



State of Ohio Environmental Protection Agency

Northeast District Office

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

June 30, 2008

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

RECEIVED
OHIO EPA

JUL 03 2008

DIV. OF HAZARDOUS
WASTE MGT.

RE: HAZARDOUS WASTE PERMIT MODIFICATION, CLASS 1A APPROVAL (PITS #080623-1A-1), HERITAGE - WTI, INC. (WTI), OHD 980 613 541 / 02-15-0589

Dear Mr. Peterka:

On June 23, 2008, Ohio EPA received a request for a **Class 1A** (Class 1 requiring prior approval) hazardous waste permit modification dated June 19, 2008 from Heritage-WTI, Inc. (WTI). This modification request has been assigned a tracking number of 080623-1A-1. With this letter, Ohio EPA approves the above referenced Class 1A modification submitted pursuant to Ohio Administrative Code (OAC) 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. Also, the records of Ohio EPA have been changed accordingly:

To allow for the placing of incinerator residual (slag) from the treatment of Mixed Infectious and Hazardous Waste (MIHW) that may contain incompletely combusted MIHW into the Bulk Solid Waste Tanks. The permit stipulates that untreated (not previously incinerated) MIHW cannot be placed into the Bulk Solid Waste Tanks.

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

Section C – Waste Characteristics and Waste Analysis Plan:

The header for the pages in Section C is Revision 16 dated June 19, 2008.

- Replace Cover Page
- Replace Page i of the Table of Contents
- Replace Page C-34
- Replace Page C-40
- Replace Page C-77d
- Replace Page C-77r
- Replace Page C-77z

Section D - Process Description:

The header for the pages in Section D is Revision 41 dated June 19, 2008.

- Replace Cover Page
- Replace page D-12a
- Replace page D-25
- Add page D-25a
- Replace page D-31
- Replace Page D-147



Section F - Procedures to Prevent Hazards:

The header for the pages in Section F is Revision 18 dated June 19, 2008.

- Replace Cover Page
- Replace Page F-35d
- Replace Page 35e

Part B Permit:

- Replace Page 43
- Replace Page 43a
- Replace Page 50
- Add Page 50a
- Replace Page 95b
- Replace Page 95g
- Replace Page 95h

Enclosed is a copy of the permit application revision(s). This has been included to ensure that all involved parties have written confirmation of the change(s)*. 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
John Nyers, DHWM, CO
Frank Popotnik, DHWM, NEDO
Patricia Natali, DHWM, NEDO
Wen Huang, U.S. EPA, Region V
Carrie Beringer, Heritage-WTI, Inc.

ec: Sherry Slone, DHWM, NEDO

*Also, in accordance with Ohio Administrative Code Rule 3745-50-51(D)(1)(a)(ii), the Permittee must 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 Dave Sholtis at (614) 644-2917, or by e-mail at dave.sholtis@epa.state.oh.us.

D. TANK STORAGE, TREATMENT AND MANAGEMENT

General Overview

The Permittee is authorized for tank storage and treatment activities associated with organic and inorganic waste treatment operations, laboratory processes, internal and external truck washes, general wastewater treatment, and fuel blending. These activities are described below. Construction has not been started or is only partially completed for many of the permitted operations. Additional specific details for tank systems, including piping and instrumentation diagrams (P&IDs), are provided in Section D of the permit application.

Mixed infectious and hazardous waste (MIHW) must not be placed into any tank system. However, treatment residual (slag) from the incineration of MIHW that contains waste not combusted to ash or slag, except for metallic, glass, and ceramic items, may be placed in the Bulk Solid Waste Tanks for reprocessing. See Sections C and D of the Part B permit application and Module I (B) of this permit for more information.

