



John R. Kasich, Governor  
Mary Taylor, Lt. Governor  
Craig W. Butler, Director

CERTIFIED MAIL

September 11, 2014

Ronald Guenther  
Chemtron Corporation  
35850 Schneider Court  
Avon, Ohio 44011

Re: Chemtron Corporation  
Permit-Short Term  
Draft for Public Comment  
Hazardous Waste  
Lorain  
OHD 066 060 609

Dear Mr. Guenther:

The Ohio EPA, Division of Materials and Waste Management (DMWM) staff has reviewed your Ohio Hazardous Waste Facility Installation and Operation Permit (Permit) renewal application. It is the recommendation of the staff that the Director issue a draft renewal permit to Chemtron Corporation (Chemtron) for its facility located at 35850 Schneider Court, Avon Ohio 44011. Since the permit application is complete and meets appropriate standards, and the applicant has a history of compliance with relevant environmental laws and demonstrates sufficient reliability, expertise and competency to operate a hazardous waste facility. The draft renewal permit authorizes Chemtron to continue hazardous waste management activities at the facility.

A public notice concerning the issuance of the draft renewal permit will appear on September 11, 2014, in The Chronicle Telegram newspaper. A public announcement similar in form will be made through a local radio station. Ohio EPA will accept written comments relevant to the permit application and the draft renewal permit until October 14, 2014. Written comments should be submitted before the close of the public comment period to Ohio EPA Attn: John Nyers, Division of Materials and Waste Management, P.O. Box 1049, Columbus, Ohio 43216-1049, (614) 644-2621. A copy of the draft renewal permit package can be reviewed at any of the following locations:

Ohio EPA, Northeast District Office  
2110 E. Aurora Road  
Twinsburg, Ohio 44087

Phone: (330) 963-1200

Ohio EPA, Central Office Division of Materials and Waste Management  
50 W. Town Street, Suite 700  
Columbus, Ohio 43215  
Phone: (614) 644-2621

A copy of the permit and renewal fact sheet will also be available at the Avon Branch Library, 37485 Harvest Drive, Avon, Ohio 44011 for the duration of the public comment period. After considering public comments, Ohio EPA will reconsider the draft renewal permit and should issue or deny the final renewal permit. If you have any questions concerning the draft renewal permit, please call Adrienne LaFavre of the Northeast District Office at (330) 963-1200.

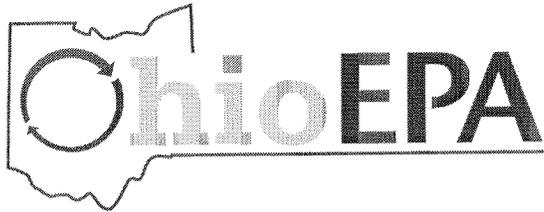
Sincerely,



Demitria Crumiell-Hagens, Administrative Professional II  
Division of Materials and Waste Management

Attachments

cc: John Nyers, DMWM-CO  
Heidi Grismer, PIC-CO  
Jae Lee, US EPA, Lee.Jae@epa.gov  
Adrienne LaFavre, DMWM-NEDO  
Frank Popotnik, DMWM-NEDO  
Ed Lim, DERR-CO  
Ed D'Amato, DERR-NEDO  
Scott Hester, DMWM-CO  
Todd Anderson, Legal-CO  
RCRAInfo, DMWM-CO  
Facility Mailing List  
Ron Drozdowski



August 2014

## Draft Hazardous Waste Permit Renewal and Comment Period

**Facility Name:** Chemtron Corporation

**U.S. EPA I.D.:** OHD 066 060 609

**Location:**

35850 Schneider Court  
Avon, Ohio 44011

**Facility Owner:**

RJG Enterprises dba Chemtron  
35850 Schneider Court  
Avon, Ohio 44011

**Facility Operator:**

RJG Enterprises dba Chemtron  
35850 Schneider Court  
Avon, Ohio 44011

**Activity:**

Permit renewal for tank and container storage of hazardous waste; treatment of hazardous waste in containers, tanks and a miscellaneous unit; Corrective Action.

**Comment Period:**

September 11, 2014 - October 14, 2014

**Submit Comments to:**

Ohio EPA  
John Nyers  
Division of Materials and Waste Management  
P.O. Box 1049  
Columbus, Ohio 43216-1049  
(614) 644-2621  
[john.nyers@epa.ohio.gov](mailto:john.nyers@epa.ohio.gov)

U.S. EPA, Region 5  
Jae Lee  
RCRA/TSCA Programs Section, LR-8J  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590  
[lee.jae@epa.gov](mailto:lee.jae@epa.gov)

Ohio Environmental Protection Agency and U.S. Environmental Protection Agency are issuing a joint (State and Federal portions) Hazardous Waste Permit to Chemtron Corporation.

**What is the history of the hazardous waste program?**

The Resource Conservation and Recovery Act (RCRA), an amendment to the Solid Waste Disposal Act, was passed in 1976. The main reason for the amendment was to address the growing volume of municipal and industrial solid waste generated across the United States. A few goals established by RCRA include: to protect human health and the environment from potential hazards of waste disposal, to reduce the amount of waste generated and to ensure that wastes produced are managed in an environmentally sound manner.

When RCRA was written, U.S. Congress' intent was for the states to assume primary responsibility for implementing the hazardous waste regulations with oversight from the United States Environmental Protection Agency (U.S. EPA). U.S. EPA must approve each state as an authorized state. To become an authorized state, each must demonstrate that the state program is at least equivalent to and consistent with federal laws, provides adequate enforcement authority and provides availability of information similar to the federal program. Since 1989, the State of Ohio has been an authorized state by U.S. EPA for the majority of the hazardous waste program.

Currently, the State of Ohio is not authorized by U.S. EPA to issue a permit for organic air emissions (40 CFR Part 264, Subparts BB and CC) from hazardous

## Draft Hazardous Waste Permit Renewal

waste storage units. U.S. EPA has drafted a RCRA permit to address organic air emissions from hazardous waste storage units. U.S. EPA's draft permit and the State of Ohio's draft permit have been issued concurrently and both share the same comment period.

### How can I become more involved?

All persons, including the applicant, may submit written comments relating to this draft action. Written comments or requests for a public meeting may be submitted before the end of the comment period to the address in the box on the front page.

The comment period begins on September 11, 2014 and ends on October 14, 2014. Copies of the permit application and the draft permit are available for review by the public at the following locations:

Ohio EPA, Northeast District Office  
2110 East Aurora Road  
Twinsburg, Ohio 44087  
(330) 963-1200

Ohio EPA, Central Office  
Division of Materials and Waste Management  
Lazarus Government Center  
50 West Town St., Suite 700  
Columbus, Ohio 43215  
(614) 644-2621

U.S. EPA, Region 5  
RCRA Branch, LR-8J  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590  
(312) 886-3781

Copies of the Ohio draft permit and the federal draft permit are available for review by the public at:

Lorain Public Library System  
Avon Branch Library  
37485 Harvest Drive  
Avon, OH 44011  
(440) 934-4743

A copy of the draft permit is available for review by the public online at the following locations:

The Ohio draft permit is available for review by the public online under the "Stakeholder Input" tab at: [epa.ohio.gov/dmwm/](http://epa.ohio.gov/dmwm/).

The federal draft permit is available for review by the public at: [epa.gov/region5/waste/permits/actions.htm](http://epa.gov/region5/waste/permits/actions.htm).

Within sixty (60) days of the close of the public comment period, Ohio EPA will, without prior hearing, issue the permit (or deny the request) in accordance with Chapter 3734 of the Ohio Revised Code (ORC). If Ohio EPA approves the application, taking into account public comments, a renewal permit will be issued with terms and conditions as are necessary to ensure compliance with hazardous waste rules.

### What does the facility do?

Chemtron Corporation (Chemtron) was founded in 1971 as a recycler of halogenated solvents. It now offers hazardous waste storage and treatment options to its customers. In addition to storage and treatment of hazardous wastes, Chemtron also offers activities not regulated by this permit including transportation services, laboratory services, field services, mercury reclamation, and non-RCRA waste management.

### What would this hazardous waste permit allow the facility to do?

This permit allows Chemtron to store and treat hazardous waste in containers and tanks. Hazardous wastes include both listed and characteristic wastes.

There are six areas where storage and treatment occur. A total of 160,488 gallons of container storage takes place in Areas 2-6. A total of 161,300 gallons of tank storage takes place in Areas 1, 2, 4, 5, and 6.

Treatment activities take place in all six areas and include: fuel blending, shredding, neutralization,

## **Draft Hazardous Waste Permit Renewal**

compaction, separation/consolidation, pre-blending, and deactivation.

### **What is the regulatory basis to support this permit renewal?**

The Director of Ohio EPA has determined that Chemtron submitted an application for renewal one hundred eighty (180) days prior to the expiration date of its present permit, which was issued by Ohio EPA on December 31, 2003. The Director has considered the application, inspection reports, a report regarding the facility's compliance with the present permit, and the rules adopted under ORC Section 3734. The Director has found that the Part B permit application meets the

Director's performance standards and that the facility has a history of compliance with this chapter, rules adopted under it, the existing permit, and orders entered into, which demonstrates reliability, expertise, and competency to subsequently operate the facility under this chapter, the rules, and the permit.

### **Who can I contact for more information?**

For additional information, please contact Adrienne La Favre, Ohio EPA, Northeast District Office at (330) 963-1266 or Jae Lee of the U.S. EPA Regional Office in Chicago, Illinois at (800) 621-8431 ext. 63781.

**OHIO ENVIRONMENTAL PROTECTION AGENCY**  
**OHIO HAZARDOUS WASTE FACILITY**  
**INSTALLATION AND OPERATION PERMIT RENEWAL**

Permittee: **R.J.G. Enterprises, Inc. dba Chemtron Corporation**

Mailing Address: **Chemtron Corporation  
35850 Schneider Court  
Avon, Ohio 44011**

Owner: **R.J.G. Enterprises, Inc. dba Chemtron Corporation  
35850 Schneider Court  
Avon, Ohio 44011**

Operator: **R.J.G. Enterprises, Inc. dba Chemtron Corporation  
35850 Schneider Court  
Avon, Ohio 44011**

Location: **Chemtron Corporation  
35850 Schneider Court  
Avon, Ohio 44011**

US EPA ID:	<b>OHD 066060609</b>
Issue Date:	
Effective Date:	
Expiration Date:	

**AUTHORIZED ACTIVITIES**

In reference to the application of R.J.G. Enterprises, Inc. for an Ohio Hazardous Waste Facility Installation and Operation Renewal Permit under Ohio Revised Code (ORC) Chapter 3734 and the record in this matter, you are authorized to conduct at the above-named facility the following hazardous waste management activities:

- **Storage of hazardous waste in tanks and containers;**
- **Treatment of hazardous waste in containers, tanks and miscellaneous units;**
- **Corrective Action**

**PERMIT APPROVAL**

\_\_\_\_\_  
Craig W. Butler, Director  
Ohio Environmental Protection Agency

This permit approval is based upon the record in this matter which is maintained at the offices of the Ohio Environmental Protection Agency. The Director has considered the application, accompanying information, inspection reports of the facility, a report regarding the facility's compliance or noncompliance with the terms and conditions of its permit and rules adopted by the Director under this chapter, and such other information as is relevant to the operation of the facility. The Director has determined that the facility under the existing permit has a history of compliance with ORC Chapter 3734, rules adopted under it, the existing permit, or orders entered to enforce such requirements that demonstrate sufficient reliability, expertise, and competency to operate the facility henceforth under this chapter, rules adopted under it, and the renewal permit.

Entered into the Journal of the Director this \_\_\_\_ day of \_\_\_\_\_, 2014.

By \_\_\_\_\_ of the Ohio Environmental Protection Agency.

## MODULE A - GENERAL PERMIT CONDITIONS

### A. GENERAL PERMIT CONDITIONS

#### A.1 Effect of Permit

ORC Sections 3734.02 (E) and (F) and 3734.05  
OAC Rule 3745-50-58(G)

- (a) The Permittee is authorized to treat and store hazardous waste in containers, tanks, and miscellaneous units in accordance with the terms and conditions of this Ohio hazardous waste permit (hereinafter permit), ORC Chapter 3734, all applicable Ohio hazardous waste rules, all applicable regulations promulgated under the Resource Conservation and Recovery Act (RCRA), as amended, and the permit application. The permit application, as submitted to Ohio EPA on June 5, 2013 and last updated on April 4, 2014, is hereby incorporated into this permit. In the instance of inconsistent language or discrepancies between the above, the language of the more stringent provision shall govern.
- (b) Any management of hazardous waste not authorized by this permit is prohibited, unless otherwise expressly authorized or specifically exempted by law. Issuance of this permit does not convey property rights of any sort or any exclusive privilege; nor does it authorize any injury to persons or property, or invasion of other private rights. Compliance with the terms and conditions of this permit does not obviate Permittee's obligation to comply with other applicable provisions of law governing protection of public health or the environment including but not limited to the Community Right to Know law under ORC Chapter 3750.

#### A.2 Permit Actions

OAC Rule 3745-50-58(F)

This permit may be modified or revoked as specified by Ohio law. The filing of a request by the Permittee for a permit modification, or the notification of planned changes or anticipated noncompliance on the part of the Permittee, does not stay any permit term or condition.

#### A.3 Permit Effective/Expiration Date

OAC Rule 3745-50-54

The effective date of this permit is the date the permit is entered into the Director's Journal. The permit expiration date is ten years after the date of journalization of this permit.

A.4 Severability

The provisions of this permit are severable, and if any provision of this permit, or the application of any provision of this permit to any circumstance, is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.

