



State of Ohio Environmental Protection Agency

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P.O. Box 1049  
Columbus, Ohio 43216-1049

CERTIFIED MAIL

October 9, 2007

Re: **Sunoco Chemicals-Haverhill**  
EPA ID No: OHD 005 108 477  
Ohio ID No: 04-73-0251  
Modified Hazardous Waste Permit

Mr. Kevin Soucy  
Sunoco Chemicals-Haverhill  
1019 Haverhill-Ohio Furnace Road  
Haverhill, Ohio 45636

Dear Mr. Soucy:

On June 11, 2007, Ohio EPA received Sunoco Chemicals-Haverhill's request to update the facility's Part B application, including replacement of outdated information. For this modification, Sunoco Chemicals-Haverhill submitted a Class 2 modification application<sup>1</sup>. The Agency did not receive any verbal or written comments concerning this Class 2 modification application. I have enclosed the final modified Ohio hazardous waste facility installation and operation permit (Permit) that was issued by the director today. Please note that the modified Permit remains in effect until it is renewed, withdrawn, suspended or revoked.

You are hereby notified that this action of the Director is final and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00 which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

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<sup>1</sup>Ohio EPA assigned tracking #s 070611-2-1 to this modification application.  
Ted Strickland, Governor  
Lee Fisher, Lieutenant Governor  
Chris Korleski, Director

Mr. Kevin Soucy  
Sunoco Chemicals-Haverhill  
October 9, 2007

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Environmental Review Appeals Commission  
309 South Front Street  
Room 222  
Columbus, Ohio 43215

If you have any questions, please contact Vicky German of Ohio EPA's Southeast District Office at (740) 385-8501.

Sincerely,



David A. Sholtis, Assistant Chief  
Division of Hazardous Waste Management

cc: Jeremy Carroll/Pam McCoy, ERAS, DHWM  
Dale Meyer, U.S. EPA, Region V  
Vicky German, SEDO, DHWM  
file

## PUBLIC NOTICE

Scioto County

### OHIO EPA ISSUES FINAL MODIFIED HAZARDOUS WASTE PERMIT TO SUNOCO CHEMICALS-HAVERHILL

On October 9, 2007, Ohio EPA issued a final Class 2 modified Hazardous Waste Facility Installation and Operation Permit (Permit) to Sunoco Chemicals-Haverhill for its facility at 1019 Haverhill-Ohio Furnace Road, Haverhill, Ohio 45636. The EPA Identification Number for this facility is OHD005108477.

#### **Why is Sunoco Chemicals-Haverhill modifying its Permit?**

Sunoco Chemicals-Haverhill (Sunoco) is a chemical production facility that produces phenol and acetone from cumene. Wastes from the production of these chemicals are stored in three permitted tanks prior to being used as a fuel in Sunoco's boilers. Sunoco wishes to update the facility's Part B application, including replacement of outdated information. This final modified permit will allow Sunoco to make the requested changes. To issue this final modified Permit, Ohio EPA determined that the Permit application is complete and meets appropriate standards.

#### **Can I appeal this final modified Permit?**

Yes, if you are an officer of an agency of the state or of a political subdivision, acting in a representative capacity, or any person who would be aggrieved or adversely affected by this modified Permit, you have the right to appeal this Permit decision to the Environmental Review Appeals Commission (ERAC).

#### **If I decide to appeal this final modified Permit, how and when must I make the appeal?**

If you file an appeal, you must put it in writing no later than November 12, 2007. Your appeal must explain why you are appealing the action and the grounds you are using for your appeal. The appeal must be accompanied by a filing fee of \$70.00 which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. You must file your appeal, according to Ohio Revised Code § 3745.04 with ERAC at the following address: ***Environmental Review Appeals Commission***, 309 South Fourth Street, Room 222, Columbus, Ohio 43215. You must send a copy of the appeal to the director of Ohio EPA at the following address no later than three (3) days after you file it with ERAC: ***Chris Korleski, Director of Ohio EPA***, P.O. Box 1049, Columbus, Ohio 43216-1049.

