



State of Ohio Environmental Protection Agency

Northeast District Office

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Ted Strickland, Governor
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Laura H. Powell, Acting Director

January 16, 2007

CERTIFIED MAIL
RETURNED RECEIPT REQUESTED

Ms. Allison Knowles
Von Roll America, Inc.
1250 St. George Street
East Liverpool, OH 43920

**RE: HAZARDOUS WASTE PERMIT MODIFICATION CLASS 1A APPROVAL
FRONT WALL ATOMIZATION PRESSURE
VON ROLL AMERICA (VRA), INC. OHD 980 613 541 / 02-15-0589**

Dear Ms. Knowles:

Ohio EPA received a request dated December 13, 2006, for a Class 1A (Class 1 requiring prior approval) hazardous waste permit modification (tracking number - OHD 980613541 - 061214 - 1A-1) from Von Roll America (VRA), Inc. With this letter, Ohio EPA approves the above referenced Class 1A modification submitted pursuant to Ohio Administrative Code Rule 3745-50-51.

FOR APPROVAL

The following modification has been made to your Ohio Hazardous Waste Facility Installation and Operation Permit, journalized on March 23, 2005, and the Part B permit application.

The Class 1A permit modification is needed to remove a RCRA permit condition for a parameter that is also regulated by the Clean Air Act, HWC MACT. Ohio EPA approved a permit modification (tracking number OHD 980613541 - 051205-1A-1) on February 7, 2006 to remove RCRA permit conditions that were also included in the facility's Title V permit. The front wall atomization pressure parameter was overlooked at the time the modification was approved.

NOTE: In the Document of Compliance (DOC), a part of the VRA operating record, this parameter is identified as the Feed Lance Atomization Pressure.

The modification will require changes to Section D, Process Description, of the Part B permit application and permit.

Section D, Process Description

Replace Cover page with Revision 21, dated December 13, 2006;
Replace Page D-124 with Revision 21, dated December 13, 2006;
Replace Page D-141 with Revision 21, dated December 13, 2006;
Replace Attachment D.41 Cover page with Revision 21, dated December 13, 2006;
Replace Automatic Waste Feed Cut Off (AWFCO) and Manual Waste Feed Cut-Off (MWFCO) tables (redacted and unredacted).

VON ROLL AMERICA, INC.
CLASS 1A APPROVAL
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Permit pages

Replace permit page 86, Permit Condition I(A).3, Construction, Instrumentation, and Operational Performance Requirements, (I);
Replace permit page 96, Attachment 1 - Waste Feed Cut-Offs;
Replace permit page 104, Attachment 3 - Incineration System Operating Parameters.

VRA is asserting a **claim of business confidentiality** for the AWFCO and the MWFCO tables. VRA considers this information "trade secret" and treats it as confidential. VRA consistently requires its vendors, subcontractors, and its own employees to safeguard the material from unwanted release to others. A redacted version of the AWFCO and MWFCO tables has been included in this approval.

Attached are copies of the permit page revisions and the revised pages of the Part B permit application. This has been included to ensure that all involved parties have written confirmation of the changes*. If you have any questions concerning this action, please contact Patricia Natali at the Ohio EPA East Liverpool field office, (330) 385-8447 or the Ohio EPA Northeast District Office, (330) 963-1279.

Sincerely,



William T. Skowronski
District Chief
Northeast District Office

WTS:ddw

Enclosure

cc: Pamela Allen, Manager, ITTSS, DHWM, CO
Jeremy Carroll, Supervisor, Engineering Unit, DHWM, CO
John Nyers, DHWM, CO
Patricia Natali, DHWM, NEDO
Frank Popotnik, DHWM, NEDO
Wen Huang, USEPA, Region V
Michelle Tarka, DHWM, NEDO
ec: Sherry Slone, DHWM, NEDO

key words: C1A, approval, frontwall atomization pressure

*Also, in accordance with Ohio Administrative Code Rule 3745-50-51(D)(1)(a)(ii), *Von Roll America, Inc.* shall send a notice within 90 days of an approved Class 1A Modification to all persons on the Agency mailing list. An updated mailing list can be obtained by contacting Pamela Allen at (614) 644-2980, or by e-mail at pamela.allen@epa.state.oh.us.

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- (l) ~~Atomization fluid pressure (e.g., steam, air) to the front wall lances shall be no less than 45 psig and monitored and recorded in accordance with Attachments 1 and 3 to this permit. The limit of 45 psig was recorded during the Permittee's initial trial burn and will be maintained until and unless additional testing demonstrates that complete combustion can be achieved at atomization pressures other than 45 psig.~~

~~If the atomization pressure for any of the feed lances at the front wall fall below 45 psig, the feed for that lance will be cutoff until such time the pressure can be maintained. RESERVED.~~

- (m) The following conditions apply to the Secondary Combustion Chamber (SCC):
- (i) The water level in the slag quench tank at the base of the SCC shall be maintained automatically by a level probe and automatic valve. A visible and audible alarm shall warn the operator if the water level falls below the bottom edge of the outlet in the bottom of the SCC.
 - (ii) Reserved.
- (n) The outlet temperature of the spray dryer (inlet temperature of the ESP) must be between 250°F and 450°F at all times waste is in the incineration system and shall be monitored and recorded on a continuous basis and in accordance with Attachments 1 and 3 to this permit.
- (o) Reserved.

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ATTACHMENT 1 - WASTE FEED CUT-OFFS

AUTOMATIC WASTE FEED CUT-OFFS	
PARAMETER	OPERATING LIMIT - TESTED WEEKLY
FRONT WALL LANCES	ATOMIZATION PRESSURE AT LANCES MUST BE > 45 PSIG
SPRAY DRYER OUTLET TEMPERATURE	MUST BE ABOVE 250°F AND BELOW 450°F

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ATTACHMENT 3 - INCINERATION SYSTEM OPERATION PARAMETERS

System Parameter	Instrument (DCS Tag#) and Monitoring System	Operating Limit and Monitoring Frequency	Calibration Frequency	Back-up System
Front Wall Lances	FI-3110, 3120, 3130, 3140, 3150, 3160 Pressure switches	Atomizing steam, air or oxygen pressure > 45 psi Monitored continuously	annually or as needed	WFGO
Slag Quench Tank	LI-4610, Level indicator	water level in tank monitored continuously	annually or as needed	none

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