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DIVISION OF WASTE MANAGEMENT
HAZARDOUS WASTE SECTION

Your Name: Richard Concepcion

Document Category: Facility

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Facility Name/Subject: Clariant Corp. - Mount Holly West

Document Date: 09/07/2016

Description: Compliant TSD Inspection

Author: Richard Concepcion

Branch/Unit: Compliance Branch-Western Region

Facility/Site Address: 625 East Catawba St.

Facility/Site City: Mount Holly

Facility/Site State: North Carolina

Facility/Site Zipcode: 28120

Facility/Site County: Gaston

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Waste Management
ENVIRONMENTAL QUALITY

NORTH CAROLINA DEPARTMENT OF ENVIRONMENTAL QUALITY
DIVISION OF WASTE MANAGEMENT
HAZARDOUS WASTE SECTION (HWS) / COMPLIANCE BRANCH

RCRA INSPECTION REPORT

1. **Facility Information:** Clariant Corporation – Mount Holly West
625 East Catawba Street
Mount Holly, N.C. 28120
NCD 085 074 821, LQG + TSD Facility

P.O. Box 866
Mount Holly, NC 28120

2. **Facility Contact:** Mr. Michael DePalma, Regional Head of ESHA, ISC.
704-822-2113

3. **Inspector(s):** Mr. Sean Morris, NCDENR/HWS
Mr. Michael Bebulin, NCDENR/HWS
Mr. Richard Concepcion, NCDENR/HWS

4. **Survey Participants:** Mr. Clay Dunn, Clariant-WWTP Manager

5. **Date/Time of Inspection:** September 7, 2016 – Arrived: 10:45am Departed: 2:15pm

6. **Date of Report:** September 19, 2016 – Prepared by: Richard Concepcion

7. **Purpose of Inspection:** Compliance Evaluation Inspection

8. **Facility Description:**

On September 07, 2016 I conducted an unannounced compliance evaluation inspection at Clariant Corporation-Mont Holy West, located in Mount Holly, NC. Clariant Corporation-West is located on an approximately 60-acre fence next to Catawba River in Gaston County. The facility currently has approximately 170 employees and the facility operates 24 hours a day, seven days a week. The facility operates under a Non-contact NPDES permit for the discharge of wastewater, from multiple storm water outfalls points into the Catawba River. The facility also operates a pre-treatment wastewater system for discharge to the local municipality system. Wastewater treatment sludge/bio solids has determined to be non-hazardous waste and is collected every five to six weeks by a company named Synagrove Technologies. Synagrove provides the sludge/bio solids to various facilities for land application as o nutrient supplement. The facility is supplied by municipal water service and there are multiple monitoring wells onsite. The facility is located within 500-feet from property residential areas to the north and the west of the plant.

The facility currently manufactures organic specialty chemicals. The chemicals are primarily used for the production of DEET insecticide and pesticides but also include chemical intermediates used in the production of personal care products, cleaning chemicals, and various lubricants. The facility manufactures over 200 different products through batch processing.

Hazardous waste is primarily generated from the DEET production process, off specification and out of date materials, laboratory chemical waste and batch chemicals reactor clean-outs. The facility generates approximately 14,000 kilograms of hazardous waste every six weeks and was operating as a large quantity generator (LQC) at the time of the inspection.

The facility maintains a waste stream spreadsheet that lists hazardous waste types and generation points throughout the facility. The spread sheet allows facility personnel to quickly access hazardous waste profiles for all waste streams. Clariant Corporation-West operates one RCRA Permitted Hazardous Waste Storage Area. The facility's permit renewal was last completed and signed on October 30, 2009.

