Document(s) 1. Training 1.pdf 2. Training 2.pdf 3. Training 3.pdf		
Record: Contingency Plan		AOC: No
Ref #: TD2-RR-005	Reviewed By: Tiffany DeLong	Reviewed Date: 04/30/2024
I requested the facilities RCRA Contingency Plan from Mr. Titterington. He provided me with the RCRA Contingency Plan; the Stormwater Pollution Prevention Plan; the Spill Prevention, Control, and Countermeasure Plan; and the Emergency Preparedness Master Plan. Ms. Thompson stated to Mr. Titterington that the RCRA Contingency Plan did not have the emergency and backup coordinator home address for Michael Titterington and Kenny James. Mr. Titterington reviewed the document and stated that all plans used to be housed together in a single binder but were recently separated when Univar was bought out in November 2022. He stated that the Emergency Preparedness Master Plan that was previously in the same binder as the RCRA Contingency Plan does list the addresses of both personnel. I reviewed the Emergency Preparedness Master Plan and did find the contact information for both Mr. Titterington and Mr. James. It should be noted that the state of Kansas approved Univar's permit in 2022 which included the same version of the contingency plan provided to me during the inspection. Additionally, the Generator Improvements Rule, published November 28, 2016, eliminated the requirement of unnecessary employee personal information to protect privacy (Federal Register :: Hazardous Waste Generator Improvements). Furthermore, the state of Kansas does not take enforcement for those facilities that fail to provide the home address for emergency coordinators. Therefore, I did not add this to the Notice of Preliminary Findings. After review, a compliance officer may add to my findings.		
Document(s) 1. Univar KC RCRA Contingency Update (002).pdf		

SECTION IV – AREA OF CONCERN

The presentation of Area(s) of Concern does not constitute a formal compliance determination or violation.

Building: Main Building	Area: Truck Rack	Sub-area:
TD2-OB-008		
<u>NOPF 1:</u> K.A.R. 28-31-262(c)(7) - Failure to mark a satellite accumulation container with the words "Hazardous Waste".		
Building: Outside	Area:	Sub-area:
TD2-OB-009		
<u>NOPF 2:</u> Permit section II.D referencing 40 CFR 264.14 and Part B permit application section F1.a.2.a - Failure to maintain fencing in good condition at 7-feet in height.		

SECTION V – CLOSING CONFERENCE AND FOLLOW UP**Closing Conference**

I summarized the findings and recommendations with Mr. Titterington. I provided him with a Confidentiality Notice which he signed as acknowledgement of receipt; Mr. Titterington made no confidentiality claims. I also provided Mr. Titterington with a Receipt for Documents and Samples and Notice of Preliminary Findings (NOPF), which he signed as acknowledgement of receipt. All signed documents can be found in Appendix 2, "SignedDocuments.pdf". No compliance assistance documents were provided to the facility at the conclusion of the CEI.

Communication Log

The following information was received by REGION 7 on/after exiting the Facility on 04/30/2024.

Type	Location	Point of Contact	Job Title/Organization	Description	Contains PII	Date
Email		Michael Titterington	Operations Manager/Univar Solutions	Email to Mr. Titterington about the requested follow-up items following the inspection. These items included an electronic copy of the contingency plan reviewed during the inspection, an electronic copy of the training for	No	05/01/2024 11:48 AM (CT)

				each employee reviewed during the inspection, and profiles for all the hazardous waste generated by Univar at their Kansas City, Kansas location.		
Email		Michael Titterington	Operations Manager/Univar Solutions	Mr. Titterington responded and provided all requested documentation.	No	05/02/2024 09:16 AM (CT)
Email		Erik Otto	Regional Regulatory Manager	Response to Notice of Preliminary Findings	No	5/14/2024 10:26 AM (CT)

SECTION VI – SAMPLING ACTIVITIES AND ANALYTICAL RESULTS

No sampling was conducted.

SECTION VII – LIST OF APPENDICES

1. Photo Log
2. Document Log