



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1201 ELM STREET, SUITE 500
DALLAS, TEXAS 75270

April 21, 2022

Louis C. Palmer
Plant Manager - OxyChem Geismar
8318 Ashland Road
Geismar, Louisiana 70734

RE: The United States Environmental Protection Agency (EPA) Region 6 Proposed Re-Authorization of Occidental Chemical Corporation (OxyChem) to Dispose of Onsite Generated Liquid Polychlorinated Biphenyls (PCBs) in its F-1 Hex Furnace at its Facility Located at Geismar, LA; EPA ID LAD092681824.

Dear Mr. Palmer:

Enclosed is EPA Region 6 approval for OxyChem to dispose of onsite generated PCBs in its F-1 Hex Furnace incinerator located in Geismar, LA. No comments were received during the public comment period. This approval is effective from the date of this letter and expires as detailed in General Condition 22.

If you have questions or comments, please contact Mr. Harry Shah of my staff at shah.harry@epa.gov.

Sincerely,

4/21/2022

X Ronald D. Crossland

Ronald D. Crossland

Signed by: RONALD CROSSLAND

Director
Land, Chemical and Redevelopment Division

Enclosure

cc: Robert Thomas, LDEQ

**APPROVED CONDITIONS FOR INCINERATION
OF ON-SITE GENERATED PCBs
AT
OCCIDENTAL CHEMICAL CORPORATION
GEISMAR, LOUISIANA**

This approval is issued pursuant to Section 6(e) of the Toxic Substances Control Act (TSCA) and the federal Polychlorinated Biphenyls (PCB) Regulations, 40 CFR Part 761.

Failure to comply with the approval conditions specified herein shall constitute a violation of 40 CFR 761.50(a) and 761.60(e) and may also be a violation of other provisions of the PCB Regulations in 40 CFR Part 761. A violation of the regulations is a prohibited act under Section 15 of TSCA.

The terms and abbreviations in these conditions are in accordance with those defined in 40 CFR 761.3, unless otherwise noted. The word "Facility" hereinafter refers to Occidental Chemical Corporation (OxyChem), Geismar, Louisiana, which owns and operates the F-1 Hex Furnace incinerator.

The Facility is located near Geismar, Louisiana, on Ashland Road. The coordinates are latitude 30° 11' 15" North and longitude 90° 59' 18" West.

Pursuant to 40 CFR 761.65 and 761.70, the Facility is approved to operate the following Facility units for storage and disposal of onsite generated PCBs in the manner prescribed by this approval. All PCB waste management is to be confined to the approved units listed in this approval.

FACILITY SPECIFIC CONDITIONS

1. Pursuant to 40 CFR 761.70(a) and (d), the Facility is approved to incinerate liquid PCB contamination wastes in the F-1 Hex Furnace from only the following processes:
 - a. PCB contaminated "hex" waste from the Perchloroethylene Process Unit
 - b. PCB contaminated groundwater from groundwater recovery wells, and
 - c. Spill materials contaminated with PCBs.
2. Pursuant to 40 CFR 761.70(d)(4), the Facility is prohibited from disposing of PCBs received from off-site sources.
3. Pursuant to 40 CFR 761.65, Tank D-2009 and D-40 are approved for the storage of phased PCB contaminated groundwater.
4. Pursuant to 40 CFR 761.65, Tank D-228, is approved to store PCB "hex" waste from the Perchloroethylene Process Unit.
5. At all times during PCB disposal, the incinerator shall meet the incinerator operating requirements specified in 40 CFR 761.70(a)(1)-(a)(9), except those requirements that are specifically waived in this approval.

