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# Hazardous Waste Enforcement: U.S. Environmental Protection Agency and Salisbury, North Carolina Personal/Home Care Manufacturing Facility Enter into Consent Agreement

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The United States Environmental Protection Agency (“EPA”) and Innospec Active Chemicals, LLC (“IAC”) entered into an August 24th Consent Agreement (“CA”) addressing alleged violations of the North Carolina hazardous waste regulations. See Docket No. RCRA-04-2020-2106(b).

The CA provides that IAC operates a facility (“Facility”) in Salisbury, North Carolina, that:

... develops, manufactures, and markets products for the personal care, home care, professional cleaning, agrochemical, mining and construction industries.

EPA and the North Carolina Department of Environmental Quality (“DEQ”) are stated to have conducted on June 21, 2019 a Focused Compliance Inspection (“FCI”) at the Facility. The two agencies are stated to have conducted an additional Compliance Evaluation Inspection (“CEI”) on August 6, 2019 at the Facility.

The Facility was stated, at the time of the FCI, to have been generating a spent methanol and isopropyl alcohol (“IPA”) solvent waste mixture as a result of cleaning process tanks used to manufacture calcium and sodium docusates at its Facility. Such spent methanol and IPA solvent mixture is stated to have a flashpoint of less than 140 degrees Fahrenheit and is a D001 characteristic and F003 listed hazardous waste.

IAC is stated to have not determined at the time of the FCI whether the spent methanol and IPA solvent mixture was a D001 characteristic and F003 listed hazardous waste. It is also stated to have not determined whether the waste met the LDR treatment standards. The Facility was stated to be sending the spent methanol and IPA solvent mixture off-site without a hazardous waste manifest or a land disposal restriction notice.

The CA states that at the time of the CEI a 275 gallon container was observed within a satellite accumulation area located in the immediate vicinity of the process tanks that were cleaned with methanol between production batches of sodium and calcium docusate. This container was stated to be collecting spent methanol and IPA hazardous waste.

The container was stated to be labeled with the words “hazardous waste” and marked with an accumulation start date of less than three days from the time of the CEI. Spent methanol and IPA

hazardous waste were stated to not being added to the 275 gallon container at the time of the CEI and it was stated to be open. Further, at the time of the August 6, 2019 CEI, containers of hazardous waste in the Facility upstairs and downstairs' laboratories satellite accumulation areas were not labeled with the words "hazardous waste."

As a result of these alleged findings, violations are referenced in the CA.

IAC is stated to neither admit nor deny the factual allegations in the CA.

A civil penalty of \$68,000 is assessed.

A copy of the CA can be downloaded [here](#).