



State of Ohio Environmental Protection Agency

Northeast District Office

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

June 21, 2005

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

**RE: HAZARDOUS WASTE PERMIT MODIFICATION, CLASS 1A APPROVAL,  
SECOND TIME EXTENSION FOR COMPLIANCE SCHEDULE IN A.27(d)  
VON ROLL AMERICA, INC., OHD 980 613 541 / 02-15-0589**

Dear Ms. Knowles:

Ohio Environmental Protection Agency (Ohio EPA) is in receipt of a request dated June 16, 2005 from Von Roll America, Inc. (VRA) for a Class 1 hazardous waste permit modification with Director's prior approval (**Class 1A**). This modification was assigned a permit information tracking system (PITS) ID number of 050617-1A-1. With this letter, Ohio EPA approves the above referenced Class 1A modification submitted pursuant to Ohio Administrative Code Rule 3745-50-51 and accordingly has updated the facility's Ohio Hazardous Waste Facility Installation and Operation Permit Renewal (Renewal Permit) issued by Ohio EPA and journalized on March 23, 2005.

FOR APPROVAL:

The modification request is for a second time extension to the compliance schedule found in Condition A.27(d) of the facility's Renewal Permit. The compliance schedule requires VRA to submit an amended permit application which includes changes resulting from permit modifications approved between the dates of issuance of the draft renewal permit and issuance of the final renewal permit, and also requires VRA to submit permit modifications to address the three issues described in A.27.(d)(ii) through (iv). The additional time is necessary for VRA to prepare a thorough and accurate amended permit application including redacted versions of pages where confidential information is provided.

With the letter dated June 16, 2005, VRA requested that the compliance date be extended to 120 days from the permit journalization date, to allow thorough and accurate completion of those items. The new compliance date is July 21, 2005.

The following modification has been made to page 14 of the Ohio Hazardous Waste Facility Installation and Operation Permit Renewal journalized on March 23, 2005:

A.27(d) The Permittee shall submit for approval to the Ohio EPA within ~~90~~ 120 days after permit journalization:

**VON ROLL AMERICA, INC.**  
**CLASS 1 ACKNOWLEDGMENT**  
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Enclosed is a copy of the revision to the Renewal Permit page 14. There are no changes to the facility's Part B permit application at this time. The revised permit page has been included to ensure that all involved parties have written confirmation of the change.\* If you have any questions concerning this action, please contact Michelle Tarka at the Ohio EPA Northeast District Office (330) 963-1234 or the East Liverpool Field Office (330) 385-8421.

Sincerely,



William T. Skowronski  
District Chief

WTS:MT:ddw

Enclosure

cc: Pamela Allen, Manager, ITTSS, DHWM, CO  
Jeremy Carroll, Supervisor, Engineering Unit, DHWM, CO  
John Nyers, DHWM, CO  
Gary Victorine, USEPA, Region V  
Carrie Beringer, VRA  
ec: Frank Popotnik, DHWM, NEDO  
Michelle Tarka, DHWM, NEDO  
Patricia Natali, DHWM, NEDO

\* Also, in accordance with Ohio Administrative Code Rule 3745-50-51 (D)(1)(a)(ii), VRA shall also send a notice within 90 days of an approved Class 1A modification to all persons on the Agency mailing list.

keywords: permit, compliance, time extension

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- (d) The Permittee shall submit for approval to the Ohio EPA within ~~ninety~~ 120 days after permit journalization:
- (i) An amended permit application updated for changes resulting from permit modifications approved between the dates of issuance of the draft renewal permit and issuance of the final renewal permit. The updated permit application is to be submitted as a Class 1 modification requiring director's prior approval in accordance with OAC rule 3745-50-51.
  - (ii) A permit modification to change the applicable sections in the approved Part B permit application to include new language regarding principal organic hazardous constituents (POHCs). The updated permit application is to be submitted as a Class 1 modification requiring director's prior approval in accordance with OAC rule 3745-50-51.
  - (iii) A permit modification to change the applicable sections in the approved Part B permit application to include new language regarding dioxin-bearing waste. This modification shall also include language restrictions for wastes carrying the codes, F032, F039, K043, and K099. The updated permit application is to be submitted as a Class 1 modification requiring director's prior approval in accordance with OAC rule 3745-50-51.
  - (iv) A permit modification to change the applicable sections in the approved Part B permit application to include new language regarding restricted wastes. The updated permit application is to be submitted as a Class 1 modification requiring director's prior approval in accordance with OAC rule 3745-50-51.
- (e) The Permittee shall submit a written RFI Workplan to Ohio EPA within 270 days after the effective date of this permit according to Permit Condition E.5(a).