

**U.S. EPA HAZARDOUS SOLID WASTE AMENDMENTS (HSWA)
FEDERAL CORRECTIVE ACTION PERMIT RENEWAL
FACT SHEET**

FACILITY: Exxon Mobil Centreville Landfarm
10987 Highway 24 East, Centreville, Mississippi
EPA I.D. Number: MSD 083 543 009

OWNER/OPERATOR: Exxon Mobil Corporation

I. INTRODUCTION

This Fact Sheet is prepared for a Federal draft permit developed by the U.S. Environmental Protection Agency (EPA) Region 4 pursuant to the 1984 Hazardous and Solid Waste Amendments (HSWA) to the Resource Conservation and Recovery Act (RCRA). The EPA invites the public to review and comment on the draft HSWA Permit written for Exxon Mobil Corporation (hereafter called the “Permittee”), which owns and operates the facility located at 10987 Highway 24 East, Centreville, Mississippi (the Facility). The EPA I.D. Number for this Facility is MSD 083 543 009. This draft HSWA Permit renews the HSWA Permit that was last renewed on September 8, 1998, and administratively continued pursuant to 40 C.F.R. § 270.51.

In Mississippi, implementation of the environmental permitting regulations under RCRA is shared between the Mississippi Department of Environmental Quality (MDEQ) and the EPA. The State of Mississippi has been authorized by the EPA to issue permits for the operation, closure, and post-closure care of Hazardous Waste Management Units (HWMUs), while the EPA retains authority to issue permits requiring corrective action for releases from Solid Waste Management Units (SWMUs) and Areas of Concern (AOCs). SWMUs are any units which have been used for the treatment, storage or disposal of solid waste at any time, irrespective of whether the unit is or was intended for the management of solid waste. AOCs are areas having a probable release to the environment of a hazardous waste or hazardous constituent which is not associated with a SWMU and is determined to pose a current or potential threat to human health or the environment.

The EPA HSWA Permit is a companion permit to the MDEQ-issued Post-Closure Permit issued in 2009 covering the post-closure care of the nineteen land treatment units.

II. REQUEST FOR PUBLIC COMMENTS

The draft HSWA Permit, which is explained below in Sections V through VII of this Fact Sheet, is subject to change based on information received as a result of public participation. Therefore, the EPA is soliciting all relevant information, including public comment, to ensure that the draft HSWA Permit complies with all State and Federal regulations. Any and all comments are encouraged by the public. The forty-five (45) day public comment period on the draft HSWA Permit begins on **November 19, 2020**, and ends at midnight on **January 2, 2021**. Persons wishing to comment on the draft HSWA Permit during the 45-day public notice and comment period are invited to submit comments in writing

to:

Kevin Greaney
US EPA – Region 4
Atlanta Federal Center
61 Forsyth Street, SW
Atlanta, GA 30303
greaney.kevin@epa.gov

For additional information on the draft HSWA Permit and its requirements, the public is encouraged to review the Administrative Record for the draft HSWA Permit, which is available at the locations listed in Table 1 below.

Table 1. Locations for Administrative Record on the draft HSWA Permit		
Online	Local	STATE
https://semspub.epa.gov/src/collection/04/AR66542	Centre ville Town Hall 1 Municipal Drive Centre ville, Mississippi 39361 Hours: Mon. – Fri. 8:00 a.m. to 3:45 p.m. *Availability of local repository could be limited due to local COVID-19 restrictions.	Mississippi Department of Environmental Quality 515 East Amite Street Jackson, Mississippi 39202 Hours: Mon.-Fri. 8:00 a.m. to 5:00 p.m. Contact Deidre Thompson to arrange for viewing files on record at the MDEQ. Phone: (601) 961-5758 Email: dthompson@mdeq.ms.gov

III. PUBLIC MEETING/HEARING

No public meeting is currently scheduled at this time, but the public can request a formal public hearing on the draft HSWA Permit. Such a request must be made in writing and must state the nature of the issues to be raised during the hearing. Requests must be submitted to Kevin Greaney at the EPA address listed in Section II above and must be postmarked/sent by the deadline for the public comment period. If a public hearing is held, the time and place of the hearing will be published at least thirty (30) days prior to the hearing.

IV. POST PUBLIC COMMENT PERIOD – FINAL DECISION

The EPA will not finalize its decision until after review of and response to all received written comments. After the EPA’s 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. Issuance of the final permit will be in accordance with 40 C.F.R. § 124.15. All persons submitting comments will be notified of the EPA’s final decision. The final permit decision shall become effective thirty (30) days after the service of notice of the decision unless a later date is specified or review is requested under 40 C.F.R. § 124.19. If no comments are received

requesting a change in the draft permit, the final permit shall become effective immediately upon issuance.

