Attachment E

Plain Language Summary

BASF Corporation
WDW-51, WDW-99, WDW-408 and WDW-409 (proposed)
Permit Renewal Application to Dispose of Waste in a Class I Injection Well

The applicant is BASF Corporation (referred to as BASF). This application and supporting technical document is for a permit to dispose of waste in a Class I injection well. BASF is requesting renewal for four permits for three drilled wells, which are currently permitted as waste disposal wells WDW-51, WDW-99 and WDW-408, and for one proposed waste disposal well WDW-409. The waste injected in the wells will be wastewater generated primarily during the manufacture of caprolactam at the BASF Facility, which is located on 602 Copper Road in Freeport, Texas. The injection wells are located on property which is owned by BASF Corporation.

The principal waste that will be routinely injected is industrial hazardous wastewater generated from production of caprolactam. The additional permitted wastes include other associated wastes such as ground water and rainfall contaminated by the above authorized wastes, spills of the above authorized wastes, solutions used in cleaning and servicing the waste disposal well equipment and aqueous wastes generated during shutdown, start-up and clean-out operations in the caprolactam production processes and other non-hazardous wastes from other facility operations which are compatible with the permitted waste streams, injection zone and well materials. Wastes generated during well construction or closure of the well and associated facilities that are compatible with permitted wastes, injection zone and well materials could occur as a one-time-only waste and the volume of waste generated will be miniscule in comparison to the other wastes previously discussed.

The wastewater generated for injection into the WDW-51, WDW-99, WDW-408 and WDW-409 (proposed) injection wells will consist of a composite of a number of individual waste streams described in Table IX.A of the permit application. The pH of injected waste streams shall be greater than 2.0 and less than 12.5. The following RCRA waste codes are applicable to the BASF Freeport facility: D002 and D018.

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The USEPA has approved a petition from BASF for exemption from the land disposal restrictions based on a no-migration demonstration. BASF has with that application demonstrated to a reasonable degree of certainty, there will be no migration of hazardous waste from the Injection Zone. Information submitted in the No-Migration Petition demonstrates that subsurface injection of the waste stream is protective of human health and the environment.

Therefore, the company is confident that injection of waste at the BASF Freeport Facility is the best technology available for disposal of the waste stream.

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