A.5 Duty to Comply  
OAC Rule 3745-50-58(A)

The Permittee must comply with all applicable provisions of ORC Chapter 3734, all applicable Ohio hazardous waste rules, and all terms and conditions of this permit, except to the extent and for the duration such noncompliance is authorized by the laws of the State of Ohio. Any permit noncompliance, other than noncompliance authorized by the laws of the State of Ohio, constitutes a violation of ORC Chapter 3734 and is grounds for enforcement action, revocation, modification, denial of a permit renewal application or other appropriate action.

A.6 Duty to Reapply and Permit Expiration  
OAC Rules 3745-50-40(D), 3745-50-58(B), 3745-50-56 and ORC Section 3734.05(H)

- (a) If the Permittee wishes to continue an activity allowed by this permit after the expiration date of this permit, the Permittee must submit a completed permit application for a hazardous waste facility installation and operation permit renewal and any necessary accompanying general plans, detailed plans, specifications, and such information as the Director may require, to the Director no later than one hundred eighty (180) days prior to the expiration date of this permit, unless a later submittal date has been authorized by the Director upon a showing of good cause.
- (b) The Permittee may continue to operate in accordance with the terms and conditions of the expired permit until a renewal permit is issued or denied if:
  - (i) the Permittee has submitted a timely and complete permit application for a renewal permit under OAC Rule 3745-50-40; and
  - (ii) through no fault of the Permittee, a new permit has not been issued pursuant to OAC Rule 3745-50-40 on or before the expiration date of this permit.
- (c) The Corrective Action obligations contained in this permit will continue regardless of whether the facility continues to operate or ceases operation and closes. The Permittee is obligated to complete facility-wide Corrective Action under the conditions of this permit regardless of the operational status of the facility. The Permittee must submit an application for permit renewal at least

180 days before the expiration date of this permit pursuant to OAC Rule 3745-50-40(D) unless a) the permit has been modified to terminate the Corrective Action schedule of compliance and the Permittee has been released from the requirements for financial assurance for Corrective Action; or b) a later submittal date has been authorized by the Director.

A.7 Need to Halt or Reduce Activity Not a Defense  
OAC Rule 3745-50-58(C)

It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce a permitted activity in order to maintain compliance with the conditions of this permit.

A.8 Duty to Mitigate  
OAC Rule 3745-50-58(D)

The Permittee must take all reasonable steps to minimize releases to the environment and must carry out such measures as are reasonable to prevent significant adverse impact on human health or the environment resulting from noncompliance with this permit.

A.9 Proper Operation and Maintenance  
OAC Rule 3745-50-58(E)

The Permittee must at all times properly operate and maintain the facility (and related appurtenances) to achieve compliance with the terms and conditions of this permit. Proper operation and maintenance includes effective management practices, adequate funding, adequate operator staffing and training, and where appropriate, adequate laboratory and process controls, including appropriate quality assurance/quality control procedures. This provision requires the operation of back-up or auxiliary facilities or similar systems only when necessary to achieve compliance with the terms and conditions of this permit.

A.10 Duty to Provide Information  
OAC Rule 3745-50-58(H)

The Permittee must furnish to the Director, within a reasonable time, any relevant information which the Director may request to determine whether cause exists for modifying or revoking, or to determine compliance with, this permit. The Permittee must also furnish to the Director, upon request, copies of records required to be kept by this permit.

A.11 Inspection and Entry  
OAC Rules 3745-50-58(I), 3745-49-03 and 3745-50-30, and ORC Section 3734.07

(a) The Permittee must allow the Director, or an authorized representative, upon

stating the purpose and necessity of the inspection and upon proper identification, to:

- (i) enter, at reasonable times, upon the Permittee's premises where a regulated facility or activity is located or conducted, or where records must be kept under the terms and conditions of this permit;
  - (ii) have access to and copy, at reasonable times, any records required to be kept under the terms and conditions of this permit;
  - (iii) inspect and photograph, at reasonable times, any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under the terms and conditions of this permit; and
  - (iv) sample, document, or monitor, at reasonable times, for the purposes of assuring permit compliance or as otherwise authorized by ORC Chapter 3734 and the rules adopted thereunder, any substances or parameter at any location.
- (b) Any record, report or other information obtained under the hazardous waste rules or Chapter 3734 of the Revised Code shall not be available to the public upon the Permittee's satisfactory showing to Ohio EPA that all or part of the information would divulge methods or processes entitled to protection as trade secrets pursuant to Ohio Trade Secret Law and OAC Rules 3745-49-03 and 3745-50-30.

A.12 Monitoring and Records  
OAC Rule 3745-50-58(J)

- (a) Any sample and measurement taken for the purpose of monitoring must be representative of the monitored activity. Further, a sample must be a representative sample, as such term is defined and used in the Ohio hazardous waste rules. The method used to obtain a representative sample of the waste to be analyzed must be the appropriate method from Appendix I of OAC Rule 3745-51-20, Laboratory Methods. Laboratory methods must be those specified in Test Methods for the Evaluation of Solid Waste, Physical/Chemical Methods, EPA Publication SW-846, Third Edition, as amended by Updates I, II, IIA, IIB, III and IIIA, and additional supplements or editions thereof; Standard Methods for the Examination of Water and Wastewater: Twentieth Edition, 1999; or an equivalent method as specified in the approved waste analysis plan, or as this term is defined and used in the Ohio hazardous waste rules.
- (b) Records of monitoring information must specify the:
  - (i) date(s), exact place(s), and time(s) of sampling or measurements;

- (ii) individual(s) who performed the sampling or measurements;
- (iii) date(s) analyses were performed;
- (iv) individual(s) who performed the analyses;
- (v) analytical technique(s) or method(s) used; and
- (vi) results of such analyses.

A.13 Signatory Requirement and Certification of Records  
OAC Rules 3745-50-58(K) and 3745-50-42

All applications, reports or information must be properly signed and certified in accordance with OAC Rule 3745-50-58(K).

A.14 Retention of Records and Information Repository  
OAC Rules 3745-50-40(G), 3745-50-58(J), 3745-50-58(M) and 3745-50-58(N)

- (a) The Permittee must retain records of all monitoring information, including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, copies of all reports and records required by this permit, the certification required by OAC Rule 3745-54-73(B)(9), and records of all data used to complete the application for this permit, for a period of at least three (3) years from the date of the sample, measurement, report, certification, or application.
- (b) The record retention period may be extended by request of the Director at any time and is automatically extended during the course of any unresolved enforcement action regarding the facility.
- (c) The Permittee must maintain, in accordance with the Ohio hazardous waste rules, records of all data used to complete the permit application and any amendments, supplements or modifications of such application. The Permittee must retain a complete copy of the current application for the effective life of the permit as indicated in Permit Condition A.3.
- (d) The Permittee must maintain records from all ground water monitoring wells and associated ground water surface elevations for the active life of the facility and for disposal facilities for the post-closure care period as well.
- (e) Reserved.
- (f) Corrective Action records must be maintained at least three (3) years after all Corrective Action activities have been completed.

A.15 Planned Changes

OAC Rules 3745-50-51 and 3745-50-58(L)(1)

The Permittee must give notice to the Director as soon as possible of any planned physical alterations or additions to the facility. All such changes must be made in accordance with OAC Rule 3745-50-51.

A.16 Waste Shipments

OAC Rules 3745-52-12 and 3745-53-11, ORC Section 3734.15(C)

The Permittee must only use properly registered transporters of hazardous waste to remove hazardous waste from the facility, in accordance with all applicable laws and rules.

A.17 Anticipated Noncompliance

OAC Rule 3745-50-58(L)(2)

The Permittee must give advance notice to the Director of any planned changes in the permitted facility or operations which may result in noncompliance with the terms and conditions of this permit. Such notification does not waive the Permittee's duty to comply with this permit pursuant to Permit Condition A.5.

A.18 Transfer of Permits

OAC Rules 3745-50-52, 3745-50-58(L)(3) and 3745-54-12

- (a) The permit may be transferred to a new owner or operator only if such transfer is conducted in accordance with ORC Chapter 3734 and the rules adopted thereunder. This permit may be transferred by the Permittee to a new owner or operator only if the permit has been modified under OAC Rule 3745-50-51. Before transferring ownership or operation of the facility, the Permittee must notify the new owner or operator in writing of the requirements of ORC Chapter 3734 and the rules adopted thereunder (including all applicable Corrective Action requirements).
- (b) The Permittee's failure to notify the new owner or operator of the requirements of the applicable Ohio law or hazardous waste rules does not relieve the new owner or operator of its obligation to comply with all applicable requirements.

A.19 Compliance Reports

OAC Rules 3745-50-58(L)(5) and 3745-50-50

Reports of compliance or noncompliance with, or any progress reports on, interim and final requirements contained in any compliance schedule (developed in accordance with OAC Rule 3745-50-50) of this permit must be submitted to the Director no later than fourteen (14) days following each scheduled date.

A.20 Immediate Reporting of Noncompliance  
OAC Rule 3745-50-58(L)(6)

- (a) The Permittee must report orally to Ohio EPA's Division of Environmental Response and Revitalization within twenty-four (24) hours from the time the Permittee becomes aware of any noncompliance with this permit, ORC Chapter 3734 or the rules adopted thereunder, which may endanger human health or the environment, including:
  - (i) information concerning the release of any hazardous waste that may cause an endangerment to public drinking water supplies; and
  - (ii) any information of a release or discharge of hazardous waste or a fire or explosion from the hazardous waste facility, which could threaten the environment or human health outside the facility.
- (b) The report must consist of the following information (if such information is available at the time of the oral report):
  - (i) name, address, and telephone number of the owner or operator;
  - (ii) name, address, and telephone number of the facility;
  - (iii) date, time, and type of incident;
  - (iv) name and quantity of material(s) involved;
  - (v) the extent of injuries, if any;
  - (vi) an assessment of actual or potential hazards to the environment and human health outside the facility, where this is applicable; and
  - (vii) estimated quantity and disposition of recovered material that resulted from the incident.

A.21 Follow-Up Written Report of Noncompliance  
OAC Rule 3745-50-58(L)(6)(c)

- (a) A written report must also be provided to Ohio EPA's Division of Environmental Response and Revitalization and the Division of Materials and Waste Management Northeast District Office within five (5) days of the time the Permittee becomes aware of the circumstances reported in Permit Condition A.20.
- (b) The written report must address the items in Permit Condition A.20 and must contain a description of such noncompliance and its cause; the period(s) of

noncompliance (including exact dates and times); whether the noncompliance has been corrected; and, if not, the anticipated time it is expected to continue; and steps taken or planned to minimize the impact on human health and the environment and to reduce, eliminate, and prevent recurrence of the noncompliance.

- (c) The Permittee need not comply with the five (5) day written report requirement if the Director, upon good cause shown by the Permittee, waives that requirement and the Permittee submits a written report within fifteen (15) days of the time the Permittee becomes aware of the circumstances.

A.22 Other Noncompliance

OAC Rules 3745-50-58(L)(10) and 3745-50-58(L)(4)

The Permittee must report to the Director all other instances of noncompliance not provided for in Permit Conditions A.19 and A.20. These reports must be submitted within thirty (30) days of the time at which the Permittee is aware of such noncompliance. Such reports must contain all information set forth within Permit Condition A.20.

A.23 Reserved

A.24 Other Information

OAC Rule 3745-50-58(L)(11)

If at any time the Permittee becomes aware that it failed to submit any relevant facts, or submitted incorrect information to the Director, the Permittee must promptly submit such facts, information or corrected information to the Director.

A.25 Confidential Information

OAC Rules 3745-49-03 and 3745-50-30

In accordance with ORC Chapter 3734 and the rules adopted thereunder, the Permittee may request confidentiality for any information required to be submitted by the terms and conditions of this permit, or any information obtained by the Director, or an authorized representative, pursuant to the authority provided under Permit Condition A.11.

A.26 Ohio Annual Permit, Disposal, and Treatment Fees

OAC Rules 3745-50-33 through 3745-50-36

The annual permit fee, calculated pursuant to OAC Rule 3745-50-36 and payable to the Treasurer of the State, must be submitted to the Director on or before the anniversary of the date of issuance during the term of the permit. For the purpose of the payment of the Ohio Annual Permit Fee, the date of issuance is the date the permit was entered into the Journal of the Director of Ohio EPA.

A.27 Compliance Schedule - Documents  
OAC Rules 3745-50-50 and 3745-50-51

- (a) Unless specified otherwise, the Permittee must submit the documents listed below to:

Ohio EPA, Director  
c/o DMWM, Engineering, Remediation, and Authorizations Section  
P.O. Box 1049  
Columbus, Ohio 43216-1049

Ohio Environmental Protection Agency  
Northeast District Office  
Division of Materials and Waste Management  
2110 East Aurora Road  
Twinsburg, Ohio 44087

- (b) The Permittee must submit to Ohio EPA within sixty (60) days after permit journalization, in accordance with Ohio's hazardous waste rules, the following information to be incorporated in the permit application:

- (i) Updated Closure Cost Estimate  
OAC Rules 3745-55-42

Section I of the permit application containing the financial assurance mechanism for closure must be updated to include a copy of the current closure cost estimate as set forth in OAC Rule 3745-55-42.

- (ii) Updated Financial Assurance Mechanism for Closure  
OAC Rules 3745-55-43

Section I of the permit application containing the financial assurance mechanism for closure must be updated to include a copy of the current financial assurance mechanism, as set forth in OAC Rule 3745-55-43, and as specified by the wording requirements of OAC Rule 3745-55-51. The value of the financial assurance mechanism must reflect at least the current amount of the closure cost estimate.

During the life of the permit, the Permittee may change the financial assurance mechanism as stated in OAC Rule 3745-55-43. The Permittee must submit the financial assurance mechanism documentation to the Director of Ohio EPA in accordance with the parameters set forth in OAC Rule 3745-55-43.

(iii) Updated Liability Requirements  
OAC Rule 3745-55-47

Section I of the permit application containing the mechanism used to demonstrate third party liability coverage must be updated to include a copy of the current liability mechanism as set forth in OAC Rule 3745-55-47 and as specified by the wording requirements of OAC Rule 3745-55-51.

