

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

JAN 15 1999

SUBJECT: Standard Chlorine Reinspection

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THRU: Walter K. Wilkie, Acting Chief *WkW*
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TO: Charles McPhedran
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ENFORCEMENT CONFIDENTIAL

On January 13, 1999, Walter Wilkie, Doreen Au, and myself conducted a reinspection of Standard Chlorine of Delaware (Standard) with respect to compliance with the alleged violations cited in the complaint dated May 18, 1998. We met with the following facility representatives: Mr. Paul Johnston, Environmental Manager; Mr. Robert Touhey, Vice President of Environmental Affairs, and Mr. Tony Penchuk, Acting President.

Background

Since the filing of the complaint, Standard was purchased by Charter Oak Capital Partners on December 2, 1998. Standard has subsequently been renamed Metachem Products, LLC (Metachem). Further, the address of the facility has been changed to 745 Governor Lea Road, New Castle, Delaware 19720. The change of the address from Delaware City to New Castle was to gain more efficient mail handling services for the facility.

I explained to the Metachem representatives that our inspection would only deal with determining the compliance status of the alleged violations stemming from the May 1998 complaint. It was our intention to only focus on the six claims from the complaint that dealt mainly with the Hazardous Organic NESHAP (HON) and CFC industrial refrigeration requirements. Mr. Touhey wanted to clarify that since the sale of Standard to Charter Oak, the facility has had no involvement in the Standard Chlorine litigation process.

Compliance Interview

Mr. Johnston explained the organizational changes that has taken place since the new ownership as they affected the leak detection and repair (LDAR) program at Metachem:

1. Individual maintenance personnel (5) have been assigned to the operations group which is more closely affiliated to the LDAR responsibilities. Response to repairs has been very good and the tracking of the repairs, especially recordkeeping, has improved. In addition, Mr. Touhey's added responsibilities has included the direct supervision of maintenance and engineering staff, which has improved turnaround times on projects.
2. Sealtec is still the contractor used for valves and pumps monitoring. Mr. Johnston continues to conduct monthly and weekly visuals for pumps as well as connectors. In fact, Mr. Johnston recently completed connectors monitoring and has determined that the facility must now return to a yearly monitoring cycle because the leak rate exceeded 0.5% for connectors.
3. The Foxboro 108 is used for the LDAR program.
4. The facility has continued to reduce the number of pieces of equipment subject to LDAR. Total valves and pumps for the facility is 1312 and connectors are 2600.
5. As for CFC facility use, the facility has not handled CFCs since 1996. Vendors have picked up all CFC storage from site. All CFCs work being done on site is being conducted by contractors. The current contractor is York.
6. Mr. Johnston has instituted personnel training on capping open-ended valves or lines for maintenance workers. Process supervisors are now responsible for walking through the units to ensure the lines and valves are properly capped or they must replace them.

Compliance Review

The following are the six claims from the complaint:

1. Failure to cap open-end lines and valves. A walk-through of the facility was conducted and visual inspection showed no uncapped lines or valves. Facility is currently in compliance.
2. Failure to maintain Method 21 calibration records. Calibration records for both Sealtec and Mr. Johnston were reviewed. Facility is currently in compliance.
3. Failure to maintain connectors monitoring schedule. Mr. Johnston provided process diagrams to depict how connectors are monitored and completion tracked. Facility is currently in compliance.
4. Failure to maintain LDAR records. Logs for LDAR records were reviewed. We were able to trace when a leak was detected through first attempt of repair, to work order issued for parts, to final repair and retest. Facility is currently in compliance.
5. Percent leak rate for pumps were improperly changed. The facility has now

returned to facility-wide basis for calculating percent leak rate for pumps. Facility is currently in compliance.

6. Carrier Sanvik Belt refrigeration unit, leak in excess of 35%, repaired without shutdown or mothballing, no initial verification tests or follow-up.

Conclusions & Recommendations:

The January 13, 1999 reinspection of Standard Chlorine did not identify any violations of the HON. However, a January 14, 1999 Section 114 Request for Information letter and response on CFC (Part 82) issues indicate that CFC violations had continued under Standard Chlorine's ownership as to several CFC-related repairs subsequent to EPA April 1996. Although EPA has not identified any Clean Air Act violations since Metachem's ownership began in 12/98, EPA has not found any evidence showing that work practices at the facility have changed or will change.