

US EPA ARCHIVE DOCUMENT



# Project XL: OSi Specialities, Inc.



## WHAT IS PROJECT XL?

Project XL is a national pilot program that tests innovative ways of achieving better and more cost-effective public health and environmental protection. Through site-specific agreements with project sponsors, EPA is gathering data and project experience that will help the Agency redesign current approaches to public health and environmental protection. Under Project XL, sponsors, private facilities, industry sectors, Federal facilities, and communities can implement innovative strategies that produce superior environmental performance, replace specific regulatory requirements, and promote greater accountability to stakeholders. For more information on Project XL, see EPA's fact sheet entitled, "What Is Project XL? Excellence and Leadership in Environmental Protection" (EPA 231-F-97-001), April 1997, available on the Internet at <http://www.epa.gov/ProjectXL> or via Project XL's fax-on-demand line at 202-260-8590.

## SUMMARY OF THE OSi SPECIALTIES PROJECT

OSi Specialities, Inc. (a subsidiary of Witco Corporation) is a specialty chemical manufacturer. OSi, EPA, and the West Virginia Department of Environmental Protection (WVDEP) have signed an agreement for OSi's Sistersville, WV plant that will achieve superior environmental benefits while providing OSi with significant cost savings. To achieve the environmental benefits, OSi has agreed to (1) install air pollution controls on a production unit well ahead of when the controls are anticipated to be required by EPA regulations (the Miscellaneous Organic NESHAPS, or "MON"), (2) reuse/recycle methanol, reducing generation of sludge at the facility, and (3) study the feasibility of reducing its waste streams. As an incentive for the environmental benefits of the Project, EPA and WVDEP have agreed to propose a deferral of new organic air emission regulations (RCRA Subpart CC) applicable to OSi's two hazardous waste surface impoundments, as described in the Regulatory Flexibility section below. In addition, if necessary, EPA and WVDEP will also propose a deferral of certain regulations (CAA Subpart YYY) that may be triggered if OSi implements waste reduction projects, as described in the Regulatory Flexibility section below. CAA Subpart YYY would be deferred on a case-by-case basis and only if these waste reduction projects meet strict environmental protection requirements.

## SUPERIOR ENVIRONMENTAL PERFORMANCE

Without the project, OSi would be required to comply with RCRA

**REGULATORY  
FLEXIBILITY**

Subpart CC and may be required to comply with CAA Subpart YYY under certain circumstances, but would not implement any of the environmentally beneficial components of the project. As a result, the facility's air emissions and waste generation without the project are estimated to be substantially greater than with the project.

Under the project, OSi will install an incinerator and route the process vents from a production unit to the incinerator. The incinerator will destroy 98 percent (by weight) of the organic compounds in the vent stream, or about 309,000 pounds per year. In addition, OSi will recover and reuse an estimated 500,000 pounds per year of methanol that would otherwise be treated in its wastewater system. This will result in a reduction in sludge from the facility's wastewater treatment system of about 815,000 pounds per year. OSi will also conduct a waste minimization/pollution prevention study which should lead to additional reductions in the volume and toxicity of the waste generated by the facility and provide useful information on waste reduction to EPA and other facilities.

EPA and WVDEP have agreed to propose and promulgate (subject to review of public comment) a deferral of RCRA Subpart CC organic air emission standards applicable to OSi's two surface impoundments. If not deferred, these new standards would require OSi to install air emission controls on its surface impoundments.

If OSi begins recovering certain substances listed in proposed CAA Subpart YYY as a result of its waste minimization efforts, EPA and WVDEP will consider issuing a limited scope deferral of the regulations on a case by case basis. If such a deferral is granted, EPA and WVDEP will propose and promulgate (subject to review of public comment) regulations implementing the deferral. This XL project includes this provision because CAA Subpart YYY, if applicable, would require additional air emission controls. These air emission controls could make certain waste minimization projects economically infeasible for OSi.

EPA and WVDEP would propose any regulatory deferrals such that they are effective until the required compliance date of the MON. This future Clean Air Act standard is expected to require installation of controls similar to the incinerator to be installed under the project. The compliance date of the future air standard is currently anticipated to be in 2002. At that time, the Project will end unless additional environmental benefits warrant the continuation of the regulatory flexibility.

OSi is working to ensure that stakeholders have an opportunity to participate fully in the Project. Efforts so far include:

\$ A series of public information meetings held at the OSi facility

- \$ A presentation to the West Virginia Conference on the Environment
- \$ Interviews with radio and newspaper media
- \$ Publication of meeting notices in local newspapers
- \$ A public file on the Project located at the local Sistersville library and EPA Region III in Philadelphia
- \$ Meeting minutes and other information sent to interested parties

In the future, periodic reports featuring information on the site's environmental programs and progress will be distributed to stakeholders

**STAKEHOLDER INVOLVEMENT**

- C Can providing the flexibility to control pollution in a more cost-effective manner produce benefits for both industry and the environment?
- C Is it environmentally beneficial to defer regulations as an incentive for encouraging waste minimization/pollution prevention activities?
- C What results can be obtained through a waste minimization/pollution prevention study?

Regional Contact: Cheryl Atkinson, 215-566-3392  
EPA/XL HQ: Nancy Birnbaum, 202-260-2601  
State Contact: Lucy Pontiveros, 304-558-1220  
Company Contact: Okey Tucker, 304-652-8131

More information about Project XL is available on the Internet at <http://www.epa.gov/ProjectXL>, via Project XL's fax-on-demand line at 202-260-8590, or via Project XL's Information Line at 703-934-3239.

**APPROACHES TO BE TESTED**

**CONTACTS**

**FOR ELECTRONIC INFORMATION**