



State of Ohio Environmental Protection Agency

Northeast District Office

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

March 29, 2010

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

**RE: HAZARDOUS WASTE PERMIT MODIFICATION, CLASS 1A APPROVAL
HERITAGE-WTI, INC., COLUMBIANA COUNTY
OHD 980 613 541 HWFB NO. 02-15-0589**

Dear Ms. Beringer:

On March 16, 2010, Ohio EPA received a request for a Class 1A (Class 1 requiring prior approval) hazardous waste permit modification (tracking number – PITS# OHD 980613541-100316-1A-1) from Heritage-WTI, Inc. (WTI). 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 2005, Ohio Hazardous Waste Facility Installation and Operation Permit. Also, the records of Ohio EPA have been changed accordingly:

On January 30, 2008, a permit modification was approved by Ohio EPA to allow WTI to accept and treat specific non-hazardous, non-flammable, and non-reactive compressed gas waste streams. The approved compressed gas/gas mixtures are processed through Direct Organic Tanker East (bay#1) at the WTI facility in East Liverpool, OH. This modification will allow WTI to add 1,1,1,2-Tetrafluoroethane gas mixture to the approved compressed gas list found in Section C, the Waste Characteristics and Waste Analysis Plan (WAP), of the Part B permit application; Table C-1a(2)(i).

When the original permit modification (to include the receipt and treatment of compressed gas/gas mixtures) was evaluated, a risk and accident analysis was conducted. The new gas mixture shares many of the characteristics of the already approved gas waste streams, consequently 1,1,1,2-Tetrafluoroethane, aka HFC-134A, will be managed and processed in the same manner of the other gases on the approved compressed gas list, Table C-1a(2)(i).

Enclosed is a copy of the permit and permit application revisions. This has been included to ensure that all involved parties have written confirmation of the changes*.

Section C - Waste Characteristics and Waste Analysis Plan

All pages for Section C are Revision 23, dated March 15, 2010.

APR - 1 2010

DIV. OF HAZARDOUS
WASTE MGT.

Cover Page – New revision number and date;
Page C-15 - Add new compressed gas mixture to waste received at the facility;
Page C-121 - Add new compressed gas mixture to waste received at the facility;
Page C-126 - Add new compressed gas mixture to waste received at the facility.

Section I – Closure Plans, Post Closure Plans, and Financial Requirements

All pages for Section I are Revision 28, dated March 15, 2010.

Cover Page – New revision number and date;
Page I-1 - Add new compressed gas mixture to waste received at the facility.

Attachment 7 – Additional Terms and Conditions to the Ohio Hazardous Waste Facility Installation and Operation Permit added during the Class 3B permit modification to process compressed gas at the facility has been affected by this modification and updated accordingly.

If you have any questions concerning this action, please contact Patricia Natali at the Ohio EPA Northeast District Office, (330) 963-1279 or Mr. Frank Popotnik, DHWM, NEDO, (330) 963-1198.

Sincerely,



William T. Skowronski
District Office Chief
Northeast District Office

WTS:ddw
Enclosure

cc: Frank Popotnik, DHWM, NEDO
Patricia Natali, DHWM, NEDO
John Nyers, DHWM, CO
Michelle Tarka, DHWM, NEDO
Wen Huang, USEPA, Region V
ec: Jeremy Carroll, Manager, RISS, DHWM, CO
Mike Allen, Supervisor, Engineering Unit, DHWM, 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, Regulatory and Information Services Section at (614) 644-2917, or by e-mail at jeremy.carroll@epa.state.oh.us.

Attachment 7 - Modification to Process Compressed Gas
and Gas Mixtures at the East Liverpool, WTI
Facility

Heritage-WTI, Inc.
Ohio Hazardous Waste Facility Installation and Operation Permit

Class 3B Permit Modification, PITS# OHD 980613541-020625-3B-1
Approved August 23, 2005

Class 1A Permit Modification, PITS# OHD 980613541-100316-1A-1
Approved March 29, 2010

Terms and Conditions

Attachment 7
Heritage – WTI, Inc.
Ohio Hazardous Waste Facility Installation and Operation Permit

Additional Terms and Conditions
Class 3B Permit Modification to process compressed gas

- A. Approved compressed gas/gas mixtures, may only be fed to the incineration system via an approved direct organic tanker unloading station, such as East Bay in the Organic Tanker Unloading unit (bay #1) or South Bay in the Incinerator Feed Building. When appropriate, all modifications to waste management units or processing equipment used to manage compressed gaseous waste will be made following NFPA Standards for handling compressed gas/gas mixtures. For these modifications, the Permittee will submit a certification from the East Liverpool Fire Department, or another approved, authorized agency. The certification, submitted ten days prior to utilization of the modified unit, equipment, and/or SOP, will be used by Ohio EPA to ensure the correct standards were applied and/or implemented.
- B. The Permittee will require the generator of the approved specific gas/gas mixtures to properly characterize the waste stream prior to approval for receipt at the facility. This may be in the form of analytical data or material safety data sheets (MSDS).
- C. The Permittee is not authorized for storage of compressed gas/gas mixtures at the facility. The Permittee will schedule shipments of the waste such that only one tanker of compressed gas/gas mixture will be on-site at any time unless exceptional situations arise and the Ohio EPA is notified
- D. Gaseous waste treated in the incinerator must be included in the Permittee's total feed treatment limits.
- E. The Permittee is permitted to accept and treat specific non-hazardous, non-flammable, and non-reactive compressed gas waste streams. The approved compressed gas list is found in Section C, Waste Characteristics and Waste Analysis Plan (WAP) of their Part B permit application.
- F. If the Permittee desires to add additional compressed gas/gas mixture(s) to their permit, actions described in Section C, Waste Characteristics and Waste Analysis Plan (WAP) of their Part B permit application should be followed. The procedure includes criteria to be used to evaluate a new gas/gas mixture and a decision tree for proper modification classification determination.