

## ATTACHMENT D

### PLAIN LANGUAGE SUMMARY

Kuraray America, Inc. (Kuraray) is submitting this permit renewal application to continue operation of three active (WDW-82, WDW-83 and WDW-149) and one proposed (WDW-360) Class I Injection Wells. The injected waste streams are non-hazardous. The Kuraray facility is a chemical manufacturing facility, and the injection wells are operated on a non commercial basis solely in support of the manufacturing activities.

The Kuraray facility name is Kuraray La Porte and the facility is located at 12342 Strang Road in La Porte, TX 77571. The primary products manufactured at the facility include polyvinyl alcohol (PVA) and vinyl acetate monomer (VAM). The Kuraray La Porte facility manufactures approximately 90,000,000 pounds of PVA per year and approximately 600,000,000 pounds of VAM per year. The waste streams generated during the manufacturing process which are disposed of via the active Class I injection wells are non-hazardous and consists primarily of water (99.5%). The balance consists of acetic acid, sodium acetate, and methanol along with salts and other minor organics.

The use of underground injection is a proven and accepted technology for disposal of the nonhazardous industrial waste streams generated at the Kuraray La Porte facility. Underground injection is superior to all other technologies presently available and associated operations are protective of human health and the environment. The liquid wastes disposed of in the injection wells are contained in the defined injection intervals on essentially an infinite basis. The reservoirs receiving the injectate are saturated with saline water; and are sealed above with impermeable or nearly impermeable sediments which contain the injected fluids.

Surface waters (fresh and marine) are protected from pollution using a mature technology that has been proven by the oil/gas and chemical industries, by continuous monitoring of operations, secondary containment systems, and inspection of facility manufacturing operations. Safeguards present at and employed by the Kuraray facility are: 1) favorable injection interval geology; 2) stringent well design, installation, and construction standards; 3) regulatory oversight and reporting; 4) annual mechanical integrity testing of wells per TCEQ regulations; 5) operational permit limitations (pressure, volume, fluid density, pH), and 6) monitoring systems for the permitted operational limits.

Groundwater is protected from pollution by adherence to the permitting and operating requirements incorporated into the operating permits for WDW-82, WDW-83, WDW-149, and WDW360 (proposed). The construction of the injection wells incorporates several groundwater protection safeguards: completion in appropriate geologic formations, drilling mud, conservative cementing practices, casing strings, pressurized annulus system and annulus fluid monitoring program, and injection tubing. All these contribute to exceptional confinement and isolation of the injected waste from underground source of drinking water.