During the life of the permit, the Permittee may change the mechanism used to demonstrate liability coverage as stated in OAC Rule 3745-55-47. The Permittee must submit the liability mechanism documentation to the Director of Ohio EPA in accordance with the parameters set forth in OAC Rule 3745-55-47.

This information must be submitted in accordance with OAC Rule 3745-50-51.

A.28 Information to be Maintained at the Facility  
OAC Rule 3745-54-74

- (a) Unless otherwise specified by the hazardous waste rules, the Permittee must maintain at the facility, until closure is completed and certified by an independent, registered professional engineer, pursuant to OAC Rule 3745-55-15, and until the Director releases the Permittee from financial assurance requirements pursuant to OAC Rule 3745-55-43, the following documents (including amendments, revisions and modifications):
- (i) waste analysis plan, developed and maintained in accordance with OAC Rule 3745-54-13 and the terms and conditions of this permit;
  - (ii) contingency plan, developed and maintained in accordance with OAC Rule 3745-54-53 and the terms and conditions of this permit;
  - (iii) closure plan, developed and maintained in accordance with OAC Rule 3745-55-12 and the terms and conditions of this permit;
  - (iv) cost estimate for facility closure, developed and maintained in accordance with OAC Rule 3745-55-42 and the terms and conditions of this permit;
  - (v) personnel training plan and the training records, developed and maintained in accordance with OAC Rule 3745-54-16 and the terms and conditions of this permit;
  - (vi) operating record, required by OAC Rule 3745-54-73 and the terms and conditions of this permit;

- (vii) inspection schedules, developed in accordance with OAC Rules 3745-54-15, 3745-55-74 and 3745-55-95 and the terms and conditions of this permit;
  - (viii) annually-adjusted cost estimate for facility closure, as required by OAC Rules 3745-55-42 and 3745-55-44 and the terms and conditions of this permit; and
  - (ix) all other documents required by Module A, Permit Condition A.12.
- (b) The Permittee must maintain copies of all inspection logs at the facility for a period not less than three (3) years from the date of inspection.

A.29 Waste Minimization Report  
OAC Rules 3745-54-73 and 3745-54-75

- (a) The Permittee must submit a Waste Minimization Report describing the waste minimization program required by OAC Rules 3745-54-75(H), (I), and (J); 3745-54-73(B)(9); and 3745-52-20(A) at least once every five years. The provisions of OAC Rules 3745-54-75(H), (I) and (J); and 3745-54-73(B)(9) must be satisfied biennially.
- (b) The Permittee must submit the Waste Minimization Report to Ohio EPA's Office of Compliance Assistance and Pollution Prevention within one hundred eighty (180) days of the effective date of this permit, and must submit updates to this report once every five years thereafter.

## MODULE B - GENERAL FACILITY CONDITIONS

### B. GENERAL FACILITY CONDITIONS

#### B.1 Design and Operation of Facility OAC Rule 3745-54-31

- (a) The Permittee must design, construct, maintain and operate the facility to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, ground water or surface waters which could threaten human health or the environment.
- (b) Reserved

#### B.2 Required Notices OAC Rule 3745-54-12

- (a) 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), he must inform the generator in writing that 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) Hazardous Wastes from Foreign Sources

The Permittee must notify the U.S. EPA regional administrator in writing at least four weeks in advance of the date the Permittee expects to receive hazardous waste from a foreign source, as required by OAC Rule 3745-54-12(A). Notice of subsequent shipments of the same waste from the same foreign source is not required.

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

- (a) Before an owner or operator treats, stores, or disposes of any hazardous wastes, or nonhazardous wastes if applicable under OAC Rule 3745-55-13(D), he must obtain a detailed chemical and physical analysis of a representative sample of the wastes. At a minimum, this analysis must contain all the information which must be known to treat, store, or dispose of the waste in accordance with the requirements of Chapters 3745-54 to 3745-57, 3745-205, and 3745-270 of the Administrative Code.

- (b) The Permittee must follow the procedures described in the waste analysis plan found in Section C of the permit application and the terms and conditions of this permit.
- (c) The Permittee must 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 must 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 must inform the laboratory in writing that it must operate under the waste analysis conditions set forth in this permit.

B.4 Security  
OAC Rule 3745-54-14

The Permittee must comply with the security provisions of OAC Rule 3745-54-14(B)(2), and (C) and Section F of the permit application.

B.5 General Inspection Requirements  
OAC Rules 3745-54-15 and 3745-54-73

The Permittee must inspect the facility in accordance with OAC Rule 3745-54-15 and the inspection schedule set forth in Section F of the permit application. The Permittee must remedy any deterioration or malfunction discovered by an inspection, as required by OAC Rule 3745-54-15(C). Records of inspection must be kept for a minimum of three years from the date of inspection. These records must be a part of the facility's operating record as required by OAC Rule 3745-54-73.

B.6 Personnel Training  
OAC Rule 3745-54-16

The Permittee must conduct personnel training, as required by OAC Rule 3745-54-16. This training program must contain at least the elements set forth in Section H of the permit application. The Permittee must maintain training documents and records as required by OAC Rule 3745-54-16(D) and (E).

B.7 General Requirements for Ignitable, Reactive, or Incompatible Wastes  
OAC Rule 3745-54-17

- (a) The Permittee must comply with the requirements of OAC Rule 3745-54-17 and must follow the procedures for handling ignitable, reactive, and incompatible wastes set forth in Section F of the permit application.

- (b) The Permittee must provide electrical grounding for all containers, tanks, and transport vehicles during all operations involving the handling of ignitable or reactive wastes.
- (c) The Permittee must provide, and require the use of, spark proof tools during all operations involving the handling of all ignitable or reactive wastes.
- (d) The Permittee must prohibit smoking and open flames in each area where ignitable, reactive or incompatible hazardous wastes are managed and must post appropriate signs.

B.8 Reserved

B.9 Required Equipment  
OAC Rule 3745-54-32

At a minimum, the Permittee must maintain at the facility all the equipment required by OAC Rule 3745-54-32 and the equipment set forth in the contingency plan contained in Section G of the permit application.

B.10 Testing and Maintenance of Equipment  
OAC Rule 3745-54-33

The Permittee must inspect, test and maintain the equipment required by Permit Condition B.9 as necessary to assure its proper operation in time of emergency, as specified in OAC Rule 3745-54-33, Section D of the permit application and the terms and conditions of this permit.

B.11 Access to Communications or Alarm System  
OAC Rule 3745-54-34

The Permittee must maintain access to the communications and alarm systems, as required by OAC Rule 3745-54-34, Section F of the permit application and the terms and conditions of this permit.

B.12 Required Aisle Space  
OAC Rule 3745-54-35

At a minimum, the Permittee must maintain aisle space to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment to any area of facility operation in an emergency, as required by OAC Rule 3745-54-35.

B.13 Arrangements with Local Authorities  
OAC Rule 3745-54-37

- (a) The Permittee must comply with the requirements of OAC Rule 3745-54-37 (A) by making a diligent effort to:
  - (i) make arrangements and familiarize all emergency response agencies which are likely to respond in an emergency with the location and layout of the facility, properties of hazardous waste managed at the facility and associated hazards, places where facility personnel will normally be working, entrances to and roads inside the facility, and possible evacuation routes as depicted and explained in Section G of the permit application;
  - (ii) make arrangements with Ohio EPA emergency response teams, emergency response contractors, and equipment suppliers;
  - (iii) make arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and types of injuries or illnesses which could result from fires, explosions, or releases at the facility; and
  - (iv) make agreements designating primary emergency authority to a specific police department and a specific fire department and make agreements with any others to provide support to the primary emergency authority, where more than one police and fire department may respond to an emergency.
- (b) Where authorities decline to enter into such agreements or arrangements set forth in OAC Rule 3745-54-37(A), the Permittee must document the refusal in the operating record as required by OAC Rule 3745-54-37(B).

B.14 Implementation of Contingency Plan  
OAC Rules 3745-54-51 and 3745-54-56

The Permittee must immediately carry out the provisions of the contingency plan and follow the emergency procedures described in OAC Rule 3745-54-56, whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents which threatens or could threaten human health or the environment.

In regard to spills and related toxic gas releases, the plan must describe the criteria to be used by the emergency coordinator to determine when the plan will be implemented. At a minimum, the plan must be implemented in the following situations:

- (a) Any fire involving hazardous waste; or
- (b) Any explosion involving hazardous waste; or

- (c) Any uncontrolled hazardous waste reaction that produces or has the potential to produce hazardous conditions, including noxious, poisonous, flammable and/or explosive gases, fumes, or vapors; harmful dust; or explosive conditions; or
- (d) Any hazardous waste release, outside of a secondary containment system, that causes or has the potential to cause off-site soil and/or surface water contamination; or
- (e) Any hazardous waste release that produces or has the potential to produce hazardous conditions, including noxious, poisonous, flammable and/or explosive gases, fumes, or vapors; harmful dust; or explosive conditions.

B.15 Content of the Contingency Plan  
OAC Rule 3745-54-52

The Permittee must comply with OAC Rule 3745-54-52 and the contingency plan, as set forth in Section G of the permit application.

B.16 Contingency Plan - Released Material and Emergency Response Material and By-products  
OAC Rule 3745-54-56(G)

- (a) Immediately after an emergency, the emergency coordinator must provide for treating, storing, or disposing of recovered waste, contaminated soil or surface water, or any other material that results from a release, fire, or explosion at the facility.
- (b) All liquid or solid material resulting from fire, explosion, released material or emergency response material and by-products that the Permittee is required to evaluate to determine whether such material is hazardous waste in accordance with OAC Rule 3745-52-11; must be collected and managed as a hazardous waste unless the Permittee can demonstrate that such waste is not hazardous in accordance with OAC Rule 3745-51-03(C) and (D).

B.17 Amendments to Plan  
OAC Rule 3745-54-54

The Permittee must review the contingency plan at least annually and upon the occurrence of any event listed in OAC Rule 3745-54-54. If necessary or appropriate, the Permittee must amend the contingency plan as required by OAC Rule 3745-54-54 in accordance with OAC Rule 3745-50-51.

B.18 Copies of Plan

OAC Rule 3745-54-53

- (a) The Permittee must comply with the requirements set forth in OAC Rule 3745-54-53 regarding contingency plan distribution. The Permittee must maintain at the facility a copy of the contingency plan and all revisions to the plan.
- (b) The Permittee must, in accordance with OAC Rule 3745-54-53, submit a copy of the contingency plan to all local police departments, fire departments, hospitals and local emergency response teams that may be called upon to provide emergency services. The Permittee must notify such agencies and the local authorities, in writing, within ten (10) days of the effective date of any amendments of, revisions to, or modifications to the contingency plan.
- (c) The Permittee must, in accordance with OAC Rule 3745-54-53, submit a copy of the contingency plan to Ohio EPA's Division of Environmental Response and Revitalization.

B.19 Emergency Coordinator

OAC Rule 3745-54-55

The Permittee must comply with the requirements set forth in OAC Rule 3745-54-55 regarding the emergency coordinator.

B.20 Emergency Procedures

OAC Rule 3745-54-56

The Permittee must comply with the requirements regarding emergency procedures set forth in OAC Rule 3745-54-56, Section G of the permit application and the terms and conditions of this permit.

B.21 Availability, Retention and Disposition of Records

OAC Rule 3745-54-74

All records shall be furnished by the Permittee upon request to, and made available at all reasonable times for inspection by, Ohio EPA, in accordance with OAC Rule 3745-54-74.

B.22 Operating Record

OAC Rule 3745-54-73

The Permittee must comply with the requirements set forth in OAC Rule 3745-54-73 regarding an operating record, including information to be recorded and the maintenance thereof.

B.23 Contingency Plan Records  
OAC Rule 3745-54-56(J)

The Permittee must note in the operating record the time, date, and details of any incident that requires the implementation of the contingency plan. Within fifteen (15) days after any such incident, the Permittee must submit to the Director a written report of the incident containing the elements set forth in OAC Rule 3745-54-56(J).

B.24 Manifest System  
OAC Rules 3745-54-70, 3745-54-71, 3745-54-72 and 3745-54-76

- (a) In managing waste at the facility, the Permittee must comply with OAC Chapter 3745-52 and OAC Rules 3745-54-71, 3745-54-72 and 3745-54-76 with regard to the manifest system.
- (b) Manifest discrepancy report. If a significant discrepancy in a manifest is discovered, the Permittee must attempt to reconcile the discrepancy. If not resolved with fifteen (15) days after receiving the waste, the Permittee must submit a letter describing the discrepancy and attempts to reconcile it, and a copy of the manifest, to the Director in accordance with OAC Rule 3745-54-72.
- (c) Unmanifested waste report. If the Permittee receives unmanifested waste which is not excluded from the manifest requirements of OAC Rule 3745-51-05, then the Permittee must submit an unmanifested waste report to the Director within fifteen (15) days after receipt of the waste. The report must include the information required under OAC Rule 3745-54-76.

B.25 Biennial Report and Additional Reports  
OAC Rules 3745-54-75 and 3745-54-77

The Permittee must comply with the report requirements set forth in OAC Rule 3745-54-75 and the additional report requirements set forth in OAC Rule 3745-54-77.

B.26 Closure Performance Standard  
OAC Rule 3745-55-11

During facility closure, the Permittee must implement the provisions of the closure plan found in Section I of the permit application in such a manner as to achieve compliance with OAC Rule 3745-55-11.

B.27 Closure Plan  
OAC Rules 3745-55-10, 3745-55-11 and 3745-55-13

The Permittee must implement those procedures detailed within Section I of the permit application, in accordance with OAC Rules 3745-55-10 through 3745-55-20.

