



State of Ohio Environmental Protection Agency

Northeast District Office

2110 East Aurora Rd.
Twinsburg, Ohio 44087

TELE: (330) 963-1200 FAX: (330) 487-0769
www.epa.state.oh.us

Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

February 27, 2008

Mr. John Peterka
Heritage - WTI, Inc. (WTI)
1250 Saint George Street
East Liverpool, OH 43920

RE: HAZARDOUS WASTE PERMIT MODIFICATION, REMOVE 85 GALLON RESTRICTION FROM THE CONTAINER HOLDING BUILDING CLASS 1A APPROVAL (PITS #080131-1A-1), HERITAGE - WTI, INC. (WTI) U.S. EPA ID# OHD 980 613 541 / OHIO PERMIT # 02-15-0589

Dear Mr. Peterka:

On January 31, 2008, Ohio EPA received a request for a **Class 1A** (Class 1 requiring prior approval) hazardous waste permit modification dated January 28, 2008, from Heritage - WTI, Inc. (WTI). This modification involves the removal of the >85 gallon restriction from the Container Holding Building (Slag Canopy). Previously, containers were required to be greater than 85 gallons in order to be stored in the Container Holding Building. With this modification, any size container may be stored in the Container Holding Building.

With this letter, Ohio EPA approves the above referenced Class 1A modification submitted pursuant to Ohio Administrative Code (OAC) Rule 3745-50-51. The modification has been assigned a tracking number (PITS number) of #080131-1A-1.

FOR APPROVAL

The following modification has been made to your Ohio Hazardous Waste Facility Installation and Operation Permit, journalized on March 23, 2005. Also, the records of Ohio EPA have been changed accordingly.

Please replace or remove the following pages in the appropriate sections of the facility's Part B permit application and Permit, as instructed below:

Part A (replace entire Part A):

The header for the pages in the Part A is Revision 12, dated January 28, 2008
- **Page A-2** – revised description of Container Holding Building (Slag Canopy)

Section D - Process Description:

The header for the pages in Section D is Revision 35, dated January 28, 2008
- **Replace Section D Cover Page** – new revision number and revision date
- **Replace page D-15** – remove 85 gallon restriction, replace VRA with "Permittee"
- **Replace page D-51** - remove 85 gallon restriction, replace VRA with "Permittee"

RECEIVED
OHIO EPA
MAR - 4 2008
DIV. OF HAZARDOUS
WASTE MGT.

Section F - Procedures to Prevent Hazards:

The header for the pages in Section F is Revision 15, dated January 28, 2008

- **Replace Section F Cover Page** - new revision number and revision date
- **Replace Attachment F.4 Cover Page** - new revision number, revision date, remove Von Roll America, Inc. or VRA references
- **Replace BOP Daily/Weekly inspection form** - remove 85 gallon restriction from Item B, replace VRA with "Permittee"
- **Replace BOP Monthly/Yearly inspection form** - remove VRA reference
- **Replace Daily Perimeter Check inspection form** - remove VRA reference

Section I - Closure, Post Closure Plans,

The header for the pages in Section I is Revision 16, dated January 28, 2008

- **Replace Section I Cover Page** - new revision number and revision date
- **Replace Page I-10** - remove 85 g restriction, replace VRA with "Heritage-WTI, Inc."

Part B Permit:

- **Replace Page 35** - revise language to remove 85 gallon restriction, add stacking detail
- **Replace Page 42c** - revise language to remove 85 gallon restriction, add other details
- **Replace Page 113** - revise language to remove 85 gallon restriction, add other details

Enclosed is a copy of the permit application revisions and the revised Permit Pages. These have been included to ensure that all involved parties have written confirmation of the changes. If you have any questions concerning this action, please contact Michelle Tarka at the Ohio EPA East Liverpool field office at (330) 385-8421.

Sincerely,



William T. Skowronski
District Chief
Northeast District Office

WTS:ddw
Enclosure

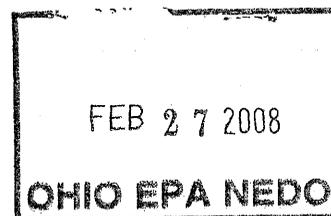
cc: Dave Sholtis, Assistant Chief, DHWM, CO
Jeremy Carroll, Supervisor, Engineering Unit, DHWM, CO
Patricia Natali, DHWM, NEDO
Michelle Tarka, DHWM, NEDO
Frank Popotnik, DHWM, NEDO
Wen Huang, U.S. EPA, Region V
ec: Sherry Slone, DHWM, NEDO

keywords: slag canopy, 85 gallon, remove restriction

Building C, also known as the Lab Pack Building, is 56' x 60' with racks installed to store up to 13,200 gallons in a variety of container types and sizes. Total secondary containment in this building is 11,200 gallons. The building is used primarily for the storage and management of lab pack and loose pack waste as well as processing third party waste as described in Permit Condition C.(d) and Section C in the permit application. The building is also used for other processing activities as described in Section D of the permit application. Containers processed or staged in Building C will be no more than five (5) cubic yards in size. The building is equipped with forced air ventilation, a breathing airline, and vapor recovery collection points used during processing activities.

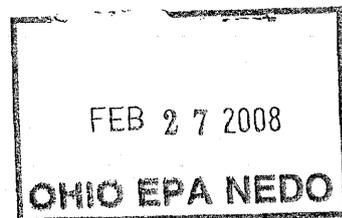
The Container Holding Building, also known as the Slag Canopy, is 50' x 50' with a storage capacity of 100,000 gallons. The building is enclosed on three sides to minimize the accumulation of storm water. Total secondary containment is 10,520 gallons. Containers, on pallets or an equivalent device, can be stored on the floor and in heavy duty racks installed on the east and west side of the building. The height of stacked containers on pallets cannot exceed the equivalent height of two (2) stacked pallets of 55 gallon containers. The Permittee will ensure that double-stacked pallets are stable and level. Waste stored in this building must be non-reactive and compatible. Processing of waste for use in the Bucket Hoist may be conducted in this building in accordance with Section D-2e(4) of the permit application.

