



State of Ohio Environmental Protection Agency

STREET ADDRESS:

Lazarus Government Center
50 W. Town St., Suite 700
Columbus, Ohio 43215

TELE: (614) 644-3020 FAX: (614) 644-3184
www.epa.state.oh.us

MAILING ADDRESS:

P.O. Box 1049
Columbus, Ohio 43216-1049

CERTIFIED MAIL

May 30, 2007

Re: **Von Roll America, Inc.**
EPA ID No: OHD 980 613 541
Ohio ID No: 02-15-0589
Modified Hazardous Waste Permit

Ms. Allison Knowles
Von Roll America, Inc.
1250 St. George Street
East Liverpool, Ohio 43920-3400

Dear Ms. Knowles:

On January 30, 2007, Ohio EPA received Von Roll America, Inc.'s request to: 1) reduce the auditing frequency for lab pack waste generated off-site; 2) revise criteria for what constitutes minor and major lab pack discrepancies; 3) implement a procedure for tracking and evaluating lab pack discrepancies discovered during auditing and splitting activities; 4) implement a procedure for remediation if and when packing standards are not met; and, 5) change the title of Laboratory Chemist to Field Chemist. For this modification, Von Roll America, Inc. submitted a Class 2 modification application¹. The Agency did not receive any verbal or written comments concerning this Class 2 modification application. I have enclosed the final modified Ohio hazardous waste facility installation and operation permit (Permit) that was issued by the director today. Please note that the modified Permit remains in effect until it is renewed, withdrawn, suspended or revoked.

You are hereby notified that this action of the Director is final and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00 which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with

¹Ohio EPA assigned tracking # 070130-2-1 to this modification application.

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

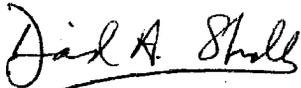
Ms. Allison Knowles
Von Roll America, Inc.
May 30, 2007
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the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
309 South Fourth Street, Room 222
Columbus, OH 43215

If you have any questions, please contact Patricia Natali of Ohio EPA's Northeast District at (330) 385-8447.

Sincerely,



David A. Sholtis, Assistant Chief
Division of Hazardous Waste Management

Enclosures

cc: Ed Lim, ERAS, DHWM, CO
Jeremy Carroll/John Nyers, ERAS, DHWM
Dale Meyer, U.S. EPA, Region V
Frank Popotnik/Patricia Natali, NEDO, DHWM
Carol Hester, Ohio EPA, PIC

PUBLIC NOTICE

Columbiana County

OHIO EPA ISSUES FINAL MODIFIED HAZARDOUS WASTE PERMIT

On May 30, 2007, Ohio EPA issued a final class 2 modified Hazardous Waste Facility Installation and Operation Permit (Permit) to Von Roll America, Inc. for its facility at 1250 St. George Street, East Liverpool, Ohio 43920-3400. The EPA Identification Number for this facility is OHD980613541.

Why is Von Roll America, Inc. modifying its Permit?

Von Roll America, Inc. is permitted to operate a hazardous waste incinerator and other related hazardous waste management units at its facility. Von Roll America, Inc. wishes to: 1) reduce the auditing frequency for lab pack waste generated off-site; 2) revise criteria for what constitutes minor and major lab pack discrepancies; 3) implement a procedure for tracking and evaluating lab pack discrepancies discovered during auditing and splitting activities; 4) implement a procedure for remediation if and when packing standards are not met; and, 5) change the title of Laboratory Chemist to Field Chemist. This final modified permit will allow Von Roll America, Inc. to make the requested changes. To issue this final modified Permit, Ohio EPA determined that the modification application is complete and meets appropriate standards.

Can I appeal this final modified Permit?

Yes, if you are an officer of an agency of the state or of a political subdivision, acting in a representative capacity, or any person who would be aggrieved or adversely affected by this modified Permit, you have the right to appeal this Permit decision to the Environmental Review Appeals Commission (ERAC).

If I decide to appeal this final modified Permit, how and when must I make the appeal?

If you file an appeal, you must put it in writing no later than **July 2, 2007**. Your appeal must explain why you are appealing the action and the grounds you are using for your appeal. The appeal must be accompanied by a filing fee of \$70.00 which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. You must file your appeal, according to Ohio Revised Code § 3745.04 with ERAC at the following address: **Environmental Review Appeals Commission**, 309 South Fourth Street, Room 222, Columbus, Ohio 43215. You must send a copy of the appeal to the director of Ohio EPA at the following address no later than three (3) days after you file it with ERAC: **Chris Korleski, Director of Ohio EPA**, P.O. Box 1049, Columbus, Ohio 43216-1049.