9. **Waste Type:**

Wates Codes	Description
D001	methanol
D001/D002	waste acetic acid
D002.	various waste corrosive liquids
D001/U002/U029/U036.	waste aerosol
D001.	waste flammable liquid (trimethylamine. ethyl-n-toluidine) *prim *waste stream*
D038/F002/F005/D001/D022.	waste flammable liquid (acetone. Paint)
D003	waste phosphorus pentoxide
D001/D007.	waste oxidizing solid
D007.	waste environmentally hazardous substance liquid
D002/D007/D009/D011.	waste corrosive liquid (sulfuric acid. mercuric sulfate)
D001/D018.	waste solids
D001 /F003/U031.	waste butanol's
F002/F005/D00l /D022/D038.	waste flammable liquid (toluene. isobutanol)
U220/D001.	waste toluene
U002/U003/U154/U213/F002/D001.	waste flammable liquid (acetonitrile. methanol)
D001.	waste flammable liquid (methanol)*primary *waste stream*
U007.	waste toxic liquid (acrylamide)
D009.	waste mercury
P004/P044/P123/U002/U029/U036.	waste aerosols
D005/D007/U188.	waste toxic liquids (barium chloride. chromium)
D001/D003.	waste organic peroxides
PI05.	waste sodium azide
D001.	various labpack waste
U031/F003/D001.	waste butanol's
U154.	hazardous waste solids

10. **Area of Inspection:**

Manifest:

All hazardous waste manifests were reviewed for the past year. The manifests reviewed were in good order and documented approved transporters and TSD facilities. Land Disposal Restriction forms accompanied the manifests.

Transporters:

Transporters Name	Transporter EPA ID Number
STAT. Inc.	NCD 980 799 142
Heritage Environmental	IND 058 484 114
Robbie Wood	ALD 067 138 891
Clean Harbors Environmental Services	MAD 039 322 250
Veolia ES	AZD 000 337 360
Haz-Mat	NCD 000 003 186
Sumter Transport Company	SCD 987 584 778

TSD's

TSD's Name	TSD's EPA Number
EcoFlo, Inc.	NCD 980842 132
Heritage WTI	OHD 980 613 541
Heritage Environmental	IND 093 219 012
Clean Harbors of Baltimore	MDD 980 555 139
Clean Harbors LaPorte	TXD 982 290 140
Clean Harbors Deer Park	TXD 055 141 378
Geocycle, LLC	SCD 003 368 891
Dart Acquisitions, LLC	NCD 121 700777

Waste Minimization:

The facility maintains a written waste minimization plan onsite. The facility uses a self-evaluation program called "Responsible Care Pollution Prevention Code". The program includes various areas of waste minimization self-evaluation and the plan is reviewed or revised on an annual basis. The final plan was listed with a revision date of August 22, 2016.

Weekly Inspections:

Facility personnel maintain a log of weekly hazardous waste storage area inspections. Inspections are conducted at the facility's permitted storage area and one less than 90-day storage area. Inspection records were found to be up to date at the time of the inspection. Weekly inspections of emergency equipment are also conducted and documented. The facility has designated Mr. Wayne Chapman, Clariant contactor with Austin Company, to conduct and document weekly inspections.

Emergency Preparedness:

The facility maintains an internal alarm system and P / A system. The facility maintains pull down fire alarms and phones are located throughout the facility and employees carry two-way radios. Firefighting equipment is available throughout the facility. Both hazardous waste storage areas are in close proximity to fire alarms, fire extinguishers, and phones. The facility is equipped with a sprinkler system supplied by two onsite containment ponds. Emergency drills are conducted regularly and spill kits are located throughout the facility. The facility maintains an emergency response team and training is conducted on a regular basis. Outside emergency response agencies routinely tour the plant. The facility is maintained to prevent fire, explosions, and releases. Arrangements with local emergency response agencies and contractors are documented in the facility's contingency plan and
arrangement letters have been submitted as required by their hazardous waste permit. Emergency arrangement request letters have been submitted to all required local authorities.

No incidents have been reported in the last year.

Training:

The facility has a hazardous waste training program in place. The in-house training program includes either a RCRA training PowerPoint presentation or computer software based training modules. Mr. Clay Dunn typically present the RCRA PowerPoint training to facility personnel. The RCRA PowerPoint training topics included process waste disposal procedures, emergency response procedures, hazardous waste storage area locations, empty container management, satellite accumulation container management, hazardous waste tanker loading and universal waste management. The computer based training module also includes similar RCRA training topics and includes a quiz after completion.

