



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OCT 28 1999

OFFICE OF  
SOLID WASTE AND EMERGENCY  
RESPONSE

Mr. Sam Z. Chamberlain  
Vice President, Environmental, Health, and Safety  
Pioneer Companies, Inc.  
700 Louisiana Street, Suite 4300  
Houston, TX 77002

Dear Mr. Chamberlain:

This letter confirms that, effective October 25, 1999, the U.S. Environmental Protection Agency (EPA) has granted a site-specific determination of equivalent treatment (DET) to Pioneer Chlor-Alkali, Inc. in St. Gabriel, Louisiana.

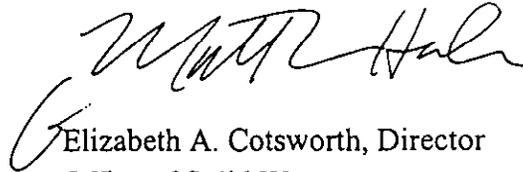
For the reasons specified in the *Federal Register* notice of September 23, 1999 (attached), we find that Pioneer meets the criteria of 40 CFR 268.42(b). Therefore, Pioneer's Remerc process is determined to be an equivalent technology to roasting or retorting (RMERC). As stated in section IV.C. of the *Federal Register* notice, the conditions and other provisions of the DET are as follows:

- (1) Remerc residuals at Pioneer's facility must meet a mercury standard of 0.20 mg/L TCLP;
- (2) If Pioneer generates a high mercury subcategory (i.e., greater than 260 mg/kg total mercury) treatment residual from its Remerc process, it may be re-treated using the Remerc process until it meets Condition #1 above;
- (3) After treatment residuals meet Condition #1, Pioneer may dispose of the residuals in a RCRA Subtitle C landfill if the residuals meet any other applicable LDR treatment standards;
- (4) Compliance with these Conditions does not relieve the facility from compliance with any other applicable treatment standards associated with this waste, including other applicable federal, state, or local requirements as specified in the facility's waste analysis plan; and
- (5) This DET has no expiration date.

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If you have any questions, please feel free to contact Josh Lewis of our Waste Treatment Branch, at (703) 308-7877.

Sincerely,



Elizabeth A. Cotsworth, Director  
Office of Solid Waste

cc: Dana Oliver, Pioneer Chlor-Alkali Company, Inc.  
Barton Day, Bryan Cave LLP  
Teena Wooten, USEPA Region 6  
Gene Keeper, USEPA Region 6  
Bruce Hammatt, Louisiana Department of Environmental Quality  
Chris Roberie, Louisiana Department of Environmental Quality