OHIO ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF HAZARDOUS WASTE MANAGEMENT

SUMMARY OF MODIFICATIONS TO HAZARDOUS WASTE
INSTALLATION AND OPERATION PERMIT

Von Roll America, Inc.
U.S. EPA ID #: OHD 980 613 541
Ohio ID #: 02-15-0589

Modification of the Hazardous Waste Facility Installation and Operation Permit will authorize Von Roll America, Inc. (VRA), to make the following changes:

Class 2 Modification:

- 1) Reduce the auditing frequency for lab pack waste generated off-site and packed by VRA personnel and non-VRA personnel who have been trained and accepted into the Von Roll America, Inc. lab pack program;
- 2) Revise criteria for what constitutes minor and major lab pack discrepancies;
- 3) Implement a procedure for tracking and evaluating lab pack discrepancies discovered during auditing and splitting activities. This is intended to ensure lab packs meet packing standards outlined in the permit;
- 4) Implement a procedure for remediation if and when packing standards are not met;
- 5) Change the title of Laboratory Chemist to Field Chemist for VRA personnel involved in packing or auditing lab packs.

jms

OHIO EPA DHWM

MAY 30 2007

OHIO ENVIRONMENTAL PROTECTION AGENCY

OHIO E.P.A.

**MODIFIED OHIO HAZARDOUS WASTE FACILITY
INSTALLATION AND OPERATION PERMIT**

MAY 30 2007

ENTERED DIRECTOR'S JOURNAL

Date of Issuance: May 30, 2007
Effective Date: May 30, 2007

U.S. EPA ID No.: OHD 980 613 541
Ohio Permit No.: 02-15-0589

Name of Permittee: Von Roll America, Inc.
Mailing Address: 1250 St. George Street
East Liverpool, OH 43920-3400
Facility Location: 1250 St. George Street
East Liverpool, OH 43920-3400
Person to Contact: Ms. Allison Knowles

This Modified Ohio Hazardous Waste Facility Installation and Operation Permit is issued pursuant and subject to Section 3734.05(I) of the Ohio Revised Code and Rule 3745-50-51(D) of the Ohio Administrative Code.

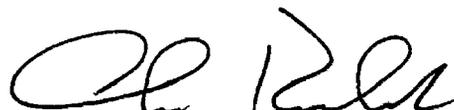
The Ohio Hazardous Waste Facility Installation and Operation Permit with the above-referenced permit number as issued by the Ohio Environmental Protection Agency and journalized on March 23, 2005, is hereby incorporated by reference in its entirety, except as it may be modified herein.

This modification of the permit shall remain in effect until such time as the Ohio Hazardous Waste Facility Installation and Operation Permit is renewed, modified, withdrawn, suspended or revoked.

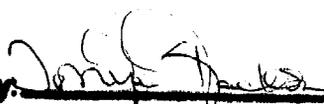
The Permittee shall comply with all requirements of the modified Part B permit application as amended or supplemented on January 30, April 12, and May 11, 2007. The information contained in the modified Part B permit application is incorporated herein by reference. Specifically, all written statements regarding the specifications, locations or capabilities of the processes, equipment, containment devices, safety devices or programs, or other matters made by the applicant in the permit modification application are hereby incorporated as express, binding terms and conditions of this modified permit.

The modified Terms and Conditions of this permit are attached hereto and are incorporated herein by reference. The modified Terms and Conditions supersede and replace the corresponding pages found in the March 23, 2005 renewal permit.

I certify this to be a true and accurate copy of the official documents as filed in the records of the Ohio Environmental Protection Agency.


Chris Korleski
Director

jms

By:  Date: 5-30-07

The volume of all wastes received and stored is limited by storage capacity as defined in this permit; the total volume of waste treated is limited by the permitted process flow of the incineration system. Additional treatment processes employed at the facility, or permitted as future activities, prior to incineration include: (1) polymerization of isocyanates with a permitted treatment capacity of 1,000 gallons per day; (2) blending of wastes; (3) consolidation of waste in the facility's bucket hoist and in containers; (4) splitting of waste; (5) addition of absorbent material; (6) size reduction; (7) steam heating in the facility's drum heater; and (8) slurrification of some waste streams.

Several types of mechanical processing are included in the Part A permit application, all of which are described in Section D of the permit application. These include (1) extrusion of waste at a rate of 18,000 pounds per hour per extruder; and (2) extruding (or pushing) of solid waste from drums at a rate of 18,000 pounds per hour using a pusher. One of two permitted extruders currently exists and one is planned for construction in the future. The pusher unit has not been constructed.

The facility is permitted to accept lab packs in containers less than 85 gallons in size. Lab packs typically are received in drums of varying composition, pails, and fiber boxes. A predetermined number of lab packs are audited by the Permittee and compared to the generator's inventory sheet. The facility also accepts waste in containers described as loose packs. Loose pack waste constitutes the consolidation of consumer packaged waste. Management of loose pack and lab pack waste is described in Section C of the permit application.

C.1. Process Capacity/Annual Quantity Limitation
OAC Rule 3745-50-43(A)(7)

- (a) The Permittee shall not store more than 638,380 total gallons of containerized waste at any given time in the permitted container storage areas and waste staging areas at the facility. Waste staging areas at the facility are described in Section D of the approved permit application. Container storage areas are listed below:

Building A (Drum Warehouse)	510,000 gallons
Building B (External Truck Wash Building)	15,180 gallons
Building C (Lab Pack Building)	13,200 gallons
Container Holding Building (Slag Canopy)	100,000 gallons