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NEIC

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**RESOURCE CONSERVATION AND RECOVERY ACT
COMPLIANCE INVESTIGATION REPORT**

Dow Chemical
2301 N. Brazosport Boulevard
Freeport, Texas
NEIC Project No.: VP1231

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CONTENTS

INTRODUCTION	3
FACILITY BACKGROUND	3
INVESTIGATION METHODS	3
ON-SITE INSPECTION SUMMARY	4
Site Observations	5
SUMMARY OF FINDINGS	8
AREAS OF NONCOMPLIANCE	8
AREAS OF CONCERN	12

TABLES

Table 1. SUMMARY OF EQUIPMENT MONITORED DURING ONSITE INSPECTION	5
Table 2. SUMMARY OF TANKS INSPECTED DURING ON-SITE INSPECTION	7

APPENDICES (*NEIC-created)

A Photographs Taken During Goodnight Inspection (4 pages)*
B Photographs Taken During TeKrony Inspection (16 pages)
C Carbon Acceptance Test Report (37 pages)
D May 4 2017, Email (4 pages)
E Manifest for Calgon Carbon (1 page)
F Inspection Record for Isotainer TRLU050515-5 (1 page)
G B44 Tote LeakDas Report (1 page)
H B66 AVO LeakDas Report (1 page)
I B6610 AVO Leak Monitoring Results (1 page)
J Potential AVO at B75 Follow-up (1 page)

**This Contents page shows all of the sections contained in this report
and provides a clear indication of the end of the report.**

INTRODUCTION

At the request of U.S. Environmental Protection Agency (EPA) Region 6, the EPA National Enforcement Investigations Center (NEIC) conducted a Resource Conservation and Recovery Act (RCRA) compliance investigation of the Dow Chemical (Dow) facility located at 2301 N. Brazosport Boulevard in Freeport, Texas.

This report presents NEIC's field observations during the February 7 through 16, 2017, on-site inspection of Dow. The information presented in this report was collected from personnel interviews, direct observations, company-provided documentation, and state and federal government databases. The Eastern Research Group (ERG) is an EPA contractor that was tasked with providing additional inspector resources during this on-site inspection. With the participation of EPA Region 6, EPA headquarters, and ERG, NEIC conducted the RCRA inspection of the Dow facility with the following objectives:

- Conduct a RCRA on-site inspection of Dow, specifically focusing on the process operations, waste determinations, recordkeeping in compliance with RCRA Subparts BB and CC, and perform leak detection and repair (LDAR) monitoring.
- Evaluate all information obtained during the investigation to determine Dow's compliance with applicable RCRA regulations and permits, specifically with RCRA Subparts BB and CC.

FACILITY BACKGROUND

Dow operates a RCRA treatment, storage, and disposal (TSD) facility and is a large quantity generator of hazardous waste (EPA ID No. TXD008092793). Dow's production operations and associated waste streams are subject to major environmental statutes, including the Clean Water Act (CWA); Clean Air Act (CAA); Emergency Planning and Community Right-to-Know Act (EPCRA); and the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). Its operations also are subject to environmental permits and regulations administered by the EPA and the Texas Commission on Environmental Quality (TCEQ). Dow's RCRA permit authorizes the operation of a hazardous waste TSD facility. At the time of the NEIC inspection, Dow was operating under an expired permit, but had submitted a renewal application.

The Dow facility is a large, integrated chemical manufacturing complex covering 7,000 acres. The site has more than 3,300 employees, 3,200 contract employees, and 65 manufacturing units that produce 44 percent of Dow products sold in the United States. The facility consists of four plants: Plant A, Plant B, Oyster Creek, and Salt Dome. The products manufactured on-site are transported by rail, truck, marine vessels, and pipeline to customers around the world.

INVESTIGATION METHODS

NEIC performed the following activities to accomplish the investigation objectives:

- Met with facility personnel to discuss process operations, waste determinations, and recordkeeping in compliance with RCRA Subparts BB and CC, and performed LDAR monitoring.
- Conducted walk-through tours of the facility to observe process operations.
- Reviewed and copied (as appropriate) facility documents, including operating plans, procedures, and records. Specifically, NEIC reviewed Dow's records associated with RCRA Subparts BB and CC.