(A) Organic Waste Treatment Operations

Organic waste treatment operations include bulk solid waste storage tanks, an organic tank farm, pump-out tanks, and flue gas scrubber effluent treatment. The bulk solid waste storage tanks are located in the Incinerator Feed Building. These tanks are utilized to process loose solid waste received in containers, end-dumps and roll off boxes. Four tanks with a total capacity not to exceed 2,400 cubic yards of waste are permitted. Two of these have been installed. The installed tanks are each 18 feet by 33 feet and hold up to 600 cubic yards each of waste. The tanks are reinforced concrete, in-ground, open-topped tanks. There are no pumps, piping, bypass systems, or pressure relief devices associated with these tanks. Waste destined for the bulk solid waste storage tanks cannot carry RCRA waste codes of D002 and D003 or contain any free liquids.

The installed portion of the organic tank farm is located in a building at the southeast end of the facility. It contains 18 aboveground tanks with a capacity of 288,000 gallons. The Permittee is authorized to eventually store a total capacity of 612,300 gallons of waste in 52 tanks. The purpose of the Organic Waste Tank Farm is to receive, blend, and store bulk liquid and sludge waste prior to treatment in the Incineration System.

Tanks may also be used to accumulate waste for fuel blending operations. Waste received from off-site may be blended in tanks in the organic waste tank farm and in container pump-out tanks prior to transport off-site to a permitted facility to be used as fuel or for further treatment. Section C of the approved Part B permit application includes waste restrictions associated with the fuel blending operations.

Existing tanks have secondary containment sized to contain the volume of the largest tank in each group. Tanks are equipped with level and temperature alarms, safety cutoffs, bypass systems, pressure and vacuum relief safety devices, and inert gas blanketing. Section D of the permit application describes each tank as well as the material of construction and the tank specifications.

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handling, processing, or treatment considerations.

- (e) Untreated mixed infectious and hazardous waste (MIHW) must not be placed into any tank system. However, treatment residual (slag) from the incineration of MIHW that contains waste not combusted to ash or slag, except for metallic, glass, and ceramic items, may be placed in the Bulk Solid Waste Tanks for reprocessing. See Sections C and D of the Part B permit application and Module I(B) of this permit for more information.

D.2. Design and Installation of New Tank Systems or Components
OAC Rule 3745-55-92

- (a) The Permittee shall construct any future new tank system(s) in accordance with Section D-9 of the approved Part B permit application.
- (b) Prior to operation of the newly constructed tank system, the Permittee shall submit the certification of installation of the tank system in accordance with OAC Rule 3745-55-92(B) to ensure that proper handling procedures were adhered to in order to prevent damage to the system during installation.

D.3. Containment and Detection of Releases
OAC Rule 3745-55-93

The Permittee shall construct and operate the secondary containment system in accordance with requirements of OAC Rules 3745-55-93(B) through (F), and Section D and F of the approved Part B permit application.

D.4. Operating Requirements
OAC Rule 3745-55-94

- (a) The Permittee shall not place hazardous wastes or treatment reagents in the tank system if they could cause the tank, its ancilliary equipment, or a containment system to rupture, leak, corrode, or otherwise fail.
- (b) The Permittee shall prevent spills and overflows from the tank or containment systems using the methods described in the approved Part B permit application. The Permittee shall comply with the requirements of OAC Rule 3745-55-96 if a leak or spill occurs in the tank system.

- (c) The Permittee shall operate and manage tanks in accordance with Permit Condition D.1, B.7, and Section D of the Part B permit application. This shall include, for example, temperature and pressure sensors in the tanks, nitrogen blanketing, and rupture disks which release to the facility's vapor recovery system.