**OHIO ENVIRONMENTAL PROTECTION AGENCY  
DIVISION OF HAZARDOUS WASTE MANAGEMENT**

**SUMMARY OF MODIFICATIONS TO HAZARDOUS WASTE  
INSTALLATION AND OPERATION PERMIT**

**Sunoco Chemicals-Haverhill**  
**U.S. EPA ID#: OHD 005 108 477**  
**Ohio Permit #: 04-73-0251**

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Modification of the Hazardous Waste Facility Installation and Operation Permit will authorize Sunoco Chemicals-Haverhill to make the following changes:

**Class 2 Modification:**

General updates to the facility's Part B permit application, including replacement of outdated information.

OHIO EPA DHWM

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OHIO ENVIRONMENTAL PROTECTION AGENCY ENTRUSTED DIRECTOR'S JOURNAL

**MODIFIED OHIO HAZARDOUS WASTE FACILITY  
INSTALLATION AND OPERATION PERMIT**

I certify this to be a true and accurate copy of the official documents as filed in the records of the Ohio Environmental Protection Agency.

Date of Issuance: October 9, 2007  
Effective Date: October 9, 2007

U.S. EPA ID No.: OHD 005 108 477  
Ohio Permit No.: 04-73-0251

By: Jim Zacher Date: 10-9-07

**Name of Permittee:** Sunoco Chemicals-Haverhill  
**Mailing Address:** P.O. Box 180  
Haverhill, Ohio 45636  
**Facility Location:** 1019 Haverhill-Ohio Furnace Road  
Haverhill, Ohio 45636  
**Person to Contact:** Jordan L. Morgan, Plant Manager

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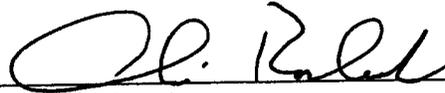
This Modified Ohio Hazardous Waste Facility Installation and Operation Permit is issued pursuant and subject to Section 3734.05(I) of the Ohio Revised Code and Rule 3745-50-51(D) of the Ohio Administrative Code.

The Ohio Hazardous Waste Facility Installation and Operation Permit with the above-referenced permit number as issued by the Ohio Environmental Protection Agency and journalized on October 29, 2001, is hereby incorporated by reference in its entirety, except as it may be modified herein.

This modification of the permit shall remain in effect until such time as the Ohio Hazardous Waste Facility Installation and Operation Permit is renewed, modified, withdrawn, suspended or revoked.

The Permittee shall comply with all requirements of the modified Part B permit application as amended or supplemented on June 11, 2007 and August 29, 2007. The information contained in the modified Part B permit application is incorporated herein by reference. Specifically, all written statements regarding the specifications, locations or capabilities of the processes, equipment, containment devices, safety devices or programs or other matters made by the applicant in the permit modification application are hereby incorporated as express, binding terms and conditions of this modified permit.

The modified Terms and Conditions of this permit are attached hereto and are incorporated herein by reference. The modified Terms and Conditions supersede and replace the corresponding pages found in the October 29, 2001 renewal permit.



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Chris Korleski  
Director

OHIO EPA DHWM

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**OHIO ENVIRONMENTAL PROTECTION AGENCY**      **OHIO EPA DHWM**  
**OHIO HAZARDOUS WASTE FACILITY**  
**INSTALLATION AND OPERATION PERMIT RENEWAL**      **OCT 09 2007**

Permittee:      **Sunoco Chemicals-Haverhill**

Mailing  
Address:      **Sunoco Chemicals-Haverhill**  
                  **1019 Haverhill-Ohio Furnace Road**  
                  **Haverhill, Ohio 45636**

Owner:         **Aristech Chemical Corporation**  
                  **1735 Market Street, Suite LL**  
                  **Philadelphia, Pennsylvania 19103**

Operator:      **Sunoco Inc. (R&M)**  
                  **1735 Market Street, Suite LL**  
                  **Philadelphia, Pennsylvania 19103**

Location:      **Sunoco Chemicals-Haverhill**  
                  **1019 Haverhill-Ohio Furnace Road**  
                  **Haverhill, Ohio 45636**