All activities of NEIC personnel were performed in accordance with the NEIC quality system.

ON-SITE INSPECTION SUMMARY

NEIC conducted the on-site inspection of Dow from February 7 through 16, 2017. The inspection team included Lorna Goodnight (project manager), Matt Schneider, Linda TeKrony, and Jacquelyn Vega from NEIC. Debra Pandak and John Penland from EPA Region 6 and Naomi Hall from TCEQ also attended the inspection. During the opening meeting on February 7, 2017, credentials were presented to Fran Falcon, Dow environmental leveraged delivery leader.

NEIC conducted a general process review of Dow's operations. During this review, NEIC examined the major operational aspects of the Dow facility, including process operations, management of hazardous wastes, and LDAR data management. NEIC's process review was based on discussions with facility personnel, records reviews (hard copy and digital), and a tour of the operational areas.

Following the process review, NEIC conducted focused inspections of various process units and operations and performed LDAR monitoring with EPA headquarters and ERG personnel on equipment subject to RCRA Subparts BB and CC. This report presents the observations and findings of the NEIC inspection. ERG is preparing a separate report containing the results of its LDAR monitoring, review of Dow's LeakDas database, and its investigation observations and findings.

At the conclusion of the on-site inspection on February 16, 2017, NEIC held an exit conference with Dow personnel to discuss preliminary inspection observations. During the exit conference, NEIC advised Dow that final compliance determinations would be made by EPA Region 6. Before leaving the site, the inspection team provided Dow a complete list of all documents received on-site by NEIC, and logs and copies of all photographs taken by NEIC.

NEIC previously conducted a Clean Air Act 112(r) inspection of Dow in January 2016. A process review of the B-33 rotary kiln, and B-39 Epoxy 5 glycidyl methacrylate (GMA) was conducted, and a discussion of that review is included in the NEIC August 2016 final report. This report focused on areas subject to RCRA Subparts BB and CC.

Site Observations**Evaluation of Regulatory Determinations**

NEIC reviewed documents and held discussions with Dow environmental personnel regarding the hazardous wastes and waste management units that Dow has determined to be exempt from the air emission regulations. Dow handles most of the hazardous wastes generated on-site that contain volatile organics in accordance with Subpart CC requirements. Dow operates an on-site groundwater remediation system that includes tanks and an air stripper, which Dow determined is not regulated under Subparts AA, BB, or CC requirements due to the wastewater treatment unit exemption. The groundwater remediation system is included in Dow's Texas Pollutant Discharge Elimination System (TPDES) permit application for TPDES permit No. 00007. Under 40 Code of Federal Regulations (CFR) § 264.1(g)(6), wastewater treatment units are exempt from Part 264 requirements, including the air emission requirements.

Subpart AA

Dow has no units operating under RCRA Subpart AA.

Subpart BB

Equipment associated with permitted or less-than-90-day tanks or container systems are subject to Subpart BB (40 CFR § 264.1050 (b)) if it contains or contacts hazardous waste with greater than or equal to 10 percent organics. Equipment regulated under Subpart BB includes valves, pumps, compressors, relief devices, sampling systems, and connectors/flanges. According to Dow, the on-site facilities subject to Subpart BB include: A-32 Picloram, B-8 Environmental Operations Thermal Oxidizer, B-1450 Research and Development, B-33 Environmental Operations Kiln, B-44 Voranol, B-46 SPC, B-6610 Quatanary, B-68 PDC-Hydro, B-75 PO Purification, B-77 APP, Marine, PDH-1, B-19 Butylene Oxide, and B-23 Telone.

During the on-site inspection NEIC, EPA headquarters, and ERG personnel performed LDAR monitoring. On February 13 through 15, 2017, Matt Schneider performed LDAR monitoring using a Thermo Scientific toxic vapor analyzer (TVA) 2020. **Table 1** contains a summary of equipment subject to Subpart BB that was monitored by NEIC.

