



Update on the Status of Romic's Permit Application

December 2006



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PAID
U.S. EPA
Permit No. G-35

United States Environmental Protection
Agency, Region 9
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Official Business
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US EPA is continuing to review the HHRA to determine if it is consistent with EPA's guidelines for preparing a Risk Assessment, and to carefully evaluate each of the calculated risk estimates against the acceptable risk ranges.

EPA will use the information to inform our permit decision. Should EPA decide to propose to grant Romic's permit, the Agency would establish permit conditions based upon the results of the HHRA. These conditions would ensure protection of Human Health and the Environment.

Public Participation/Contact EPA

EPA is committed to maintaining ongoing communication with communities concerned about or interested in the Romic facility, and we welcome public comments on all aspects of this project at any time.

EPA periodically hosts public meetings about this facility and maintains a web site with current information.
<http://www.epa.gov/region09/waste/romic/index.html>

If you would like to be added to our mailing list for this facility to receive notices of public meetings and/or if you have questions or comments about this facility, please contact:

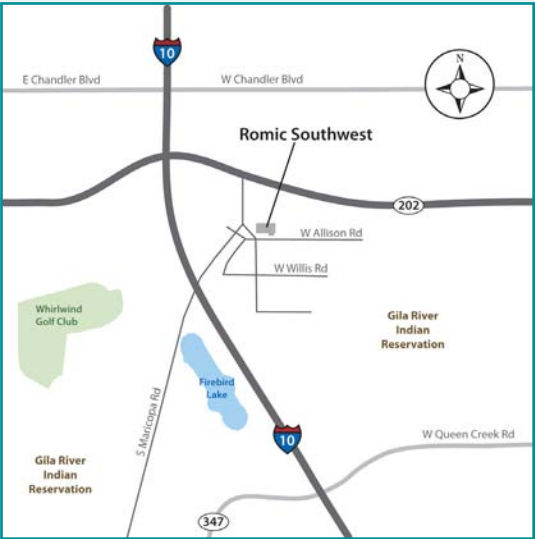
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Background

Romic Environmental Technologies Corporation - Southwest (or "Romic") is a hazardous waste storage and treatment facility that recycles solvents. Romic does not dispose any wastes at its site; all wastes are treated or shipped off-site for disposal. The Romic facility is approximately 3 acres in size and is located on the Gila River Indian Community (GRIC) within the Lone Butte Industrial Park at 6760 West Allison Road, near Chandler, Arizona.

Romic has been operating since 1988 when the company purchased its predecessor Southwest Solvents. Southwest Solvents had been in operation at this site since 1975. Each year, Romic receives about 13,000 tons of waste from across the United States; about half of this waste is regulated as hazardous waste by the US Environmental Protection Agency (EPA).



Interim Status at Romic

Federal laws regulating hazardous wastes were passed in 1980, well after the facility had been in operation. In such cases, EPA granted "interim status" to facilities that allowed them to continue operations until EPA made a final permit decision. Romic was granted interim status in 1988 and must comply with extensive regulations which are designed to protect human health and the environment.

Romic submitted a final permit application to EPA in February 2005 requesting a ten year permit to continue to treat and store hazardous waste. The next step for the EPA is to review the permit application and propose to either grant or deny Romic's permit.

Romic's Current and Proposed Operations

These proposed changes will allow Romic to recycle more of the waste it currently receives on-site. The proposed changes will not increase the total length of time that waste may be stored on-site nor will the changes expand the facility beyond the existing property lines.

Romic's Current Operations	Romic's Proposed Operation Changes
Storage of 2,200 drums of hazardous waste in one storage building	No Change
Storage of 1,000 drums of non-hazardous waste in one storage building	Allow this building to store hazardous waste as well as non-hazardous waste
Storage of 93,800 gallons of hazardous waste in 13 above ground storage tanks	Add 17 new above-ground storage tanks that hold approximately 112,700 gallons of hazardous and non-hazardous waste for treatment (Acid/Base Neutralization, Fuel Blending, and Wastewater Treatment)
Three hazardous waste solvent recycling processes	Add one additional new solvent recycling process
One recycling unit for aerosol cans	Replace existing unit with a new unit for recycling of aerosol cans

Types of Wastes Treated and Recycled at Romic

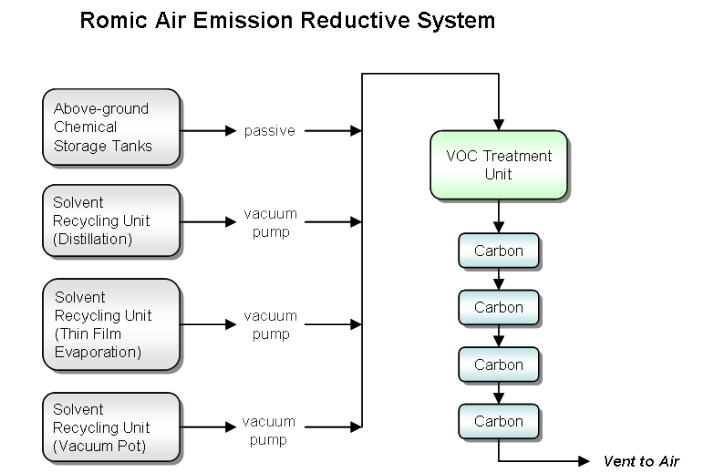
Some of the most common types of wastes accepted at Romic include:

