

Fact Sheet
Tentative Hazardous Waste Permit Action
Renewal of the Hazardous Waste Operating Permit
Arkema Inc.
Calvert City, Marshall County, Kentucky
EPA ID KYD-006-370-159, AI 2918
June 24, 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 Arkema Inc. (Arkema). The permitting process is governed by the requirements of the federal Resource Conservation and Recovery Act (RCRA) and Commonwealth of Kentucky statutes and regulations.

Arkema is located at 4444 Industrial Parkway, Calvert City, Kentucky 42029. The facility contact is Jeremy Rowe, who may be reached at (270) 395-6692.

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 Permittee owns and operates an 836 acres chemical manufacturing facility in Marshall County. The site began operations in 1949 as Pennsylvania Salt Manufacturing Company. Subsequent corporate names for the facility included Pennsalt, Pennwalt, Atochem North American, Inc., Elf Atochem North America, Inc., and ATOFINA Chemicals, Inc. The company became Arkema, Inc. on October 4, 2004.

The Permittee currently produces Hydrochlorofluorocarbons (Forane[®] HCFCs), hydrofluorocarbons (Forane[®] HFC), hydrochloric acid (HCl), vinylidene fluoride (VF₂), and polyvinylidene fluoride (Kynar[®] PVDF) at the Calvert City Plant.

The Permittee stores hazardous waste generated on-site from the production of the chemicals mentioned above in five (5) above ground storage tanks. The hazardous waste stored in these tanks is then disposed of in the on-site incinerator.

The Permittee does not store hazardous waste in containers for more than 90 days at the facility and does not accept any hazardous waste generated off-site.

The hazardous waste generated, stored and disposed of at the Permittee typically consists of halogenated (chlorine, fluorine) organics. Currently there are three waste streams designated by the Permittee and are listed in the table below.

Estimated Annual Waste Amount	Unit of Measure	EPA Waste Numbers
3,500	Tons	D002, D003, D004, D006, D007, D008, D028, D029
350	Tons	D029, D006, D007, D008, D002, D001
800	Tons	D003, D007, D008, D039, D040, D029

Below is a table that lists the EPA waste numbers managed at the Permittee and its hazardous characteristics or contaminants.

EPA Waste Numbers	Characteristics or Contaminants
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D001	Ignitable Waste
D002	Corrosive Waste
D003	Reactive Waste
D004	Arsenic
D006	Cadmium
D007	Chromium
D008	Lead
D028	1,2-Dichloroethane
D029	1,2-Dichloroethylene
D039	Tetrachloroethylene
D040	Trichloroethylene

Arkema completed the 30 year Post-Closure Care period on December 31, 2016 for the four (4) closed regulated units which had been included in previous permits. A Post-Closure Certification Report was submitted to and approved by the Division on January 22, 2019. Arkema will continue to monitor and maintain the units as part of the Corrective Action program with the remaining Solid Waste Management Units (SWMUs) and Areas of Concern (AOCs).

III. Basis of the Draft Permit

The Division has reviewed the permit application, has 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 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. The public comment period begins on June 24, 2021 coincident with the date of the publication of the public notice in The Lake News and ends on August 8, 2021. All public comment shall submit with name and mailing address of the individual making the comment.

The administrative record, which includes the draft permit, the permit application, and related information, can be reviewed at the following locations:

Division of Waste Management, 300 Sower Blvd., Frankfort, KY 40601

Contact: Tina Fisher at Tina.Fisher@ky.gov

Marshall County Public Library, Calvert City Library Branch, 23 Park Road, Calvert City, Kentucky 42029

Contact: Tammy Blackwell

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:

Ms. April J. Webb, P.E., Manager
Kentucky Energy and Environment Cabinet
Division of Waste Management

300 Sower Boulevard, 2nd Floor
Frankfort, Kentucky 40601
(502) 782-6470
Email: April.Webb@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 john.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.