Table 1. SUMMARY OF EQUIPMENT MONITORED DURING ONSITE INSPECTION Dow Chemical Freeport, Texas							
Block	Plant/Equipment Name	Valves	Connectors	Pumps	Agitators	Tank Hatch	Misc.
B33	Env Ops – Kiln	243	587	10	3	8	3
B33	Env Ops – Direct Burn	66	130	3			
B8	Env Ops – Thermal Oxidizer	57	144	3			
B44	Voranol						1

Table 1. SUMMARY OF EQUIPMENT MONITORED DURING ONSITE INSPECTION Dow Chemical Freeport, Texas							
Block	Plant/Equipment Name	Valves	Connectors	Pumps	Agitators	Tank Hatch	Misc.
B46	D840	57	136			1	
B68	D436	36	94	2		1	
B19	Butylene Oxide	24	58	1			
B23	Telone	21	44				
B75	Tanks 109 and 110	111	238	4	4	6	
Marine		10	29			1	
B6610	Quaternary Plant T5	20	43	1			

Industrial Specialty Services (ISS) is the contractor that performs Method 21 monitoring for Dow. ISS employs 12 full-time technicians who monitor approximately 2 million Subpart BB components using a flame ionization detector. LDAR monitoring records are managed by Dow staff in the LeakDas database. Monitoring records are recorded by the instrument, then uploaded into the LeakDas database. All leaks and remonitoring are recorded in the database. Calibration records are kept in a Microsoft Excel spreadsheet. Calibration gases include: 0, 500, 1,000, 2,000, and 10,000 parts per million (ppm) methane. All equipment subject to Subpart BB is also subject to the CAA, 40 CFR Part 60, 61 or 63.

Subpart CC

NEIC inspected eight less-than-90-day accumulation tanks for hazardous waste and 10 RCRA-permitted tanks. Table 2 contains a summary of the information gathered regarding the regulatory status of each tank regarding Subpart CC applicability and the regulatory compliance options chosen by the facility.

NEIC also inspected 21 large containers (from tote size to isotainers) for compliance with the Subpart CC requirements. These containers were located throughout the facility; Dow used the option of complying with U.S. Department of Transportation (DOT) regulations to comply with RCRA requirements.

Table 2. SUMMARY OF TANKS INSPECTED DURING ON-SITE INSPECTION

Dow Chemical
Freeport, Texas

Block	Plant Name	Equipment Name	Size (gallons)	Vapor Pressure of Material in Tank (pounds per square inch [psi])	Subpart CC Tank Level Designation	Regulated by Subpart CC or CAA	Control Device	Pressure Settings on Pressure Safety Devices (pounds per square inch gauge [psig])	Alarm Settings for Pressure (psig)
A-3200	Chlor-Pyridine Picloram	D-106C		3.2	1	Part 63 Subpart MMM	TOX/THROX	15	13.5
A-3200	Chlor-Pyridine Picloram	D-106D		3.2	1	Part 63 Subpart MMM	TOX/THROX	1.75	0.97
A-3200	Dichlorophenol (DCP) Plant	D-4450		5.1	1	Part 265 Subpart CC	TOX/THROX	N/A	25
B-1900	BO Plant	V-1208 A/B (Olin Operated)		3.45	1	Part 265 Subpart CC	THROX	25	12
B-3300	Env Ops – Kiln	D-410		1.78	1	Part 63 Subpart DD	Kiln	50	20
B-3300	Env Ops – Kiln	D-420		0.2	1	Part 63 Subpart DD	Kiln	50	20
B-3300	Env Ops – Kiln	D-430		3.9	1	Part 63 Subpart DD	Kiln	50	20
B-3300	Env Ops – Kiln	D-440		0.2	1	Part 63 Subpart DD	Kiln	50	20
B-3300	Env Ops – Kiln	D-450		1.87	1	Part 63 Subpart DD	Kiln	50	20
B-3300	Env Ops – Kiln	D-460		1.25	1	Part 63 Subpart DD	Kiln	50	20
B-4600	SPC Copolymer	D-840		1.93	1	Part 63 Subpart JJJ	TOX	50	45
B-6600	Quat Plant	T-5		3.4	1	Part 63 Subpart FFFF	Pressure Tank – Atm	30	7.5
B-6800	PDC Hydro	D-436		14.5	2	Part 63 Subpart H	Kiln/THROX	32	High Pressure = 22 Low Pressure = 5
B-7500	Propylene Oxide Purification	V-109		0.265	1	Part 63 Subparts G and H	Kiln/THROX	Pressure set = 0.625 Vacuum set = 0.031	High Pressure = 0.32 Low Pressure = 0.054
B-7500	Propylene Oxide Purification	V-110		0.265	1	Part 63 Subparts G and H	Kiln/THROX	Pressure set = 0.75 Vacuum set = 0.031	High Pressure = 0.577 Low Pressure = 0.054
B-800	Env Ops – Thermal Oxidizer	V-2		0.08	1	Part 63 Subpart DD	BIF	50	10
B-800	Env Ops – Thermal Oxidizer	V-4		1.25	2	Part 63 Subpart DD	BIF	15	6
B-800	Env Ops – Thermal Oxidizer	V-5		1.87	2	Part 63 Subpart DD	BIF	50	6