- (b) The Permittee shall manage MIHW in accordance with the requirements and time limitations stated in the facility's Part B permit application and Ohio Hazardous Waste Facility Installation and Operation Permit. On occasion, and with sufficient justification, Ohio EPA may allow additional time, up to a maximum of thirty (30) days, for managing MIHW at the facility.
- (i) MIHW will be managed as "high priority" waste. MIHW will be restricted in the packaging, concentration, size, quantity, type, and as scheduled by the Permittee to ensure safe handling and incineration at the facility. MIHW will also be restricted to specific processing, staging, and/or storage areas prior to incineration.
 - (ii) Containers of MIHW will not be opened for any reason, including sampling or splitting into smaller charge sizes. However, containers being processed to the incinerator through the direct tanker bays or the direct drum pump-out stations can be opened for that purpose.
 - (iii) Only the feed mechanisms specified in Sections C and D of the approved Part B permit application may be used to feed MIHW to the incineration system.
 - (iv) Untreated MIHW will not be placed into any tank system or into any miscellaneous unit. However, treatment residual (slag) from the incineration of MIHW that contains waste not combusted to ash or slag, except for metallic, glass, and ceramic items, may be placed in the Bulk Solid Waste Tanks for reprocessing.
 - (v) MIHW shall not be managed during periods of precipitation unless the waste and the waste management operations are protected from the elements of weather.
 - (vi) The Permittee shall follow standard operating procedures (SOPs) for the management of MIHW. All SOPs will be made available to Ohio EPA upon request, for review and inclusion of comments. If significant changes are made to SOPs regarding the management of MIHW, the Permittee will submit those SOPs to Ohio EPA for review and inclusion of comments.

- (g) All container storage and staging areas where MIHW may be located shall be visibly labeled with signs stating "high priority" and "mixed infectious and hazardous waste" at all points of access.
- (h) MIHW must be stored in a manner that affords protection from animals and does not provide a breeding place or a food source for insects or rodents.

I(B).6. Inspection Schedules and Procedures
OAC Rules 3745-54-15 and 3745-54-73

Inspections shall be conducted in accordance with the Part B permit application. Inspections shall monitor the condition of containers and for the deterioration of the containment system caused by corrosion or other actors, at minimum. The Permittee shall document the results of these inspections on inspection forms, along with any remedial action taken in accordance with the procedures contained in Section F of the approved Part B permit application.

- (a) The Permittee shall inspect all containers of MIHW while the waste is being managed at the facility, in accordance with the requirements and inspection schedule contained in Sections C and F of the approved Part B permit application.
- (b) Visual inspection of treatment residual (slag) removed from the rotary kiln is required during periods of treatment of MIHW, in accordance with the Part B permit application.
 - (i) Inspections shall be conducted in accordance with Section F of the Part B permit application, and shall be documented on inspection forms.
 - (ii) Based upon inspection or other means, if MIHW is determined to be incompletely combusted, that waste must either be removed from the slag and placed in a collection container that is covered and labeled, or the entire roll-off box of treatment residual may be dumped into the Bulk Solid Waste Storage Tanks for reprocessing, in accordance with SOPs and the Part B permit application.

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- (c) Inspection records associated with the management of MIHW will be maintained by the Permittee and provided to Ohio EPA on a routine basis and upon request.

I(B).7. Response to Leaks or Spills

Additional precautions are required for the management of MIHW at the facility. The Permittee shall respond to any releases of MIHW in accordance with SOPs and the Part B permit application.

- (a) Releases of MIHW shall be cleaned by utilizing either a U.S. EPA registered hospital disinfectant that is also tuberculocidal, for a contact time as specified by the manufacturer, an unexpired dated stabilized bleach product that is a U.S. EPA registered hospital disinfectant that is also tuberculocidal, for a contact time as specified by the manufacturer, or a minimum ten percent sodium hypochlorite solution prepared immediately prior to use with a minimum thirty minutes of contact time with the waste.
- (b) Any wastewater or other materials resulting from a spill or MIHW or debris resulting from the cleanup of a spill of MIHW shall be managed as MIHW.
- (c) Spill kits will be stationed and maintained at designated locations and in areas where MIHW will be managed. Spill kits will be easily accessible when processing MIHW, in accordance with SOPs and the Part B permit application.

I(B).8. Record Keeping
OAC Rule 3745-54-73

The Permittee shall record and maintain, in the operating record for the facility, all monitoring and inspection data compiled under the requirements of this permit and in accordance with OAC Rule 3745-54-73 and all applicable sections of the Part B permit application.