6. Pursuant to 40 CFR 761.70(d)(5), EPA waives the combustion criteria requirements (1200° C, 2-second dwell time and 3% percent excess oxygen in the stack gas) of 40 CFR 761.70(a)(1). The Facility's Clean Air Act permit establishes alternative operating parameter limits which were demonstrated in the 2010 Trial Burn to adequately destroy PCBs. Specific Conditions 18, 19, and 20 establish operating limits in lieu of the requirements of 40 CFR 761.70(a)(1).
7. Pursuant to 40 CFR 761.70(d)(5), EPA waives the 99.99% combustion efficiency requirement of 40 CFR 761.70(a)(2). Combustion efficiency is a measure of complete combustion. Incomplete combustion of PCB containing wastes can lead to emissions of PCBs. The 2010 Trial Burn demonstrated a PCB destruction efficiency of greater than 99.9999% at the operating parameter limits in the Facility's Clean Air Act permit. Specific Conditions 18, 19, and 20 establish operating limits that ensure adequate PCB destruction in lieu of combustion efficiency.
8. Based upon guidelines issued by EPA, the records required in Specific Conditions 21 and 22 meet the monitoring requirements of 40 CFR 761.70(a)(3).
9. Pursuant to 40 CFR 761.70(a)(4), the temperatures of the incineration process shall be continuously measured and recorded. The combustion temperature of the incineration process shall be based on either direct (pyrometer) or indirect (wall thermocouple-pyrometer correlation) temperature readings.
10. Pursuant to 40 CFR 761.70(d)(5), EPA waives the automatic shutoff requirement of 40 CFR 761.70(a)(5) for temperature because the temperature requirements of 40 CFR 761.70(a)(1) have been waived (in Specific Condition 6). Instead, the facility will comply with Specific Condition 18.
11. Pursuant to 40 CFR 761.70(d)(5), EPA waives the O₂ monitoring and recording requirement of 40 CFR 70(a)(7)(i). Excess O₂ is a parameter indicating proper combustion. CO is also an indicator of proper combustion. The monitoring and recording requirements of temperature (Specific Condition 9) and CO (Specific Condition 12) have been deemed sufficient to monitor combustion in the incinerator.
12. Pursuant to 40 CFR 761.70(a)(7)(ii), the CO concentration shall be continuously monitored and recorded when PCBs are being incinerated.
13. Pursuant to 40 CFR 761.70(d)(5), EPA waives the requirement of 40 CFR 761.70(a)(7)(iii) to monitor CO₂ when PCBs are being incinerated. CO₂ is a parameter that serves as an indicator of proper combustion. The continuous monitoring of temperature (Specific Condition 9) and CO (Specific Condition 12) are deemed sufficient parameters to monitor combustion in the incinerator.
14. Pursuant to 40 CFR 761.70(a)(8)(i), the flow of PCBs to the incinerator shall stop automatically if there is failure of the CO monitoring operations required by Specific Condition 12.

15. Pursuant to 40 CFR 761.70(a)(8)(ii), the flow of the PCBs to the incinerator shall stop automatically if there is a failure of the continuous PCB feed flow measuring and recording equipment of Specific Condition 22.
16. Pursuant to 40 CFR 761.70(d)(5), EPA waives the automatic shut off requirements relating to excess oxygen of 40 CFR 761.70(a)(8)(iii) because Specific Condition 11 waives the requirement to monitor O₂. Instead, the facility will follow the automatic shut off requirements related to CO in Specific Condition 19. CO concentration is an indicator of proper combustion.
17. Pursuant to 40 CFR 761.70(a)(9), the T-11 water scrubbing tower shall be used for HCl control during PCB incineration and shall meet any performance requirements specified by EPA. Scrubber effluent shall be monitored and shall comply with applicable effluent or pretreatment standards, and any State and Federal laws and regulations.
18. Pursuant to 40 CFR 761.70(d)(4), EPA requires the PCB waste feed streams shall automatically shut off when the temperature drops below the established minimum combustion temperature (hourly rolling average basis) in Addendum A. If a new or modified Part 70 Operating permit is issued, the Facility shall submit the authorizing letter and F-1 Hex Incinerator operating limit table from the Part 70 Operating permit to EPA Region 6 Land, Chemical and Redevelopment Division, RCRA Permits and Solid Waste Section, within five (5) working days of the effective date of the state action. The operating parameter limits will be effective from the date of authorization and EPA will administratively update Addendum A of this Approval.
19. Pursuant to 40 CFR 761.70(d)(4), EPA requires that the PCB flow to the incinerator be automatically shut off when the rolling hourly average of the CO concentration in parts per million (dry, corrected to 7 percent oxygen) exceeds 100 parts per million in the stack gas. The CO continuous monitor systems shall be operated and maintained in accordance with the requirements of 40 CFR 63.1209(a) during PCB incineration.
20. Pursuant to 40 CFR 761.70(d)(4), EPA requires that the PCB waste feed streams shall automatically shut off when the combustion air flowrate exceeds the established maximum combustion air flowrate (hourly rolling average basis) in Addendum A. If a new or modified Part 70 Operating permit is issued, the Facility shall submit the authorizing letter and F-1 Hex Incinerator operating limit table from the Part 70 Operating permit to EPA Region 6 Land, Chemical and Redevelopment Division, RCRA Permits and Solid Waste Section, within five (5) working days of the effective date of the state action. The operating parameter limits will be effective from the date of authorization and EPA will administratively update Addendum A of this Approval.
21. Pursuant to 40 CFR 761.70(d)(4), EPA requires that the Facility shall analyze each of the following PCB contaminated waste streams at least once every six months, and the results kept on file:
 - a. The "hex" waste feed for PCBs stream from Tank D-228 and,
 - b. The phased contaminated groundwater from Tank D-2009.

