

**HAZARDOUS WASTE SECTION - COMPLIANCE BRANCH
FILE TRANSMITTAL & DATA ENTRY FORM**

Your Name: Heather Goldman

Facility ID Number: NCD990867152

Facility Name: Huntsman International, LLC

Document Group: Inspection/Investigation (I)

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County (if not on report): Mecklenburg

**STATE OF NORTH CAROLINA
DEPARTMENT OF ENVIRONMENTAL QUALITY
DIVISION OF WASTE MANAGEMENT
HAZARDOUS WASTE SECTION**

**LARGE QUANTITY GENERATOR (LQG)
COMPLIANCE EVALUATION INSPECTION (CEI) REPORT**

1. FACILITY INFORMATION:

Name: **Huntsman International LLC**
EPA ID Number: **NCD 990 867 152**
Type of Facility: Large Quantity Generator (LQG)
Facility Location: 3400 Westinghouse Boulevard, Charlotte, NC 28237
Telephone Number: 704-587-5014
County: Mecklenburg

2. AUTHOR OF REPORT: Heather Goldman, Environmental Senior Specialist, NCDEQ
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Date of Report: March 11, 2016

3. FACILITY CONTACT: Marc Kesten, EHS Coordinator, Huntsman Textile Effects
Office: 704-587-5014

4. SURVEY PARTICIPANTS: Marc Kesten – Huntsman; Jeff Bruening – Global EHS Coordinator; Heather Goldman -
ESS NCDEQ

5. DATE OF INSPECTION: February 26, 2016

PURPOSE OF EVALUATION: An evaluation to determine compliance with hazardous waste management regulations (also known as the Resource Conservation & Recovery Act, or RCRA) which are described at Chapter 40 of the Code of Federal Regulations (40 CFR), Parts 260 – 270, 273, and 279; and Title 15 Chapter 13A Hazardous Waste Management Rules (Rules) of the North Carolina Administrative Code (NCAC).

6. DESCRIPTION OF FACILITY: Huntsman International, LLC (Huntsman) is a manufacturer of specialty chemicals for the textile industry. The facility has a distribution, warehousing, and production center. A majority of generated hazardous waste is from materials in the warehouse becoming out-of-date or off-specification materials. Waste acetone is generated in two laboratories. A waste determination is conducted on a list of chemicals that are out-of-date or off-specification. After the waste determination is conducted, the products are deemed waste. Hazardous waste is moved from product shelving to the 180-day Hazardous Waste Storage Area at that time.

At the time of inspection, the facility was notified with the Hazardous Waste Section as a Large Quantity Generator (LQG). The facility recently requested a change in generator status as a Small Quantity Generator (SQG). Records reviewed during the inspection demonstrated that the facility has operated as a SQG since December 2014.

7. General Information:

- Legal owner of facility: Huntsman International, LLC
- Legal owner of property: Huntsman International, LLC
- Number of on-site wells: Numerous monitoring wells – registered with Mecklenburg County
- Water supply (municipal or well): Charlotte Water
- Municipal sewer/septic/on-site treatment facility: Charlotte Water
- Distance to closest off-site well: Monitoring wells on adjacent property
- Number of Employees: 60 employees/contractors

- Operating Shifts: One shift, Monday - Friday
- Closest private residence: approximately 0.2 miles
- Site Acreage: 13.58 acres

8. AREAS OF REVIEW AND INSPECTION:

Manifests: Manifests were reviewed from September 2014 – present. All necessary copies were available and the facility used approved transporters and TSDFs. LDRs were available for review.