Ohio Permit No.:	04-73-0251
US EPA ID:	OHD 005 108 477
Issue Date:	October 29, 2001
Effective Date:	October 29, 2001
Expiration Date:	October 29, 2011

**AUTHORIZED ACTIVITIES**

In reference to the application of **Sunoco Chemicals-Haverhill** for an Ohio Hazardous Waste Facility Installation and Operation Renewal Permit under Ohio Revised Code (ORC) Chapter 3734 and the record in this matter, you are authorized to conduct at the above-named facility the following hazardous waste management activities:

- ◆ **Tank Storage of Hazardous Waste**
- ◆ **Treatment of Hazardous Waste in Boilers**
- ◆ **Corrective Action**

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A.26. Ohio Annual Permit Fee  
OAC Rule 3745-50-36

The annual permit fee, calculated pursuant to OAC Rule 3745-50-36 and payable to the Treasurer of the State, shall be submitted to the director on or before the anniversary of the date of issuance during the term of the permit. For the purpose of the payment of the Ohio annual permit fee, the date of issuance is the date the permit was entered into the Journal of the director of the Ohio Environmental Protection Agency.

A.27. Compliance Schedule - Documents

- (a) The Permittee shall submit to Ohio EPA within sixty (60) days after permit journalization, the following information to be incorporated in the Part B permit application:
  - (i) Updated financial requirements for closure of the facility and liability requirements. This includes the cost estimate for closure as required by OAC Rule 3745-55-42, financial assurance for facility closure as required by OAC Rule 3745-55-43, and liability insurance as required by OAC Rule 3745-55-47.
  - (ii) Reserved.
- (b) Reserved.
- (c) On or before February 26, 2003, the Permittee painted all areas of Tank 2104-F that showed signs of external corrosion. Every five years thereafter, or sooner, this tank shall be painted if the tank begins to show signs of external corrosion, in order to provide continued external corrosion protection.
- (d) On or before February 26, 2004, the Permittee painted all areas of Tank 2105-F that showed signs of external corrosion. Every five years thereafter, or sooner, this tank shall be painted if the tank begins to show signs of external corrosion, in order to provide continued external corrosion protection.

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## MODULE I - BOILERS

### I.1. General

The Permittee must meet the applicable requirements of OAC Rules 3745-266-100 through 112 - Hazardous Waste Boilers and Industrial Furnaces (BIF Rule). The Permittee must also 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)

All Conditions of Module I are intended to ensure compliance with the requirements of the BIF Rule. Conditions I.2. through I.3(d) of Module I may be removed from this permit through a permit modification once the Permittee submits the notification of compliance pursuant to 40 CFR §§ 63.1207(j) and 63.1210(b) demonstrating compliance with the requirements of 40 CFR Part 63 Subpart EEE.

### 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. The waste analysis plan shall be as described in the Waste Analysis for BIF Rule Compliance, submitted to Ohio EPA in September 2005.

#### (a) Heavy Hydrocarbons (HHC)

The HHC, stored in Tanks 2104-F, 2105-F, and 2108-F may be generated from the following sources:

- (i) Phenol distillation column bottom tars from 328-F (K022), and
- (ii) BPA (bisphenol A) purification system column bottom tars from D-802.

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(b) Light Hydrocarbons (LHC)