Mr. Dunn explained that class room training and computer based training is usually provided on an alternating basis. The last documented hazardous waste training was presented to approximately 90-employees during multiple sessions throughout May thru July 2016 sign-in sheets were available for review. Clariant has a few contracted employees who are responsible for handling and management of hazardous waste. The facility's training records include RCRA job titles and job descriptions for all required employees. Clariant's training program includes a separate PowerPoint presentation designed for personnel designated as emergency coordinators, specifically those listed as RCRA coordinators in the facility's RCRA contingency plan and Mr. Dunn has developed a training module specifically for employees that may sign hazardous waste manifests working in the DEET production process. They are Mr. Robert Ward, Mr. Phillip Palmer, Mr. Butch Chapman. The last training event for these gentleman was November 19, 2015.

Biennial Report:

The facility submitted their 2015 biennial hazardous waste report on February 24, 2016. The report was available for review at the time of the inspection.

Contingency Plan:

The facility maintains a hazardous waste contingency plan on-site. The plan is prepared by Hart & Hickman, PC on behalf of Clariant Corp. Mr. Jason Sobon, with Hart & Hickman, emailed a final copy of the plan on August 20, 2014. The final plan was listed with a revision date of November 5, 2015 and was also submitted to Mr. Carl Utterback, with the NC HWS-Facility Management Branch, as well as all other required emergency response agencies. The plan includes all required site information and description of the types of hazardous waste managed at the site. The plan also includes emergency contacts, emergency response procedures, emergency equipment types, locations & capabilities and includes the facilities evacuate & emergency on plan/procedures. The plan lists the facility's RCRA emergency coordinators along with their home addresses & phone numbers. The plan also describes specific RCRA coordinator job responsibilities & duties, plan implementation procedures and notification requirements. The plan includes facility diagrams for listing emergency equipment and hazardous waste storage area locations. The plan lists emergency arrangement agreements with local authorities and references arrangement request letters that have been submitted.

Accumulations Areas:

The following hazardous waste satellite accumulations areas (SAA's) were inspected during the visit:

1. Analytical Laboratory: There was a 5-gallon container being used to accumulate off specification / out of date chemicals that was empty.

2. Analytical Hood D: There was no containers in this area.

3. Analytical Hood 6: There was three (3) one gallon used to accumulate flammable liquid (D001). There also was two (2) one gallon used to accumulate D002 hazardous waste. All containers were found to be properly closed and labeled at the time of this inspection.

4. Plant #1 Area #1: There was one 55-gallon container being used to accumulate D003 hazardous aerosol cans that do not contain paint. The container is being stored on the loading dock outside Plant #1. The container is kept inside a flammable material storage cabinet. The container was properly labeled and closed at the time of the inspection. The container is adjacent to operator's office.

5. Plant #1 Area #2: There was one 55-gallon container being used to accumulate D003 hazardous aerosol cans that do not contain paint. The container is being stored on the loading dock outside Plant #1. The container is kept inside a flammable material storage cabinet. The container was properly labeled and closed at the time of the inspection. The container is adjacent to operator's office.

6. Plant #1 Area #3: There was one 55-gallon container being used to accumulate D003 hazardous aerosol cans that do not contain paint. The container is being stored on the loading dock outside Plant #1. The container is kept inside a flammable material storage cabinet. The container was properly labeled and closed at the time of the inspection. The container is adjacent to operator's office.

Hazardous Waste Storage Areas:

There is one hazardous waste storage area being utilized for storage of waste for less than 90-days.

1. Warehouse W4: The area is located inside Warehouse # 4. Fire extinguishers and spill control equipment is located near the area and two-way radios are used for emergency communication devices. The area is clearly labeled as a hazardous waste storage area and is labeled as a non-smoking area.

   The area did not have hazardous waste at the time of the inspection.