SUMMARY OF FINDINGS

The following table summarizes the findings and observations of NEIC's on-site inspection and follow-up review of facility-provided files. Areas of noncompliance (AON) pertain to areas or issues identified by NEIC that may have potential compliance implications, but are neither inclusive nor exclusive of all such potential areas or issues. Areas of concern are inspection observations of potential problems/activities that could impact the environment, result in future noncompliance with permit or regulatory requirements, and/or are areas associated with pollution prevention issues. EPA Region 6 will assess the applicability of regulatory requirements based on its review of this report and other technical, regulatory, and facility information.

Areas of noncompliance are designated and organized by number, while areas of concern are designated and organized by letter. These are linked to specific supporting documents, including photographs taken during the NEIC inspection (**Appendices A and B**).

RESOURCE CONSERVATION AND RECOVERY ACT			
AREAS OF NONCOMPLIANCE			
	Regulatory Citation	Finding/Observation	Evidence Reference
1	30 Texas Administrative Code (TAC) § 335.43(a) [40 CFR § 270.1(c)] – <i>Except as provided in § 335.2 of this title (relating to Permit Required), no person shall store, process, or dispose of hazardous waste without first having obtained a permit from the Texas Natural Resource Conservation Commission.</i>	Dow was storing hazardous waste in the Marine area without a RCRA permit. On February 15, 2017, twelve 55-gallon drums labeled “Spent carbon from for Recycle” were observed by NEIC inspectors in the Marine area (Appendix A, photos 3 and 4). Based on that labeling, Dow was managing those drums as if they were not solid waste under “40 CFR 261.2 (c)(3),” presumably as characteristic sludges destined for reclamation. The federal regulations define a carbon regeneration unit as a thermal treatment device. On February 21, 1991, a final rule was promulgated defining “carbon regeneration unit” as a thermal treatment device (56 <i>Federal Register</i> [FR] 7200). According to 56 FR 7200, carbon regeneration units are not exempt reclamation units, and the waste contaminants are being destroyed in the regeneration process. Thermal treatment units require a RCRA permit. Therefore, spent carbon destined for reclamation and treated in a thermal treatment unit does not meet the exemption from solid waste under 40 CFR 261.2(c)(3). Reclaiming the carbon is treatment of a hazardous waste. On January 12, 2017, Dow obtained the test results on a sample of the material in these drums. The sample was analyzed twice using the toxicity characteristic leaching procedure (TCLP, Method	Appendix A – Photographs Taken During Goodnight Inspection Appendix C – Carbon Acceptance Test Report Appendix D – May 4 2017, Email Appendix E – Manifest for Calgon Carbon

RESOURCE CONSERVATION AND RECOVERY ACT

8260B), with tetrachloroethene concentrations of 5.7 and 5.4 milligrams per liter (mg/L) (Appendix C, page 29). This analysis confirms that the spent carbon meets the definition of a RCRA characteristic hazardous waste (EPA hazardous waste [HW] No. D039).