22. Pursuant to 40 CFR 761.70(d)(4), EPA requires that the PCB feed rate shall not exceed 12.95 pounds per hour in any one-hour period. The PCB concentration in the waste feed streams shall be based on the average of the analytical results from the previous 3 years for each waste stream. The results of the analysis and the method used shall be kept on file. The feed shall be monitored by a continuous flow measurer and recorder.
23. All PCB tank storage facilities shall comply with 40 CFR 761.65(b).
24. Decontamination of PCB containers or movable equipment shall comply with 40 CFR 761.79.
25. All PCB articles, equipment and containers shall be properly marked, as required by 40 CFR 761.40 and 45.

GENERAL CONDITIONS

1. For approval of additional units, the Facility shall not commence storage or disposal in the new unit until it has requested approval from the EPA Region 6 Land, Chemical and Redevelopment Division, and received written approval from EPA.
2. For expansion in capacity or modification of an existing unit, the Facility shall not store or dispose of PCBs in the modified unit until it has requested approval from the EPA Region 6 Land, Chemical and Redevelopment Division, and received written approval from EPA.
3. The Facility shall at all times during PCB storage and disposal, properly operate and maintain all facilities and systems of treatment and control (and related appurtenances), which are installed and used to achieve compliance with the conditions of this approval. Proper operation and maintenance include effective performance, adequate funding, adequate operator staffing and training, and adequate laboratory and process controls, including appropriate quality assurance procedures.
4. The Facility shall have on hand and comply with a PCB Operating Manual for PCB handling and incineration. The manual shall be reviewed annually. During the annual review period, any necessary updates to the standard PCB operating procedures will be incorporated. Any revisions made during the annual review period will be submitted to the EPA Region 6 Land, Chemical and Redevelopment Division, RCRA Permits and Solid Waste Section, within ten (10) working days of updating the PCB Operating Manual.
5. The Facility shall comply with all applicable requirements of 40 CFR Part 761, as well as the specific and general conditions of this approval. The Facility is not required to comply with only those requirements of 40 CFR 761.70 that are specifically waived in this approval.
6. This approval applies only to the requirements under the Toxic Substances Control Act (TSCA). This approval does not cite to or make any determination regarding the requirements that may be applicable under other federal, state, or local law. Further, this approval does not release the Facility from any applicable requirements of federal, state, or local law.

