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Responsible Care® A Public Commitment

Registered mail

January 14, 2016

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

RE: Exporter of Hazardous Waste
2015 Annual Report –Occidental Chemical
Niagara Falls, NY Plant
EPA ID: NYD000824482

Dear Sir or Madame,

Pursuant to CFR Part 262.56, since Occidental Chemical is an exporter of hazardous waste to Canada, the following information is submitted to fulfill this USEPA requirement.

1. *The EPA identification number ,name , and mailing and site address of the exporter*
   a. EPA ID : NYD000824482
   b. Occidental Chemical Corporation
      Niagara Plant
      Site Address: 4700 Buffalo Avenue, Niagara Falls NY 14303
      Mailing Address: PO Box 344, Niagara Falls NY 14303

2. *Calendar year covered by the report* ; 2014 5

3. *Name and site address of each consignee*:
   Newalta Corporation
   1131 Snow Valley Road
   Barrie, ON L4 1J2
   NCO0000000530
   Note: In 2015 Newalta was acquired by Revolution Environmental Solutions Acquisitions GP INC., with the same address.

4. *By Consignee, for each hazardous waste reported, a description of the EPA hazardous waste number (from 40 CFR part261, subpart C or D), DOT hazard class, the name of each transporter used, total amount of waste shipped and the number of shipments pursuant to each notification.*

Occidental Chemical Corporation
P.O. Box 344
Niagara Falls, New York 14302-0344
716/278-7777

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received

This information is provided below; Occidental only had one consignee, which was Newalta that was acquired by Revolution Environmental Solutions Acquisition GP INC.as noted in 2015.

a. Description: The waste is a chlorinated organic waste generated from the Dechlorane Plus process at the Niagara Plant
b. EPA waste numbers: D001,D019,D032,D033,D034,D039,F002
c. Shipping name /hazard class : RQ UN1992,Waste Flammable Liquids, Toxic, N.O.S. (cyclooctadiene, tetrachloroethylene) 3(6.1) PG II (D001,D019,D032,D033,D034,D039,F002)
d. Transporter : Newalta Corporation NYF00600137
e. The following were shipments made to Newalta/ Revolution Environmental Solutions Acquisition GP INC and quantities ;

1)	01/19/2015	17,980 lbs.	(Newalta)
2)	04/16/2015	31,060 lbs.	(Revolution)
3)	07/17/2015	36,270lbs.	(Revolution)
4)	09/10/2015	15,849 lbs.	(Revolution)
5)	11/06/2015	38,600 lbs.	(Revolution)
	Total	*139,759 lbs.*	

5. Except for hazardous waste produced by exporters of greater than 100 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; (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.

A description of waste minimization efforts are as follows with respect to item 5:

(i) Best management operating practices were used throughout 2015 by the operations department to minimize the waste.

(ii) Under NYSDEC Hazardous Waste Reduction Plan (HWRP) requirements, an on going HWRP has been submitted and approved by NYSDEC, which includes this, waste stream. In the past, the following projects for this waste stream were implemented:

a. Changing operating variables, charges, hold times and procedures estimated 20-per year ton reduction.

b. Procedure changed on still operations with an estimated 3 ton per year reduction.

It should also be noted, that this waste stream was previously disposed of at a facility in Texas by incineration. Working with Waste Technology Services (WTS), a waste technology and waste broker firm, a disposal outlet was located in Ontario, Canada which resulted in a reuse activity (fuels blending) with a decreased risk in transportation, since the distance to Canada was substantially reduced.

Should you have any questions, or desire any additional information, please contact me at 716 278-7534.

Respectfully yours,

James J Czapla
Environmental Engineer

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.

John Morrisey

John Morrisey
Plant Manager
Occidental Chemical –Niagara Plant

Occidental Chemical (
P.O. Box 344
Niagara Falls, N.Y. 14302-0344

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