



John R. Kasich, Governor
Mary Taylor, Lt. Governor
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Ohio EPA - DMWM

November 8, 2012

Jason Patrick
Haverhill Chemicals, LLC
1019 Haverhill-Ohio Furnace Road
P. O. Box 180
Haverhill, Ohio 45636

**Re: Hazardous Waste Permit Modification
Haverhill Chemicals, LLC
Class 1 Acknowledgment
OHD005108477/04-73-0251**

Dear Mr. Patrick:

On November 2, 2012, Ohio EPA received a notification for a Class 1 hazardous waste permit modification from Haverhill Chemicals, LLC. With this letter, Ohio EPA acknowledges the above referenced Class 1 modification submitted pursuant to Ohio Administrative Code (OAC) Rule 3745-50-51, and accordingly has updated the facility's Part B permit application and permit.

The permit update, to reflect the RCRA closure of Utility Boilers 2001-UA and 2001-UB, was assigned permit information tracking system (PITS) ID number of 121102-1-1.

Attached is a copy of the permit application revision(s). This has been included to ensure that all involved parties have written confirmation of the change(s). If you have any questions concerning this action, please contact Rich Stewart at the Ohio EPA Southeast District Office.

Sincerely,

Steve Rine
Manager, Southeast District Office
Division of Materials & Waste Management

SR/mr

cc: Jeremy Carroll, Manager, RISS, DMWM, CO
Supervisor, Engineering Unit, DMWM, CO
Scott Bergreen, DMWM, Southeast District Office

MODULE D - TANK STORAGE AND MANAGEMENT

D. MODULE HIGHLIGHTS

The Permittee has applied for tanks #2104-F, #2105-F, and #2003-F to be permitted as greater than 90-day hazardous waste storage tanks. The tanks have a storage capacity of 200,000 gallons, 250,000 gallons, and 200,000 gallons, respectively. Tanks #2104-F and #2105-F hold the listed hazardous waste K022 (distillation bottoms from the production of phenol and acetone from cumene). Tank #2003-F holds the characteristic wastes D001 (ignitability) and light oils used in the plant. All three tanks have overfill control, secondary containment, and organic vapor emission controls. Tanks #2104-F and #2105-F have scrubbers and tank #2003-F has an internal floating roof. All three tanks are above ground with primarily above ground ancillary equipment and piping leading to two industrial boilers. The stored hazardous wastes are burned for energy recovery in the industrial boilers.

D.1 Tank Storage Quantity Limitation/Waste Identification

- (a) The Permittee may store a total volume of 650,000 gallons of hazardous waste in three tanks, subject to the terms of this permit and as detailed in the table below.

The Permittee shall store in tanks only the hazardous waste codes specified in the permit application and summarized below:

Tank No.	Capacity (Gallons)	Dimensions of Tank	Secondary Containment Volume(Gallons)	Description of Hazardous Waste	Hazardous Waste No.
2104-F	200,000	33' x 31'	Yes- in place	Phenol distillation column bottoms (K022) & BPA purification system column bottoms (nonhazardous)	K022
2105-F	250,000	36' x 30'	Yes- in place	Phenol distillation column bottoms (K022) & BPA purification system column bottoms (nonhazardous)	K022
2003-F	200,000	33' x 28'	Yes- in place	Phenol process spent emission scrubber fluid (D001), AMS distillation column bottoms (D001), & Purification system light hydrocarbons (D001)	D001

D.2 Reserved.

MODULE I - BOILERS

The Permittee currently has two hazardous waste burning boilers on-site: Units 2001-UC and 2001-UE. Boiler units UC and UE are used to burn hazardous waste fuels that are generated on-site for energy recovery. Boiler UE burns only light hydrocarbon waste fuels while boiler UC can burn light hydrocarbon and heavy hydrocarbon waste fuels simultaneously. In 2009 the Permittee notified Ohio EPA that boilers UC and UE comply with 40 CFR 63, Subpart EE (the HWC MACT Standards). The only sections of RCRA regulations that will continue to apply to the hazardous waste burning boilers are Contingency Planning, Closure, Post-Closure, Standards for Direct Transfer, and Standards for Regulation of Residues.

I.1. General

The Permittee must meet the applicable requirements of ORC Section 3734.20 and OAC Chapters 3745-54 and 3745-55, including:

- (a) Closure and Post-Closure. (OAC Rules 3745-55-11 through 15)
- (b) Financial Requirements. (OAC Rules 3745-55-41 through 43, 47 through 51)

I.2. Hazardous Waste Fuels

The hazardous waste fuels burned in the boilers must either be heavy hydrocarbons (HHC) or light hydrocarbons (LHC) as defined herein. These two hazardous fuel streams shall be separately handled, stored, and tested prior to firing in the boilers.

(a) Heavy Hydrocarbons (HHC)

The wastes that are pumped to the on-site industrial boilers for heat recovery include:

- (i) Phenol distillation column bottoms (K022); and
- (ii) BPA purification system column bottoms (nonhazardous).

(b) Light Hydrocarbons (LHC)

Tank 2003-F receives several light hydrocarbon process waste streams. They are:

- (i) Phenol process spent emission scrubber fluid (D001);
- (ii) AMS distillation column bottoms (D001); and
- (iii) Purification system light hydrocarbons (D001).

I.3 Boilers (UC and UE)

Boiler System Maintenance Requirements

- (i) Each boiler must be cleaned, as required, by removing, to the extent practicable, all accumulated ash in the boiler. The boiler ash from burning HHC must be handled, transported, and disposed of as hazardous waste.
- (ii) Each boiler must meet the requirements of American Society of Mechanical Engineers' (ASME) Pressure Vessel Code or equivalent standards.
- (iv) Each boiler must be maintained to meet the definition of boiler as specified in OAC Rule 3745-50-10.

I.4. Reserved.

END OF CONDITIONS