



State of Ohio Environmental Protection Agency

STREET ADDRESS:

Lazarus Government Center  
122 S. Front Street  
Columbus, Ohio 43215

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

MAILING ADDRESS:

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

**CERTIFIED MAIL**

June 22, 2005

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

Mr. Fred Sigg  
Von Roll America, Inc.  
1250 St. George Street  
East Liverpool, Ohio 43920-3400

Dear Mr. Sigg:

On December 9, 2004, Ohio EPA received Von Roll America, Inc.'s (Von Roll) request to change the language in Sections C and D of the approved Part B permit application allowing the substitution of non-hazardous wastewater generated off-site for municipal water purchased from the city of East Liverpool in various processes at the facility. For this modification, Von Roll submitted a Class 2 permit modification application<sup>1</sup>. The Agency did not receive any verbal or written comments concerning the Class 2 modification. I have enclosed the final modified Ohio hazardous waste facility installation and operation permit (Permit) action 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 Please note that the modified Permit remains in effect until it is renewed, withdrawn, suspended or revoked.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 have the right to appeal this Permit decision to the Environmental Review Appeals Commission (ERAC) no later than 30 days after the public notice (See Ohio Revised Code § 3745.04). You may file your appeal with ERAC at the following address: Environmental Review Appeals Commission, 309 South Fourth Street, Room 222, Columbus, Ohio 43215.

If you file an appeal, you must put it in writing. Your appeal must explain why you are appealing the action(s) and the grounds you are using for your appeal. You must send a copy of the appeal to the director of the Ohio Environmental Protection Agency no later than three (3) days after you file it with ERAC.

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<sup>1</sup>Ohio EPA assigned tracking # 041209-2-1 to this modification application.

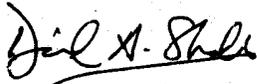
Bob Taft, Governor  
Bruce Johnson, Lieutenant Governor  
Joseph P. Koncelik, Director

Fred Sigg  
Von Roll America, Inc.  
June 22, 2005  
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If you have any questions, please contact Patricia Natali of Ohio EPA's Northeast District Office at (330) 385-8447.

Sincerely,



fr

Pamela S. Allen, Manager  
Regulatory and Information Services  
Division of Hazardous Waste Management

cc: Jeremy Carroll/John Nyers, ERAS, DHWM  
Harriet Croke, U.S. EPA, Region V  
Kurt Princic/Patrica Natali NEDO, DHWM  
Carol Hester, Ohio EPA, PIC  
Allison Knowles, Von Roll America, Inc.  
file

**PUBLIC NOTICE**

**Columbiana County**

**OHIO EPA ISSUES FINAL MODIFIED HAZARDOUS WASTE PERMIT**

On June 22, 2005, 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. 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. requests to change the language in Sections C and D of the approved Part B permit application allowing the substitution of non-hazardous wastewater generated off-site for municipal water purchased from the city of East Liverpool in various processes at the facility. 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 22, 2005**. Your appeal must explain why you are appealing the action and the grounds you are using for your appeal. 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: ***Joseph P. Koncelik, Director of Ohio EPA***, P.O. Box 1049, Columbus, Ohio 43216-1049.

OHIO E.P.A. OHIO ENVIRONMENTAL PROTECTION AGENCY

JUN 22 2005 MODIFIED OHIO HAZARDOUS WASTE FACILITY  
INSTALLATION AND OPERATION PERMIT

ENTERED DIRECTOR'S JOURNAL

Date of Issuance: June 22, 2005  
Effective Date: June 22, 2005

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

**Name of Permittee:** Von Roll America, Inc., a/k/a Waste Technologies Industries (VRAWTI)

**Mailing Address:** 1250 St. George Street  
East Liverpool, Ohio 43920-3400

**Facility Location:** 1250 St. George Street  
East Liverpool, Ohio 43920-3400

**Person to Contact:** Ms. Allison Knowles  
Environmental, Health, & Safety Manager

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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 on March 23, 2005, and as subsequently modified by the Ohio Environmental Protection Agency, is hereby incorporated by reference in its entirety except as it may be modified herein.