B.28 Amendment of Closure Plan  
OAC Rules 3745-55-12 and 3745-50-51

Should a change in the facility closure plan become necessary, the Permittee must amend the closure plan in accordance with OAC Rule 3745-55-12 (C).

B.29 Content of Closure Plan  
OAC Rule 3745-55-12

The Permittee must maintain the closure plan at the facility which contains the elements set forth in OAC Rule 3745-55-12 and all elements required by the terms and conditions of this permit.

B.30 Notification of Closure  
OAC Rule 3745-55-12

The Permittee must notify the Director in writing at least 45 days prior to the date on which he expects to begin final closure of the facility, as required by OAC Rule 3745-55-12(D).

B.31 Time Allowed For Closure  
OAC Rule 3745-55-13

Within ninety (90) days after receiving the final volume of hazardous waste, the Permittee must remove from the facility, or treat or dispose of on-site, all hazardous waste in accordance with the closure plan. The Director may approve a longer closure period if the Permittee complies with all applicable requirements for requesting a modification to the permit as set forth in OAC Rule 3745-55-13(A). The Permittee must complete all closure activities within one hundred eighty (180) days after receiving the final volume of hazardous waste in accordance with OAC Rule 3745-55-13. The Director may approve a longer closure period if the Permittee complies with all applicable requirements for requesting a modification to the permit as set forth in OAC Rule 3745-55-13 (B).

B.32 Disposal or Decontamination of Equipment, Structures, and Soils  
OAC Rule 3745-55-14

- (a) The Permittee must decontaminate or dispose of all contaminated facility equipment, structures, and soils, as required by OAC Rule 3745-55-14, the closure plan and the terms and conditions of this permit.
- (b) The Permittee must notify the Ohio EPA Northeast District Office within five (5) working days prior to all rinseate and soil sampling.

B.33 Certification of Closure  
OAC Rule 3745-55-15

The Permittee and an independent, registered professional engineer must certify that each hazardous waste management unit or the facility has been closed in accordance with the specifications in the closure plan and the terms and conditions of this permit, as required by OAC Rule 3745-55-15. The Permittee must furnish to the Director, upon request, documentation supporting the certification.

B.34 Reserved

B.35 Reserved

B.36 Cost Estimate for Facility Closure  
OAC Rule 3745-55-42

- (a) The Permittee's most recent closure cost estimate, prepared in accordance with OAC Rule 3745-55-42 is specified in Section I of the permit application.
- (b) The Permittee must adjust the closure cost estimate for inflation within 60 days prior to the anniversary date of the establishment of the financial instrument(s) used to comply with OAC Rule 3745-55-43.
- (c) The Permittee must revise the closure cost estimate whenever there is a change in the facility's closure plan that increases the cost of closure as required by OAC Rule 3745-55-42(C).
- (d) The Permittee must submit to Ohio EPA and keep at the facility the latest closure cost estimate as required by OAC Rule 3745-55-42(D) and (E).

B.37 Financial Assurance for Facility Closure

The Permittee must maintain continuous compliance with OAC Rule 3745-55-43 and provide documentation of financial assurance, which meets the requirements of OAC Rule 3745-55-51, in at least the amount of the cost estimates required by Permit Condition B.36.

B.38 Liability Requirements

The Permittee must maintain continuous compliance with the requirements of OAC Rule 3745-55-47 and the documentation of liability by providing liability coverage which meets the requirements of OAC Rule 3745-55-51 for sudden accidental occurrences in the amount of at least \$1 million per occurrence, with an annual aggregate of at least \$2 million, exclusive of legal defense costs.

B.39 Incapacity of Owners or Operators, Guarantors, or Financial Institutions  
OAC Rule 3745-55-48

The Permittee must comply with requirements set forth in OAC Rule 3745-55-48 regarding the incapacity of owners, operators, guarantors or financial institutions.

B.40 General Requirements for Land Disposal Restrictions  
OAC Chapter 3745-270

The Permittee must comply with all applicable regulations regarding land disposal prohibitions and restrictions as required by OAC Chapter 3745-270.

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## MODULE C - CONTAINER STORAGE & TREATMENT

### C. CONTAINER STORAGE AND MANAGEMENT

The Permittee operates five container storage areas. Areas 2, 3, 4, 5, and 6 are summarized in Attachment I. Areas 2, 4, 5, and 6 also have tanks. A wide variety of containers can be found in these areas including small containers, for example one and five gallons, as well as fifty-five gallon drums and totes. All containers are compatible with the materials contained.

**Area 2** is an outdoor area with a total of 7,648 square feet of area. It is canopied to limit precipitation affecting the unit. The concrete pad is sealed and curbed. Area 2 has 37,504 gallons of secondary containment. A maximum of 16,500 (300 fifty-five gallon drums) gallons of containerized hazardous waste are stored in Area 2. Waste codes which are stored in Area 2 are listed in Attachment II. Area 2 is also used to treat waste in containers. The following types of treatment are permitted in Area 2: separation and consolidation, deactivation, and compaction.

**Area 3** is an indoor area with a total of 6,600 square feet of area. The concrete pad is sealed. Area 3 has 3,740 gallons of secondary containment provided by the building. A maximum of 10,450 (190 fifty-five gallon drums) gallons of containerized hazardous waste are stored in Area 3. Waste codes which are stored in Area 3 are listed in Attachment II. Area 3 is also used to treat waste in containers. The following types of treatment are permitted in Area 3: separation and consolidation and deactivation.

**Area 4** is an outdoor area with a total of 10,511 square feet of area. The concrete pad is sealed and partially curbed. A portion of Area 4 does not have secondary containment. The curbed (contained) square foot portion of Area 4 is canopied with walls and has 14,303 gallons of secondary containment. A maximum of 56,763 (1032 fifty-five gallon drums) gallons of containerized hazardous waste are stored in Area 4. Waste codes which are stored in Area 4 are listed in Attachment II. Area 4 is also used to treat waste in containers. The following types of treatment in containers are permitted in Area 4: separation and consolidation, pre-blending, and deactivation. The non-contained portion of Area 4 is used for storage of roll-offs with materials which would pass the paint filter test. This area is not canopied and occupies 1,918 square feet.

**Area 5** has an indoor area of 6,853 square feet and an outdoor canopied area of 4730 square feet. The concrete floor of the building is sealed. The concrete pad of the outdoor area is sealed and curbed. The indoor portion of Area 5 has 11,937 gallons of secondary containment provided by the building. The outdoor portion of Area 5 has 14,887 gallons of containment. A maximum of 39,650 (720.9 fifty-five gallon drums) gallons of containerized hazardous waste are stored in Area 5. Waste codes which are stored in Area 5 are listed in Attachment II. D003, non-water reactives, such as sulfides and cyanides, are permitted in the general Area 5 container storage area as well as in the Lab Pack Rooms 1 and 2. Aerosol cans are also stored in Area 5.

Attachment II lists the waste codes permitted for aerosol cans. Area 5 is also used to treat waste in containers. The following types of treatment are permitted in Area 5: separation and consolidation, deactivation, shredding, pre-blending, and compaction. Special to Area 5 are two rooms designated as Lab Pack Room 1 (reactive waste cell) and Lab Pack Room 2 (organic lab pack cell). Wastes with certain P and U codes as well as D003 are stored and treated in these rooms.

**Area 6** is an indoor area with 7,004 square feet and an outdoor canopied area of 6,336 square feet of area. The concrete floor of the building is sealed. The concrete pad of the outdoor area is sealed and curbed. The indoor portion of Area 6 has 9,811 gallons of secondary containment provided by the building. The outdoor portion of Area 6 has 13,607 gallons of containment. A maximum of 37,125 (675 fifty-five gallon drums) gallons of containerized hazardous waste are stored in Area 6. Waste codes which are stored in containers in Area 6 are listed in Attachment II. Area 6 is also used to treat waste in containers. The following types of treatment are permitted in Area 6: separation and consolidation and deactivation.

#### C.1 Container Storage/Quantity Limitation

- (a) The Permittee is authorized to store the following number of gallons of hazardous waste at any given time in the permitted container areas noted below:

**Area 2** contains 16,500 gallons of hazardous waste;  
**Area 3** contains 10,450 gallons of hazardous waste;  
**Area 4** contains 56,763 gallons of hazardous waste;  
**Area 5** contains 39,650 gallons of hazardous waste; and  
**Area 6** contains 37,125 gallons of hazardous waste.

Hazardous waste that the Permittee stores in these areas is listed in Attachment II. The Permittee must store hazardous waste in the types of containers (size and type) described in Section D of the permit application.

- (b) For the purpose of compliance with the capacity limitation of this permit, each container will be considered to be storing an amount of hazardous waste equal to its capacity, regardless of the actual quantity stored in the container.
- (c) Permit Conditions C.1(a) and C.2 shall not apply to the Permittee's activities as a generator accumulating hazardous waste on-site in compliance with OAC Rule 3745-52-34 and 40 CFR Part 265, subparts AA, BB, and CC.

However, when accumulating waste within the permitted container storage area, in accordance with OAC Rule 3745-52-34 and 40 CFR Part 265, subparts AA, BB, and CC, the Permittee must not, for the total amount of hazardous waste stored and accumulated, exceed the maximum container storage inventory established under this permit condition.

C.2 Limitations on Treatment of Hazardous Waste in Containers

- (a) The Permittee is authorized to treat hazardous waste in the permitted treatment areas, located in Areas 2, 3, 4, 5, and 6. Hazardous waste that the Permittee treats in these areas is listed in Attachment II including the type of treatment permitted for each specific waste code.

Throughput limits are noted in the table below.

Treatment	Amount (Total for both container and tank)	Area
Neutralization - T01(B)	9,000 gallon/day	5
Fuel Blending - (X99)	10,000 gallon/day	4
Shredding - T04(H)	100 ton/day	5
Compaction - (T04(G)	10 ton/day	2, 5
Consolidation/Separation - T04(I)	100 ton/day	2, 3, 4, 5, 6
Pre-blending - T04(F)	0.15 ton/day	4, 5
Deactivation - T04(K)	3,000 gallon/day	2, 3, 4, 5, 6
Solvent Recovery – T04(j)	Not applicable, exempted RCRA treatment	3

The Permittee must treat hazardous waste in containers in the manner described in Section D of the permit application.

- (b) Permit Condition C.2(a) shall not apply to the Permittee's activities as a generator treating hazardous waste in containers on-site in compliance with OAC Rule 3745-52-34.

However, when treating waste within the permitted treatment area, in accordance with OAC Rule 3745-52-34, the Permittee must not, for the total amount of hazardous waste treated, exceed the maximum throughput capacity established under this condition.

C.3 Waste Identification

The Permittee must store and/or treat in containers only the hazardous waste codes specified in Attachment II.

C.4 Condition of Containers  
OAC Rule 3745-55-71

If a container holding hazardous waste is not in good condition (e.g., severe rusting, apparent structural defects) or if it begins to leak, the Permittee must transfer the hazardous waste from such container to a container that is in good condition or otherwise manage the waste in compliance with the conditions of this permit and the hazardous waste facility chapters of the OAC.

C.5 Compatibility of Waste with Containers  
OAC Rule 3745-55-72

The Permittee must use a container made of or lined with materials which will not react with, and are otherwise compatible with, the hazardous waste to be stored, so that the ability of the container to contain the waste is not impaired.

C.6 Management of Containers  
OAC Rule 3745-55-73

- (a) The Permittee must keep all containers closed during storage, except when it is necessary to add or remove waste, and must not open, handle, or store containers in a manner which may rupture the container or cause it to leak.
- (b) In the event lab-pack wastes are generated they must be handled in compliance with applicable storage requirements.
- (c) In the event lab-pack wastes are generated they must be packaged in drums containing absorbent material that is compatible with the waste.

C.7 Containment Systems  
OAC Rule 3745-55-75

- (a) The Permittee must maintain the containment system in accordance with the plans and specifications contained in Section D of the permit application.
- (b) The Permittee must maintain the containment system as described in the permit application, designed with sufficient capacity to contain ten percent of the total volume of the containers or the volume of the largest container, whichever is greater. The containment system must be free of cracks and gaps and sufficiently impervious to contain leaks and spills and accumulated precipitation until the collected material is detected and removed.
- (c) The base of the containment system must be sloped or the containment system must be otherwise designed and operated to drain and remove liquids resulting from leaks, spills, or precipitation, unless the containers are elevated or are otherwise protected from contact with accumulated liquids.
- (d) Run-on into the containment system must be prevented unless the collection system has sufficient excess capacity in addition to that required in Permit Condition C.7(b) above.

- (e) Spilled or leaked waste and accumulated precipitation must be removed from the sump or collection area in a timely manner. This time period is not to exceed twenty-four (24) hours from the time spilled and/or leaked waste is discovered to have reached the hazardous waste pad sump.

C.8 Reserved

C.9 Inspection Schedules and Procedures  
OAC Rules 3745-54-15 and 3745-54-73

The Permittee must inspect the container storage area in accordance with the inspection schedule contained in Section D of the permit application and in accordance with OAC Rule 3745-54-15. The inspection schedule must be designed to detect for leaking containers, deteriorating containers, and/or containment systems. The Permittee must note the results of these inspections in the inspection log along with any remedial action taken.

Areas subject to spills, such as loading or unloading areas, shall be inspected daily when in use pursuant to the inspection procedure described in Section D of the permit application. The Permittee must maintain these inspection results in the facility operating record.

C.10 Recordkeeping  
OAC Rule 3745-54-73

The Permittee must comply with all recordkeeping requirements of OAC Rule 3745-54-73 as part of the facility operating record.