40 CFR § 261.24(a) (as referenced by **30 Texas Administrative Code (TAC) 335.504(3)**) – *A solid waste...exhibits the characteristic of toxicity if...the extract from a representative sample of the waste contains any of the contaminants listed in Table 1 at the concentration equal to or greater than the respective value given in that table...*

EPA HW No.	Contaminant	Regulatory Level (mg/L)
D039	Tetrachloroethylene	0.7

A May 4, 2017, email from Dow (**Appendix D**) states the spent carbon was generated from vapor abatement for maintenance on perchloroethylene tank in September 2015. The drums were shipped back to Calgon Carbon on April 17, 2017 (**Appendix E**) as a hazardous waste (EPA hazardous waste No. D039), which means that the drums were stored in the Marine area for approximately 19 months.

Additionally, the storage of the spent carbon hazardous waste did not meet the less-than-90-day hazardous waste accumulation exemption from permitting, because the container was not marked with the date accumulation began or the words “Hazardous Waste,” as required by 30 TAC 335.69(a). As a result, Dow was engaged in unpermitted storage. And, as noted above, the drums were not shipped until April 17, 2017, beyond the 90-day period.

30 TAC 335.69(a) [40 CFR § 262.34(a)] – *...A generator may accumulate hazardous waste on-site for 90 days without a permit... provided that: ... (2) The date upon which each period of accumulation begins is clearly marked and visible for inspection on each container; and (3) While being*

RESOURCE CONSERVATION AND RECOVERY ACT		
	accumulated on-site, each container and tank is labeled or marked clearly with the words, "Hazardous Waste"	
2	30 TAC § 335.43(a) [40 CFR § 270.1(c)] - Except as provided in § 335.2 of this title (relating to Permit Required), no person shall store, process, or dispose of hazardous waste without first having obtained a permit from the Texas Natural Resource Conservation Commission. The spent carbon drums are hazardous wastes and were stored in an area that does not have a RCRA permit. Dow was storing hazardous waste in a tank and two containers without a RCRA permit. Dow did not label or mark one tank and two containers with the words "Hazardous Waste," a condition for exemption from permitting. 30 TAC 335.69(a) [40 CFR § 262.34(a)] -....A generator may accumulate hazardous waste on-site for 90 days without a permit... provided that: ... (3) While being accumulated on-site, each container and tank is labeled or marked clearly with the words, "Hazardous Waste" On February 8, 2017, tank D-106C, located in A-3200 Chlorpyridine Picloram area, was not labeled or marked with the words "Hazardous Waste" (Appendix B, photographs 4 and 5). The tank was reinsulated in February 2016 and was not re-marked at that time. Dow personnel marked the tank the same day (Appendix B, photograph 6). On February 9, 2017, roll-off 1546, located in B-3300 Environmental Operations, was not labeled or marked with the words "Hazardous Waste" (Appendix B, photographs 15 through 19). The roll-off was being stored in TCEQ permit area No. 22, Container Storage Area. Dow personnel labeled the roll-off with the words "Hazardous Waste" the same day (Appendix B, photograph 29). On February 9, 2017, tank trailer T-12133, located in B-3300 Environmental Operations, was not labeled or marked with the words "Hazardous Waste" (Appendix B, photographs 22 through 27). The tank trailer was being stored in the direct burn area of the kiln (TCEQ permit No. 3). A tag located on the drain pipe at the back of the trailer stated that the material inside the trailer was "D840 Waste Monomer Polymerization Waste." Dow personnel labeled the tank trailer the same day (Appendix B, photograph 30).	Appendix B – Photographs Taken During TeKrony Inspection

