

WastePro Memorandum

To: Richard Gladstein (ENRD), Department of Justice

From: Jeff Karnes

Date: March 12, 2007

Re: Hazardous Waste Receipts into MSP - Target Generators

The purpose of this project is to produce a list of the corporations that sent the most hazardous waste into the Marine Shale Processors Inc (MSP) plant in Amelia, LA, USEPA ID: LAD98105776. The information was consolidated from the Top 500 generator lists obtained from three distinct data sets: 1985 through 1990 facility reports, 1991 facility reports, and 1992 through 1996 hazardous waste manifests, see memo from Jeff Karnes to Richard Gladstein (ENRD), "Hazardous Waste Receipts into MSP Data: 1985-1990, 1991 and 1992-1996", March 12, 2007.

The procedure used to create the list began by identifying the sites that shipped at least 1,750 tons to MSP on any of the lists. The volume cut-off was chosen to yield an initial list of around 100 sites. Next, corporate websites, EPA online resources and state databases were used to research each site. This procedure identified operational status, NPL status and current corporate ownership.

Individual sites could appear on each of the three Top 500 lists, and in the case of the 1985 - 1990 list, they could appear multiple times on a single list. For example, Roebuck Disposal LLC appeared once on the 1992-1996 list, on the 1991 list, and four times on the 1985-1990 list. Each occurrence of this Clean Harbors' facility was under a different generator name. EPA IDs remain consistent over time. These were available for the 1992-1996 and 1991 lists. For about 20 sites, the hard copy files for 1985 to 1990 had to be researched to obtain EPA IDs and addresses. The multiple records were consolidated into single record for the site.

The above procedure yielded a list of about 38 corporations owning about 70 sites. The remaining sites below the cut-off volume on each of the three lists were evaluated to identify other sites belonging to the 38 corporations. As a result, about another 30 sites and their shipments were added. During this process, it became apparent that several sites just below the 1,750-ton cut-off appeared on multiple lists. Consequently, the combined volumes from any of these sites would be well above the cut-off. The cut-off definition was modified to be all corporations that sent more than 1,750 tons totaled across the three time periods and all their

sites. After following the above procedures for this new cut-off level, another 9 corporations and 18 more sites were added.

The resultant information is presented in the table "Waste Receipts into Marine Shale Processors 1985-1996: Largest Generators Grouped by Current Corporate Ownership". This group of 37 corporations accounted for 571 thousand tons of the 718 thousand tons (80 percent) of the hazardous waste shipped to Marine Shale Processors. These numbers exclude any non-hazardous waste shipped to MSP.

Summary tables of sites and volumes are provided for each corporation. Additionally, detailed shipment information at the individual hazardous waste manifest level is included for the 1992 to 1996 period. This level of detail is not available for earlier shipments.