The Truck Holding and Sampling Area, a canopied building, is located west of the Container Processing Building. The building is approximately 60' x 96', has a storage capacity of approximately 46,000 gallons, and is permitted for storing containerized and bulk solid wastes. The area is divided into six bays or stations that share a common reinforced concrete sump. Total secondary containment is 22,000 gallons. Containerized waste will not be stored on the floor of this building nor in the racks which are used for consumer products and raw materials. Containers of Mixed Infectious and Hazardous Waste (MIHW), highly reactive waste, and/or pyrophoric hazardous wastes are prohibited from storage in this area. All waste will be stored according to compatibility guidelines and, if incompatible wastes are stored in adjacent bays, the Permittee will take action as described in Section D of the Part B Permit Application to prevent mixing should a release occur. In addition to storage, this area is also used for sampling, staging, and processing waste, decontamination of equipment, and dewatering of bulk solid waste containers.



the individual containers are first staged in an area and includes consolidation in the hoppers. By the end of the 48 hours, the filled hoppers must be processed or stored in a permitted storage area.

- (d) Organic Tanker Unload Stations (East Bay/Bay 1, Bay 2, Bay 3) – The Organic Tanker Unloading Bays may be used to stage bulk waste containers for up to 3 days. See permit application section D-2f.
- (e) Building B (External Truck Wash) – Staging of bulk containers is permitted for up to 3 days. Staging of other containers is permitted for up to 1 day, in accordance with restrictions regarding compatibilities and aisle space. See permit application section D-2h.
- (f) Building C (Lab Pack Building) – Containers, other than lab packs or loose packs, processed or staged in Building C will be no more than five cubic yards in size, with the required aisle space, prior to further processing. Containers, other than lab packs or loose packs, may be staged in the Lab Pack Building for up to 5 days. See permit application section D-2i.
- (g) Container Holding Building (Slag Canopy) – Containers may be staged in the Container Holding Building for Bucket Hoist hopper filling for up to 1 day. While being filled, Bucket Hoist hoppers may be staged for up to 48 hours. The 48 hour time period begins when the individual containers are first staged until the hoppers must be processed to the hoist or stored. See permit application section D-2j.
- (h) Containers of waste designated as direct feed waste (not to be stored on-site) will be processed within 24 hours of receipt at the facility. Bulk containers of direct feed waste may be staged, if necessary, in areas of the facility which are covered, have automatic fire detection and suppression systems, and are in "C" storm water management areas. Locations include Truck Holding and Sampling Bays, Organic Tanker Unloading Bays, Direct Organic Tanker Unloading Areas, Container Receiving Unloading Docks.
- (i) The Permittee shall remove all containers being staged for processing and treatment and place them in permitted storage areas within 24 hours of



- N) WMU 14 – Container Receiving Area (unloading docks) – This unit consists of two covered truck unloading docks that abut the northeast side of the Container Processing Building (WMU 10). The unloading docks are paved with reinforced concrete treated to resist chemicals that are managed in this unit. A reinforced concrete containment wall and speed bump border the north and east edges of the unit along the two sides not bordered by the Container Processing Building (WMU 10). A reinforced concrete containment trench is located along the south side of each unloading station. The paved surface of each dock is sloped toward these trenches. This unit manages containerized wastes generated off-site. Tankers may also be staged in this unit in accordance with Section D of the approved Part B permit application and this permit. The wastes are subsequently unloaded to the Container Processing Building (WMU 10). There have been no documented releases from this unit. The potential for release to ground water, surface water, on-site soils, and air is low.
- O) WMU 15 – Container Holding Building (Slag Canopy) – This unit is a 50 foot by 50 foot structure used to store containers of nonreactive, compatible waste. Staging and processing of some waste streams may occur in this building in accordance with Section D of the approved Part B permit application and this permit. WMU 15 is located just north of the incineration system (WMU 1). The unit has a roof and is enclosed on three sides to minimize the accumulation of storm water. The floor of this unit is constructed of reinforced concrete treated to resist chemicals that are managed at this unit, and is bordered by a six inch high speed bump on two sides and a six inch high curb on the other two sides. The paved surface within the speed bumps and curbs is sloped towards a concrete sump. The curb and speed bumps of this covered unit have a containment capacity of 10,520 gallons. There have been no documented releases from this unit. The potential for release to ground water, surface water, on-site soils, and air is low.
- P) WMU 16 – Bulk Less Than 90 Day Accumulation Areas – Two bulk units are currently sited at the following locations: (1) east of the Building B (External Truck Wash)(WMU 5), and (2) along the utility bridge north of the Organic Waste Unloading Area (WMU 3). The areas store wastes generated on-site, typically containers holding slag and ash (the treatment residuals from the incineration process), slag quench water, used refractory brick, and spent activated carbon. The Permittee is also permitted to conduct specifically approved hazardous waste activities as described in Section D of the Part B permit application. The two areas are open, uncovered, and located over reinforced concrete in constructed containment areas. Curbing, sumps, and sloped berms control run-on and are part of the containment system. There have been no documented releases from this unit. The potential for release to ground water, surface water, on-site soils, and air is low.

FEB 27 2008

OHIO EPA NEDO