RESOURCE CONSERVATION AND RECOVERY ACT

3 30 TAC § 335.43(a) [40 CFR § 270.1(c)] – Except as provided in § 335.2 of this title (relating to Permit Required), no person shall store, process, or dispose of hazardous waste without first having obtained a permit from the Texas Natural Resource Conservation Commission.	Dow was storing hazardous waste in a container without a RCRA permit. One container accumulating hazardous waste at B-4400 Voranol was not marked with the accumulation start date, a condition for exemption from permitting. 30 TAC 335.69(a) [40 CFR § 262.34(a)] – ...A generator may accumulate hazardous waste on-site for 90 days without a permit... provided that: ... (2) The date upon which each period of accumulation begins is clearly marked and visible for inspection on each container On February 14, 2017, the container located at B-4400 Voranol consisted of a metal tote containing hazardous waste. At the time of the inspection, the accumulation start date (12-8-16) was marked on the wall of the building located behind the tote, not on the tote itself (Appendix B, photographs 38 through 41). Dow personnel marked the tote with the appropriate accumulation start date the same day (Appendix B, photograph 44).	Appendix B – Photographs Taken During TeKrony Inspection
4 40 CFR § 265.1087(d) [as referenced by 30 TAC 335.69 (a)(1)(B) and 40 CFR § 262.34(a)(1)(ii)] – Container Level 2 standards. (1) A container using Container Level 2 controls is one of the following: (i) A container that meets the applicable U.S. Department of Transportation (DOT) regulations on packaging hazardous materials for transportation as specified in paragraph (f) of this section. 40 CFR § 265.1087(f) [as referenced by 30 TAC 335.69 (a)(1)(B) and 40 CFR § 262.34(a)(1)(ii)] – For the purpose of compliance with paragraph (c)(1)(i) or (d)(1)(i) of this section, containers shall be used that meet the applicable U.S. Department of Transportation (DOT) regulations on packaging hazardous materials for transportation as follows:	Dow failed to inspect, on the schedule required by DOT rules for portable tanks, one hazardous waste container subject to Subpart CC controls. Dow has determined that the isotainers at B-3300 contain more than 500 parts per million volatile organics, and due to the size of isotainers, these containers are subject to the Level 2 container requirements. Isotainer TRLU 050515-5 was located at the B-3300 Environmental Operations area in container storage area (TCEQ permit No. 3). The 5-year inspection was conducted 2 years and 2 months late (Appendix F). The last hydro test was conducted in August 2009, and this form documents the hydro test conducted in June 2016.	Appendix F – Inspection Record for Isotainer TRLU050515-5

RESOURCE CONSERVATION AND RECOVERY ACT		
	(1) The container meets the applicable requirements specified in 49 CFR part 178—Specifications for Packaging or 49 CFR part 179—Specifications for Tank Cars. 49 CFR § 178.275(j) – Approval, inspection and testing. Approval procedures for UN portable tanks are specified in § 178.273. Inspection and testing requirements are specified in § 180.605 of this subchapter. 49 CFR § 180.605(c) – Schedule for periodic inspections and tests. Each Specification portable tank must be tested and inspected in accordance with the following schedule: (1) Each IM or UN portable tank must be given an initial inspection and test before being placed into service, a periodic inspection and test at least once every 5 years, and an intermediate periodic inspection and test at least every 2.5 years following the initial inspection and the last 5 year periodic inspection and test.	
5	40 CFR § 264.175(b) (adopted by reference, 30 TAC 335.112(a)(8)) – A containment system must be designed and operated as follows: (1) A base must underlie the containers which is free of cracks or gaps and is sufficiently impervious to contain leaks, spills, and accumulated precipitation until the collected material is detected and removed	The containment system under the B-3300 container storage area was not free of cracks or gaps. On February 9, 2017, cracks and gaps surrounding the drain of the containment system under the container storage area were found during a visual inspection (Appendix B, photographs 20 and 21). This drain is connected to a sump that is used to provide secondary containment for the container storage area. Dow personnel fixed the cracks and gaps in the coating the same day (Appendix B, photograph 32).
AREAS OF CONCERN		
A	40 CFR § 264.173(a) (adopted by reference, 30 TAC 335.112(a)(8)) – Management of containers.	Dow collects ash from the hazardous waste kiln and the afterburner of the kiln in open containers in the B-3300 area.
		Appendix B – Photographs Taken During TeKrony Inspection