V. SUMMARY OF HSWA PERMIT

This draft HSWA Permit contains the following components:

➤ HSWA Permit Cover Page

The Cover Page cites authority for issuance of the HSWA Permit and establishes the term of the permit, which is ten (10) years.

➤ PART I. Standard Permit Conditions

Part I of the HSWA Permit sets 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. Unless otherwise specified, all citations refer to the regulations as codified in Title 40 of the Code of Federal Regulations (40 C.F.R.). Mississippi has incorporated these federal regulations by reference and they have been authorized as part of the Mississippi Hazardous Waste Program at 11 Miss. Admin. Code Pt. 3, Ch. 1.

➤ PART II. Corrective Action

Part II of the HSWA Permit sets forth the specific corrective action requirements with which the Permittee must comply to address releases from SWMUs and AOCs that have been identified at the Facility. Specifically, HSWA Permits can require any of the following corrective action activities for any SWMUs or AOCs:

- **Confirmatory Sampling** to determine if a release has occurred.
- A **SWMU Assessment Report** to report and/or investigate a newly identified SWMU.
- **RCRA Facility Investigation** to determine the scope and extent of a release.
- **Interim Measures** to minimize or prevent further contamination or exposure while long-term remedies are evaluated.
- **Corrective Measures Study** to identify and evaluate potential remedial alternatives for the releases that have been identified at the Facility.
- A **Remedy** to implement corrective measures necessary for the protection of human health and the environment.

The authority to investigate/clean up contamination from SWMUs or AOCs extends to contamination on-site, as well as to contamination that has migrated off-site from the Facility.

VI. FACILITY BACKGROUND

Facility Description

The Facility consists of approximately 240 acres located in a rural area of Centreville, Mississippi. The property was originally owned by Rogers' Rental and Landfill (RRL) Company. RRL received miscellaneous waste streams from separate generators at discrete intervals in the early 1970s, which they disposed of in landfills on the eastern portion of the 240-acre parcel. Beginning in 1976, RRL contracted with Exxon Mobil, U.S.A. to receive, transport, dispose, and treat sludge generated from wastewater treatment at the Exxon Mobil Refinery in Baton Rouge, Louisiana. These sludges were a listed hazardous waste (K048); therefore, RRL was required to obtain a RCRA operating permit for land treating hazardous waste on the engineered hazardous waste landfarm.

The RRL hazardous waste landfarm was constructed of 19 land treatment plots and of 19 man-made surface water ponds (also called the "NPDES ponds"). The hazardous waste was incorporated into the land treatment plots by mixing it uniformly into the upper soil layer. Hazardous waste landfarming activities resulted in groundwater being contaminated with heavy metals, including mercury and cobalt. In 1990, the hazardous waste landfarm ceased receiving waste and commenced closure activities. The landfarm is currently regulated under a MDEQ Post-Closure Permit, which addresses groundwater contamination resulting from landfarming activities. Exxon Mobil Corporation has since purchased the RRL hazardous waste landfarm and has assumed all environmental liability for its clean-up and remediation.

The NPDES ponds are designed to mitigate hazardous waste migration from surface water run-off from the land treatment plots by collecting all the rainwater within these man-made ponds. Furthermore, these 19 surface water ponds are interconnected, one pond flowing into another until the final discharge point from the South Pond into Thompson Creek (see fig. 1). Water in the South Pond must meet MDEQ National Pollutant Discharge Elimination System (NPDES) Permit limits prior to discharge, which includes limits established for hazardous constituents found in the K048 hazardous waste. Therefore, surface water releases are regulated by the MDEQ NPDES Permit.

Hazardous waste that makes its way into the ponds may settle to the bottom, which can create an ecological risk to fish and animals that reside in and/or visit the ponds. The ponds contain known wildlife, including native alligators, fish, and birds. In the 1990s, RRL drained the pond water and dredged its sediments; however, no sampling reports were ever submitted to the EPA. Furthermore, these ponds have continued to receive surface water run-off for over twenty years since the dredging occurred. Therefore, the level of ecological risk present today is unknown. As discussed below, this HSWA Permit requires an investigation of pond bottom sediments for hazardous constituents in order to assess ecological risk.

