

Fact Sheet
Tentative Hazardous Waste Permit Action
Renewal of the Treatment and Storage Permit
Rohm and Haas Chemicals LLC - Louisville Plant
Louisville, Jefferson County, Kentucky
EPA ID KYD-006-390-017, AI 2205
February 28, 2021

The Kentucky Energy and Environment Cabinet, Division of Waste Management (Division), has tentatively decided to approve the renewal of the Hazardous Waste Permit for Rohm and Haas Chemicals LLC – Louisville Plant (Facility). The permitting process is governed by the requirements of the federal Resource Conservation and Recovery Act (RCRA) and Commonwealth of Kentucky statutes and regulations.

The Facility is located at 4300 Campground Road, Louisville, KY 40216. The facility contact is Elaine Mink, Environmental Specialist (502) 449-5291.

I. Purpose of the Permitting Process

The permitting process gives the public the opportunity to evaluate the Permittee’s ability to comply with the hazardous waste management regulations. The Division must prepare a draft permit that identifies, within one concise document, every applicable requirement that must be met. The public then has forty-five (45) days to review the draft permit and submit comments before the Cabinet makes any final permit decision.

II. Facility Description

The Rohm and Haas manufacturing site is located in Jefferson County, Louisville, Kentucky. The site is in west Louisville in the “Rubbertown” area. The Facility’s property encompasses two land parcels totaling approximately 132 acres. The parcels lie on both the east and west sides of Camp Ground Road. The west parcel (approximately 120 acres) is where the main manufacturing facility is located. The Ohio River borders the west parcel to the west. Chemours property borders the Rohm and Haas property to the north and American Synthetic Rubber Corporation, Arkema, and another DuPont operation is located to the south. The east parcel, which encompasses approximately 12 acres, is located on the east side of Camp Ground Road, and includes the former fly ash/white water pond area, located at the terminus of Schmitt Road.

Rohm and Haas currently manufactures acrylic polymers in the form of plastics additives and impact modifiers, solid and solution grade resins, refined methyl methacrylate (MMA), and steam. The facility’s major raw material, crude MMA, is received by barge and railcar. It is distilled into a refined monomer that is reacted to form polymer products or is shipped to customers. The bottoms from this distillation process, called Third Stage Bottoms (TSB), are burned for energy recovery in Boiler 100. This boiler also uses natural gas as a fuel and produces steam for use onsite. Some steam is also sold to neighbor manufacturing plants.

The renewal is for an existing hazardous waste permit to store and treat hazardous. This includes existing 90-day container storage, operation of hazardous waste storage tanks, the operation of a boiler industrial furnace (BIF) used to treat hazardous waste, and requirements for corrective action related to the facility’s Solid Waste Management Units (SWMUs) and Areas of Concern (AOCs). The requirements to control organic air emissions from hazardous waste treatment and storage units as well as associated ancillary equipment, which previously were included in a permit issued by the Environmental Protection Agency (EPA) Region IV, have been added to this draft permit, as Kentucky has now been delegated authority for this program.

III. Basis of the Draft Permit

The Division has reviewed the permit application, determined that it is technically complete, and has tentatively decided to issue the renewal permit for the above activities.

The draft permit includes conditions required under RCRA and the Commonwealth of Kentucky statutes and regulations to ensure that all hazardous waste treatment, storage, and disposal activities are protective of human health and the environment.

IV. Procedures to Make a Final Decision

The public notice announces the opening of a forty-five (45) day public comment period in which any interested person is encouraged to submit comments on the proposed draft permit. This public comment period begins on **February 28, 2021** and ends on **April 15, 2021**.

The administrative record, which includes the draft permit, the permit application, and related information, can be reviewed by request or by visiting the Division's web page listed below:

Division of Waste Management Contact: Emily Perkins at EEC.KORA@KY.GOV

Division of Waste Management web site: <https://eec.ky.gov/Environmental-Protection/Waste/hazardous-waste/Pages/permit-review-corrective-action.aspx>

Upon request, this information can be made available in alternative formats. To make an appointment, submit a written request at least 72 hours prior to the desired review date.

Anyone wishing to submit a comment, needing additional information, or wanting to be put on the facility mailing list should contact:

John Moore
Kentucky Energy and Environment Cabinet
Division of Waste Management
300 Sower Boulevard
Frankfort, Kentucky 40601
(502) 564-6716
Email: johnf.moore@ky.gov

What will the Division do with the Comments they receive?

After consideration of all written comments and requirements of state laws and regulations, the Director of the Division of Waste Management will make a final decision regarding the permit. If the tentative decision to issue a permit is substantially changed, the Division will issue a public notice indicating a revision of the decision. If the tentative decision to issue a permit modification is substantially unchanged from those announced in the public notice, notification of issuance will be given to the applicant and each person who has submitted comments or requested notice of the final permit decision. When a final permit is issued, the Division will also release a Response to Comments document. All significant comments on the draft permit, raised during the public comment period, will be responded to in the Response to Comments document.

Any person who may be aggrieved by the final issuance of the permit modification may file a petition with the Cabinet or the Division, which sets forth the grounds of the objection and the demand for a formal hearing pursuant to KRS 224.10-420(2). This type of hearing is held before a hearing officer. All parties are advised to have legal counsel present.

The Division of Waste Management does not discriminate on the basis of race, color, religion, national origin, disability, sex, age, sexual orientation, gender identity, ancestry, or veteran status. The division provides, on request, reasonable accommodations necessary to afford an individual with a disability an equal opportunity to participate in all services, programs and activities. To request materials in an alternate format, contact John Moore at (502) 782-6419, or johnf.moore@ky.gov. Hearing and speech impaired persons may contact the agency by using the Kentucky Relay Service, a toll-free telecommunication device for the deaf (TDD). For voice to TDD, call (800)648-6057. For TDD to voice, call (800)648-6056.