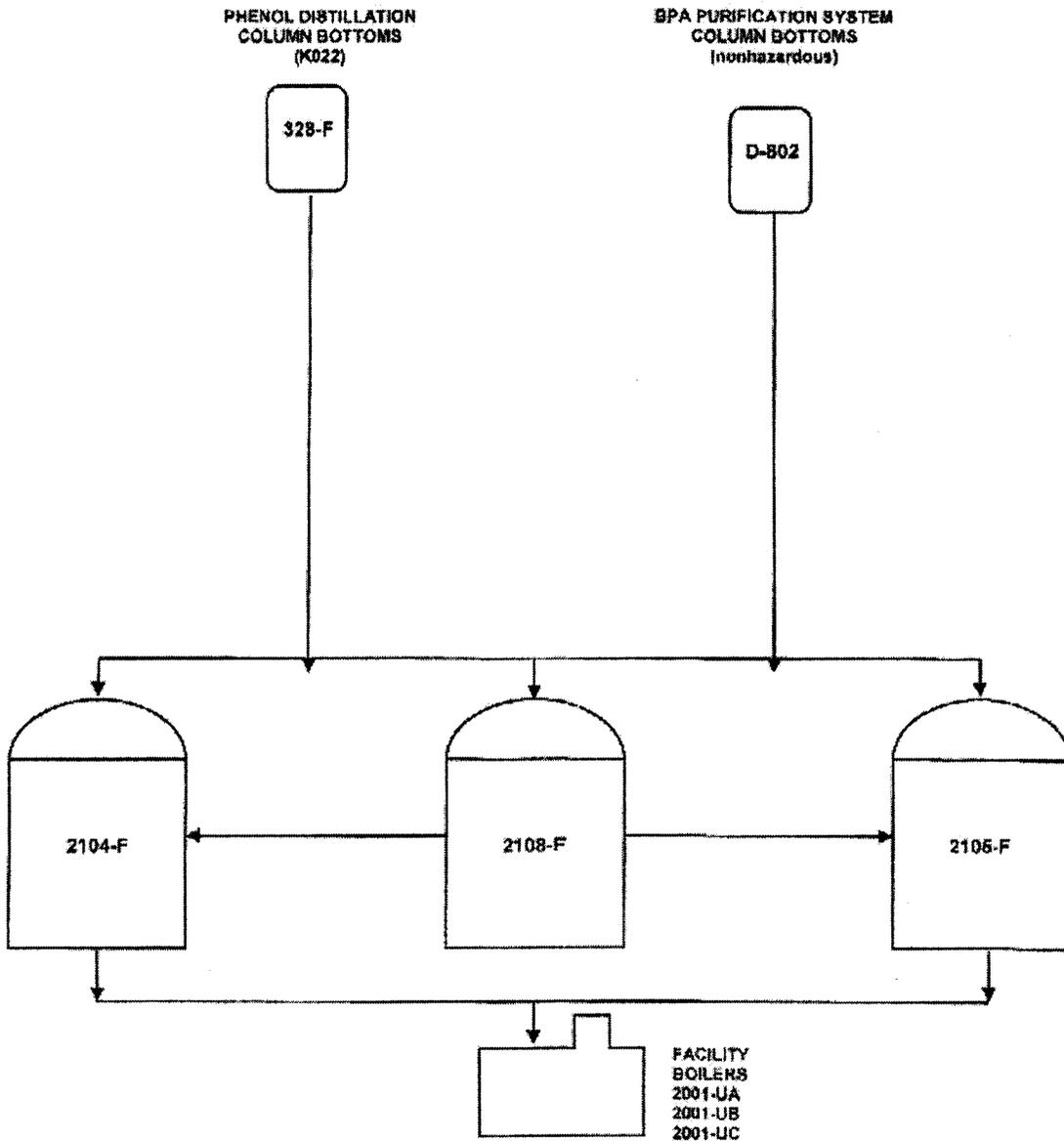
The LHC, generated from phenol process, aniline process, and waste lubricating oil, must be stored in Tank 2003-F. The LHC fuel may include the following sources:

- (i) Condensable organics, 334-F purge from 304-F and 307-F emission control systems (D001 and D018),
- (ii) Organic waste, 325-F purge from 308-EA overhead accumulator (D001 and D018),
- (iii) Spent emissions scrubber fluid from 2502-LF (D001 and D018),
- (iv) AMS distillation column bottoms from 501-E (D001),
- (v) Condensable organics from scrubber outlet condenser 2105-CVC (D001 and D018),
- (vi) Phenol wastewater treatment system skimmed oil from 2421-F (D001 and D018),
- (vii) Purification system light hydrocarbons from 503-E ethylbenzene removal column overhead (D001, D018, and D035), and
- (viii) Skimmed oil from 2421-F Decanter (D001, D018, and D035).