7. The conditions of this approval are severable, and if any provision of this approval, or any application of any provision is held invalid, the remainder of this approval shall not be affected thereby.
8. Violations of any applicable regulations or conditions of this approval may be subject to enforcement action and may result in termination of this approval. Violation of any requirement of this approval is a violation of 40 CFR 761.60(e) and 761.50(a) and may also be a violation of other provisions of 40 CFR Part 761. A violation of the regulations is a prohibited act under Section 15 of TSCA.
9. The Facility shall furnish to EPA, within a reasonable time, any relevant information to determine whether cause exists for modifying, revoking, reissuing, or terminating this approval, or to determine compliance with this approval.
10. The Facility shall also furnish to EPA, upon request, copies of records required to be kept under this approval or the PCB regulations.
11. The Facility shall at all times during PCB incineration, properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used to achieve compliance with the conditions of this approval. Proper operation and maintenance include effective performance, adequate funding, adequate operator staffing and training, and adequate laboratory and process controls, including appropriate quality assurances procedures.
12. The Facility shall allow an authorized representative, upon presentation of credentials and other documents as may be required by law, to:
 - a. Enter the Facility where PCBs are being handled, stored, treated, or disposed.
 - b. Have access to and copy, at reasonable times, any records that must be kept under the TSCA PCB regulations.
 - c. Inspect any facilities, equipment (including monitoring and control equipment) or,
 - d. Sample or monitor for the purpose of assuring that the Facility is operating in compliance with the conditions of this approval and the TSCA PCB regulations.
13. The Facility shall comply with all applicable monitoring and record keeping requirements of 40 CFR 761.70 and 761.180, except those that have been specifically waived in this approval. All PCB records, documents, and reports shall be maintained at one centralized location at the Facility and shall be made available for inspection by authorized EPA representatives.
14. All records required by 40 CFR 761.180 and this approval shall be written in ink, typed, or contained electronically. Any modification or correction of the records must be initialed and dated by the supervisor in charge.
15. The Facility shall notify EPA at least ninety (90) days before transferring ownership of the Facility. The Facility shall also submit to the EPA, at least ninety (90) days before such transfer, a notarized affidavit signed by the transferee stating that the transferee shall abide by the terms of this approval.

16. This approval shall administratively continue beyond the expiration date in General Condition 22 until EPA reaches a final decision on an application if: the Facility has submitted an application for approval to EPA and EPA, through no fault of the Facility, does not issue a new approval with an effective date on or before the expiration date of this approval. The Facility shall continue to comply with the conditions of the administratively continued approval and may not operate under any proposed revised conditions. The Facility shall, at least 180 days prior to expiration of this approval, submit to the EPA an application that includes all documents necessary to satisfy the requirements for a TSCA PCB approval under 40 CFR Part 761.
17. The EPA may require the Facility to conduct another demonstration test to assure the EPA that the Facility will continue to operate its F-1 Hex Furnace in accordance with the applicable performance standards and in a manner that does not present an unreasonable risk of injury to health or the environment. As a result, the Facility is encouraged to contact the EPA Region 6 Land, Chemical and Redevelopment Division, RCRA Permits and Solid Waste Section, 365 days prior to the expiration date of this approval, to ascertain whether the EPA would require the Facility to conduct a new demonstration test. This is especially important if the Facility wants to make changes to its operating parameters. Under those circumstances, the Facility will not be allowed to operate under revised operating conditions until the EPA issues the Facility a fully renewed, and revised operating approval.
18. The Facility shall maintain an adequately trained on-site inspector to direct emergency procedures, which could result from fires, explosions, or releases of PCB containing wastes at the Facility. The Facility shall maintain in good working order, any equipment required to deal with these emergencies.
19. PCB spills occurring at the Facility, or from any Facility-owned PCB transport vehicle, shall be cleaned up according to the PCB Spill Cleanup Policy, 40 CFR Part 761, Subpart G.
20. PCB spills directly contaminating surface water, sewers, or drinking water supplies, PCB spills directly contaminating grazing lands or vegetable gardens, and/or PCB spills exceeding 10 pounds of PCBs by weight, shall be reported within twenty-four (24) hours of the event to the EPA Region 6 Land, Chemical and Redevelopment Division, RCRA Permits and Solid Waste Section.
21. If spills cannot be cleaned up within twenty-four (24) hours, a Facility official shall notify the EPA Region 6 Land, Chemical and Redevelopment Division of the circumstance of the spill, the estimated time of cleanup, and a justification for the delay of the cleanup. The EPA may order cessation of PCB disposal at the Facility if spills are not cleaned up to acceptable levels as defined by EPA.
22. This approval shall become effective on the date of the approval letter and shall expire the same month and day at midnight after five years.

