



Facility Fact Sheet

SI Group, Inc.

725 Cannon Bridge Road

Orangeburg, Orangeburg County, South Carolina

Draft Hazardous Waste Permit

Facility ID SCD 043 384 072

The South Carolina Department of Health and Environmental Control (DHEC) and the U.S. Environmental Protection Agency, Region 4 (EPA) have written a draft Hazardous Waste Permit for SI Group, Inc. located in Orangeburg, South Carolina. DHEC and EPA have drafted a hazardous waste permit to comply with the South Carolina Hazardous Waste Management Act and Regulations, and the Federal Resource Conservation and Recovery Act (RCRA), as amended by the Hazardous and Solid Waste Amendments (HSWA). EPA has drafted the federal HSWA portion of the RCRA permit for the hazardous waste industrial boiler at SI Group, Inc., which is also reflected in Module 4 of the DHEC Permit.

DHEC has not requested to be authorized by EPA for the requirements at 40 C.F.R. Part 266, Subpart H regarding the treatment of hazardous waste in boilers and industrial furnaces. As a result, EPA issues the portion of the Permit covering those provisions of RCRA for which DHEC does not have authorization. Together, the EPA Permit and the DHEC Permit comprise the full RCRA Permit for SI Group, Inc.

This fact sheet explains the hazardous waste permitting process and the conditions of the two draft permits. Comments on improving this fact sheet are welcome during the public comment period.

I. Hazardous Waste Permitting Process

DHEC and EPA jointly regulate hazardous waste activities at permitted facilities in South Carolina.

The permitting process enables DHEC and EPA to evaluate the ability of a facility to comply with state and federal regulations.

After a hazardous waste permit application is received and determined to be complete, DHEC and EPA write a draft RCRA permit containing conditions that the facility must follow.

The public is given forty-five (45) days to review and comment on the facility's permit

application and the draft permit(s) before DHEC and EPA jointly make a final permit decision.

Citizens may request a public hearing to learn more about the facility during the public comment period.

DHEC and EPA encourage all interested persons to participate in the permitting process.

II. Facility Description

SI Group, Inc. is a specialty chemical manufacturer located at 725 Cannon Bridge Road, Orangeburg, South Carolina.

Numerous organic chemicals, such as Carbon Tetrachloride, are used in the manufacturing process at SI Group, Inc. resulting in the generation of hazardous wastes which are managed on-site in tanks and treated in an industrial boiler.

RCRA establishes standards which define acceptable management of hazardous waste for property owners and operators that generate, store, treat or dispose hazardous waste identified in the RCRA regulations. RCRA requires owners and operators to have a permit that specifically addresses management of hazardous waste on their property.

SI Group, Inc. is being issued a permit for the hazardous waste activities on their property in tanks and treatment of hazardous waste in an industrial boiler.

Additionally, SI Group, Inc. is responsible for cleaning up contamination through a process called Corrective Action. The RCRA Permit will include Corrective Action requirements specifically for SI Group, Inc. The Corrective Action process is described in SI Group, Inc.'s hazardous waste permit. DHEC oversees all remediation activities at the site.

The objective of Corrective Action at SI Group, Inc. is to evaluate the nature and extent of contamination and, if needed, to put corrective measures and remedies in place that will protect human health and the environment.

III. Facility's Hazardous Waste Permit History

DHEC and EPA jointly issued a RCRA Permit to Albemarle Corporation on February 27, 2006. In 2014, SI Group, Inc. purchased the site from Albemarle Corporation and the RCRA permit was modified on September 1, 2014 to reflect the change of ownership.

SI Group, Inc. will continue to operate under the conditions of the 2006 RCRA permit until a renewal permit becomes effective.

Hazardous waste permits issued by DHEC and EPA are effective for a ten-year period but can be administratively continued until a renewal permit becomes effective.

IV. Draft Permit Requirements

There will be **no new hazardous waste activities at SI Group, Inc.** as a result of the draft permit.

The draft permit includes requirements based on any new regulations that have become effective since the facility's last permit was issued.

A brief outline of the draft permit conditions is provided in the attached tables. These conditions include the following specific requirements:

1. Hazardous waste storage and treatment in tanks.

SI Group, Inc. will be allowed to continue storage and treatment (by blending) of hazardous waste in four (4) tanks.

2. Hazardous waste treatment in Industrial Boiler.

SI Group, Inc. will be allowed to continue to treat hazardous wastes generated at the Facility in an industrial boiler.

3. Identification of solid waste management units (SWMUs) and areas of concern (AOCs) and Corrective Action for those units.

SWMUs and AOCs are areas where contamination has been released to the environment or is being assessed for releases to the environment.

There have been 165 SWMUs and eight (8) AOCs that have been identified at SI Group, Inc. Corrective Action for these units is detailed in the draft permit.

Included with this draft permit renewal is the proposed selection of remedies for four units (SWMUs 22, 24, 26 and AOC F). SI Group, Inc. has prepared a Statement of Basis that provides a summary and justification for each of the selected remedies.

4. Waste minimization.

SI Group, Inc. is required to minimize the generation of hazardous wastes at the Facility.

5. Land disposal restrictions.

SI Group, Inc. is prohibited from land disposing hazardous wastes exceeding regulatory limits.

6. RCRA organic air emission standards.

SI Group, Inc. is allowed to manage hazardous waste emissions from tanks using a closed-vent system to an air emission control device subject to the RCRA air emission control standards.

V. Public Participation

The permit application and draft permit are available for public review and comment from **October 29, 2020 through December 14, 2020.**

DHEC and EPA placed a joint public notice in *The State* and *Orangeburg Times and Democrat* newspapers on October 29, 2020, announcing the beginning of the public comment period.