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|--|--|
| Non Hazardous Wastes: | Hazardous Wastes: |
| <ul style="list-style-type: none">Waste oilAntifreezeNon-hazardous solventsScrap metalFluorescent light tubesWastewater | <ul style="list-style-type: none">SolventsCorrosivesWaste paint & paint thinnerMetal sludgesLaboratory chemicals |

Air Emissions at Romic

Romic accepts and recycles a variety of waste streams that have volatile organic compounds (VOCs). VOCs are chemicals that readily evaporate at normal temperature. Once they are evaporated into the air, these chemicals can be harmful to persons who inhale them.

Romic’s storage tanks and recycling units that process VOCs are connected by pipes to an onsite Air Emission Reduction System that is designed to remove these chemicals from the air (they are condensed back into liquid and sold as product). The exit air stream is then routed through a series of four drums containing activated carbon to ensure reduction of VOCs prior to venting to the atmosphere.



Romic **monitors the air emission reduction system daily** for air temperature (a measurement of the system’s efficiency) and for the concentration of all volatile chemicals. Samples of the air stream are taken just prior to the VOC treatment unit, between each carbon drum, and prior to venting to the air. If concentrations of VOCs are detected between the third and fourth carbon drum, then Romic exchanges the carbon drums with fresh drums of carbon. The drums of spent carbon are sent to a recycling facility offsite. Romic submits bimonthly reports to EPA for review of the monitoring data and carbon change out.

Romic’s Permit Application

Romic’s permit application describes both the current site operations and the proposed changes to the facility. The application includes:

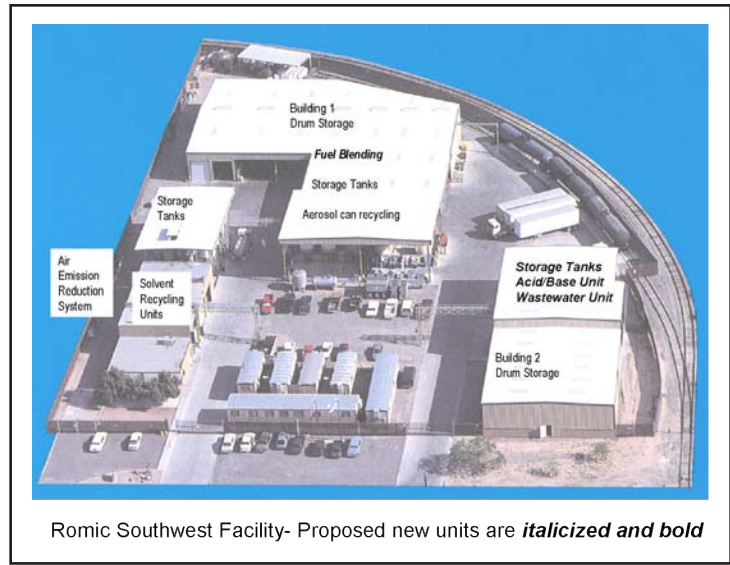
- Physical description of the facility
- Description of the waste analysis and waste acceptance procedures
- Description of the operation of each of the process units (including air emission reductions)
- Copy of Romic’s Contingency Plan (e.g. plan for emergencies)
- Copy of Romic’s Employee Training Plan
- Description of activities for the final closure of the facility (including any corrective action, a cost estimate to implement these activities and Financial Assurance for these costs).

The complete permit application is available at:

EPA’s web site for Romic:
<http://www.epa.gov/region09/waste/romic/index.html>

EPA’s office: 75 Hawthorne Street, San Francisco, California, 94105 (please call 415-947-4597 to set up an appointment to review the file).

Gila River Indian Community Department of Environmental Quality: 35 Pima Street, Sacaton, Arizona 85247 (please call 520-562-2234 to set up an appointment to review the file).



EPA plans to make a proposed permit decision after completing our review of Romic’s permit application. At that time, EPA will host a public meeting and public hearing to solicit public comments prior to making a final permit decision.

Compliance at Romic

EPA’s authority to inspect and enforce at hazardous waste facilities comes from the Resource Conservation and Recovery Act (RCRA). EPA’s inspectors look for compliance with the requirements of RCRA and EPA’s hazardous waste regulations. These regulations control operations at hazardous waste storage and treatment facilities, such as Romic.

