



State of Ohio Environmental Protection Agency

Northeast District Office

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Ted Strickland, Governor
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Chris Korleski, Director

April 15, 2010

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

**RE: HAZARDOUS WASTE PERMIT MODIFICATION, CLASS 1A APPROVAL
REMOVE REQUIREMENT FOR OEPA SIGNATURE ON PROFILES
HERITAGE-WTI, INC. (WTI), OHD 980 613 541 / 02-15-0589**

Dear Ms. Beringer:

On April 6, 2010, Ohio EPA received a notification dated April 1, 2010 for a Class 1 hazardous waste permit modification from Heritage-WTI, Inc. (WTI). The modification was assigned permit information tracking system (PITS) ID number OHD 980 613 541 - #100406-1A-1.

With this letter, Ohio EPA acknowledges the above referenced class 1A (class 1 with prior approval) modification submitted pursuant to Ohio Administrative Code (OAC) Rule 3745-50-51, and accordingly has updated the WTI Hazardous Waste Facility Installation and Operation Part B Permit Application and Permit.

WTI submitted changes to Section C, Waste Characteristics and Waste Analysis Plan, to remove the requirement for Ohio EPA approval of waste profiles.

Previously, WTI's waste approval system for most waste streams was a five-step process that consisted of the following: (1) Waste Profile Sheet review by WTI; (2) Supplemental Physical/Chemical Analysis as applicable; (3) Waste Approval by WTI; (4) Ohio EPA review and approval of profiles; (5) Waste Approval Acknowledgement to the customer. There were exceptions to this process. WTI had previously submitted several permit modifications to Ohio EPA to eliminate step 4 (Ohio EPA profile review) for certain types of waste profiles. A list of the specific waste profile templates exempt from the Ohio EPA signature requirement was previously found in Section C, Waste Characteristics and Waste Analysis Plan, specifically Section C-1b(2)(iv)(a).

This permit modification request is similar to the permit modifications mentioned above that exempted specific waste profile templates from Ohio EPA approval as listed in Section C-1b(2)(iv)(a). However, this permit modification request from WTI removed the requirement for Ohio EPA approval for all waste profiles. Both the Part B Permit Application and the Ohio Hazardous Waste Permit are affected.

Changes to the Part B permit application include:

- Replace Section C, Cover Page
- Replace page (i) of the Table of Contents
- Replace page C-21
- Replace page C-22
- Replace page C-31
- Replace page C-32
- Replace page C-34



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- Replace page C-35
- Replace page C-36
- Replace page C-37
- Replace page C-38
- Replace page C-39
- Replace page C-40
- Replace page C-41
- Replace page C-42
- Replace page C-43
- Replace page C-52
- Replace page C-87
- Replace page C-97
- Replace page C-99

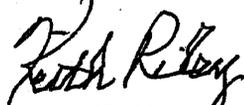
Changes to the Ohio Hazardous Waste Facility Installation and Operation Permit include:

- Replace page 19 of 117
- Replace page 95d of 117

All modified pages for this permit modification are Revision ²⁴~~23~~ dated April 1, 2010, and date-stamped with the date of this letter from Ohio EPA. The two affected permit pages are modified in the upper left corner of each page as well as modified in the text, and are date-stamped with the date of this letter from Ohio EPA.

Enclosed are copies of the revised permit and application pages for the WTI Part B permit application. This has been included to ensure that all involved parties have written confirmation of the changes. If you have any questions concerning this action, please contact Michelle Tarka at the Ohio EPA East Liverpool Field Office (330) 385-8421.

Sincerely,


William T. Skowronski, Chief
Northeast District Office

WTS:ddw

Enclosure

cc: Michelle Tarka, DHWM, NEDO
Frank Popotnik, DHWM, NEDO
Patricia Natali, DHWM, NEDO
ec: Sherry Slone, DHWM, NEDO
John Nyers, DHWM, CO
Mike Allen, Supervisor, DHWM, CO
Jeremy Carroll, Manager, RISS, CO

Keywords: class one, profiles, oepa signature

(b) Hazardous Waste from Off-Site Sources

When the Permittee is to receive hazardous waste from an off-site source (except where the Permittee is also the generator), (s)he must inform the generator in writing that (s)he has the appropriate permits and will accept the waste the generator is shipping. The Permittee must keep a copy of this written notice as part of the operating record.

B.3. General Waste Analysis Plan
OAC Rule 3745-54-13

- (a) The Permittee shall prepare and approve waste profile sheets (WPS) in accordance with Section C of the approved Part B permit application. Waste codes not permitted in the approved Part A permit application shall not be stored or treated at the facility until the Permittee has received approval in accordance with the Ohio hazardous waste rules.
- (b) The Permittee shall follow the procedures described in the approved waste analysis plan found in Section C of the approved Part B permit application and the terms and conditions of this permit. The Permittee shall verify the analysis of each waste stream annually as part of its quality assurance program, in accordance with Test Methods for Evaluating Solid Waste: Physical/Chemical Methods, EPA Publication SW-846, or equivalent methods approved by the Director. At a minimum, the Permittee shall maintain proper functional instruments, use approved sampling and analytical methods, verify the validity of sampling and analytical procedures, and perform correct calculations. If the Permittee uses a contract laboratory to perform analyses, then the Permittee shall inform the laboratory in writing that it must operate under the waste analysis conditions set forth in this permit including all requirements found in the facility's quality control/quality assurance plan. All outside contracted laboratories must be audited and their quality control/quality assurance plan evaluated prior to the laboratory performing services for the Permittee. The results of the audits must be maintained as part of the facility's operating record.
- (c) The Permittee shall ensure that all phenolic wastes received for treatment at the facility will be treated by incineration.
- (d) The Permittee shall ensure that all organic wastes not covered by Condition B.3.(c) will be incinerated unless other treatment methods are provided or specified in the approved Part B permit application.

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- (d) Individual containers of MIHW to be fed intact into the incinerator shall not exceed a total volume of more than 55 gallons and are restricted to non-metal containers such as plastic or fiber (cardboard). For specific waste streams that are packaged in an appropriate container size and/or waste concentration, metal containers may be acceptable. Individual 55 gallon containers of MIHW may be over packed into a larger non-metal container, if necessary.
- (e) MIHW will be evaluated upon receipt at the facility for conformity to the WPS. Non-conforming waste will be managed in accordance with the Part B permit application.
- (f) A tracking system for MIHW must be developed and utilized by the Permittee in accordance with the Part B permit application. The tracking system will be provided to the Ohio EPA for review on a regular basis and upon request at any time.

I(B).3. Operational Performance Requirements

The minimum temperature for the incineration of MIHW shall be no less than the minimum temperature for incinerating either hazardous or infectious waste, whichever temperature is more protective.

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