C.11 Special Container Provisions for Ignitable or Reactive Waste  
OAC Rules 3745-54-17 and 3745-55-76

- (a) The Permittee must not store ignitable or reactive waste except in accordance with OAC Rules 3745-54-17 and 3745-55-76.
- (b) The Permittee must not locate containers holding ignitable or reactive waste within 15 meters (50 feet) of the facility's property line, with the following exception. The Permittee requested an exemption from the requirement of OAC Rule 3745-55-76 to locate containers holding ignitable hazardous waste at least 50 feet from the Facility's property line for certain storage areas. The storage areas included portions of permitted storage/treatment Areas 2, 4 and 5. The first area is located in the northwest corner of the property and involves the truck dock outside of Area 2. The second area is on the north side of Areas 4 and 5 within the confines of the existing buildings. The exemption request

included a letter from the City of Avon Fire Chief. The Fire Chief conducted a review of the Facility's request for variance from the fire code's similar requirement to store ignitable or reactive wastes at least 50 feet from the property line. The Fire Chief concluded the request for variance granted with conditions.

Pursuant to ORC Section 3734.02(G) and OAC Rule 3745-50-31, the Director, by order, may exempt any person generating, storing, treating, disposing of, or transporting hazardous waste, in such quantities or under such circumstances that, in the determination of the Director, are unlikely to adversely affect the public health or safety or the environment from any requirement to obtain a permit or comply with other requirements of ORC Chapter 3734. The Director evaluated the application and determined that the Permittee's storage of ignitable hazardous waste in the above areas is unlikely to adversely affect the public health or safety or the environment. The Permittee is exempted from the requirement to store ignitable waste at least 50 feet from the Facility property line, for the above described areas, provided that the ignitable hazardous waste is managed in accordance with all other applicable hazardous waste laws and Ohio Fire Code and National Fire Protection Association requirements and standards. The exemption request as submitted to Ohio EPA on October 29, 2013 and supplemented on February 20, 2014, is hereby incorporated into this permit.

- (c) The Permittee must take precautions to prevent accidental ignition or reaction of ignitable or reactive waste and shall follow the storage procedures specified in Section D the permit application.

C.12 Special Container Provisions for Incompatible Waste  
OAC Rules 3745-54-17(B) and 3745-55-77

- (a) The Permittee must not store incompatible waste except in accordance with OAC Rules 3745-54-17(B) and 3745-55-77.
- (b) The Permittee must not place hazardous waste in an unwashed container that previously held an incompatible waste or material.
- (c) The Permittee must separate or protect (by means of a dike, berm, wall, or other device) a storage container holding a hazardous waste that is incompatible with any waste or other materials stored nearby in other containers, piles, open tanks, or surface impoundments.

C.13 Reserved

C.14 Closure and Post-Closure  
OAC Rules 3745-55-10 through 3745-55-20, and 3745-55-78

At closure of the container areas, the Permittee shall remove all hazardous waste and hazardous waste residues from the containment systems, in accordance with the procedures in the closure plan set forth in Section I of the permit application.

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## MODULE D - TANK STORAGE, TREATMENT, AND MANAGEMENT

The Permittee operates five (5) tank storage areas, Areas 1, 2, 4, 5, and 6, with a total of thirty (30) tanks which are permitted. Not all tanks have been installed. All tanks and ancillary equipment and piping are above ground. Individual tank volumes, dimensions, and year of installation are listed in Permit Condition D.1 below. All feed systems are manually activated. All tanks have either an indicator level control or equivalent for the safety cut-off. Each tank has a low/high level control. Tanks in Areas 1, 2, and 4 have by-pass systems which are manual. Tanks in Area 5, when installed, will have by-pass systems. Tanks in Area 6 have by-pass systems. Pressure control for tanks in Areas 1, 2, and 6 is achieved by venting to the atmosphere. Tanks in Area 4 use a nitrogen blanket for pressure control. Tanks in Area 5 will have a properly engineered pressure control designed for the appropriate tank contents.

All tank systems have adequate containment. Containment volumes are at least the volume of the largest tank. If drums are also stored in the area, containment capacity is at least the volume of the largest tank plus 10% of the permitted container volume. Areas 2, 4, 5, and 6 also have containers.

Total tank volumes for Areas 1, 2, 4, 5, and 6 are summarized in Attachment I. Waste codes and treatment permitted for each area are detailed in Attachment II. Treatments are summarized in Attachment III.

A brief description of each area follows below:

**Area 1** is an outdoor area with 1,776.5 square feet of area. It is canopied to limit precipitation affecting the unit. The concrete pad is sealed and curbed. Area 1 has 9,902 gallons of secondary containment. Tanks 1, 2, 3, 6, 7, 8, 13, 14, and 15 are located in Area 1. A maximum of 46,600 gallons of hazardous waste is stored in tanks in Area 1. Descriptions of each tank are included in Permit Condition D.1. Waste codes which are stored in tanks in Area 1 are listed in Attachment II. Area 1 is also used to treat waste in tanks. The following types of treatment are permitted in Area 1: separation and consolidation and deactivation.

**Area 2** is an outdoor area with 7,648 square feet of area. It is canopied to limit precipitation affecting the unit. The concrete pad is sealed and curbed. Area 2 has 37,504 gallons of secondary containment. Tanks 10 (not yet installed), 11, 12, and 24 are located in Area 2. A maximum of 21,100 gallons of hazardous waste is stored in tanks in Area 2. Descriptions of each tank are included in Permit Condition D.1. Waste codes which are stored in tanks in Area 2 are listed in Attachment II. Area 2 is also used to treat waste in tanks. The following types of treatment are permitted in Area 2: separation and consolidation and deactivation.

**Area 4** is an outdoor area with 10,511 square feet of area. The concrete pad is sealed and partially curbed. A portion of Area 4 does not have secondary containment, however there are no tanks in this area. The curbed (contained) portion of Area 4 is canopied with walls and has 14,303 gallons of secondary containment. Tanks 18, 19, 20, 21 (not yet installed), 22, 23, and 25 are located in Area 4. A maximum of 45,000 gallons of hazardous waste is stored in tanks in Area 4. Descriptions of each tank are included in Permit Condition D.1. Waste codes which are stored in tanks in Area 4 are listed in Attachment II. Area 4 is also used to treat waste in tanks. The following types of treatment are permitted in Area 4: separation and consolidation, pre-blending, fuel blending, and deactivation.

**Area 5** has a total area of 9,730 square feet with both an outdoor canopied area and an indoor under roof area. Tanks, when installed, will be located inside. The concrete floor of the building is sealed. The indoor portion of Area 5 has 11,937 gallons of secondary containment provided by the building. Presently there are no tanks in Area 5, however they are permitted. Upon installation of these permitted tanks, the tanks will be designated as tanks 26, 51, 52, 53, and 54. When tanks are installed, a maximum of 22,600 gallons of hazardous waste will be stored in tanks in Area 5. Waste codes which will be stored in tanks in Area 5 are listed in Attachment II. Area 5 is also used to treat waste in tanks. The following types of treatment are permitted in Area 5: separation and consolidation, deactivation, neutralization, and pre-blending.

**Area 6** has a total area of 12,944 square feet in an outdoor canopied area and also has an indoor area. There are no tanks in the indoor area. The concrete pad (5,244 square feet) of the outdoor area is sealed and curbed. The outdoor portion of Area 6 has 13,607 gallons of secondary containment. Tanks U, V, W, X and Y are located in Area 6. A maximum of 26,000 gallons of hazardous waste can be stored in tanks in Area 6. Descriptions of each tank are included in Permit Condition D.1. Waste codes which can be stored in tanks in Area 6 are listed in Attachment II. Area 6 can also be used to treat waste in tanks. The following types of treatment are permitted in Area 6: separation and consolidation and deactivation. Presently hazardous wastes are not stored or treated in any tanks in Area 6.

## **D. MODULE HIGHLIGHTS**

### **D.1 Tank Storage Quantity Limitation/Waste Identification**

- (a) The Permittee may store a total volume of 161,300 gallons of hazardous waste in 30 tanks, subject to the terms of this permit and as detailed in the table below.

The Permittee shall store and treat in tanks only the hazardous waste codes specified in the permit application and in Attachment II.

Tank No.	Capacity (Gallons)	Dimensions of Tank	Secondary Containment Volume (Gallons)	Description of Hazardous Waste	Hazardous Waste No.
Tank System 1 Area 1 1993	6,000	8.5 ft. (diam) x 14 ft.	9,902	Waste organic solvents	Attachment II
Tank System 2 Area 1 1993	6,000	8.5 ft. (diam) x 14 ft.	9,902	Waste organic solvents	Attachment II
Tank System 3 Area 1 1993	6,000	8.5 ft. (diam) x 14 ft.	9,902	Waste organic solvents	Attachment II
Tank System 6 Area 1 1994	5,250	8 ft. (diam) x 15 ft.	9,902	Waste organic solvents	Attachment II
Tank System 7 Area 1 1994	5,250	8 ft. (diam) x 15 ft.	9,902	Waste organic solvents	Attachment II
Tank System 8 Area 1 1994	5,250	8 ft. (diam) x 15 ft.	9,902	Waste organic solvents	Attachment II
Tank System 10 Area 2 Not installed	1,000	To be provided	37,504	Waste organic solvents	Attachment II
Tank System 11 Area 2 1986	2,000	7 ft. (diam) x 8 ft.	37,504	Waste organic solvents	Attachment II
Tank System 12 Area 2 1993	13,000	12 ft. (diam) x 15 ft.	37,504	Waste organic solvents	Attachment II
Tank System 13 Area 1 1983	3,000	6 ft. (diam) x 15 ft.	9,902	Waste organic solvents	Attachment II
Tank System 14 Area 1 1983	3,000	8 ft. (diam) x 15 ft.	9,902	Waste organic solvents	Attachment II

<b>Tank No.</b>	<b>Capacity (Gallons)</b>	<b>Dimensions of Tank</b>	<b>Secondary Containment Volume (Gallons)</b>	<b>Description of Hazardous Waste</b>	<b>Hazardous Waste No.</b>
Tank System 15 Area 1 1994	6,850	8 ft. (diam) x 20 ft.	9,902	Waste organic solvents	Attachment II
Tank System 18 Area 4 1993	6,750	10 ft. (diam) x 11.5 ft.	14,303	Waste organic solvents	Attachment II
Tank System 19 Area 4 1993	6,750	10 ft. (diam) x 11.5 ft.	14,303	Waste organic solvents	Attachment II
Tank System 20 Area 4 1993	6,750	10 ft. (diam) x 11.5 ft.	14,303	Waste organic solvents	Attachment II
Tank System 21 Area 4 Not installed	4,500	To be provided	14,303	Waste organic solvents	Attachment II
Tank System 22 Area 4 1998	6,750	10 ft. (diam) x 11.5 ft.	14,303	Waste organic solvents	Attachment II
Tank System 23 Area 4 1998	6,750	10 ft. (diam) x 11.5 ft.	14,303	Waste organic solvents	Attachment II
Tank System 24 Area 2 1998	5,100	10 ft. (diam) x 11.5 ft.	37,504	Waste organic solvents	Attachment II
Tank System 25 Area 4 1998	6,750	10 ft. (diam) x 11.5 ft.	14,303	Waste organic solvents	Attachment II
Tank System 26 Area 5 Not installed	5,000	To be provided	11,937	Waste organic solvents	Attachment II

Tank No.	Capacity (Gallons)	Dimensions of Tank	Secondary Containment Volume (Gallons)	Description of Hazardous Waste	Hazardous Waste No.
Tank System 51 Area 5 Not installed	4,400	To be provided	11,937	Waste organic solvents	Attachment II
Tank System 52 Area 5 Not installed	4,400	To be provided	11,937	Waste organic solvents	Attachment II
Tank System 53 Area 5 Not installed	4,400	To be provided	11,937	Waste organic solvents	Attachment II
Tank System 54 Area 5 Not installed	4,400	To be provided	11,937	Waste organic solvents	Attachment II
Tank System U Area 6 Installed, not used for hazardous waste	5,200	8 ft. (diam) x 13.5 ft.	13,607	Waste organic solvents	Attachment II
Tank System V Area 6 Installed, not used for hazardous waste	5,200	8 ft. (diam) x 13.5 ft.	13,607	Waste organic solvents	Attachment II
Tank System W Area 6 Installed, not used for hazardous waste	5,200	8 ft. (diam) x 13.5 ft.	13,607	Waste organic solvents	Attachment II

Tank No.	Capacity (Gallons)	Dimensions of Tank	Secondary Containment Volume (Gallons)	Description of Hazardous Waste	Hazardous Waste No.
Tank System X Area 6 Installed, not used for hazardous waste	5,200	8 ft. (diam) x 13.5 ft.	13,607	Waste organic solvents	Attachment II
Tank System Y Area 6 Installed, not used for hazardous waste	5,200	8 ft. (diam) x 13.5 ft.	13,607	Waste organic solvents	Attachment II

(b) Reserved

(c) If the volume of waste in tank 1 exceeds 6,000 gallons, the Permittee must prevent the total storage volume of Area 1 from exceeding 46,600 gallons.

D.2 Limitations on Treatment of Hazardous Waste in Tanks

(a) The Permittee is authorized to treat hazardous waste in the permitted treatment areas, located in Areas 1, 2, 4, 5, and 6. Hazardous waste that the Permittee is authorized to treat in these areas is listed in Attachment II including the type of treatment permitted for each specific waste code.

Throughput limits are noted in the table below.

Treatment	Amount (Total for both container and tank)	Area
Neutralization - T01(B)	9,000 gallon/day	5
Fuel Blending - (X99)	10,000 gallon/day	4
Shredding - T04(H)	100 ton/day	5
Compaction - (T04(G)	10 ton/day	2, 5
Consolidation/Separation - T04(I)	100 ton/day	1, 2, 4, 5, 6
Pre-blending - T04(F)	0.15 ton/day	4, 5
Deactivation – T04(K)	3,000 gallon/day	1, 2, 4, 5, 6
Solvent Recovery – T04(j)	Not applicable, exempted RCRA treatment	3

The Permittee shall treat in tanks only the hazardous waste codes specified in the permit application and summarized in Attachment II.