RESOURCE CONSERVATION AND RECOVERY ACT

	<i>(a) A container holding hazardous waste must always be closed during storage, except when it is necessary to add or remove waste.</i>	The collection containers Dow uses to collect kiln ash consist of open tubs that collect the ash as it exits the process (Appendix B , photograph 28). Each end of the rotating belt is equipped with scrapers that periodically move material into the open tubs. The kiln and ash handling system are constantly running, but the ash is not always dumping into the open tubs. Waste is generated inside the unit and then scraped out as the belt scrapers travel along. Dow contends that waste is continuously being added to the containers so they are allowed to be open.	During TeKrony Inspection
B		A stain located under the cap of the B-4400 Voranol hazardous waste tote could be an indication of leaks or incomplete emptying of the transfer hose. On February 14, 2017, NEIC inspectors observed a stain beneath the cap of the unloading pipe on the tote located in B-4400 Voranol (Appendix B, photographs 36 and 37). At the time of the NEIC inspection, there was no visual leak; however, the stain indicates that releases from the tote have occurred in the past.	Appendix B – Photographs Taken During TeKrony Inspection
C		During the on-site inspection, NEIC performed LDAR monitoring and found one leaking level indicator operating with detectable emissions (Appendix A, photos 1 and 2). On February 14, 2017, Matt Schneider of NEIC observed a reading of 20,000 ppm on the level indicator (tag No. 664843) on the top of the Voranol tote in area B4400. The leak was confirmed by ISS (Dow's LDAR contractor), who observed a reading of 18,099 ppm. Dow provided documents showing the valve packing was leaking (Appendix G) and was replaced on February 17, 2017, and showed a reading of 0 ppm after repair.	Appendix A – Photographs Taken During Goodnight Inspection Appendix G – B44 Tote LeakDas Report
D		NEIC observed leaked material from a sampling line in the Quantanary Amines (Quat) Plant in area B6610. The highest TVA reading that NEIC observed was 100 ppm, above the material on the bucket lid (Appendix A, photographs 6 and 7). The bucket was labeled "DCP and methylene chloride." Dow stated (Appendix D) that the material observed from the blowdown line in area B6610 is a 90 percent dichloropropanol and 10 percent methylene chloride mixture. The flush bucket is used to catch	Appendix A – Photographs Taken During Goodnight Inspection Appendix D – May 4 2017, Email

RESOURCE CONSERVATION AND RECOVERY ACT		Appendix H – B66 AVO LeakDas Report
	blowdown for samples, as well as to catch liquid when the loading hose is disconnected from the carrier container fitting. The contents of the bucket are disposed of into D-58 (a flush drum whose contents are pumped back to the beginning of the finishing portion of the process) immediately following the flush portion of the procedure. Dow's LeakDas report (Appendix H) records the visual leak on February 16, 2017. The report documents that the connection was tightened and no visual leak was observed after the tightening. The leak was monitored again on February 22, 2017 (Appendix I) with a recorded value of 0 ppm.	Appendix I – B6610 AVO Leak Monitoring Results
E	During LDAR monitoring on February 15, 2017, NEIC observed liquid on a control valve in the B75 area. On February 15, 2017, Benita Anderson, representing Dow, wiped the residue off the actuator and returned a few hours later. There was no sign of a leak from the actuator. Dow representative Kent Green inspected the actuator again on March 30, 2017, and there was no evidence of a leak (Appendix J).	Appendix J – Potential AVO at B75 Follow-up
F	Two RCRA-permitted dempsters (tank Nos. 166 and 167) in the Marine area have not been used in 2.5 years. Dow representatives stated the dempsters are RCRA empty, but not clean closed, and are monitored as part of Dow's LDAR program. Dow representatives stated they were attempting to obtain a permit to take the dempsters over the road.	