TD*X Associates LP

Fact Sheet

Chemical Waste Management Northwest Hazardous Waste Permit ORD 089 452 353

- TDX Associates LP operates a Thermal Desorption Unit (TDU) in Robstown, Texas under an enhanced Resource Conservation and Recovery Act (RCRA) permit issued in 2016 by the Texas Commission of Environmental Quality (TCEQ).

- The TDX Associates LP TDU handles organic waste from petroleum, petrochemical and manufacturing operations, as well as organic-bearing liquids, sludges and solids, in a more sustainable and cost-effective manner than incineration.

- The RCRA Subpart X permit for the TDX Associates LP TDU requires air emissions meet Maximum Achievable Control Technology (MACT) EEE emission limits that are protective of human health and the environment.

- Chemical Waste Management operates a TDU in Lake Charles, Louisiana that was permitted by the Louisiana Department of Environmental Quality (LDEQ) under the same RCRA regulatory standards as the TDX Associates LP TDU in Texas.

- Chemical Waste Management is seeking to be excluded from RCRA Subpart X requirements for its TDU in Arlington, Oregon, which is operating under temporary authorization. The Arlington TDU handles waste streams identical to the TDX Associates LP and Chemical Waste Management Lake Charles plants.

- Impacts of less stringent requirements at the Arlington TDU include:
  - Less oversight from regulators
  - No air emission testing and monitoring requirements
  - No limits on numerous hazardous emissions from the TDU
  - Loopholes that could lead to zero recycling of materials combusted by the TDU

- Typical compounds present in the hazardous wastes handled by TDUs include mercury, cadmium, arsenic and lead. Facilities not subject to RCRA Subpart X and MACT EEE emission limits can result in far higher toxic emissions. For example, mercury emissions could be 7,000 times higher.

- RCRA and MACT EEE are intended as a national, not an optional standard. Allowing TDU operators to use unregulated, unproven and untested control technology is not responsible. CWM Arlington has no limit on the amount of toxic compounds they can receive and will therefore attract more concentrated hazardous waste which increases toxic air emissions.

- Oregon has an unfortunate track record of ignoring potential toxic air emissions. Bullseye Glass in Portland now faces a class-action lawsuit alleging it emitted arsenic, cadmium and other toxic heavy metals while operating under a DEQ air permit. The company is suing Oregon’s governor, alleging lax environmental protection.

- TD*X Associates does not oppose the Arlington TDU. It advocates permitting the Arlington TDU under the same RCRA Subpart X requirements as similar facilities in Texas, Arkansas and Louisiana, including a facility operated by Chemical Waste Management.