- (b) The provision of Condition D.2(a) shall not apply to the Permittee's activities as a generator treating hazardous waste in tanks on-site in compliance with the provisions of OAC Rule 3745-52-34.

However, when treating waste in tanks in accordance with OAC Rule 3745-52-34, the Permittee shall not, for the total amount of hazardous waste treated, exceed the maximum throughput capacity established under this Condition.

D.3 Design and Installation of New Tank Systems or Components  
OAC Rule 3745-55-92

- (a) The Permittee must construct the tank system in accordance with Section D of the permit application.
- (b) Prior to operation of the newly constructed tank system, the Permittee must 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.4 Containment and Detection of Releases.  
OAC Rule 3745-55-93

(a) New Tank Systems

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

New tanks at the facility are 10, 21, 26, 51, 52, 53, and 54.

- (b) Existing Tank Systems with Secondary Containment The Permittee must design, construct, and operate the secondary containment system, in accordance with the detailed design plans and descriptions contained in the permit application.

Existing tanks at the facility are: 1, 2, 3, 6, 7, 8, 11, 12, 13, 14, 15, 18, 19, 20, 22, 23, 24, 25, U, V, W, X, and Y. Tanks U, V, W, X, and Y do not contain and have not contained hazardous waste. The Permittee must notify Ohio EPA if and when tanks are used for hazardous waste storage and/or treatment.

D.5 Operating Requirements  
OAC Rule 3745-55-94

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

D.6 Inspection Schedules and Procedures  
OAC Rule 3745-55-95

- (a) The Permittee must inspect the tank systems, in accordance with the Inspection Schedule found in Section D of the permit application and must complete the items in Permit Conditions D.6(b) and D.6(c) as part of those inspections:
- (b) The Permittee must inspect the overfill controls, in accordance with the procedure and schedule in the permit application.
- (c) The Permittee must inspect the following components of the tank system once each operating day:
- (i) Aboveground portions of the tank system, if any, to detect corrosion or releases of waste;
  - (ii) Data gathered from monitoring and leak detection equipment (e.g., pressure or temperature gauges, monitoring wells) to ensure that the tank system is being operated according to its design; and
  - (iii) Construction materials and the area immediately surrounding the externally accessible portion of the tank system, including the secondary containment system, to detect erosion or signs of releases of hazardous waste (e.g., wet spots, dead vegetation).

- (d) The Permittee must document compliance with Permit Condition D.6 in the operating record of the facility.

D.7 Response to Leaks or Spills  
OAC Rule 3745-55-96

- (a) In the event of a leak or a spill from the tank system or from a secondary containment system, or if a system becomes unfit for continued use, the Permittee must remove the system from service immediately and complete the following actions:
  - (i) Immediately stop the flow of hazardous waste into the tank system or secondary containment system and inspect the system to determine the cause of the release.
  - (ii) If the release was from the tank system, the owner/operator must, within twenty-four hours after detection of the leak, or, if the owner/operator demonstrates that it is not possible, at the earliest practicable time, remove as much of the waste as is necessary to prevent further release of hazardous waste to the environment and to allow inspection and repair of the tank system to be performed.

If the material released was to a secondary containment system, all released materials must be removed within twenty-four hours or in as timely a manner as possible to prevent harm to human health and the environment.
  - (iii) The Permittee must immediately conduct a visual inspection of all releases to the environment and based on that inspection: (1) prevent further migration of the leak or spill to soils or surface water and (2) remove and properly dispose of any visible contamination of the soil or surface water.
- (b) Unless the requirements of Permit Conditions D.7(b)(i) through D.7(b)(iv) are satisfied, the Permittee must close its tank system in accordance with OAC Rule 3745-55-97 and its closure plan if there has been a leak or spill from the tank system, from a secondary containment system, or if a system becomes unfit for continual use.
  - (i) For a release caused by a spill that has not damaged the integrity of the system, the Permittee must remove the released waste and make any necessary repairs to fully restore the integrity of the system before returning the tank system to service.

- (ii) For a release caused by a leak from the primary tank system to the secondary containment system, the Permittee must repair the primary system prior to returning it to service.
  - (iii) For a release to the environment caused by a leak from the portion of the tank system component that is not readily available for visual inspection, the Permittee must provide secondary containment for the entire component that meets the requirements of OAC Rule 3745-55-93 before the component can be returned to service.
  - (iv) If the Permittee replaces a component of the tank system to eliminate the leak, that component must satisfy the requirements for new tank systems or components in OAC Rules 3745-55-92 and 3745-55-93.
- (c) For all major repairs (e.g., installation of an internal liner, repair of a ruptured tank, or repair or replacement of a secondary containment vault) to eliminate leaks or restore the integrity of the tank system, the Permittee must obtain a certification by an independent, qualified, registered professional engineer in accordance with OAC Rule 3745-50-42(D)(1) that the repaired system is capable of handling hazardous wastes without release for the intended life of the system before returning the system to service. This certification must be submitted to the Director within seven days after returning the tank system to use.

D.8 Recordkeeping and Reporting

OAC Rules 3745-55-96, 3745-55-91(A), and 3745-55-92(G)

- (a) The Permittee must report to the Director, within 24 hours of detection, when a leak or spill occurs from the tank system or secondary containment system to the environment. A leak or spill of one pound or less of hazardous waste, that is immediately contained and cleaned-up, need not be reported. Releases that are contained within a secondary containment system need not be reported.
- (b) Within 30 days of detecting a release to the environment from the tank system or secondary containment system, the Permittee must report the following information to the Director:
  - (i) Likely route of migration of the release;
  - (ii) Characteristics of the surrounding soil (including soil composition, geology, hydrogeology, and climate);
  - (iii) Results of any monitoring or sampling conducted in connection with the release. If the Permittee finds it will be impossible to meet this time period, the Permittee must provide the Director with a schedule of when

the results will be available. This schedule must be provided before the required 30-day submittal period expires;

- (iv) Proximity of downgradient drinking water, surface water, and populated areas; and
  - (v) Description of response actions taken or planned.
- (c) The Permittee must obtain, and keep on file at the facility, the written statements by those persons required to certify the design and installation of the tank system.
  - (d) The Permittee must keep on file at the facility the written assessment of the tank system's integrity.

D.9 Closure and Post-Closure Care  
OAC Rule 3745-55-97

- (a) At closure of the tank system(s), the Permittee must follow the procedures in the closure plan in Section I of the permit application.
- (b) If the Permittee demonstrates that not all contaminated soils can be practically removed or decontaminated, in accordance with the closure plan, then the Permittee must close the tank system(s) and perform post-closure care.

D.10 Special Tank Provisions for Ignitable or Reactive Wastes  
OAC Rule 3745-55-98

- (a) The Permittee must not place ignitable or reactive waste in the tank system or in the secondary containment system, unless the procedures specified in the permit application are followed. The Permittee must document compliance with this condition and place the documentation in the operating record.
- (b) The Permittee must comply with the requirements for the maintenance of protective distances between the waste management area and any public ways, streets, alleys, or an adjoining property line that can be built upon, as required in Tables 2-1 to 2-6 of the National Fire Protection Association's "Flammable and Combustible Liquids Code" (1996 or most recent edition) incorporated by reference in OAC Rule 3745-50-11.

D.11 Special Tank Provisions for Incompatible Wastes  
OAC Rule 3745-55-99

- (a) The Permittee must not place incompatible wastes, or incompatible wastes and materials, in the same tank system or the same secondary containment system, unless the procedures specified in the permit application are followed. The Permittee must document compliance with this condition and place that documentation into the operating record.
- (b) The Permittee must not place hazardous waste in a tank system that has not been decontaminated and that previously held an incompatible waste or material, unless the requirements of Permit Condition D.11(a) are met.

D.12 Compliance Schedule

The Permittee must provide the following information to the Director:

Item	Date Due to the Director
A certificate of installation for new tanks 10, 21, 26, 51, 52, 53, and 54 per OAC 3745-55-92(A)	Upon installation and prior to use for the storage and treatment of hazardous waste.
Permittee will notify Ohio EPA if and when tanks are used for hazardous waste storage and/or treatment.	Prior to use of tank(s) for storage and/or treatment of hazardous waste.

## MODULE E - CORRECTIVE ACTION REQUIREMENTS

On April 5, 1982, Chemtron reported a 1,500 gallon release of trichloroethene at the facility. USEPA responded to the incident and reported that the release had been properly cleaned up. On February 27, 1987, U.S. EPA conducted a Preliminary Assessment/Visual Site Inspection (PA/VSI). They determined that a RCRA Facility Investigation was not necessary and consequently, no Correction Actions were needed based on a completed RCRA Facility Assessment. Additionally, on March 31, 1992, U.S. EPA characterized the site as Low Corrective Action Priority.

In December 2004, Chemtron notified Ohio EPA that possible TCE contamination had been discovered on the adjacent property to the north of the facility. In an initial site investigation report completed on June 21, 2005, Chemtron identified organic constituents present in subsurface soils at the facility, including trichloroethene, tetrachloroethene and their daughter products. In the spring of 2006, Chemtron confirmed the presence of contamination on the parcel immediately to the west of the facility. It is believed that the source of the contamination is the 1982 release. Contaminants are being addressed via Interim Measures (Section E.6 of this permit). Chemtron installed monitoring wells and implemented a groundwater monitoring program. Beginning in 2011 and ending in September 2012 Chemtron initiated a remedy involving the use of enhanced reductive de-chlorination and source-removal to address the contamination. The progress of the reductive de-chlorination is being monitored and additional remedies may be implemented.

The Permittee shall provide Ohio EPA copies of all documentation pertaining to the investigation, mitigation and remediation of this release.

### E.1 Corrective Action at the Facility OAC Rules 3745-50-10 and 3745-54-101

In accordance with OAC Rule 3745-50-10, waste management unit means any discernible unit at which solid waste, hazardous waste, infectious waste (as those terms are defined in ORC Chapter 3734), construction and demolition debris (as defined in ORC Chapter 3714) industrial waste, or other waste (as those terms are defined in ORC Chapter 6111), has been placed at any time, irrespective of whether the unit was intended for the management of waste or hazardous waste. Such units include any area at a facility at which wastes have been routinely and systematically released. For the purpose of Corrective Action, facility is defined as all contiguous property under the control of the owner or operator seeking a permit under Subtitle C of RCRA. The terms Interim Measure (IM), RCRA Facility Investigation (RFI), Corrective Measures Study (CMS) and Corrective Measure Implementation (CMI) are defined in U.S. EPA's Corrective Action Plan (CAP) (OSWER Directive 9902.3-2A, May 1994).

The Permittee must institute Corrective Action as necessary to protect human health and the environment for all releases of hazardous wastes or hazardous constituents from any waste management units (WMUs) at the Facility, regardless of the time at

which waste was placed in such units.

E.2 Corrective Action Beyond the Facility Boundary  
OAC Rule 3745-54-101

The Permittee must implement Corrective Action beyond the Facility property boundary, where necessary to protect human health and the environment, unless the Permittee demonstrates to the satisfaction of Ohio EPA that, despite the Permittee's best efforts, the Permittee was unable to obtain the necessary permission to undertake such actions. The Permittee is not relieved of all responsibility to clean up a release that has migrated beyond the Facility boundary where off-site access is denied. On-site measures to address such releases will be addressed under the RFI, CMS, and CMI phases, as determined to be necessary on a case-by-case basis.

Between 2004 and 2006 Chemtron identified contamination on the adjacent property to the north (former Pat Young property) and the adjacent property to the west (former Baylee property). Chemtron installed groundwater monitoring wells on these properties and has deployed the reductive dechlorination technology at these locations as well. The properties are currently owned by BBI-LBI, Inc., a company separate from Chemtron Corporation. Chemtron continues to monitor groundwater on these properties.

E.3 Identification of Releases  
OAC Rules 3745-50-44(D) and 3745-54-101

In an initial site investigation report completed on June 21, 2005, Chemtron identified organic constituents present in subsurface soils at the facility. The contamination is being addressed through reductive dechlorination and source removal. The Permittee shall continue to provide to Ohio EPA copies of all documentation pertaining to the investigation, mitigation and remediation of this release.

E.4 Reserved

E.5 RCRA Facility Investigation (RFI)  
OAC Rule 3745-54-101

The Permittee must conduct an RFI to thoroughly evaluate the nature and extent of the release of hazardous wastes and hazardous constituents from all applicable WMUs identified in Permit Condition E.3 above and Permit Condition E.10. The major tasks and required submittal dates are shown below. The scope of work for each of the tasks is found in U.S. EPA's CAP.

(a) RFI Workplan

The Permittee must submit a written RFI Workplan to Ohio EPA within 90 days after the effective date of this permit or, in case of a newly discovered waste

management unit, on a time frame established by Ohio EPA.

- (i) Within 45 days of receipt of any Ohio EPA comments on the RFI Workplan, the Permittee must submit either an amended or new RFI Workplan that incorporates Ohio EPA's comments.
- (ii) Ohio EPA will approve or modify and approve, in writing, the amended or new RFI Workplan. The RFI Workplan, as approved or as modified and approved, shall be incorporated into this permit and become an enforceable condition of this permit. Subsequent changes to the approved RFI Workplan must be authorized by Ohio EPA.

(b) RFI Implementation

The Permittee must implement the RFI Workplan according to the terms and schedule in the approved RFI Workplan.

(c) RFI Final Report

Within 60 days after the completion of the RFI, the Permittee must submit an RFI Final Report to Ohio EPA. The RFI Final Report must describe the procedures, methods, and results of the RFI. The Final Report must contain adequate information to support further decisions concerning Corrective Action at the Facility.

- (i) Within 45 days of receipt of any Ohio EPA comments on the RFI Final Report, the Permittee must submit either an amended or new RFI Final Report that incorporates Ohio EPA's comments.
- (ii) Ohio EPA will approve or modify and approve, in writing, the amended or new RFI Final Report. The RFI Final Report, as approved or as modified and approved, shall be incorporated into this permit and become an enforceable condition of this permit. Subsequent changes to the approved RFI Final Report must be authorized by Ohio EPA.

