**Background Document on Facility, Potential Problem, and Site Inspection**

**Anonymous Tip**

On March 2, 2023 the Plume County Air Pollution Control Department (PCAPCD) received an anonymous tip from a person claiming to be an employee of Acme Chemical Company (ACC) located at 432 Creek Road in Peopleville, CA. The caller indicated that the company was demolishing an old production line that might contain asbestos and that the material was being collected to be disposed of somewhere on the plant property. The caller also said the work must be going on at night since when he gets to work in the morning more demolition of the production line has been completed than the previous day. There was also a rumor among the employees the removed material was disposed of in fields on the facility’s property.

**Plant Operations**

The ACC plant is located on 220 acres with front footage on Creek Road. The plant has an administration building, three production buildings and a warehouse. Behind the production area is 140 acres of open fields and ravines. The back of the plant property abuts the Spring Creek, which is a source of drinking water for the town of Peopleville.

ACC produces carbamate pesticides such as carbaryl, carbofuran, and methomyl. Carbaryl is a white crystalline solid commonly sold under the brand name Sevin. ACC has four production lines. Three lines are currently operational. The fourth line has not been operational for 5 years. It is not clear if this line contains asbestos material. ACC has recently informed the PCAPCD that they are planning to construct a new production line to meet their increasing pesticide sales.

**Permit Status**

ACC received the permits required by PCAPCD for their current operation on January 2, 2023. ACC indicated that they would apply for a permit for the planned new production line prior to the start of new construction. The plant manager, Mr. Robert Jones, signed the permits.

**Previous Site Inspection, and Reported Problem**

The ACC plant was last inspected by the PCAPCD on February 2, 2023. This was a complete annual pre-announced inspection including review of records and all permit conditions.

The company has a Plume County permit to accept clean landfill material that they use to fill in the ravines behind the plant’s operational area. The plant uses heavy dirt moving equipment to do this work.

The only previous problem identified at the facility was a reported spill that occurred two and a half years ago. This occurred one month after the facility received their operating permit from the Plume County Toxics Division. At the time this department conducted a follow –up inspection and found a detectible level of the pesticide carbaryl. They fined the company $2000 and required the company to hire a contractor to remove and decontaminate ten cubic yards of soil. This cost the company $30,000. The company appealed the decision but it was denied. ACC prefers to use their hourly workers to do this type of work.

**Inspection Activities**

Based on the anonymous tip regarding the alleged asbestos demolition and renovation, the PCAPCD conducts an unannounced inspection on April 11, 2023. Upon arriving at the facility, the inspection team is told the plant manager is not immediately available, but they are given consent to inspect the suspect production line. The team conducts the inspection of the production and make the following observations: 1) more than 15 square feet of material was being removed that appeared to be asbestos, 2) the material being removed was not wetted, and 3) the material was not placed in bags labeled “asbestos containing material”. After making these observations, the team decides to interview the plant manager (Mr. Jones) to collect more information about the alleged asbestos demolition and renovation at the site. Based on the interview, the team determined they should:

**1)** Talk to the facility Gate Guard (Mr./Mrs. Jim/Ann Rose) to determine if he/she has any information regarding the alleged disposal activity, and **2)** take samples of the alleged area where the suspect material was disposed of on plant property.

**TIMELINE**

**During the Practical Exercise use the actual TIME when the following events occurred, but use the DATES BELOW when writing the inspection report:**

1-2-2023 PCAPCD CAA and CWA permits issued to ACC

2-2-2023 PCAPCD annual inspection of ACC

3-2-2023 Anonymous Tip to PCAPCD

4-11-2023 PCAPCD inspection (for cause based on anonymous tip)

4-11-2023 PCAPCD analyzes samples

4-11-2023 PCAPCD completes inspection report

7-30-2023 PCAPCD files case with court