

PUBLIC NOTICE

Division of Waste Management, N. C. Department of Environmental Quality
Hazardous Waste Section

PUBLIC HEARING FOR DRAFT HAZARDOUS WASTE OPERATING PERMIT CLARIANT WEST – MOUNT HOLLY EPA ID# NCD085074821

This is to notify the public of the issuance by the North Carolina Division of Waste Management's Hazardous Waste Section of a draft Operational Permit for the CLARIANT WEST – Mount Holly facility located at 625 East Catawba Avenue, in Mount Holly North Carolina.

This hearing will be held Tuesday June 6, 2023 at 1:00 PM at the Mount Holly Library located at 245 West Catawba Avenue in Mount Holly, North Carolina. All attendees will have the opportunity to present five (5) minute oral statements regarding the draft Permit and/or to submit written comments and data. Written comments can also be sent during the public comment period of May 6, 2023 through Thursday June 22, 2023 to the following address:

Adam Ulishney, Hazardous Waste Section Chief
Division of Waste Management, NCDEQ
MSC 1646
Raleigh, NC 27699-1646

All data submitted by the applicant is part of the administrative record and available at <https://deq.nc.gov/about/divisions/waste-management/laserfiche>. Documents may be located by using the EPA ID# NCD001810365. The draft Permit and fact sheet can also be found online at the following location: <https://deq.nc.gov/news/events/public-notice-hearings>.

A summary of the draft Operational Permit follows:

Clariant Corporation West is comprised of approximately 40 acres within the city limits of Mount Holly. An industrial facility has been at Clariant West's current location since 1953 however, the facility has changed ownership on several occasions. The facility currently has approximately 150 employees.

The site is located in an industrial land use area that is adjacent to a multifamily residential use area. The production area of the plant is secured by a fence while the eastern boundary of the property is the Catawba River. The western and northern boundaries are survey lines adjacent to the Northern and Piedmont Railroad right-of-way. The southern property boundary is a fenced survey line shared with Duke Power and other industries.

The facility includes five manufacturing plants, warehouses, administrative offices, laboratories, employee facilities, maintenance facilities, and a wastewater pretreatment plant.

Clariant West operates as a manufacturer of organic specialty chemicals. The chemicals are primarily used for the production of the insecticide N, N-diethyl-meta-toluamide (DEET); chemicals for personal care products, cleaning supplies, and various lubricants. The facility manufactures over 200 different products in batch processes. Hazardous wastes are generated primarily by the DEET production

process, off-specification and out-of-date materials, and laboratory waste. All hazardous wastes are stored in containers until transferred off-site for treatment or disposal. No hazardous wastes are received from off-site sources.

Clariant was issued a RCRA Part B operating permit in 1983, and a renewal Part B operating permit was issued in 1995. Another renewal Part B operating permit was issued in 2009. Clariant operates one RCRA-permitted hazardous waste management unit. The unit is located about 50 feet south of the Plant 1 building and is known as the Plant 1 Hazardous Waste Container Storage Area (SWMU 5). SWMU 5 consists of a concrete pad with concrete curbs for secondary containment. The unit is covered by a roof and surrounded by a chain-link fence.

Clariant began site characterization activities in 1989 and continued site-wide investigations through the mid-1990s. Generally, investigations that focused on specific units were conducted in the early 2000s. These activities resulted in several interim measures; including soil removal, decommissioning of SWMUs, groundwater recovery in the area of Plants 1 and 2, a pilot test for a SVE system east of Plant 1, and adding above-ground process sewer lines.

A RCRA Facility Assessment (RFA) for the Clariant facility was finalized by US EPA Region IV in 1994. The RFA identified forty-five Solid Waste Management Units (SWMUs) and two Areas of Concern (AOCs). Clariant completed a RCRA Confirmatory Sampling Report in 1998.

As part of the review for the 2007 RCRA Part B permit application, the HWS requested that Clariant update the information in the RFA. This request resulted in an addendum to the Part B permit application (dated April 16, 2009.) The addendum contains additions to SWMU descriptions, a SWMU location map, and groundwater monitoring well location map.