Transporters:

Freehold Cartage, Inc.	NJD 054 126 164
Robbie D. Wood	ALD 067 138 891
Maumee Express, Inc.	NJD 986 607 380
Clean Harbors Environmental Services, Inc.	MAD 039 322 250

TSDF:	Rineco Chemical Industries, Inc.	ARD 981 057 870
	Clean Harbors El Dorado, LLC	ARD 069 748 192

Waste Streams:

Waste Ethanolamine		D002
Hazardous Waste Liquids	Silver	D011
Waste Caustic Alkali Liquids	Sodium Hydroxide, EDTA	D002
Waste Corrosive Liquid, Acidic Organic	Polymaleic acid	D002
Waste Flammable Liquid	Acetone, Ethanol	D001, F003
Waste Flammable Liquid	Ethylene Glycol Formate	D001
Hazardous Waste Solid	Mercury, Lead	D008, D009

Waste Minimization: Huntsman maintains a written waste minimization plan on-site. The plan was dated as 8/14/2015 and includes measures to re-sell off specification products and to re-mix unused product back into their processes.

Weekly Inspection Records: Inspections were reviewed from August 2014 through present. Facility records demonstrate that the facility employees are performing inspections of the 180-day hazardous waste storage areas (HWSA) twice a week. The downstairs and upstairs laboratory SAAs are also inspected weekly.

Emergency Preparedness: The facility maintains their emergency equipment to assure operation during an emergency. Automated Fire Systems tests the fire extinguishers annually. A third party contractor conducts quarterly inspection of the sprinkler system. Huntsman conducts annual inspections with the fire department, does a facility tour periodically with the police department, and has emergency medical arrangements with Carolinas Medical Center. Facility personnel carry cell phones. A paging system and an evacuation alarm system are maintained. The facility also maintains spill kits and PPE for their employees. A hazardous waste emergency drill was conducted on 1/28/2015.

The facility has made formal arrangements with local responders. Copies of the arrangement letters were sent to Charlotte Mecklenburg Fire & Police, Carolinas Medical Center, and Charlotte Mecklenburg Emergency Response on April 14, 2014. The letters were sent to the facilities via certified mail and available for review.

Contingency Plan: Huntsman maintains a Waste Management Plan and SPCC Plan on-site that was last revised on 8/14/2014. The facility has a direct alarm to the fire department. The name and phone number of the emergency coordinators and the location of fire extinguishers, spill control equipment, and fire alarms (SQG requirements) are maintained next to a telephone. Marc Kesten, Robbie Vause, and Tiff Charley have been identified as the primary and secondary emergency coordinators, respectively.

Biennial Report: Huntsman submitted their Biennial Report for the waste they generated in 2015 on 2/3/2016. The facility offered for transport 4,076 pounds of hazardous waste in 2015.

Training Records: Huntsman provides annual hazardous waste training to its employees. On May 6, 2015 Marc Keston and Becky Thrower received RCRA and DOT training from Environmental Resource Center. In January 2015 Marc conducted RCRA training for 58 facility employees. More in depth RCRA and fork lift training was provided in May and July 2015 to 22 employees.

Accumulation Area(s): There were three satellite accumulations areas (SAA) observed at the time of inspection. There was one 1-gallon and one 3-gallon container of waste acetone located in the Downstairs Laboratory in separate SAAs. Both containers were closed and labeled. There was one 2.5-gallon waste acetone container located in the Upstairs Laboratory. The container was closed and label.

Storage Area: The facility maintains one designated <180-day hazardous waste storage area (HWSA). During the inspection, the HWSA was empty. The 180-day hazardous waste storage area is located in a diked area with spill control equipment immediately accessible. There was an eyewash station, alarm pull station, and two fire extinguishers in the area. The facility's policy is that all personnel entering the area HWSA has to have access to communication devices.

Universal Waste and Used Oil Management: Huntsman stores used fluorescent lamps on-site. During the inspection there was one box of used lamps. Used lamps were last shipped to Veolia located in Tallahassee, FL for recycling on April 23, 2015.

There was no used oil observed stored on-site at the time of inspection.

Site Deficiencies:

- None.



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3/11/2016
Date

cc: Marc Kesten, Huntsman Textile Effects
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