Bay City Site

OXEA Corporation
2001 FM 3057
P.O. Box 1141
Bay City, TX 77404-1141
Telephone: 979/241-4000
Fax: 979/241-4279

February 22, 2012
GRG-010-12

VIA CERTIFIED MAIL (7011 2970 0001 7770 7657)

Office of Enforcement and Compliance Assurance
Office of Federal Activities, International Compliance Assurance Division (2254A)
Environmental Protection Agency
1200 Pennsylvania Ave., NW.
Washington, DC 20460

Subject: **2011 Annual Report of Transfrontier Shipments of Hazardous Waste for Recovery within OECD Countries (40 CFR 262.87)**
OXEA Corporation – Bay City Plantsite
ISW Registration No. 50398, EPA ID# TXR 000077784

Gentlemen:

For calendar year 2011, the OXEA Bay City site exported a total of 2 shipments totaling 176 drums of hazardous waste to Nickelhutte in Germany for metals recovery of nickel and rhodium. Also, OXEA exported 2 shipments of 1 iso-container each of non-hazardous waste to Umicore in Belgium for metals recovery of rhodium.

The total quantity of hazardous material shipped was 71,920 pounds, while the total non-hazardous material shipped was 80,137 pounds.

The following report summarizes these shipments:

A. 2 shipment of 88 drums each

Notifier:

OXEA Corporation
P.O. Box 1141, Bay City, TX 77404
2001 FM 3057, Bay City, TX 77414

EPA ID#: TXR000077784

Final Recovery Facility:

Nickelhutte Aue Gmbh
Rudolf-Breitscheid-Strasse,
08280, Aue, Germany

received
SDN 3/4/12

XEA

Corporation
M 3057
x 1141
, TX 77404-1141

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Office of Enforcement and Compliance Assurance
Office of Federal Activities, International Compliance
Assurance Division (2254A)
Environmental Protection Agency
1200 Pennsylvania Ave., NW
Washington, DC 20460

Route **EPA Mail**

To: Enforcement and Com

Mailstop: ARIEL RIOS NORTH
Department: 2254A
Phone:
PKG Condition Certified

70112970000177707657

Material Exported:

Spent Raney Nickel Catalyst
Notification No.: DE 1350/164860 EPA Code: D001, D018
EWC 160802 TCEQ Code: 0574393H
OECD: A 2030 H-Code: H 13
DOT Description: RQ, Waste Environmentally Hazardous Substance, Solid, NOS (Contains Nickel/Trinickel bis-orthophosphate), Class 9, PG III, UN3077, ERG 171

Transporters:

- JetCo Delivery, EPA ID# TXR000077986
- NYK Lines, EPA ID# EXEMPT
- Neutrales Transport Kontor GmbH, EPA ID# DE114704291

B. 2 shipments of 1 iso-container each:

Notifier:

OXEA Corporation EPA ID#: TXR000077784
P.O. Box 1141, Bay City, TX 77404
2001 FM 3057, Bay City, TX 77414

Final Recovery Facility:

Umicore N.V.
Adolf Greinerstraat 14
B-2660 Hoboken, Belgium

Material Exported:

Oxo and SFA Rhodium Residue Solution (Spent Rhodium Catalyst)
Notification No.: N/A EPA Code: N/A – Non-Hazardous
TCEQ Code: 06192191
DOT Description: Non-D.O.T. Regulated, Spent Liquid Rh Catalyst (OXO and SFA Solution)

Transporters:

- Quality Carriers, EPA ID# FLR000057414
- Hapag Lloyd, EPA ID# EXEMPT
- Transport Van Loon, EPA ID# EXEMPT

OXEA

We are scrutinizing our process more closely to reduce the volume and toxicity of waste generated. The certification required by 40 CFR § 262.87(a)(6) is included as Attachment 1. If you have any questions regarding this correspondence, please contact Gladys Gavranovic at 979-241-4022.

Sincerely,

Gladys Gavranovic
Environmental Affairs
OXEA Corporation – Bay City Plant

Karen Scott
Environmental & Laboratory/QA Manager

Attachment

cc: CERTIFIED MAIL (7011 2970 0001 7770 7640)
Registration and Reporting Section – MC 129
Permitting and Remediation Support Division
Texas Commission on Environmental Quality
P.O. Box 13087
Austin, TX 78711-3087

CERTIFIED MAIL (7011 2970 0001 7770 7633)
Waste Section
Texas Commission on Environmental Quality
Region 12, Houston
5425 Polk Avenue, Ste H
Houston, TX 77023-1452

OXEA

ATTACHMENT 1

CERTIFICATION

2011 Annual Report of Transfrontier Shipments of Hazardous Waste for Recovery within OECD Countries (40 CFR 262.87)
OXEA Corporation – Bay City Plantsite
EPA ID# TXR 000077784

CERTIFICATION

I, Steven Parker, Bay City Plant Site Director, OXEA Corporation,

Certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information including the possibility of fine and imprisonment.

Signature: Steven Parker Date: 2/22/12
Steven Parker, Site Director

STATE OF TEXAS)
MATAGORDA COUNTY)

BEFORE me on this the 22ND day of FEBRUARY ,2012, personally appeared Mr. Steven Parker, Site Director of OXEA Corporation – Bay City Plant, known by me to be the person and agent of said corporation whose name is subscribed to the foregoing instrument, and he acknowledged to me that he executed the same for the purposes and in the capacity therein expressed.

GIVEN UNDER MY HAND AND SEAL OF OFFICE, this the 22ND day of FEBRUARY, 2012.

Jeanette Gormley (Signature)

JEANNETTE GORMLEY
NOTARY PUBLIC
STATE OF TEXAS
My Comm. Expires 04-22-2014

JEANETTE GORMLEY (Name)
Notary Public in and for the State
Of Texas, County of Matagorda

My Commission expires:

04-22-2014