

## FACT SHEET

Mallinckrodt  
Raleigh Pharmaceutical Plant  
8801 Capital Boulevard  
Raleigh, NC 27616  
NCD 042 091 975

A Draft Modified Permit has been prepared for Mallinckrodt that allows the facility to treat K083 waste aniline still bottoms in Boiler Number 7 under the provisions of the Federal Resource Conservation and Recovery Act (RCRA). This modification also removes references to Boiler Number 1 which has been closed and removed from service. 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 modification request 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 constitutes a complete permit under the Resource Conservation and Recovery Act.

Mallinckrodt is a manufacturer of bulk pharmaceutical and specialty organic chemicals. The major 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 waste 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 regulated by the Title V Air Quality permit.

Mallinckrodt is an area source for hazardous air pollutants (HAP) 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. Mallinckrodt is currently operating under a RCRA Temporary Authorization to burn the K083 waste aniline still bottoms in Boiler Number 7 in compliance with 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. This Class 3 modification will update and formalize the RCRA permit conditions for Boiler Number 7 for compliance with the Standards to Control Particulate Matter and the Standards to Control Metals Emissions specified in 40 CFR 266.105 and 40 CFR 266.106 as adopted in 15A NCAC 13A .0111.

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 November 18, 2017. All data submitted by the applicant is part of the administrative

record and available for your review Monday through Friday during office hours (9:00 a.m. to 4:00 p.m.). Copies of the Class 3 modification request, the draft modified permit, and a fact sheet are available at the Hazardous Waste Section located at 217 West Jones Street in Raleigh, North Carolina. Call (919) 707-8270 for an appointment before arriving. The draft modified permit and a fact sheet can also be found at <https://deq.nc.gov/news/events/public-notice-hearings>. Files are also accessible through the document management system at: <https://deq.nc.gov/about/divisions/waste-management/waste-management-rules-data/e-documents>. To locate relevant files, search using the ID Number: NCD042091975.

Persons wishing to comment on the permit modification or to object to the permit modification should submit such comments in writing prior to January 2, 2018. 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:

Ms. Julie Woosley, Chief  
North Carolina Division of Waste Management  
Hazardous Waste Section  
MSC 1646  
Raleigh, NC 27699-1646

A public hearing to receive comments concerning the issuance of the proposed permit will be held on Wednesday December 20, 2017 at 1:00 pm at the North Regional Library, 7009 Harps Mill Road, Raleigh, North Carolina. 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. When a final permit decision is made to modify the permit, notice will be given to the applicant and to each person who has submitted written comments or requested notice of the final decision.