



State of Ohio Environmental Protection Agency

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MAILING ADDRESS:

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

**CERTIFIED MAIL**

July 25, 2008

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

Mr. John Peterka  
Heritage-WTI, Inc.  
1250 St. George Street  
East Liverpool, Ohio 43920-3400

Dear Mr. Peterka:

On March 21, 2008, Ohio EPA received Heritage-WTI, Inc.'s request to 1) install additional fire detection/suppression equipment and modify the current system in order to accommodate the proposed waste management activities; 2) modify containment to accommodate the storage of incompatibles; 3) install vapor recovery and ventilation systems, and; 4) make upgrades to wiring/electrical. For this modification, Heritage-WTI, Inc. submitted a Class 2 modification application<sup>1</sup>. 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 Please note that the modified Permit remains in effect until it is renewed, withdrawn, suspended or revoked.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 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:

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<sup>1</sup>Ohio EPA assigned tracking # 080321-2-1 to this modification application.

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

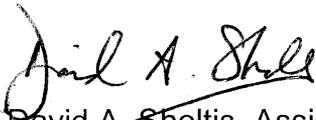
Mr. John Peterka  
Heritage-WTI, Inc.  
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Environmental Review Appeals Commission  
309 South Fourth Street, Room 222  
Columbus, OH 43215

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 July 25, 2008, Ohio EPA issued a final class 2 modified Hazardous Waste Facility Installation and Operation Permit (Permit) to Heritage-WTI, Inc., fka 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 Heritage-WTI, Inc. modifying its Permit?**

Heritage-WTI, 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: 1) install additional fire detection/suppression equipment and modify the current system in order to accommodate the proposed waste management activities; 2) modify containment to accommodate the storage of incompatibles; 3) install vapor recovery and ventilation systems, and; 4) make upgrades to wiring/electrical. This final modified permit will allow Heritage-WTI, 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 **August 27, 2008**. 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**

**Heritage-WTI, Inc., fka Von Roll America, Inc.**  
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 Heritage-WTI, Inc., to make the following changes.

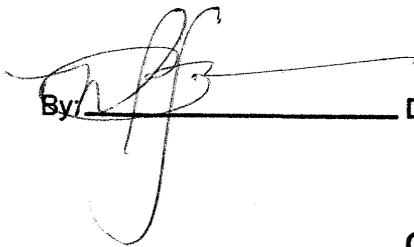
**Class 2 Modification:**

The modification involves the conversion of an existing storage area, the Container Holding Building (aka Slag Canopy) to a storage and process building. The area will be modified to include all of the safety features required by Ohio Administrative Code rules and regulations and the conditions of the permit and Part B permit application. Changes include:

- 1) Physical changes to the building, i.e., complete enclosure by adding siding and entrance ways with doors; adding vapor recovery and ventilation systems; modifying the containment to accommodate the storage/processing of incompatible waste; and upgrading the wiring/electrical system;
- 2) Installation of equipment so containers can be weighed, sampled, and labeled and accommodate splitting, consolidating, or superpacking of waste materials;
- 3) Addition and modifications to the existing fire detection/suppression system;
- 4) Design the floor plan in order for the Permittee to conduct the proposed additional processes and still observe aisle space, storage/process buffer zones, and install portable racks for storage when necessary.

The permitted storage capacity for the building will not change and will be observed at all times.

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.

By: 

Date: 7.25.08

OHIO E.P.A.

JUL 25 2008

ENTERED DIRECTOR'S JOURNAL

**OHIO ENVIRONMENTAL PROTECTION AGENCY**

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

Date of Issuance: July 25, 2008  
Effective Date: July 25, 2008

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

**Name of Permittee:** Heritage-WTI (WTI), Inc., fka 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:** Mr. John Peterka

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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.

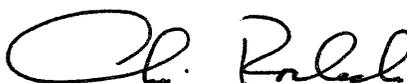
The Ohio Hazardous Waste Facility Installation and Operation Permit with the above-referenced permit number as issued by the Ohio Environmental Protection Agency and journalized on March 23, 2005, is hereby incorporated by reference in its entirety, except as it may be modified herein.

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 Ohio Hazardous Waste Facility Installation and Operation Permit (permit) and the Part B permit application as amended or supplemented on March 21, 2008 and July 8, 2008. The information

contained in the modified permit and 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.



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Chris Korleski  
Director

JN/jms

OHIO EPA DHWM

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Building C, also known as the Lab Pack Building, is 56' x 60' with racks installed to store up to 13,200 gallons in a variety of container types and sizes. Total secondary containment in this building is 11,200 gallons. The building is used primarily for the storage and management of lab pack and loose pack waste described in Section C in the permit application. The building is also used for other processing activities as described in Section D of the permit application. Containers processed or staged in Building C will be no more than five (5) cubic yards in size. The building is equipped with forced air ventilation, a breathing airline, and vapor recovery collection points used during processing activities.