Citizens may request a public hearing to learn more about the Facility, the permit application and draft permit during the comment period.

Written comments or a request for a formal public hearing must be submitted no later than **December 14, 2020**, and should be addressed to

Ms. Stacey French, PE, Director, Division of Waste Management at the following address:

SC DHEC
Bureau of Land and Waste Management
2600 Bull Street
Columbia, SC 29201
Phone: (803) 898-0238
E-Mail: FrenchSL@dhec.sc.gov

The draft permit, permit application and other related information are available for review through **December 14, 2020**, at the DHEC Columbia Office listed above and at the following location:

SC DHEC
Midlands EA Orangeburg Office
1550 Carolina Ave
Orangeburg, SC 29115
(803) 533-5480

This fact sheet, the draft permit, permit application and the public notice may also be viewed on the following websites:

<https://apps.dhec.sc.gov/Environment/PublicNotices>

<https://www.epa.gov/aboutepa/about-epa-region-4-southeast>

Anyone who would like to be placed on DHEC's mailing list to receive future hazardous waste public notices concerning this Facility should submit a written request to the attention of Ms. Norma West at the above DHEC address in Columbia or by e-mail at: westnj@dhec.sc.gov.

VI. Procedure for Reaching a Final Permit Decision

All written comments received by **December 14, 2020** will be considered before a final permit decision is made.

DHEC and EPA will not finalize their decision until after review of and response to all received written comments. After consideration of the public comments that are received, the comments will be summarized, and responses will be provided in a Response to Comments

(RTC) document. The RTC document will be drafted after the conclusion of the public comment period and will be incorporated into the Administrative Record. All persons submitting comments will be notified of DHEC's and EPA's final permit decision. The final permit decision shall become effective thirty (30) days after issuance.

Once DHEC and EPA make a final permit decision, notification will be provided to:

- The facility;
- Each person who submitted written comments; and,
- Anyone who has requested to receive notice of the final permit decision.

Any affected person who wishes to appeal the final permit decision may do so by filing a written request for final review per the appeal procedures included with the final permit decision notification.

VII. Summary of Draft Permit Conditions

The draft permits from both DHEC and EPA are divided into modules. Each module and a brief explanation of the permit conditions for that module are listed in the tables below for both the DHEC Permit and the EPA Permit. The regulation that the condition(s) must comply with is also noted.

1. DHEC Hazardous Waste Management Permit Conditions.

Module 1	General Permit Conditions	Conditions of this Module define and contain standard administrative conditions that apply to all hazardous waste management facilities. <i>(R.61-79.270.30)</i>
Module 2	General Facility Conditions	Conditions of this Module apply to all facilities that treat, store or dispose of hazardous waste. <i>(R.61-79.264)</i>
Module 3	Tanks	Conditions of this Module define the requirements of operating and closing hazardous waste storage and treatment tanks. A chart is included in this Module that identifies each tank with its capacity as well as other information for each tank. It contains general information along with schedules and required documents to be maintained by the Facility. <i>(R.61-79.264)</i>
Module 4	Industrial Boiler	Conditions of this Module establish specific operating controls and emission standards for the operation of the industrial boiler. The Conditions of this Module apply to hazardous waste treated in industrial boilers used to recover energy. <i>(R.61-79.266)</i>
Module 5	Corrective Action for Solid Waste Management Units & Areas of Concern	Conditions of this Module require the Facility to implement Corrective Action measures, when necessary. <i>(R.61-79.264)</i> The objective of the Corrective Action program at a hazardous waste management facility is to evaluate the nature and extent of releases of hazardous waste and/or constituents and, if necessary, to put corrective measures in place that will protect human health and the environment.
Module 6	Waste Minimization	Conditions of this Module require the Facility to have a program in place to reduce the volume and toxicity of hazardous waste generated and that the Facility's treatment, storage or disposal method minimizes threats to human health and the environment.

		<i>These conditions are governed by Section 44-56-170(A) of the 1976 South Carolina Code of Laws, as amended.</i>
Module 7	Land Disposal Restrictions	Conditions of this Module ensure that wastes identified in these provisions are not disposed in a land-based unit or otherwise managed unless certain requirements are met. (R.61-79.268)
Module 8	RCRA Organic Air Emission Standards	Conditions of this Module ensure that organic air emissions from hazardous waste containers and tanks are controlled. (R.61-79.264, Subpart CC)

Additional information concerning all hazardous and solid waste units and activities at the site is included in the Facility's permit application.

2. EPA Industrial Boiler Permit Conditions

Permit Cover Page	Authority & Term	The Cover Page cites authority for issuance of the EPA Permit and establishes the term of the permit, which is ten (10) years.
Module 1	Standard Permit Conditions	Conditions of this Module set forth standard conditions applicable to all hazardous waste management facilities (e.g., duty to comply, duty to allow access, etc.). Each Condition specifies the exact authority to require the Permittee's compliance with the Condition. (40 C.F.R. Parts 124 and 270)
Module 2	General Facility Conditions	Conditions of this Module establish the minimum national standards which define the acceptable management of hazardous wastes. The standards apply to owners and operators of all facilities which treat, store, or dispose of hazardous waste, unless specifically provided otherwise. (40 C.F.R. Part 261, Part 264, Subparts B – H, and Part 266, Subpart H)
Module 3	Industrial Boiler Requirements	Conditions of this Module establish unit-specific operating controls and emission standards for the operation of the Facility's industrial boiler. The Conditions of Module 3 apply to hazardous waste treated in industrial boilers used to recover energy as required by 40 C.F.R. Part 266, Subpart H. (40 C.F.R. §§ 270.22, 270.10(k) & 270.32)

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