END OF APPROVAL CONDITIONS

Addendum A:

F-1 Hex Incinerator Operating Limits from Oxychem's Part 70 Permit

JOHN BEL EDWARDS
GOVERNOR



CHUCK CARR BROWN, Ph.D.
SECRETARY

State of Louisiana
DEPARTMENT OF ENVIRONMENTAL QUALITY
ENVIRONMENTAL SERVICES

Certified Mail No. 7019 2970 0000 8772 9253

Activity No. PER20200005
Agency Interest No. 3400

Mr. John R. Eskew
Plant Manager
Occidental Chemical Corporation – Geismar Plant
8318 Ashland Road
Geismar, LA 70734

RE: Part 70 Operating Permit Modification
Occidental Chemical Corporation - Geismar Plant, Utilities Process Unit
Geismar, Ascension Parish, Louisiana

Dear Mr. Eskew:

This is to inform you that the Part 70 operating permit modification for the above referenced facility has been approved under LAC 33:III.501. The permit is both a state preconstruction and Part 70 Operating Permit. The submittal was approved on the basis of the emissions reported and the approval in no way guarantees the design scheme presented will be capable of controlling the emissions as to the types and quantities stated. A new application must be submitted if the reported emissions are exceeded after operations begin. The synopsis, data sheets and conditions are attached herewith.

It will be considered a violation of the permit if all proposed control measures and/or equipment are not installed and properly operated and maintained as specified in the application.

Operation of this facility is hereby authorized under the terms and conditions of this permit. This authorization shall expire at midnight on the 22nd of February, 2022, unless a timely and complete renewal application has been submitted six months prior to expiration. Terms and conditions of this permit shall remain in effect until such time as the permitting authority takes final action on the application for permit renewal. The permit number and agency interest number cited above should be referenced in future correspondence regarding this facility.

Please be advised that pursuant to provisions of the Environmental Quality Act and the Administrative Procedure Act, the Department may initiate review of a permit during its term. However, before it takes any action to modify, suspend or revoke a permit, the Department shall, in accordance with applicable statutes and regulations, notify the permittee by mail of the facts or operational conduct that warrant the intended action and provide the permittee with the opportunity to demonstrate compliance with all lawful requirements for the retention of the effective permit.

Done this 28th day of July, 2020.

Permit No.: 2923-V5

Sincerely,

A handwritten signature in black ink, appearing to read "Elliott B. Vega".

Elliott B. Vega
Assistant Secretary
EBV:TVN
c: EPA Region VI

APPENDIX A

**Utilities Unit
Agency Interest No.: 3400
Occidental Chemical Corporation (OxyChem) – Geismar Plant
Geismar, Ascension Parish, Louisiana**

Table 1

F-1 Hex Furnace (EPN 100577) Operating Parameter Limits

Operational Parameter	Permitted Limit	Averaging Period⁽¹⁾	AWFCO⁽²⁾
Maximum Total Liquid Feed Rate (gpm)	5.61	N/A	Y
Maximum Total Chloride Feed Rate (lb/hr)	3,875	12-HRA	Y
Minimum Combustion Temperature (°F)	1,650	HRA	Y
Maximum Combustion Air Flow (scfm)	3,646	HRA	Y
Minimum Caustic Scrubber pH	8.54	HRA	Y
Minimum Caustic Scrubber L/G (gpm/scfm)	0.063	HRA	Y
Maximum Stack Gas CO (ppmv, dry @ 7% O ₂)	100	HRA	Y
Caustic Scrubber Differential Pressure (in. wc)	Monitor and Record Only ⁽³⁾	N/A	N
Fugitive Emissions	Daily and Monthly Inspections		
Minimum Hex Waste Atomization Steam Pressure (psig)	50	HRA	Y
Minimum Solvent Waste Atomization Steam Pressure (psig)	50	HRA	Y
Minimum Caustic Scrubber Recycle Pressure (psig)	22	HRA	Y

(1) HRA refers to hourly rolling average; 12-HRA refers to 12-hour rolling average (defined in LAC 33:V.Chapter 30).

(2) AWFCO refers to Automatic Waste Feed Cutoff.

(3) The caustic scrubber differential pressure shall be continuously monitored and recorded; however, there is no limit or AWFCO associated with the minimum caustic scrubber differential pressure.