



State of Ohio Environmental Protection Agency

Northeast District Office

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

March 22, 2007

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

**RE: HAZARDOUS WASTE PERMIT MODIFICATION CLASS 1A APPROVAL  
ADJUST DIOXIN/FURAN TESTING IN PERMIT TO COINCIDE WITH MACT TESTING  
VON ROLL AMERICA (VRA), INC. OHD 980 613 541 / 02-15-0589**

Dear Ms. Knowles:

Ohio EPA received a request dated February 13, 2007, for a Class 1A (Class 1 requiring prior approval) hazardous waste permit modification (PITS tracking number: OHD 980 613 541 - 070215 -1A-1) from Von Roll America (VRA), Inc. VRA also provided additional information in a letter dated March 7, 2007. 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. The modification does not affect any pages in the VRA Part B permit application. This Class 1A permit modification is being granted as a result of VRA fulfilling a permit requirement in Condition 1(A)3.(h).

On May 8, 2003, Ohio EPA approved a permit modification, PITS tracking number: OHD 980 613 541 - 030114 -1A -2, allowing VRA to reduce the carbon feed rate to the Enhanced Carbon Injection System (ECIS), an air pollution control device in the Incineration System. The ECIS collects and removes polychlorinated dibenzodioxins and polychlorinated dibenzofurans (dioxin/furans) from the incinerator's flue gas.

A condition of the (OHD 980 613 541 - 030114 -1A -2) permit modification included an increase in dioxin/furan emission testing. The increased test frequency served to ensure the reduced carbon feed rate to the ECIS did not adversely affect the system's ability to collect and remove dioxins/furans in accordance with the incinerator's performance standards. Language in the permit suggested that if VRA were able to demonstrate continued dioxin/furan control operating under reduced carbon feed rates, the facility could request the testing frequency be changed to coincide with the Clean Air Act, Hazardous Waste Combustor MACT rules.

In a letter dated March 7, 2007, VRA provided Ohio EPA with test data for the last five dioxin/furan emission tests. The average for the five tests was below 0.055 ng/dscm, TEQ basis, corrected to 7% oxygen. This value represents the 1993-1994 ECIS average test results obtained after installation of the ECIS system and is utilized to ensure the continued performance as demonstrated during the initial emission testing. This value is lower than the MACT dioxin/furan standard of 0.2 ng/dscm, TEQ basis, corrected to 7% oxygen.



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DIV. OF HAZARDOUS  
WASTE MGT.

Von Roll America, Inc.  
Class 1A Approval  
Page 2

Permit pages

Replace permit page 83, with the revised page 83 designated as "Class 1A Modification received 2/15/07";

Replace permit page 84, with the revised page 84 designated as "Class 1A Modification received 2/15/07".

VRA is asserting a **claim of business confidentiality** for the information regarding the carbon feed rates and locations of feed points described in the Class 1A permit modification request. 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.

Enclosed are copies of the permit page revisions. 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 Frank Popotnik at the Northeast District Office, (330) 963-1198.

Sincerely,

  
for William T. Skowronski  
District Chief  
Northeast District Office

WTS/PN:ddw

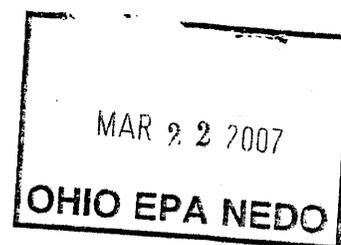
Enclosure

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

*\*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](mailto:pamela.allen@epa.state.oh.us).*

key words: C1A, approval, dioxin/furan testing

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- (f) The Permittee shall comply with annual emission limits for twelve metals: barium, mercury, silver, thallium, nickel, selenium, antimony, arsenic, beryllium, cadmium, chromium and lead; as listed in Attachment 2 to this permit.
- (g) Reserved.
- (h) The Permittee must test the performance of the incineration system to demonstrate continued polychlorinated dibenzodioxins and polychlorinated dibenzofurans (dioxin/furans) control using the test protocols employed during the October 2002 testing event, or the approved Hazardous Waste Combustion MACT Comprehensive Performance Test Plan, or an equivalent test plan as specifically approved by Ohio EPA. This testing is required by RCRA since the Permittee's 1997 comprehensive risk assessment conducted by the U.S. EPA found dioxin/furans to be a risk to human health and the environment.
- (i) Testing for dioxin/furan emission limits will be performed in conjunction with testing required by the MACT standards and in accordance with the Permittee's Title V permit.
- (ii) To evaluate the incinerator's performance, a rolling average based on five individual test events, will be tracked. The initial average was calculated from data collected during the October 2002 Annual Performance Test (two conditions); the first CPT (two conditions); and a test performed six months after the completion of the CPT. All subsequent test data will be added to the data grouping and the value from the oldest test period will drop out so that the average represents the five most recent test events. At the conclusion of each dioxin/furan testing event, the average calculated by dropping the oldest test value and adding the new test value will be compared to the previously demonstrated average performance level of 0.055 ng/dscm, TEQ basis, corrected to 7% oxygen achieved during the 26 individual stack test runs in 1993 and 1994 subsequent to the installation of the ECIS.



If, at any time, the new rolling average is greater than 0.1 ng/dscm, the Permittee must notify the Director immediately. The Permittee will initiate an evaluation for the cause of the average increase and develop a report as to the possible cause with recommendations for corrective action if warranted. The Ohio EPA may consider any such test results as new "information" under OAC Rule 3745-50-51(A)(2). The comparison of the five test period rolling average with the 1993-1994 ECIS test period average is only to monitor incinerator performance with previously demonstrated emission levels.

Unless otherwise authorized, the Permittee shall only feed the wastes described in Permit Condition I(A).2. to the incinerator: (1) after the waste feed permissives as described in Section D of the approved Part B permit application and these permit conditions have been met and (2) under the following conditions according to OAC Rule 3745-57-45.

- (i) The Permittee shall only feed waste into the Primary Combustion Chamber (PCC) or Kiln using the feed mechanisms located in the incinerator feed building and described in Section D of the approved Part B permit application

Annual feed rates for twelve metals, barium, mercury, silver, thallium, nickel, selenium, antimony, arsenic, beryllium, cadmium, chromium and lead, are listed in Attachment 2 to this Permit. The feed rates shall not be exceeded and shall be monitored and recorded on a continuous basis and in accordance with Attachments 1 and 3 to this permit.