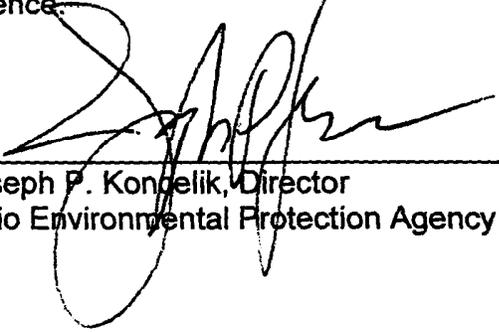
This modification of the permit shall remain in effect until such time as the Ohio Hazardous Waste Facility Installation and Operation Permit is renewed, modified, withdrawn, suspended or revoked.

The Permittee shall comply with all requirements of the modified Part B permit application as amended or supplemented on December 9, 2004 and April 5, 2005. 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 modified permit application are hereby incorporated as express, binding terms and conditions of this modified permit.

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

*[Signature]* June 22, 2005

The modified Terms and Conditions of this permit, included in Attachment 8, are attached hereto and are incorporated herein by reference.



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Joseph P. Kondelik, Director  
Ohio Environmental Protection Agency

OHIO EPA

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OHIO ENVIRONMENTAL PROTECTION AGENCY  
DIVISION OF HAZARDOUS WASTE MANAGEMENT

SUMMARY OF MODIFICATIONS TO HAZARDOUS WASTE  
INSTALLATION AND OPERATION PERMIT

Von Roll America (VRA), Inc., a/k/a  
Waste Technologies Industries (WTI)  
U.S. EPA ID #: OHD 980 613 541  
Ohio ID #: 02-15-0589

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Modification of the Hazardous Waste Facility Installation and Operation Permit will authorize Von Roll America, Inc., a/k/a Waste Technologies Industries (VRAWTI) to make the following change:

**Class 2 Modification:**

To change language in Sections C and D of the approved Part B permit application, to substitute non-hazardous wastewater generated off-site for municipal water purchased from the city of East Liverpool in various processes at the facility.

The modification includes a six month demonstration period whereby stack testing will be conducted in order to (1) ensure the volatile organic carbon limit proposed by the facility is adequate, (2) set limits for total organic carbon if necessary, (3) determine a pre-set limit for the stack total hydrocarbon continuous emission monitor that will require VRA to switch from utilization of non-hazardous wastewater to municipal water, (4) determine if limits are necessary for total suspended solids, (5) determine if the presence of organics in the non-hazardous wastewater will affect the performance of the enhanced carbon injection system in the collection of dioxins and furans, and (6) determine the effect of mercury in the non-hazardous waste water on stack emissions of mercury. During the six month period, the frequency of sampling and analysis of incinerator treatment residue (ash) will be increased to daily.

The demonstration period and stack testing requirements are outlined in the terms and conditions included in this modification.

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**Attachment 8**  
**Von Roll America, Inc., a/k/a WTI**  
**Ohio Hazardous Waste Facility Installation and Operation Permit**