Another area of the Facility requiring action under this HSWA Permit is the Benzoic Acid Residue Landfill (BARL), located on the eastern portion of the 240-acre parcel. Approximately 20,000 gallons of off-grade benzoic acid residue was disposed in this landfill in 1976. The top three feet of the landfill have been excavated and a low permeability cover was installed to reduce storm water infiltration. As discussed below, this Permit requires the Permittee to evaluate alternative remedies and long-term maintenance needs for this landfill.

VII. REGULATORY HISTORY/SUMMARY OF CORRECTIVE ACTION REQUIREMENTS

This draft HSWA Permit renewal is designed to update the existing HSWA Permit that was last renewed on September 8, 1998, and administratively continued pursuant to 40 C.F.R. § 270.51. Justifications for the currently required actions and decisions summarized below are contained in this draft HSWA Permit's Administrative Record. See Table 1 above for where the Administrative Record can be viewed.

Similar to any HSWA Permit covering corrective action, the core of this draft HSWA Permit is the list of SWMUs and AOCs and the identified further corrective actions. Table 2 below lists all SWMUs and AOCs that have been identified, along with the corrective action history for each SWMU/AOC. If available, the final disposition of the SWMU/AOC is provided.

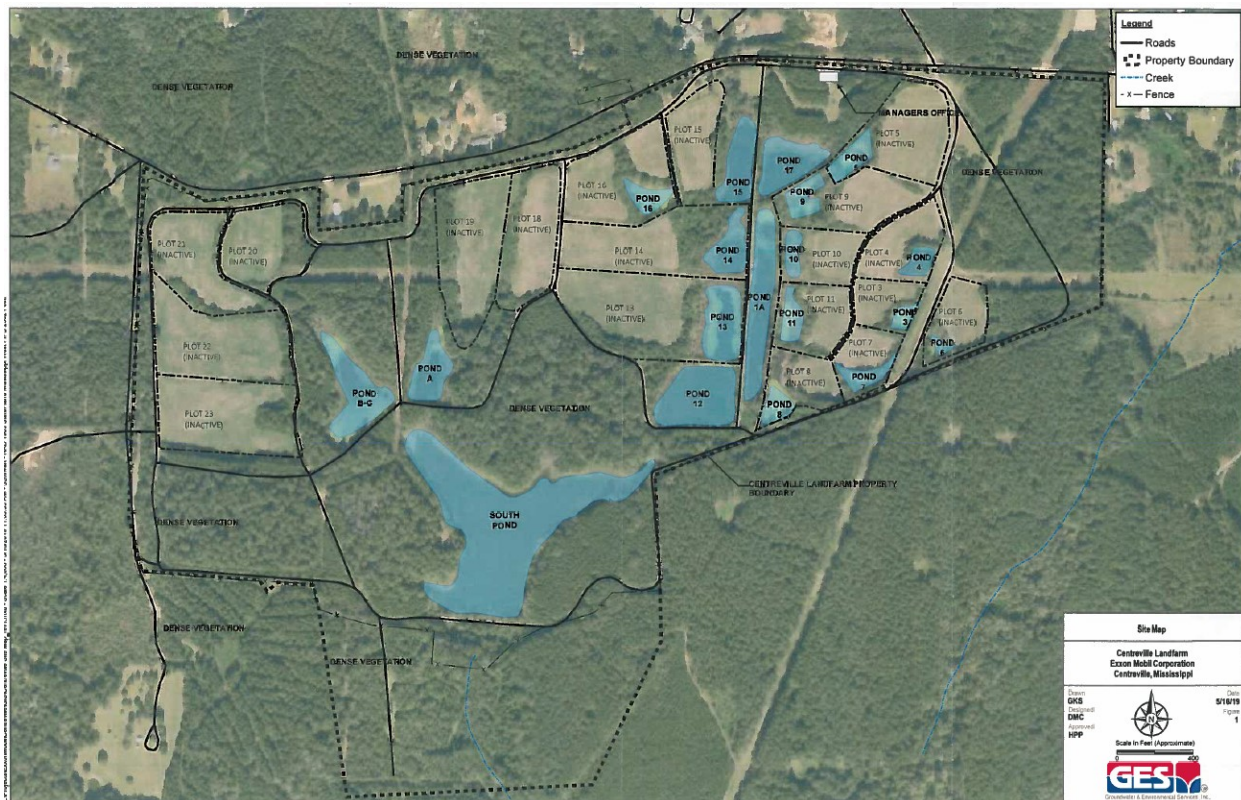


Figure 1. Areal Picture of Exxon Mobil's Centreville Landfarm

Ultimately, there are two basic conclusions possible at any SWMU/AOC:

- 1) A remedy (cleanup) is needed to protect human health and/or the environment; or
- 2) No further action is needed to protect human health and/or the environment.

