

US EPA ARCHIVE DOCUMENT



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

SEP 16 2016

OFFICE OF
SOLID WASTE AND
EMERGENCY RESPONSE

NOW THE
OFFICE OF LAND AND
EMERGENCY MANAGEMENT

Mr. Michael Pitcher
President, North America Operation
Hydrodec North America, LLC
2021 Steinway Boulevard SE
Canton, Ohio 44707

Dear Mr. Pitcher:

The U.S. Environmental Protection Agency (EPA) received Hydrodec's request, dated June 15, 2016, for permission to deviate from the operating conditions listed in their operating approval for the purposes of conducting a demonstration test of used oil contaminated with polychlorinated biphenyls (PCBs) in Hydrodec's hydrotreater at the Canton, Ohio facility during the week of September 19, 2016. The intent of the demonstration test is to gather data to support the application for renewal of Hydrodec's approval for treatment of used oil contaminated with PCBs via catalytic hydrogenation (hydrotreatment).

Based on previously-approved demonstration runs in 2009, EPA issued the 2012 operating approval for Hydrodec to treat PCBs at 2,000 parts per million (ppm) to less than 2 ppm. It is EPA's understanding that, for purposes of this 2016 demonstration using the new equipment, Hydrodec plans to treat PCBs at 500 ppm to less than 2 ppm in a series of three runs. To be considered a successful demonstration, Hydrodec must treat PCBs to less than 2 ppm in three consecutive runs. A summary of the proposed operating parameters to be used in the demonstration test can be found in the enclosed table.

By this letter, the EPA authorizes Hydrodec to deviate from the operating conditions listed in their current operating approval as described in Hydrodec's Demonstration Test Plan dated June 15, 2016 in order to conduct a demonstration test during the week of September 19, 2016. During the demonstration test, Hydrodec shall follow all of the terms and conditions found in the June 26, 2012 operating approval, except where specifically modified by the 2016 Demonstration Test Plan. The EPA finds that the operation of the hydrotreater in accordance with Hydrodec's Demonstration Test Plan during the week of September 19, 2016 does not pose an unreasonable risk of injury to health or the environment.

In accordance with EPA's policy for a successful demonstration, the process parameters used during the demonstration, including the initial PCB concentration, will inform the parameters used in any renewed operating approval. Blending the TSCA-regulated feed oil with non-TSCA regulated oil (less than 50 ppm) to achieve the desired feed concentration (500 ppm) will be allowed up to a dilution factor of 10 (10 gallons of non-TSCA regulated oil per 1 gallon of TSCA-regulated oil), during the demonstration. If

blending is successful, the EPA may consider a dilution factor for blending when we consider renewing Hydrodec's operating approval.

Hydrodec will be required to analyze for Aroclors and homologs as well. During the demonstration, split samples will be taken by the EPA and analyzed for Aroclors and homologs and/or congeners. If the demonstration is successful, a demonstration test report should be submitted within 90 days following the demonstration. For a renewal to be considered, the analytical data must be validated and a data validation report submitted as an appendix to the report. The test results section should include a summary table of all results and a description of the results.

If you have any questions regarding this letter, please contact Winston Lue of my staff at (703) 305-1617.

Sincerely,

A handwritten signature in black ink, appearing to read "Barnes Johnson", written over the printed name.

Barnes Johnson, Director
Office of Resource Conservation and Recovery

Enclosure

cc: Lisa Graczyk, EPA Region 5

Table of Hydrodec Proposed Operating Parameters for the Demonstration

PARAMETER	TEST 1	TEST 2	TEST 3
PCB Oil Concentration (Blend Outlet)(mg/kg)	500 ppm	500 ppm	500 ppm
Maximum Reactor Feed Oil Flow (kg/hr)	650	700	750
Minimum Reactor Temperature (°C)	280	280	280
Minimum Reactor Pressure (psi)	495	495	495
Minimum Recycle Gas Flow (kg/hr)	17.5	17.5	17.5
Minimum Scavenger Flow Rate (kg/hr)	5	2	2
Minimum Quench Water Flow (kg/hr)	80	30	30
Final PCB Concentration (mg/kg)	< 2ppm	< 2ppm	< 2ppm