

FACT SHEET

Mallinckrodt - Raleigh Pharmaceuticals Plant

8801 Capital Boulevard

Raleigh, NC 27616

NCD 042 091 975

A Draft Renewal Permit has been prepared for the Mallinckrodt-Raleigh Pharmaceuticals Plant (Mallinckrodt) that allows the facility to store hazardous waste in the container storage area and to treat K083 waste aniline still bottoms in Boiler Number 2 and Boiler Number 7 under the provisions of the Federal Resource Conservation and Recovery Act (RCRA). The permit also requires groundwater monitoring of two post-closure regulated units and corrective action at Solid Waste Management Units (SWMUs) across the facility. North Carolina has been authorized by the United States Environmental Protection Agency to administer RCRA including the Hazardous and Solid Waste Amendments (HSWA) of 1984. The State has determined that Mallinckrodt's proposed activities as identified in the application satisfy the full intent of the North Carolina Hazardous Waste Management Rules and Solid Waste Management Act as amended. When finalized this modified permit issued by the State of North Carolina will constitute a complete permit under the Resource Conservation and Recovery Act.

Mallinckrodt is a manufacturer of bulk pharmaceutical and specialty organic chemicals. The main facility process is the manufacturing of acetaminophen. The facility also manufactures para-aminophenol which is used to manufacture acetaminophen. The para-aminophenol production process generates a hazardous waste stream from an aniline recovery process. This hazardous waste stream is identified by waste code K083, distillation bottoms from aniline production.

Mallinckrodt treats the K083 waste aniline still bottoms by burning the waste for energy recovery in Boiler Number 2 and Boiler Number 7. Mallinckrodt is required to have both a Title V permit issued by the Division of Air Quality and a RCRA permit issued by the Division of Waste Management to burn K083 waste aniline still bottoms for energy recovery in either boiler. Mallinckrodt has demonstrated compliance with the MACT emission limits for Boiler Number 2, therefore operating limits for Boiler Number 2 are primarily regulated by the Title V Air Quality permit.

Mallinckrodt is an area source for hazardous air pollutants (HAP) as defined under 40 CFR 63.2. Pursuant to 40 CFR 266.100(b)(3) as adopted in 15A NCAC 13A .0111, Mallinckrodt has the option to comply with the Standards to Control Particulate Matter as specified in 40 CFR 266.105 as adopted in 15A NCAC 13A .0111 and the Standards to Control Metals Emissions as specified in 40 CFR 266.106 as adopted in 15A NCAC 13A .0111 rather than the particulate matter and non-mercury metal MACT emission standards under 40 CFR 63.1217. Mallinckrodt has met certain MACT emission limits when burning K083 waste aniline still bottoms for energy recovery in Boiler Number 7. These limits are regulated by the Title V permit. This RCRA permit includes conditions to meet the RCRA standards to control particulate matter and nonmercury metals emissions specified in 40 CFR 266.105 and 40 CFR 266.106 as adopted in 15A NCAC 13A .0111 while burning K083 waste aniline still bottoms in Boiler Number 7.

Additionally, this permit will allow Mallinckrodt to store up to 46,200 gallons of hazardous wastes generated on site in a designated storage building. The permit also requires Mallinckrodt to remediate contaminated soil and groundwater resulting from past waste management activities at the facility.

The North Carolina Hazardous Waste Management Rules require that the public be given a forty-five (45) day period to comment on the draft permit. This forty-five (45) day period will commence on July 1, 2022. The draft permit can be found online at the following location: <https://deq.nc.gov/public-notices-hearings>

All data submitted by the applicant is part of the administrative record. Files are accessible through the document management system at: <https://deq.nc.gov/about/divisions/waste-management/laserfiche>

Download Instructions for web portal:

- a. Select **Laserfiche** in middle of page
- b. Enter the public **Laserfiche Weblink**
- c. Select 'Search' in the upper left corner
- d. On the left ribbon under Customize Search select **Template**
- e. Under Template select **WM**
- f. Subdivision > **Hazardous Waste**
- g. Doc_Category > **Facility**
- h. Doc_Group > **Permit (P)**
- i. Program_ID > **NCD042091975**

Persons wishing to comment on this permit or the proposed permit conditions or to object to the permit issuance should submit comments in writing prior to August 15, 2022. All comments received within the forty-five (45) day period will be considered before the final permit decision is made. Comments should be sent to:

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

A public hearing to receive comments concerning the issuance of the proposed permit will be held on Thursday August 11, 2022 at 12 noon in the Training Room, NCDEQ Building, 217 West Jones Street, Raleigh, North Carolina. Additionally, a virtual public hearing will be held on Tuesday August 9 at 10:00 am. The public can join online or by phone:

Meeting Link: <https://bit.ly/3N779Ko>

Meeting Number: 2431 997 6115

Password: Mallin2

Join by Phone: +1-415-655-0003 US TOLL

Access Code: 2431 997 6115

Participation can take place in person, online, or via telephone. Attendees may submit a written statement for the official record in addition to their oral statement or they may submit written comments in lieu of making an oral presentation. Comments must be received by August 15, 2022. When a final decision is made to issue, deny, or modify the draft renewal permit, notice will be given to the applicant and to each person who has submitted written comments or requested notice of the final decision.

Anyone desiring additional information may contact Katherine O'Neal at the address listed above or at (919) 707-8209 or katherine.oneal@ncdenr.gov.