

**Environmental
Protection Agency**

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

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NOV 04 2011

Ohio EPA - DMWM

November 1, 2011

Ms. Carrie Beringer
Heritage - WTI, Inc. (WTI)
1250 Saint George Street
East Liverpool, OH 43920

**RE: HAZARDOUS WASTE PERMIT MODIFICATION, CLASS 1A APPROVAL
ELIMINATE ELECTRONIC BULLETIN BOARD SYSTEM
HERITAGE-WTI, INC. (WTI), OHD 980 613 541 / 02-15-0589**

Dear Ms. Beringer:

On September 7, 2011, Ohio EPA received a request dated September 6, 2011 for a Class 1A (Class 1 requiring prior approval) hazardous waste permit modification from Heritage-WTI, Inc. (WTI). The modification was assigned permit information tracking system (PITS) ID number OHD 980 613 541 - #1109071A-1. With this letter, Ohio EPA approves the above referenced class 1A modification submitted pursuant to Ohio Administrative Code (OAC) Rule 3745-50-51.

Section I(A).5.(e) of WTI's Ohio Hazardous Waste Facility Installation and Operation Permit required the facility to maintain an Electronic Bulletin Board System (BBS). Section D-5c(2)(o)(iii) of Section D of the facility's Part B Permit application also referenced the BBS. The purpose of the BBS was to provide timely information regarding the operating status of the incineration system using data from the Distributed Control System (DCS). WTI was required to maintain two sets of data for the BBS: (1) temperatures at specific locations within the incineration system and (2) AWFCOs, the time of occurrence, the cause, and time at which waste was permitted and resumed.

Previously, this section required several additional data sets to be posted on the BBS. These previously required data sets were removed from the Permit, by an approved permit modification dated February 7, 2006, due to the incorporation of the Maximum Achievable Control Technology (MACT) Standards for hazardous waste combustors. The Ohio EPA, Division of Air Pollution Control, receives specific data regarding incinerator performance and operating parameters on a regular basis.

Due to the limited information that is posted and the maintenance that is required to manage the BBS, WTI requested to remove Section I(A).5.(e) from the Permit and remove Section D-5c(2)(o)(iii) of Section D of the facility's Part B Permit application. The Ohio EPA has other means of obtaining data regarding facility operations.

FOR APPROVAL:

The following modification has been made to your Ohio Hazardous Waste Facility Installation and Operation Permit. Also the records of Ohio EPA have been changed accordingly:

HAZARDOUS WASTE PERMIT MODIFICATION, CLASS 1A APPROVAL
ELIMINATE ELECTRONIC BULLETIN BOARD SYSTEM
NOVEMBER 1, 2011
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Revised pages in Section D, Process Description, of the Part B permit application are Revision 27, dated September 6, 2011, and include:

- Replace **Section D, Cover Page**, revision number and date
- Replace **Section D, Page D-136**, revision number and date, removed language regarding the MS-DOS computer interface and the Electronic Bulletin Board System

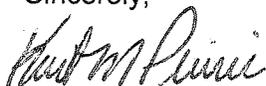
Changes to the Ohio Hazardous Waste Facility Installation and Operation Permit include:

- Reserved **Section I(A).5.(e)** on **Page 93** of 117

The affected permit page is modified in the upper left corner of the page as well as modified in the text. The affected application pages and permit pages are date-stamped with the date of this letter from Ohio EPA.

Enclosed is a copy of the revised application and permit pages for the WTI Part B permit application and Ohio Hazardous Waste Facility Installation and Operation Permit. These pages have 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 East Liverpool Field Office (330) 385-8421.

Sincerely,



Kurt Princic
District Chief
Northeast District Office

KP:ddw

Enclosure

cc: John Nyers, DMWM, CO
Michelle Tarka, DMWM, NEDO
Frank Popotnik, DMWM, NEDO
Jae Lee, US EPA, Region V

ec: Jeremy Carroll, DMWM, CO
Jeri Savelle, CO

*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 Jeremy A. Carroll, P.E., Manager, at (614) 644-2917, or by e-mail at Jeremy.carroll@epa.state.oh.us.

Keywords: bulletin board, MACT

- (c) Upon request of the Ohio EPA, the Permittee shall perform sampling and analysis of the waste and exhaust emissions to verify that the operating requirements established in this permit are being met.

(d) Periodic Incineration System Testing

The Permittee shall test the incineration system as directed by the Ohio EPA, to verify that the operating requirements established in this permit result in compliance with Attachment 2 to this permit and all applicable sections of this permit and the approved Part B permit application. Testing may also be conducted to determine whether amendment of the performance standards contained in this permit, or additions thereto, is indicated as necessary.

At a minimum, the Permittee will conduct testing for the performance standards in this permit at a frequency required by the MACT Standards and listed in the Clean Air Act Title V permit.

- (e) RESERVED

I(A).6. Waste Feed Cut-Off Requirements
OAC Rule 3745-57-45

- (a) The Permittee shall construct and maintain the systems specified in Section D of the approved Part B permit application and Permit Condition I(A).3. The Permittee shall not feed hazardous wastes