E.6 Interim Measure (IM)

In response to the finding that GW contamination was migrating offsite, the following IM was implemented:

Chemtron installed monitoring wells and implemented a groundwater monitoring program. Beginning in 2011 and ending in September 2012, Chemtron initiated a remedy involving the use of enhanced reductive dechlorination and source removal to address the contamination. The progress of the reductive dechlorination is being monitored and additional remedies may be implemented.

In the event the RFI Final Report or other information documents a release of hazardous waste or constituents to the environment, Ohio EPA may require (or the Permittee may propose) the development and implementation of additional IM(s) (this may include an IM Workplan) at any time during the life of the permit to mitigate or eliminate a threat to human health or the environment. The Permittee must implement the IM upon a time frame established by Ohio EPA.

#### E.7 Determination of No Further Action

##### (a) Permit Modification

Based on the results of the completed RFI and other relevant information, the Permittee may submit an application to Ohio EPA for a permit modification under OAC Rule 3745-50-51 to terminate the Corrective Action tasks of the Schedule of Compliance. Other tasks identified in the Schedule of Compliance shall remain in effect. This permit modification application must conclusively demonstrate that there are no releases of hazardous waste or constituents from WMUs at the Facility that pose an unacceptable risk to human health and the environment.

If, based upon review of the Permittee's request for a permit modification, the results of the completed RFI, and other information, Ohio EPA determines that releases or suspected releases which were investigated either are nonexistent or do not pose an unacceptable risk to human health and the environment, Ohio EPA will approve the requested modification. Decisions regarding the completion of RCRA Corrective Action and no further action may be made for the entire Facility, for a portion of the Facility, or for a specific unit or release.

##### (b) Periodic Monitoring

A determination of no further action shall not preclude Ohio EPA from requiring continued or periodic monitoring of air, soil, ground water, or surface water, if necessary to protect human health and the environment, when site-specific circumstances indicate that a potential or an actual release of hazardous waste or constituents exists.

##### (c) Further Investigations

A determination of no further action shall not preclude Ohio EPA from requiring further investigations, studies, or remediation at a later date, if new information or subsequent analysis indicates that a release or potential release from a WMU at the Facility may pose an unacceptable risk to human health or the environment. In such a case, Ohio EPA shall initiate a modification to the terms of the permit to rescind the determination made in accordance with Permit Condition E.7(a). Additionally, in the event Ohio EPA determines that there is insufficient information on which to base a determination, the Permittee, upon

notification, is required to develop a Work Plan and upon Ohio EPA approval of that Work Plan, perform additional investigations as needed.

#### E.8 Corrective Measures Study (CMS)

If Ohio EPA determines, based on the results of the RFI and any other relevant information, that corrective measures are necessary, Ohio EPA will notify the Permittee in writing that the Permittee must conduct a CMS either as described below or as described in Ohio EPA's notification to the Permittee. The purpose of the CMS will be to develop and evaluate the corrective action alternative(s) and to outline one or more alternative corrective measure(s) that will satisfy the performance objectives specified in Permit Condition E.9.

##### (a) CMS Workplan

The Permittee must submit a written CMS Workplan to Ohio EPA within 45 days from the notification by Ohio EPA of the requirement to conduct a CMS.

- (i) Within 45 days of receipt of any Ohio EPA comments, the Permittee must submit either an amended or new CMS Workplan that incorporates Ohio EPA's comments.
- (ii) Ohio EPA will approve or modify and approve, in writing, the amended or new CMS Workplan. The CMS Workplan, as approved or as modified and approved, must be incorporated into this permit and become an enforceable condition of this permit. Subsequent changes to the approved CMS Workplan must be authorized by Ohio EPA.

##### (b) CMS Workplan Implementation

The Permittee must implement the CMS Workplan according to the terms and schedule in the approved CMS Workplan.

##### (c) CMS Final Report

Within 60 days after the completion of the CMS, the Permittee must submit a CMS Final Report to Ohio EPA. The CMS Final Report must summarize the results of the investigations for each remedy studied and must include an evaluation of each remedial alternative.

- (i) Within 45 days of receipt of any Ohio EPA comments, the Permittee must submit either an amended or new CMS Final Report that incorporates Ohio EPA's comments.

- (ii) Ohio EPA will approve or modify and approve, in writing, the amended or new CMS Final Report. The CMS Final Report, as approved or as modified and approved, must be incorporated into this permit and become an enforceable condition of this permit. Subsequent changes to the approved CMS Final Report must be authorized by Ohio EPA.

#### E.9 Corrective Measures Implementation (CMI)

Based on the results of the CMS, the Permittee must implement one or more of the Corrective Measures authorized by Ohio EPA. Ohio EPA will authorize one or more of the Corrective Measures in the CMS, and will notify the Permittee in writing of the decision. The Corrective Measure selected for implementation must: (1) be protective of human health and the environment; (2) attain media cleanup standards; (3) control the source(s) of releases so as to reduce or eliminate further releases of hazardous waste(s) (including hazardous constituent(s)); and (4) comply with all applicable standards for management of wastes.

If two or more of the Corrective Measures studied meet the threshold criteria set out above, Ohio EPA will authorize the Corrective Measures Implementation by considering remedy selection factors including: (1) long-term reliability and effectiveness; (2) the degree to which the Corrective Measure will reduce the toxicity, mobility or volume of contamination; (3) the Corrective Measure's short-term effectiveness; (4) the Corrective Measure's implementability; and (5) the relative cost associated with the alternative.

##### (a) Permit Modification

Ohio EPA will initiate a permit modification, as provided by OAC Rule 3745-50-51 to require implementation of the corrective measure(s) authorized.

The Permittee must not implement the corrective measure until the permit is modified pursuant to OAC Rule 3745-50-51.

##### (b) Financial Assurance OAC Rule 3745-54-101

Within 30 days after receiving approval of the CMI, the Permittee must provide financial assurance in the amount necessary to implement the corrective measure(s) as required by OAC Rule 3745-54-101(B) and (C).

E.10 Newly Identified WMUs or Releases  
OAC Rule 3745-54-101

(a) General Information

The Permittee must submit to Ohio EPA, within 30 days of discovery, the following information regarding any new WMU identified at the Facility by Ohio EPA or the Permittee:

- (i) The location of the unit on the site topographic map;
- (ii) Designation of the type of unit;
- (iii) General dimensions and structural description (supply any available drawings);
- (iv) When the unit was operated; and
- (v) Specification of all waste(s) that have been managed at the unit.

(b) Release Information

The Permittee must submit to Ohio EPA, within 30 days of discovery, all available information pertaining to any release of hazardous waste(s) or hazardous constituent(s) from any new or existing WMU.

E.11 Corrective Action for Newly Identified WMUs and Releases  
OAC Rule 3745-54-101

If Ohio EPA determines that an RFI is required for newly identified WMUs, the Permittee must submit a written RFI Workplan to Ohio EPA upon a time frame established in written notification by Ohio EPA in accordance with Permit Condition E.5. This determination will be made based on the information submitted in accordance with Permit Condition E.10.

Further investigations or corrective measures will be established by Ohio EPA.

The Permittee must make such submittal in accordance with time frames established by Ohio EPA.

E.12 Completion of Corrective Action  
OAC Rule 3745-54-101

After completing Corrective Action as necessary to protect human health and the environment for all releases of hazardous wastes or hazardous constituents from any WMUs at the Facility, the Permittee shall submit a Corrective Measures Completion of

Work (CMCW) Report. The CMCW Report shall document that Corrective Action construction is complete, cleanup objectives and standards have been met, and any releases of hazardous waste or constituents no longer pose an unacceptable risk to human health and the environment. The CMCW Report may be submitted for any part of the Facility for which corrective measures are complete, or for the entire Facility. The CMCW Report must be submitted as a request for permit modification pursuant to OAC Rule 3745-50-51.

E.13 Documents Requiring Professional Engineer Stamp  
ORC Section 4733.01

Preparation of the following Corrective Action documents constitutes the "practice of engineering" as defined by ORC Section 4733.01:

Final Interim Measures Report  
Corrective Measures Final Design  
Corrective Measures Construction Completion Report  
Corrective Measures Attainment of Groundwater Performance Standards Report  
Corrective Measures Completion of Work Report

As such, the Permittee must ensure that these documents, as submitted to Ohio EPA, are stamped by a Professional Engineer licensed to practice in the State of Ohio.

## MODULE F - MISCELLANEOUS UNITS

The Permittee is permitted for two miscellaneous (Subpart X) units, the can crusher/compactor and the Fuel Blending unit.

The Fuel Blending unit has a permitted capacity of 10,000 gallons per day. The Fuel Blending unit is located in an area with secondary containment. The blending process is accomplished by utilizing various tanks, mixers, pumps, and grinders. The Hydro Pulper (or equivalent process vessel) is an integral part of the Fuel Blending unit located in Area 4. The wastes which enter the fuel blending process may be in the following physical states or a combination of states; liquid, sludge, or solid. A description of the Fuel Blending unit and how it functions in the fuel blending process is located on pages 9, 36-45 of Section D-1, and Attachment D-12 page 94 in the Permittee's Part B permit application.

The Prodeva can crusher/compactor, Model 270 (or equivalent), is a stand-alone unit located in Area 5 and has secondary containment. This unit crushes containers (up to 5 gallons) to extract their contents. The compatible wastes, such as liquid oil-based paints, are then collected in a closed container. The RCRA empty containers from the Prodeva compactor/crusher may be sent for recycling and/or further compacted as a solid in an adjacent Cives solids compactor. The Prodeva 270 can crusher/compactor and related processing is not considered to be treatment. A description of the Prodeva can crusher/compactor and how it functions is located on pages 10, 48, and 49 of Section D-1, and Attachment D-19 in the Permittee's Part B permit application.

F.1. Modification of Application  
OAC Rule 3745-50-51

Prior to construction of any new miscellaneous treatment units, the Permittee must submit plans to the Ohio EPA for review to determine consistency with the permit and the approved permit application.

F.2. Process Capacity/Annual Limitation  
ORC Section 3734.02(F) and OAC Rule 3745-50-43

The Permittee shall not exceed a maximum process treatment capacity of 10,000 gallons per day for the Fuel Blending unit.

F.3. Waste Identification  
OAC Rule 3745-50-43

The Permittee shall treat in the permitted miscellaneous units only the hazardous waste codes specified in Part A of the approved permit application. Waste restrictions that apply to any of the miscellaneous units are described in Section C of the permit application and Attachment II of this permit.

F.4. Assessment/Certification of Miscellaneous Unit  
OAC Rule 3745-57-91, 3745-50-42(D)

The Permittee shall obtain and keep on file at the facility a written statement by a qualified, registered professional engineer that attests that the miscellaneous units were properly designed and installed. The written statement must also include the certification as required by OAC Rule 3745-50-42(D).

F.5. Containment System  
OAC Rule 3745-55-93

The Fuel Blending and can crusher/compactor miscellaneous units (Units) are located in Area 4 and Area 5 and have adequate secondary containment as described in Section D of the permit application. If secondary containment is required, it must be constructed to meet the specifications of existing secondary containment at the facility and in accordance with the following:

- (a) Secondary containment must be designed, installed and operated to prevent any migration of waste or accumulated liquid out of the system to soil, groundwater, or surface water.
- (b) Secondary containment must be capable of detecting and collecting releases and accumulated liquids until the collected material is removed.
- (c) The secondary containment must meet the requirements of OAC Rule 3745-55-93.

F.6. General Operating Requirements  
OAC Rule 3745-55-94

- (a) Hazardous waste or treatment reagents shall not be placed in the miscellaneous unit if they could cause the unit, its ancillary equipment, or the secondary containment system to rupture, leak, corrode, or otherwise fail, as required by OAC Rule 3745-55-94.
- (b) The miscellaneous unit must be maintained and operated in accordance with the procedures and practices in Section D of the permit application, manufacturer's instructions, and accepted industry practice.
- (c) The Permittee must comply with the requirements of OAC Rule 3745-55-96 if a leak or spill occurs in the miscellaneous unit.

F.7. Inspections

OAC Rule 3745-55-95

- (a) The Permittee shall inspect the miscellaneous units daily in accordance with OAC Rule 3745-55-95 and Section F of the approved permit application.
- (b) The Permittee shall document compliance with Condition F.7 (a) in the facility's operating record as required by this permit and the OAC.

F.8. Special Requirements

OAC Rules 3745-55-98 and 3745-55-99

(a) Ignitable or Reactive Waste

The Permittee shall not process reactive waste through the miscellaneous units. However, waste carrying the hazardous waste code for ignitability (D001) may be processed through the units. The units are designed, installed, and operated in such a manner that the waste will not ignite while being processed.

(b) Incompatible Waste

- (i) The Permittee must not place incompatible waste in the same miscellaneous unit or place hazardous waste in a miscellaneous unit that previously held an incompatible waste or material unless it is done in accordance with OAC Rule 3745-55-99.
- (ii) The Permittee shall document compliance with Condition F.8 (b)(i) of this permit, as required by OAC Rule 3745-55-99, and place this documentation in the operating record.

F.9. Closure and Post-Closure Care

OAC Rules 3745-57-91 and 3745-57-93

At closure of the miscellaneous unit, the Permittee shall follow the procedures in Section I of the permit application in accordance with OAC Rules 3745-55-10 through 3745-55-40.