The HWS approved a revised Conceptual Site Model (CSM) in 2010. Using the actions required for SWMUs and AOCs by the RCRA Part B permit and the conclusions presented in the CSM as guidance, Clariant submitted a revised Additional Assessment Work Plan in 2011. In 2013, a revised report that discussed the work completed under the work plan was approved by the HWS. A second phase of investigations designed to address data gaps revealed by the 2011 assessment was implemented in 2014, and a report was submitted in 2015.

Clariant has completed an Environmental Indicator evaluation determinations for the Mt. Holly West facility. Clariant was able to conclude that “human exposures are under control” on September 11, 2018 and that “the migration of contaminated groundwater is under control” at the facility on September 14, 2016. Therefore, status codes CA 725 and CA 750 were entered into RCRAInfo, accordingly.

In addition to following the prescribed RCRA corrective action process, Clariant has implemented special projects such as the installation of a stormwater retention pond in 2012. At the request of Clariant, the HWS gave the project priority status.

Clariant has conducted site-wide groundwater sampling events in recent years. Two primary areas of VOCs in groundwater have been identified. The first being the area in and downgradient of Plant 1, and the second being the east-central portion of the site. The predominant compounds of concern (i.e., detected at concentrations greater than North Carolina 2L Groundwater Standards) include tetrachloroethene (PCE) and its primary degradation products: trichloroethene (TCE), cis-1,2-dichloroethene (1,2-DCE), and vinyl chloride (VC).

These compounds are present in both areas of groundwater impacts. Benzene, 1,4-dichlorobenzene, and 2-chlorotoluene were identified primarily in the area of Plant 1.

Groundwater data also indicate that a third primary area of groundwater contamination was located near Plant 3. Free product, believed to be diesel fuel, has been identified in this area of the site.

Another area of groundwater contamination is located north of the warehouse near a process sewer line release. In addition, groundwater analytical results suggest a likely source of chlorinated ethenes southeast of the wastewater pretreatment plant. The SVOCs 3-4-methylphenol, 2-methylnaphthalene, and bis (2-ethylhexyl) phthalate have been detected above 2L groundwater standards in some site wells.

Detailed discussions of impacts to soil are contained in the 2012 Additional Assessment Report. This report also presents the results of historical soil investigations. In addition, the 2013 and 2015 Environmental Indicator reports contain summaries of soil impacts at the site. Based on the results presented in the 2012 Additional Assessment Report (approved in 2013) and the Environmental Indicator reports, numerous constituents exceed soil-to-groundwater screening criteria, including constituents that have not been detected in groundwater at concentrations exceeding 2L Groundwater Standards. Compounds detected in soil at concentrations greater than industrial soil screening levels include PCE, ethylbenzene, xylene, PCBs, naphthalene, and arsenic. Recent analytical results indicate that arsenic concentrations in soil are consistent with background. Clariant prepared “Responses to the HWS’s Comments” for the referenced Additional Assessment Report.

The RCRA Permit’s expiration date has elapsed, however, by law the permit remains in effect beyond the expiration date until issuance of a new permit, which is the purpose of this Public Notice. One primary objective of the Permit Application relates to the goal of cleaning the soil and groundwaters. Historical measures of cleaning the groundwater have included groundwater recovery and onsite treatment.

Assessment activities to address permit-required confirmatory sampling and RCRA facility investigation requirements have been completed. The results will be used to evaluate potential risks to human health from site impacts and to evaluate risk-based remedial alternatives for the site. The Preliminary observations appear to support the notion that the site may be a good candidate for risk-based remediation in accordance with NC General Statutes (NCGS) 130A-310.65 through 310.77 (Risk-Based Statutes). Therefore, it is possible that Clariant will pursue risk-based remedial action under the Risk-Based Statutes in the future.

All comments received during the public comment period or at the hearing will be considered in the decision regarding this Permit. Comments received after the public comment period ends will not be considered. The statutory authority for calling the permit hearing is G.S. 130A-294(f). Applicable State rules are found in the North Carolina Hazardous Waste Management Rules 15A NCAC 13A .0105, .0109, and .0113. These rules adopt the requirements of the Federal Resource Conservation and Recovery Act as amended by the Hazardous and Solid Waste Amendments of 1984. Anyone desiring additional information may contact Mike Babuin at (919) 707-8211 or Michael.babuin@ncdenr.gov or, at the address listed above.