The Container Holding Building, also known as the Slag Canopy, is 50' x 50' with a storage capacity of 100,000 gallons. The building is enclosed to minimize the accumulation of storm water. Total secondary containment is 10,520 gallons. Containers, on pallets or an equivalent device, can be stored on the floor and in heavy duty racks installed in the building. The height of stacked containers on pallets cannot exceed the equivalent height of two (2) stacked pallets of 55 gallon containers. The Permittee will ensure that double-stacked pallets are stable and level. Waste in this building will be similar to that stored and processed in the Container Processing Building (CPB) and the Container Warehouse. This will include incompatible wastes such as water reactives, oxidizers, organic peroxides, reactives, flammables (except Class 1A flammables), and corrosives, as well as non-reactive and non-hazardous waste. Mixed infectious and hazardous waste (MIHW) will not be managed in this area. Processing activities may include, but not limited to, receiving, weighing, labeling, and storage of waste; consolidation of material (superpacking); splitting of material; repacking; sampling for analysis for inbound and outbound scheduled waste; removing pumpable materials; solidifying waste; lab pack activities as described in Section C, the WAP; and third party waste management as described in Permit Condition C.1.(d). The building is equipped with adequate health and safety equipment such as automatic fire detection and suppression systems, forced air ventilation, a breathing airline, and safety showers. Vapor recovery collection points are available to be used during processing activities when necessary.

The Truck Holding and Sampling Area, a canopied building, is located west of the Container Processing Building. The building is approximately 60' x 96', has a storage capacity of approximately 46,000 gallons, and is permitted for storing containerized and bulk solid wastes. The area is divided into six bays or stations that share a common reinforced concrete sump. Total secondary containment is 22,000 gallons. Containerized waste will not be stored on the floor of this building nor in the racks which are used for consumer products and raw materials. Containers of Mixed Infectious and Hazardous Waste (MIHW), highly reactive waste, and/or pyrophoric hazardous wastes are prohibited from storage in this area. All waste will be stored according to compatibility guidelines and, if incompatible wastes are stored in adjacent bays, the Permittee will take action as described in Section D of the Part B Permit Application to prevent mixing should a release occur. In addition to storage, this area is also used for sampling, staging, and processing waste, decontamination of equipment, and dewatering of bulk solid waste containers.

The amount of waste stored in each area will not exceed the permitted capacity at any time. All waste stored, processed, or treated will ultimately be fed to the incineration system for thermal treatment with the exception of third party waste as described in Permit Condition C.1(d). Treatment processes currently permitted at the facility will not render the waste non-hazardous. The Permittee is not permitted to store class 1A Flammable Liquids, defined by National Fire Protection Association (NFPA) codes as liquids with a flashpoint < 73 degrees Fahrenheit and a boiling point < 100 degrees Fahrenheit anywhere on-site. The Permittee may treat Class 1A Flammable Liquids through the direct feed mechanisms including direct to kiln processing.

Container types received at the facility may include, but are not limited to, drums, pails, boxes, totes, cylinders, consumer packages, lab packs, rolloffs, tanker trucks, and refrigerated trucks. Containers that may be received, stored and processed at the facility are composed of materials such as steel, wood, fiber, and plastic. Sizes and volumes of waste containers vary from millimeter vials in lab packs to cubic yard boxes, tanker trucks, and end dump trailers.

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- N) WMU 14- Container Receiving Area (unloading docks) - This unit consists of two covered truck unloading docks that abut the northeast side of the Container Processing Building (WMU 10). The unloading docks are paved with reinforced concrete treated to resist chemicals that are managed in this unit. A reinforced concrete containment wall and speed bump border the north and east edges of the unit along the two sides not bordered by the Container Processing Building (WMU 10). A reinforced concrete containment trench is located along the south side of each unloading station. The paved surface of each dock is sloped toward these trenches. This unit manages containerized wastes generated off-site. Tankers may also be staged in this unit in accordance with Section D of the approved Part B permit application and this permit. The wastes are subsequently unloaded to the Container Processing Building (WMU 10). There have been no documented releases from this unit. The potential for release to ground water, surface water, on-site soils, and air is low.
- O) WMU 15- Container Holding Building (Slag Canopy)- This unit is a 50 foot by 50 foot structure used to store containers of a wide range of waste types. Staging and processing activities are also conducted, in accordance with Section D of the approved Part B permit application and this permit. WMU 15 is located just north of the incineration system (WMU 1). The unit is fully enclosed and equipped with adequate health and safety equipment such as automatic fire detection and suppression systems, safety showers, and vapor recovery. The floor of this unit is constructed of reinforced concrete treated to resist chemicals managed in the unit. A combination of six inch high speed bumps and curbs surround the unit and are integral to the containment system and minimizing the accumulation of storm water. The floor is sloped towards a concrete sump, part of the 10,520 gallon capacity containment system. There have been no documented releases from this unit. The potential for release to ground water, surface water, on-site soils, and air is low.
- P) WMU 16- Less than 90 Day Accumulation Areas - These units are currently sited at the following locations: (1) east of the Building B (External Truck Wash, WMU 5), and (2) along the utility bridge north of the Organic Waste Unloading Area (WMU 3). The areas store wastes generated on-site, typically containers holding slag and ash (the treatment residuals from the incineration process), slag quench water, used refractory brick, and spent activated carbon. The Permittee is also permitted to conduct specifically approved hazardous waste activities as described in Section D of the Part B permit application. The two areas are open, uncovered, and located over reinforced concrete in constructed containment areas. Curbing, sumps, and sloped berms control run-on and are part of the containment system. There have been no documented releases from this unit. The potential for release to ground water, surface water, on-site soils, and air is low.

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