(c) Hazardous Waste Fuel Analysis

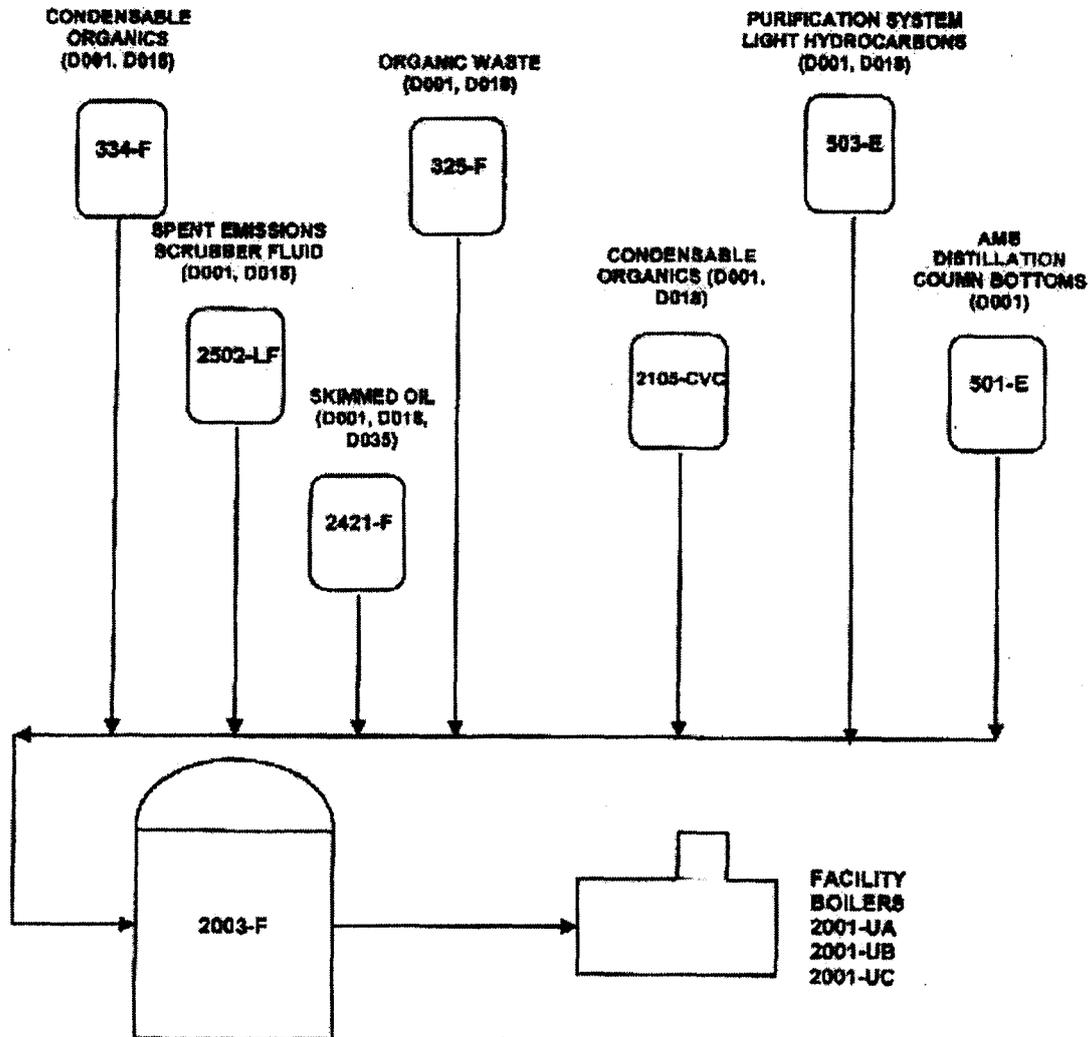
- (i) HHC and LHC must be managed in on-site tanks and in accordance with the Waste Analysis for BIF Rule Compliance. Samples shall be

**ATTACHMENT A**  
**Heavy Hydrocarbon Flow Diagram**



**TANK SYSTEMS 2104-F AND 2105-F FLOW DIAGRAM**

**ATTACHMENT B**  
**Light Hydrocarbon Flow Diagram**



**TANK SYSTEM 2003-F FLOW DIAGRAM**