REGION 6 EXECUTIVE SUMMARY

TOPIC: RCRA Waste Generated at Arkema Crosby, Texas Plant

DATE: August 31, 2017 CONTACT: Kishor Fruitwala

PURPOSE/ACTION NEEDED: For Information

DEADLINE DATE: No current deadline

Background: Arkema Crosby Plant is located at 18000 Crosby Eastgate Road, Crosby, Texas. Arkema Crosby is a RCRA Large Quantity Generator, and currently, it does not have any RCRA TSD permit. The plant manufactures organic peroxides commonly used in everyday products like kitchen countertops, industrial paints, polystyrene cups and plates, and PVC piping.

Waste Generated: The following information for the RCRA characteristic or listed waste generated at the facility in 2016 was obtained from the TCEQ Central Registry:

Waste Stream/EPA Hazardous Waste Number/2016 Quantity

1. Off-spec organic peroxide; generated from off-spec product
   D001, D002, D003/1,030 lbs
2. Maintenance activities and aerosol containers, insecticides, paints, polishes, lubricants
   D001, D035, D039/160 lbs
3. Organics from spent acid and/or miscellaneous organics
   D001, D002, D003/44,100 lbs
4. Spent sulfuric acid contaminated material
   D002/31 lbs
5. Spent sulfuric acid generated from the cleanout of process tanks or spent acid storage tank
   D001, D002, D007/8, 451,480 lbs
6. Lab waste Group III waste from sample retains and analytical tests performed in the on-site QC lab
   D001, F002, F003, F005/381 lbs
7. Lab waste Group IV generated from sample retains and analytical test performed in the on-site QC lab
   D001, D002, D003, F002/1,564 lbs
8. Industrial wastewater from process areas & process associated areas; storm water and sanitary waste
   D001, D002/291,632,425 lbs
9. Organics from wastewater treatment generated from the production of organic peroxides
   D001/533,080 lbs
10. Discarded flammable cylinders
    D001/12 lbs

RCRA 40 CFR Part 261/EPA Hazardous Waste Number

D001 (Ignitable) D002 (Corrosive) D003 (Reactive)
D007 (Chromium) D035 (Methyl Ethyl Ketone) D039 (Tetrachloroethylene)
F002 (Spent Halogenated Solvents) F003 (Spent Non-Halogenated Solvents)
F005 (Spent Non-Halogenated Solvents)