***Additional Terms and Conditions***

**Class 2 Permit Modification for  
Utilization of Non-hazardous Wastewater for Process Water**

1. The Permittee shall conduct a six month demonstration period to evaluate use of off-site generated non-hazardous wastewater in designated units and processes at the facility. Stack testing will be conducted during the demonstration period to determine the effect of non-hazardous wastewater use on mercury, particulate and dioxin/furan emissions. The Permittee shall notify the Ohio EPA at least 15 days prior to the beginning of the demonstration period.
2. At the completion of the demonstration period and if the Permittee decides to proceed with the use of non-hazardous wastewater as process water at the facility, the Permittee shall install a tank cover for the Process Water Holding Tank (W-5) and vent the tank to the existing vapor recovery system.
3. All SOPs associated with this modification should be submitted for Ohio EPA review and comment prior to beginning the demonstration period.
4. Within forty-five (45) days after completion of the demonstration period, the Permittee shall submit to the Ohio EPA a written report which includes all results of the demonstration period. The report shall include an introduction/demonstration period description, the purpose of the demonstration period, the elements of the demonstration period (this includes the parameters of interest, monitoring frequency, analytical frequency, stack testing), results and conclusions. The Permittee must retain on-site the original data collected during the demonstration period for a period of three years and make available for Ohio EPA review, upon request.
5. During the demonstration period, the Permittee will monitor and record parameters of interest in the non-hazardous wastewater received from off-site. Analysis for these parameters should be conducted on all pre-acceptance samples of non-hazardous wastewater received from off-site, on samples drawn from W-5 prior to transfer to W-4 or the existing General Wastewater Treatment System, and in accordance with all SOPs associated with this modification. This information shall be included in the report to be submitted.

The parameters to be monitored and recorded include, at a minimum, (1) total organic carbon (TOC), (2) volatile organic carbon (VOC), (3) total suspended solids (TSS), (4) brominated compounds, (5) iodine, and (6) mercury.

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6. During the demonstration period, the Permittee will monitor and record the volume and proportion of non-hazardous wastewater, on-site generated wastewater (e.g., water pumped from sumps), and municipal water accumulated in W-4 and W-5 and used throughout the facility as process water. The Permittee shall monitor and record any process water from W-4 that may be sent off-site and the reason for the transfer. The Permittee shall include this information in the written report required by Condition 4 above, as well as how much municipal water is used, where it is used, and why.
7. During the demonstration period, the Permittee will record the TOC in the slag quench tank daily and evaluate whether the use of non-hazardous wastewater has any effect on the TOC in the slag quench tank water. This information shall be included in the report to be submitted.
8. During the demonstration period, the Permittee shall increase the sampling frequency of the treatment residue (ash) to daily. At the end of the demonstration period, the Permittee shall include in the report to be submitted, data demonstrating a limit is not necessary, or if data indicates a limit for TOC in the non-hazardous wastewater is necessary, the Permittee will submit the value and data to support it. If a limit is required, the Permittee shall submit a permit modification to include a TOC limit to applicable sections of the approved Part B permit application within forty-five (45) days after the report has been submitted.
9. The Permittee shall conduct a stack test approximately sixty (60) days after the initiation of the demonstration period. A test plan shall be submitted for approval to the Ohio EPA at least 45 days prior to the stack testing event.
  - a) At a minimum the stack test plan will include testing for dioxins/furans, mercury, and particulate matter. The stack test will be used to demonstrate that non-hazardous wastewater (containing organics) will not impact the collection of dioxins/furans from the flue gas by the enhanced carbon injection system, and to determine the effect, if any, of mercury in the non-hazardous wastewater on stack emissions.
  - b) Stack testing will be conducted in order to (1) ensure the proposed VOC limit for non-hazardous wastewater used as process/make-up water is adequate, (2) set limits for TOC if necessary, (3) determine a pre-set limit for the stack total hydrocarbon continuous emission monitor for switching from utilization of non-hazardous wastewater to municipal water, and (4) determine if limits are necessary for TSS.
  - c) Results of the stack testing shall be submitted to the Ohio EPA within 90 days of completion of the testing.

- d) If at the completion of the stack testing, or at the first indication that utilization of non-hazardous wastewater is producing unanticipated and unacceptable conditions at the facility, e.g. emissions in excess of regulatory requirements, the Permittee will immediately suspend the demonstration period and the utilization of non-hazardous wastewater. The Permittee will immediately inform the Ohio EPA of the suspension and all information available regarding the suspension and compile a report of the situation to be submitted within 15 days. Upon review of the report/data, Ohio EPA may determine the Permittee can continue utilizing the non-hazardous wastewater and complete the demonstration period. Any changes that may be necessary, shall be submitted to the Ohio EPA in the form of a permit modification within 45 days to incorporate the new information.
10. The Permittee shall submit a permit modification to Ohio EPA to revise all affected permit application pages within 45 days of submitting the written report required by Condition 4 above.