On August 16, 2005, EPA signed a Consent Agreement/Final Order with Romic for violations of air emission control monitoring and recordkeeping requirements and hazardous waste management violations from previous inspections. The penalty action included a \$100,800 supplemental environmental project (SEP) to provide life-saving equipment for GRIC Fire Department and air monitoring and meteorological equipment for the GRIC Department of Environmental Quality. Romic was also required to pay a monetary penalty of \$67,888.

Most recently, EPA conducted a Compliance Evaluation Inspection at Romic in July 2006; several potential violations were identified. Romic has returned to compliance for all physical violations.

Emergency Response and Preparedness

EPA’s regulations require Romic to be prepared to respond to emergencies at its facility. An emergency is defined as a fire, explosion, earthquake, or any hazardous waste spill that may threaten human health or the environment.

Romic must describe in a written plan how it responds to emergencies at it’s facility. This is called a **Contingency Plan**. Romic’s Contingency Plan was submitted as part of its permit application. Romic is required to keep this plan current.

Human Health Risk Assessment

EPA’s regulations and policies do not require that facilities like Romic, that store and recycle hazardous waste, prepare a Human Health Risk Assessment (HHRA). EPA asked Romic to voluntarily prepare a HHRA because:

- EPA felt that it was in the best interest of the Tribe and community and prudent to complete a HHRA to better understand Romic’s operations before our permit decision;
- The Tribal council requested that Romic evaluate a worst case scenario incident and response; and
- Community members expressed concern to EPA about air emissions from Romic’s operations.

Romic recently submitted the HHRA to EPA. Although EPA has not yet completed its review; this report is being made available to the public for concurrent review. Your comments will be considered in our proposed permit decision.

Romic’s HHRA is available for public review at:

EPA’s web site for Romic:
<http://www.epa.gov/region09/waste/romic/index.html>

EPA’s office: 75 Hawthorne Street, San Francisco, California, 94105 (please call 415-947-4597 to set up an appointment to review the file).

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Factors EPA considers in permit decisions

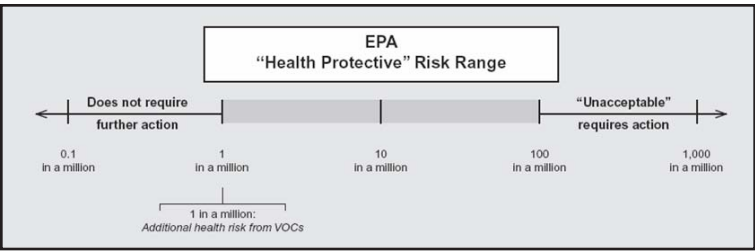
Romic’s risk assessment is just one of a number of factors that EPA is considering as part of our proposed permit decision on Romic. Generally for permit decisions, EPA considers:

- Comprehensiveness and (completeness) of the permit application (e.g. does the permit application address all the applicable regulatory and statutory requirements for the facility’s operations?)
- Technical soundness of the permit application (e.g. Does the facility design meet EPA’s performance standards for their operations?)
- Overall protectiveness of human health and the environment
- Current compliance of the facility with applicable regulations

What is a risk assessment?

Risk Assessment is a tool used by EPA to estimate the likelihood of human health or environmental impacts from exposure to different amounts of chemical substances. EPA health risk assessments estimate the likelihood of injury or disease resulting from exposure to environmental chemicals. In conducting a health risk assessment, EPA considers a compound’s toxicity, the compound’s human or ecological exposure potential, and the compound’s duration of exposure.

Health risks from chemical exposures are compared to the Agency’s “health-protective or acceptable risk range” guidelines (see figure below). The risk-range reflects the likelihood or probability of developing cancer from potential chemical exposures at the site. The acceptable range spans from one additional case of cancer (above background) in a population of one million exposed individuals (often expressed as 1 X 10⁻⁶), to 100 additional cases of cancer in a population of one million exposed individuals (often expressed as 1 X 10⁻⁴). Risks below one in a million do not require further action, while risks above 100 in a million maybe unacceptable and require additional action.



EPA risk assessments also evaluate the potential for “non-cancer” health effects from a facility’s chemical releases.

Romic’s HHRA considered both its current operations as well as its proposed operations and considered potential impacts to off-site workers and off-site residents at actual worker and residential locations. Additionally, the risk assessment evaluated potential impacts at specific locations including schools, daycare centers, health care facilities, and senior homes in the vicinity of the site.

The risk assessment evaluated air emissions from volatile chemicals through inhalation and considered various sources of air emissions for these chemicals including both process units and fugitive emissions (such as from transfer and storage operations).

Romic’s risk assessment calculated both cancer and non-cancer risk estimates for off-site workers and residents for both an average exposed individual and a reasonable maximum exposure scenario and compared the results to EPA’s “health-protective or acceptable risk range” guidelines.

Romic’s risk assessment also considered risk to onsite workers and an evaluation of non-routine releases. (cont’d on back)