A “no further action” decision has been made for five of the eight SWMUs in Table 2. Two SWMUs are still undergoing the corrective action process and one SWMU is covered under the MDEQ Post-Closure Permit. Specifically, the land treatment plots (SWMU 7) and the resulting groundwater contamination are covered under the Post-Closure Permit. The corrective action process is still ongoing at the Run-off Retention Ponds/NPDES Ponds (SWMU 1) and at the Benzoic Acid Residue Landfill

(SWMU 4).

As stated above, in the early 1990s RRL drained the pond water and dredged the sediments from the bottom of the NPDES Ponds (SWMU 1). This **Interim Measure** was performed prior to a remedial decision in order to mitigate any hazards posed by the ponds. This draft HSWA Permit requires a **RCRA Facility Investigation** of sediment to evaluate whether any contamination remains in the ponds. Furthermore, investigating sediments from the pond bottoms will reveal whether there is any ecological risk from historical contamination built up over the decades.

SWMU 4, the Benzoic Acid Residue Landfill, underwent a **RCRA Facility Investigation** that began in 1991 and concluded in 1999. Results from the RCRA Facility Investigation show that the concentration of benzoic acid waste in the soils exceeds the EPA industrial screening levels. Due to the high level of benzoic acid in the soils, the Facility implemented an **Interim Measure** by excavating the top three feet of soil and installing clean soil with a low permeability vegetative cover to minimize surface water infiltration and migration of contaminants from soil to groundwater. The next step in the Corrective Action Process at this SWMU is the **Corrective Measures Study**, where remedial alternatives will be evaluated and a final remedy will be recommended. Final remedy selection will be separately public noticed following the completion and review of the **Corrective Measures Study**.



Table 2. Identified SWMUs and AOCs and their Corrective Action History									
SWMU No. / AOC Ltr	Unit Name	Corrective Action Process History 						Final Permit Decision	
		RCRA Facility Assessment (RFA)	SWMU/AOC Assessment Report (SAR/AAR)	Confirmatory Sampling (CS)	Interim Measures	RCRA Facility Investigation (RFI)	Corrective Measures Study	Impose Remedy (Cleanup)	No Further Action
								based on...	
1	Run-off Retention Ponds/NPDES Ponds	1988 Interim RFA; 2020 Final RFA			Occurred in the mid-1990s	Imposed by the 2020 Draft Permit		To Be Determined; Corrective Action Process Still Ongoing	
2	Polyvinyl Chloride Pellets Landfill	1988 Interim RFA; 2020 Final RFA						n/a	1998 HSWA Permit
3	Former Ammonium Nitrate Landfill	1988 Interim RFA; 2020 Final RFA						n/a	1998 HSWA Permit
4	Benzoic Acid Residue Landfill (BARL)	1988 Interim RFA; 2020 Final RFA				1999	Imposed by 2020 Draft Permit	To Be Determined; Corrective Action Process Still Ongoing	
5	Facility Trash Pit	1988 Interim RFA; 2020 Final RFA			Occurred in the early 1990s			n/a	1998 HSWA Permit
6	Former Truck Wash Station and Surface Impoundments (3)	1988 Interim RFA; 2020 Final RFA						n/a	1998 HSWA Permit
7 *	Land Treatment Plots (19)	1988 Interim RFA; 2020 Final RFA						n/a	
8	Carbon Fines 55-Gallon Drum Storage Area	1988 Interim RFA; 2020 Final RFA						n/a	2020 RFA/2020 HSWA Permit

Table 2. Identified SWMUs and AOCs and their Corrective Action History									
SWMU No. / AOC Ltr	Unit Name	Corrective Action Process History 						Final Permit Decision	
		RCRA Facility Assessment (RFA)	SWMU/AOC Assessment Report (SAR/AAR)	Confirmatory Sampling (CS)	Interim Measures	RCRA Facility Investigation (RFI)	Corrective Measures Study	Impose Remedy (Cleanup)	No Further Action
							based on...		
<p>Color Key: The colors identify a corrective action decision documented in the draft HSWA Permit. Green: A green shaded cell means the EPA has determined that no further action is needed to protect human health or the environment. Yellow: This color identifies a corrective action activity required by the draft HSWA Permit. A yellow shaded cell means further action is needed to determine whether additional action is needed to protect human health or the environment.</p> <p>*The Land Treatment Plots are post-closure units regulated under the MDEQ Post-Closure Permit. Any regulatory action for this unit is deferred to MDEQ.</p>									