

April 2006



FACT SHEET

Modification to the Resource Conservation and Recovery Act (RCRA) Hazardous Waste Management Permit for Aristech Chemical Corporation (Owner) and Sunoco, Inc. R&M (Operator) Haverhill, Ohio.

EPA ID Number: OHD 005 108 477

Introduction

The U.S. Environmental Protection Agency (U.S. EPA) and the Ohio Environmental Protection Agency (OEPA) have prepared this fact sheet to inform the public of the process involved in issuing a modified Resource Conservation and Recovery Act (RCRA) Hazardous Waste Management Permit.

The Solid Waste Disposal Act was amended by RCRA in 1976, further amended by the Hazardous and Solid Waste Amendments (HSWA) of 1984. Hazardous Waste and Consolidated Permit Regulations were promulgated on May 19, 1980.

On June 30, 1989, the State of Ohio received final authorization pursuant to Section 3006 of RCRA, 42 USC § 6920, and 40 CFR Part 271, to administer the pre-HSWA RCRA hazardous waste program. However, the State of Ohio has not yet been authorized to administer certain HSWA regulations, such as the Boilers and Industrial Furnaces regulations, commonly known as the BIF Rule.

On October 21, 2004, the U.S. EPA issued a federal RCRA permit to Aristech Chemical

Corporation (Owner) and Sunoco, Inc. (Operator) for the BIF units at the facility located in Haverhill, Ohio. The Owner and Operator will be referred to as Aristech/Sunoco or Permittees.

The OEPA adopted the BIF Rule on August 31, 2004. The OEPA regulates BIF facilities using Permit-By-Rule.

The BIFs are currently operating under RCRA permit conditions. On May 20, 2005, Aristech/Sunoco proposed a Class 3 permit modification to the RCRA permit in accordance with 40 CFR § 270.42, allowing the Permittees to modify Boiler UC for burning heavy and light hydrocarbon wastes concurrently, thus streamlining waste burning and steam production from the existing boilers. The OEPA received Class 3 permit modification request on November 30, 2005.

The U.S. EPA and OEPA have reviewed the proposal including a revised trial burn plan and determined that the permit modification request met the requirements of 40 CFR § 270.42 and OEPA's Permit-By-Rule requirements.

Background

Aristech Chemical Corporation ("Aristech") owns a multiple-product integrated chemical manufacturing facility in Haverhill, Ohio. The Haverhill plant is located in southern Ohio along the Ohio River bordering Kentucky. Chemical production began in 1962 by the Oxo Chemical Company, which was purchased by United States Steel Corporation (USSC) in 1965.

USSC formed its USS Chemicals Division in 1966, making the Haverhill facility a major part of its industrial chemicals business. In 1986, Aristech succeeded to the ownership of the Haverhill plant. In May 1995, the ownership of Aristech was transferred to Mitsubishi Corporation. Sunoco, Inc. acquired all of the stock of Aristech from Mitsubishi on January 1, 2001. Aristech continues to exist as a wholly owned subsidiary of Sunoco, and continues to own the land and appurtenances at the facility. The name of the plant was changed to Sunoco Chemicals - Haverhill. On February 27, 2002, Sunoco, Inc. (R&M) became the operator of the facility.

Facility Description

Steam needed for the manufacturing processes is generated from six (6) on-site package boilers and a thermal oxidizer. Four of the 6 boilers burn hazardous waste generated on-site as a supplemental fuel to natural gas.

The Haverhill facility generates two (2) distinct types of hazardous waste fuels, namely light hydrocarbons (LHC) and heavy hydrocarbons (HHC). LHC fuel exhibits the RCRA characteristics of ignitability (D001) and toxicity for benzene (D018) and methyl ethyl ketone (D035). LHC also includes waste oil which is not regulated under RCRA. HHC fuel consists of listed hazardous waste (K022), characteristic wastes (D018), and wastes not regulated under RCRA.

The hazardous waste burning boilers are designated as UA, UB, UC and UE and are

subject to 40 CFR Part 266, Subpart H: Hazardous Waste Burned in Boilers and Industrial Furnaces, commonly referred to as the BIF Rule.

The hazardous waste fuels (LHC and HHC) are stored in on-site storage tanks. Samples are taken for analysis of constituents including the regulated metals. LHC and HHC fuels are pumped from the tanks to the boiler burners, atomized, and burned in the boilers. There are vent controls for these tanks.

Basis for Decision to Issue the Modified RCRA Permit

The permittees have processed the Class 3 permit modification request in accordance with 40 CFR § 270.42. The modified Boiler UC must meet the requirements of applicable BIF Rule. In addition, the modified permit must be protective of human health and the environment.

Tentative Decision:

Subject to public notice and comment under 40 CFR § 124.10, and under the authority of the Resource Conservation and Recovery Act as amended by the Hazardous and Solid Waste Amendments of 1984 ("HSWA"), the U.S. EPA proposes to issue a modified RCRA permit to the Permittees for the operations of the BIF facility in Haverhill, Ohio. The term of this modified permit is no more than ten years from the effective date of the permit.

Procedures for Reaching a Final Permit Decision:

This draft RCRA hazardous waste permit is based on the administrative record, which consists of this fact sheet, the permit modification request and other data the facility owner/operator has submitted, and other relevant material that the U.S. EPA has assembled. A copy of the permit modification request and draft modified permit is available locally for viewing at the Portsmouth Public Library,

Wheelersburg Branch, 666 Center Street, Portsmouth, OH 45694. Copies of the draft permit and fact sheet are also available from the U.S. EPA at the address given below. The official administrative record supporting the U.S. EPA's tentative decision is maintained at the U.S. EPA's Regional office at the address listed below.

Comments on this proposed action may be submitted to the addresses listed below, not later than _____.

After the close of the public comment period, the U.S. EPA will review and consider all comments received before making a final permit decision. The U.S. EPA will also prepare and send to all commenters a document responding to significant comments received during the public comment period. Those who submitted written comments during the official comment period or made a statement at the hearing will be notified of any final decision. Within 30 days of a final decision, any person who submitted written comments or made a statement at the hearing may petition the U.S. EPA's Environmental Appeals Board to review the decision.

Comments, requests for information, and requests for copies of the draft permit and fact sheet should be made to:

Mr. Wen Huang, P.E.
Waste Management Branch (DW-8J)
Waste, Pesticides, and Toxics Division
U.S. Environmental Protection Agency,
Region 5
77 West Jackson Boulevard
Chicago, Illinois 60604-3590
312-886-6191

or

Ms. Pam McCoy
Division of Hazardous Waste
Management

Ohio Environmental Protection Agency
122 S. Front Street
Columbus, OH 43216-1049
(614) 644-3846

A copy of the draft permit can be found on the U.S. EPA web site at:

<http://www.epa.gov/reg5rcra/wptdiv/permits/index.htm>

A copy of the draft permit can be found on the Ohio EPA web site at:

<http://www.epa.state.oh.us/dhwm/permitpubliccomment.html>