Paulsboro Refining Company

Paulsboro Refining Company LLC
800 Billingsport Road
P.O. Box 702
Paulsboro, NJ 08066

February 20, 2015

CERTIFIED MAIL 7008 2810 0001 9832 1882

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

Subject: 2014 Annual Export Report
EPA ID No. NJD002342426

Dear Administrator:

Paulsboro Refining Company LLC is submitting a calendar year 2014 Annual Report for hazardous waste that was exported to a foreign country for metals reclamation. This report was prepared in accordance with the requirements of 40 CFR §262.56.

1. *40 CFR §262.56(a)(1) – The EPA identification number, name and mailing and site address of the exporter:*

   EPA ID No. NJD002342426
   Paulsboro Refining Company LLC
   800 Billingsport Road
   P.O. Box 702
   Paulsboro, New Jersey 08066

2. *40 CFR §256.56(a)(2) – The calendar year covered by the report:*

   This report includes material shipped during calendar year 2014.

3. *40 CFR §265.56(a)(3) – The name and site address of each consignee:*

   Union Corporation
   #548, Okmyoung-Ri, Daesonq-Myon, Nam-Gu, Pohang City, Kyunqsanqbuk-Do, South Korea

4. *40 CFR §265.56(a)(4) – By consignee, for each hazardous waste exported, a description of the hazardous waste, the EPA hazardous waste number (from 40 CFR Part 261, Subpart C or D) DOT hazard class, the name and US EPA ID number (where applicable) for each transporter used, the total amount of waste shipped and number of shipments pursuant to each notification:*

   Union Corporation Korea
   CHD Hydrotreating Catalyst, K171, DOT Hazard Class 4.2

   Transporter: R&B Debris Trucking. (EPA ID # NJR000065086)
   213.39 tons; one shipment.

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5. *40 CFR §264.56(a)(5) – Except for hazardous waste produced by exporters of greater than 10 kg but less than 1000 kg in a calendar month, unless provided pursuant to §262.41, in even numbered years:*

   (i) A description of the efforts undertaken during the year to reduce the volume and toxicity of waste generated; and

   Paulsboro Refinery continues to investigate methods to reduce hazardous waste generation through process improvement and recycling. For this specific waste stream, refinery personnel evaluate and optimize production processes to extend catalyst life. While reclamation or reuse of spent catalyst is preferred, landfills or incineration may be used when recycling efforts are deemed infeasible.

   During calendar year 2014, base metals were reclaimed from K171 catalysts at Union Corporation which is located in South Korea.

   (ii) A description of the changes in volume and toxicity of waste actually achieved during the year in comparison to previous years to the extent such information is available for years prior to 1984:

   Since the volume of spent catalyst generated annually is a function of economics, product demand and process efficiency, a year-to-year comparison may not clearly indicate waste reduction efforts. However, during 2014 approximately 99% of the hazardous spent catalysts generated at Paulsboro Refinery were suitable for base-metal reclamation of molybdenum at Union Corporation.

6. *40 CFR §262.56(a)(6) – A certification signed by the primary exporter which states:*

   "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 us true, accurate, and complete. I am aware that there are significant penalties for submitting false information including the possibility of fine and imprisonment."

If you have any questions or need additional information, please contact me at (856) 224-6412.

Sincerely,

Paul W. McDonald
Staff Environmental Engineer

Paulsboro
Refining Company

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oute EPA Mail

To: Federal Activites

Mailstop: ARIEL RIOS SOUTH

Department: 2254A

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