Used Oil:

The facility generates used oil from general machinery maintenance. Used oil is accumulated in 330-gallon totes and various sized containers. There were two totes of used oil located just outside of the permitted 365-day storage area. The containers were found to be properly labeled with the words "Used Oil". The containers were nearly empty. Heritage Crystal-Kleen collects used oil and oil filters for recycling and the last documented collection date was February 10, 2016. At that date a total of 520 gallons of used oil was collected.

Universal Waste:

The facility generates universal waste incandescent, fluorescent, and high intensity discharge lamps and universal waste batteries. All universal waste is stored in the Warehouse W4 hazardous waste storage area. Universal waste is collected and managed by Heritage Environmental Services. Manifests were available to show that universal waste is collected at least annually. There were two containers of used lamps, one for four feet lamps and one for eight feet lamps. There were five containers of used batteries and five container of mercury containing devices in the storage area. All of the containers were found to be properly labeled and closed at the time of the inspection. The last document collection dates for used lamps and batteries was on February 23, 2016 and for the batteries was on May 26, 2016. For the ballast the last documented collection date was May 26, 2016.

Benzyl Chloride / Isononanoic Chloride Container Residue Neutralization:

The facility has a SOP neutralization process prepared by their Plant Chemist for the containers that are empty product of Benzyl Chloride and Isononanoic Chloride. This process is in order to safely handle empty containers (55-gallon drum) for off-site transport to a container refurbishing vendor, which last held these chemicals. The neutralization process includes the addition of a neutralization product consisting of a ratio 1:1 Caustic substance with water with a minimum retention time no less of 24 hours but not more than 5 days. At that point the drum effluent will be empty into the plant 5 sump that will pump the remaining neutralization solution to the WWTP.

11. Permitted Units:

The facility maintains one permitted 365-days hazardous waste storage pad. Permit required documents and updated financial information were properly maintained on site. Weekly inspections for the storage area were up to date. The entire facility is fenced for security and the storage area is fenced and remains locked at all times. At the time of the inspection, this storage area had one 25-gallon drum labeled with Sulfuric Acid, one 5-gallon drum labeled Acetic Acid and one 55-gallon drum label with lab solvent. All containers where found Labeled, closed and dated.

The facility also operates four areas referred to as "Red Zone Areas". The areas are located at different locations around the facility and are used to storage waste until a hazardous waste determination is conducted. Waste can only remain in area for 72-hours or less and must be marked with an accumulate starting date and time as specified by the facility's Par B Permit. There was not any hazardous waste in the Red Zone Areas visited during the inspection.

12. Financial Assurance Information:

Closure Cost Estimate

Method	Letter of Credit
Closure Cost Estimate	$217,748
Corrective Action Cost Estimate	$580,192
Date Submitted	February 29, 2016

13. Comments:

- From the Inspection performed on October 16, 2015, the report made by Mr. Sean Morris, all three recommendations where successfully conducted.
- For this inspection we strongly recommend:
  - Regarding the SOP written procedure developed by the Plant Chemist, for the neutralization process performed on the containers that last held benzyl chloride and Isononanoyl Chloride to keep monitoring this process, making sure new process will work and for how long. Evaluate new measurements for drum management of this item.
  - Include the P105 waste code in the Generation and Management Form (GM Form). The P105 waste code was listed in the w section, 11.A but not in the GM form.
  - Keep the (GWMR) Ground Water Monitoring Reports with the facility's hazardous waste records during compliance inspection.
  - The hazardous waste storage area located at Warehouse # 4, at the time of this inspection, there was no waste accumulated to be dispose of. It was observed that the lift truck paddles are affecting the integrity of the structure of the area where the hazardous waste is accumulated. We recommend that the safety manager evaluate any methodology that prevents the lift truck paddles to struck or continue affecting this area. Our concern is based on such carelessness can puncher any hazardous waste drum while waiting for the disposition thereof.

14. Site Deficiencies:

At the moment of the inspection, there were no deficiencies found.

Sept 19 : 2016

Richard C. Concepcion, / DATE
NC HWS-COMPLIANCE BRANCH

SENT BY US MAIL
FACILITY CONTACT

cc: Brent Burch, NC HWS-Compliance Branch Head
Raleigh Files
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