VALERO
ARDMORE REFINERY • Valero Refining Company - Oklahoma • P.O. Box 188 • Ardmore, Oklahoma 73402-0188 • Telephone (580) 223-0534

Greg E. Elliott
Environmental Manager

February 27, 2012

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

To Whom It May Concern:

Pursuant to 40 CFR 262.56 Valero hereby submits this annual export notification report for hazardous wastes shipped from the Valero Ardmore Refinery to facilities out of the United States in the calendar year 2011. The attached report includes the following information:

- Generator of Exported Waste
- Name and Site Address of Each Consignee
- Department of Transportation (DOT) Shipping Name
- Summary of Exported Shipments
- Waste Minimization Efforts
- Certification of Exporter

If you have any questions or require further information, please contact Rodney Cole at 580-221-3155.

Sincerely,

Greg Elliott
Environmental Manager

GEE:rwc:rks

Attachments

CERTIFIED MAIL 91 7199 9991 7031 7186 7938

received
SDN 3/4/12

91 7199 9991 7031 7186 7938

stamps

$4.050
US POSTAGE
FIRST-CLASS
FROM 73401
FEB 29 2012
stamps.com

0625000774258 1

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OFFICE of ENFORCEMENT and COMLIANCE ASSURANCE
OFFICE of FEDERAL ACTIVITIES
INTERNATIONAL COMPLIANCE ASSURANCE DIVISION (2254A)
ENVIRONMENTAL PROTECTION AGENCY
1200 PENNSYLVANIA AVENUE NW
WASHINGTON DC 20460

V0428.indd NS 3/09

Route **EPA Mail**

To: Enforcement and Co

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

Sent

1999991703171867938

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Generator of Exported Waste:

Valero Refining Company – Okla. dba Valero Ardmore Refinery
One Valero Way
Ardmore OK, 73402
EPA I.D. No.: OKD057705972

Name and Site Address of Each Consignee:

Union Corporation #548, Okyoung-ri, Daesong-myon, Nam-gu, Pohang City, Kyungsanbuk-do South Korea	Young Sin Metal Working Co., Ltd. 601 Yuha-Ri, Jang Yu-Myun Kimhae Korea 621-832 Republic of Korea	Hong Jing Resource Co., Ltd. #13-2, Wonbuk-Ri, gunbuk-Myon, Haman-Gun, Kyeong-Nam South Korea 637823

Department of Transportation (DOT) shipping name:

UN3190, RQ, Waste, Self-heating solid, Inorganic, n.o.s., (K171, Molybdenum, Nickel, Arsenic), 4.2, PG III

Summary of exported shipments:

A total of 460,587 pounds of spent hydrotreating catalyst (K171) was shipped from the Valero Ardmore Refinery in April 2011 to the Union Corporation facility in South Korea for metals reclamation. The transporter of this material from the Ardmore Refinery was Jetco Delivery, Inc. EPA I.D. number TXR000077974 with a total shipment count of 15 loads.

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A total of 1,680,327 pounds of spent hydrotreating catalyst (K171) was shipped from the Valero Ardmore Refinery in July 2011 to the Young Sin Metal Working Co., Ltd. facility in the Republic of Korea for metals reclamation. The transporter of this material from the Ardmore Refinery was Jetco Delivery, Inc. EPA I.D. number TXDR000077974 and Triad Transport, Inc. EPA I.D. number OKD981588791. Jetco Delivery, Inc. shipped out a total of 881,891 pounds of this material with a total shipment count of 26 loads. Triad Transport, Inc. shipped out a total of 798,436 pounds of this material with a total shipment count of 23 loads.

A total of 35,585 pounds of spent hydrotreating catalyst (K171) was shipped from the Valero Ardmore Refinery in July 2011 to the Hong Jing Resource Co., Ltd. facility in South Korea for metals reclamation. The transporter of this material from the Ardmore Refinery was Jetco Delivery, Inc. EPA I.D. number TXR000077974 with a total shipment count of 1 load.

Waste Minimization Efforts:

Catalysts used in refinery processes are selected to maximize the efficiency of the catalyst and to minimize the amount of waste catalyst that is generated. Catalysts that have a longer service life are used when practicable. Where feasible, regenerated catalysts are used, which minimizes the amount of catalyst that must be disposed of in a landfill. Valero routinely monitors developing catalyst technologies for opportunities to reduce the amount(s) of catalyst required or to increase the service life of the material. Where economically practical, spent catalyst is shipped to a metals reclamation facility where valuable metals are recovered.

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Major refinery maintenance turnarounds occur about every four to five years and provide an opportunity to remove certain wastes such as spent catalysts and sludge from processing units. Some catalysts are also generated during mid-cycle minor turnarounds that occur more frequently. Due to the episodic nature of catalyst generation, there is a high degree of variability from year to year, making it difficult to compare annual waste volumes or identify meaningful trends.

Certification of Exporter

I 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.

Greg Elliott, Environmental Manager