**End of Permit Conditions**

ATTACHMENT I

Chemtron Corporation  
OHD 066 060 609

HAZARDOUS WASTE STORAGE AREAS

Location	Container Storage Volume (Gal)	Tanks	Tank Storage Volume (Gal)	Total Storage Volume (Gal)
Area 1	no container storage	1,2,3,6,7,8,13,14,15	46,600	46,600
Area 2	16,500	10*, 11,12,24	21,100	37,600
Area 3	10,450	no tanks	no tank storage	10,450
Area 4	56,763	18, 19, 20, 21* ,22, 23, 25	45,000	101,763
Area 5	39,650	*26, 51*, 52*, 53*, 54*	22,600	62,250
Area 6	37,125	U**, V**, W**, X**, Y**	26,000	63,125
Total Storage Volume (Gal)	160,488		161,300	321,788

\*Tanks to be installed at a later date.

Chemtron will notify Ohio EPA before the tanks are installed in Area 5

\*\* Installed but have not and do not contain hazardous waste.

Chemtron will notify Ohio EPA if hazardous waste is stored in tanks in Area 6.

ATTACHMENT II

Chemtron Corporation  
OHD 066 060 609

HAZARDOUS WASTE CODES

Area 1

\* Waste codes to be stored in tanks 1, 2, 3, 6, 7, 8, 13, 14, and 15 of Area 1:

D001, D004-D043

F001-F012, F019-F028, F032, F034, F035, F037-F039

K001-K011, K013-K043, K048-K052, K060-K062, K064-K066, K069, K071, K073, K083, K085-K088, K090, K091, K093-K100, K103-K118, K123-K126, K131, K132, K136, K141-K145, K147, K148, K169-K172, K174-K178, K181,

P059

U001-U005, U007-U012, U014-U019, U021, U022, U024-U032, U034-U039, U041-U053, U055-U064, U066-U095, U097-U099, U101-U103, U105-U114, U116-U120, U121 (non-gas) U122-U132, U134-U138, U140-U159, U161-174, U176-U188, U190-U194, U196, U197, U200-U204, U206-U211, U213-U222, U225-U228, U235-U240, U243, U244, U246-U249, U271, U278-U280, U328, U353, U359, U364, U367, U372, U373, U387, U389, U394, U395, U404, U409-U411

Additional waste code to be stored in tanks 1, 13 and 14 of Area 1: alkaline D002

\* Waste codes to be treated by separation and consolidation in tanks 1, 2, 3, 6, 7, 8, 13, 14, and 15 of Area 1:

D001 D004-D043

F001-F012, F019-F028, F032, F034, F035, F037-F039

K001-K011, K013-K043, K048-K052, K060-K062, K064-K066, K069, K071, K073, K083, K085-K088, K090, K091, K093-K100, K103-K118, K123-K126, K131, K132, K136, K141-K145, K147, K148, K169-K172, K174-K178, K181

P059

U001-U005, U007-U012, U014-U019, U021, U022, U024-U032, U034-U039, U041-U053, U055-U064, U066-U095, U097-U099, U101-U103, U105-U114, U116-U120, U121 (non-gas), U122-U132, U134-U138, U140-U159, U161-174,, U176-U188, U190-U194, U196, U197, U200-U204, U206-U211, U213-U222, U225-U228, U235-U240, U243, U244, U246-U249, U271, U278-U280, U328, U353, U359, U364, U367, U372, U373, U387, U389, U394, U395, U404, U409- U411

Additional waste code to be treated by separation and consolidation in tanks 1, 13 and 14 of Area 1: alkaline D002

\* Waste code to be treated by deactivation in Area 1: D001, F003, U001, U002, U008, U031, U055, U056, U057, U092, U110, U112, U113, U117, U124, U125, U154, U161, U186, U213, U239

Additional waste code to be treated by deactivation in tanks 1, 13 and 14 only of Area 1: alkaline D002

## Area 2

\* Waste codes to be stored in tanks 10 (not installed), 11, 12 and 24 of Area 2:

D001, D004-D043

F001-F012, F019-F028, F032, F034, F035, F037-F039

K001-K011, K013-K043, K048-K052, K060-K062, K064-K066, K069, K071, K073, K083, K085-K088, K090, K091, K093-K100, K103-K118, K123-K126, K131, K132, K136, K141-K145, K147, K148, K169-K172, K174-K178, K181

P059

U001-U005, U007-U012, U014-U019, U021, U022, U024-U032, U034-U039, U041-U053, U055-U064, U066-U095, U097-U099, U101-U103, U105-U114, U116-U120, U121 (non-gas), U122-U132, U134-U138, U140-159, U161-174, U176-U188, U190-U194, U196, U197, U200-U204, U206-U211, U213-U222, U225-U228, U235-U240, U243, U244, U246-U249, U271, U278-U280, U328, U353, U359, U364, U367, U372, U373; U387, U389, U394, U395, U404, U409-U411

\* Waste codes to be stored in containers in Area 2:

D001, D002, D004-D043

F001-F012, F019-F028, F032, F034, F035, F037-F039

K001-K011, K013-K043, K048-K052, K060-K062, K064-K066, K069, K071, K073, K083, K085-K088, K090, K091, K093-K100, K103-K118, K123-K126, K131, K132, K136, K141-K145, K147, K148, K169-K172, K174-K178, K181

P059

U001-U005, U007-U012, U014-U019, U021, U022, U024-U032, U034-U039, U041-U053, U055-U064, U066-U095, U097-U099, U101-U103, U105-U114, U116-U120, U121 (non-gas), U122-U132, U134-U138, U140-U159, U161-U174, U176-U188, U190-U194, U196, U197, U200-U204, U206-U211, U213-U222, U225-U228, U235-U240, U243, U244, U246-U249, U271, U278-U280, U328, U353, U359, U364, U367, U372, U373, U387, U389, U394, U395, U404, U409-U411

\* Waste codes to be treated by separation and consolidation in tanks in Area 2:

D001, D004-D043

F001-F012, F019-F028, F032, F034, F035, F037, F038, F039

K001-K011, K013-K043, K048-K052, K060-K062, K064-K066, K069, K071, K073, K083, K085-K088, K090, K091, K093-K100, K103-K118, K123-K126, K131, K132, K136, K141-K145, K147, K148, K169-K172, K174-K178, K181

P059

U001-U005, U007-U012, U014-U019, U021, U022, U024-U032, U034-U039, U041-U053, U055-U064, U066-U095, U097-U099, U101-U103, U105-U114, U116-U120, U121 (non-gas), U122-U132, U134-U138, U140-U159, U161-174, U176-U188, U190-U194, U196, U197, U200-U204, U206-U211, U213-U222, U225-U228, U235-U240, U243, U244, U246-U249, U271, U278-U280, U328, U353, U359, U364, U367, U372, U373, U387, U389, U394, U395, U404, U409-U411

\* Waste codes to be treated by separation and consolidation in containers in Area 2:

D001, D002, D004-D043

F001-F012, F019-F028, F032, F034, F035, F037, F038, F039

K001-K011, K013-K043, K048-K052, K060-K062, K064-K066, K069, K071, K073, K083, K085-K088, K090, K091, K093-K100, K103-K118, K123-K126, K131, K132, K136, K141-K145, K147, K148, K169-K172, K174-K178, K181

P059

U001-U005, U007-U012, U014-U019, U021, U022, U024-U032, U034-U039, U041-U053, U055-U064, U066-U095, U097-U099, U101-U103, U105-U114, U116-U120, U121 (non-gas), U122-U132, U134-U138, U140-U159, U161-174, U176-U188, U190-U194, U196, U197, U200-U204, U206-U211, U213-U222, U225-U228, U235-

U240, U243, U244, U246-U249, U271, U278-U280, U328, U353, U359, U364, U367, U372, U373, U387, U389, U394, U395, U404, U409-U411

\* Waste code to be treated by deactivation in tanks in Area 2: D001, F003, U001, U002, U008, U031, U055, U056, U057, U092, U110, U112, U113, U117, U124, U125, U154, U161, U186, U213, U239

\* Waste codes to be treated by deactivation in containers in Area 2: D001, D002, F003, U001, U002, U008, U031, U055, U056, U057, U092, U110, U112, U113, U117, U124, U125, U154, U161, U186, U213, U239

\* Waste codes to be treated by compaction in Area 2:

D001, D002, D004-D043

F001-F012, F019-F028, F032, F034, F035, F037-F039

K001-K011, K013-K043, K048-K052, K060-K062, K064-K066, K069, K071, K073, K083, K085-K088, K090, K091, K093-K100, K103-K118, K123-K126, K131, K132, K136, K141-K145, K147, K148, K169-K172, K174-K178, K181

P059

U001-U005, U007-U012, U014-U019, U021, U022, U024-U032, U034-U039, U041-U053, U055-U064, U066-U095, U097-U099, U101-U103, U105-U114, U116-U120, U121 (non-gas), U122-U132, U134-U138, U140-U159, U161-174, U176-U188, U190-U194, U196, U197, U200-U204, U206-U211, U213-U222, U225-U228, U235-U240, U243, U244, U246-U249, U271, U278-U280, U328, U353, U359, U364, U367, U372, U373, U387, U389, U394, U395, U404, U409-U411

Area 3.

\* Waste codes to be stored in containers in Area 3:

D002, D004-D043

F001-F012, F019, F020-F028, F032, F034, F035, F037, F038, F039

K001-K012, K013-K043, K048-K052, K060-K062, K064-K066, K069, K071, K073, K083, K085-K088, K090, K091, K093-K100, K103-K118, K123-K126, K131, K132, K136, K141-K145, K147, K148, K169-K172, K174-K178, K181

P059

U001-U005, U007-U012, U014-U019, U021, U022, U024-U032, U034-U039, U041-U053, U055-U064, U066-U095, U097-U099, U101-U103, U105-U114, U116-U120, U121 (non-gas), U122-U132, U134-U138, U140-159, U161-U174, U176-U188, U190-U194, U196, U197, U200-U204, U206-U211, U213-U222, U225-U228, U235-U240, U243, U244, U246-U249, U271, U278-U280, U328, U353, U359, U364, U367, U372, U373, U387, U389, U394, U395, U404, U409-U411

\* Waste codes to be treated by separation and consolidation for containers in Area 3:

D002, D004-D043

F001-F012, F019-F028, F032, F034, F035, F037-F039

K001-K011, K013-K043, K048-K052, K060-K062, K064-K066, K069, K071, K073, K083, K085-K088, K090, K091, K093-K100, K103-K118, K123-K126, K131, K132, K136, K141-K145, K147, K148, K169-K172, K174-K178, K181

U001-U005, U007-U012, U014-U019, U021, U022, U024-U032, U034-U039, U041-U053, U055-U064, U066-U095, U097-U099, U101-U103, U105-U114, U116-U120, U121 (non-gas), U122-U132, U134-U138, U140-U159, U161-174, U176-U188, U190-U194, U196, U197, U200-U204, U206-U211, U213-U222, U225-U228, U235-U240, U243, U244, U246-U249, U271, U278-U280, U328, U353, U359, U364, U367, U372, U373, U387, U389, U394, U395, U404, U409-U411

\*Waste codes to be treated by deactivation in Area 3: D002, U001, U002, U008, U031, U055, U056, U057, U092, U110, U112, U113, U117, U124, U125, U154, U161, U186, U213, U239

#### Area 4

\* Waste codes to be stored in tanks 18, 19, 20, 21 (not installed), 22, 23, and 25 of Area 4:

D001, D004-D043

F001-F012, F019-F028, F032, F034, F035, F037-F039

K001-K011, K013-K043, K048-K052, K060-K062, K064-K066, K069, K071, K073, K083, K085-K088, K090, K091, K093-K100, K103-K118, K123-K126, K131, K132, K136, K141-K145, K147, K148, K169-K172, K174-K178, K181

P059

U001-U005, U007-U012, U014-U019, U021, U022, U024-U032, U034-U039, U041-U053, U055-U064, U066-U095, U097-U099, U101-103, U105-U114, U116-U120, U121 (non-gas), U122-U132, U134-U138, U140-U159, U161-174, U176-U188, U190-U194, U196, U197, U200-U204, U206-U211, U213-U222, U225-U228, U235-U240, U243, U244, U246-U249, U271, U278-U280, U328, U353, U359, U364, U367, U372, U373, U387, U389, U394, U395, U404, U409-U411

\*Waste codes to be stored in containers in Area 4:

D001, D002, D004-D043

F001-F012, F019-F028, F032, F034, F035, F037-F039

K001-K011, K013-K043, K048-K052, K060-K062, K064-K066, K069, K071, K073, K083, K085-K088, K090, K091, K093-K100, K103-K118, K123-K126, K131, K132, K136, K141-K145, K147, K148, K169-K172, K174-K178, K181

P059

U001-U005, U007-U012, U014-U019, U021, U022, U024-U032, U034-U039, U041-U053, U055-U064, U066-U095, U097-U099, U101-U103, U105-U114, U116-U120, U121 (non-gas), U122-U132, U134-U138, U140-U159, U161-U174, U176-U188, U190-U194, U196, U197, U200-U204, U206-U211, U213-U222, U225-U228, U235-U240, U243, U244, U246-U249, U271, U278-U280, U328, U353, U359, U364, U367, U372, U373, U387, U389, U394, U395, U404, U409-U411

\*Waste codes to be treated by separation and consolidation in tanks and preblending in Area 4:

D001, D004-D043

F001-F012, F019-F028, F032, F034, F035, F037-F039

K001-K011, K013-K043, K048-K052, K060-K062, K064-K066, K069, K071, K073, K083, K085-K088, K090, K091, K093-K100, K103-K118, K123-K126, K131, K132, K136, K141-K145, K147, K148, K169-K172, K174-K178, K181

P059

U001-U005, U007-U012, U014-U019, U021, U022, U024-U032, U034-U039, U041-

U053, U055-U064, U066-U095, U097-U099, U101-U103, U105-U114, U116-U120, U121(non-gas), U122-U132, U134-U138, U140-U159, U161-U174, U176-U188, U190-U194, U196, U197, U200-U204, U206-U211, U213-U222, U225-U228, U235-U240, U243, U244, U246-U249, U271, U278-U280, U328, U353, U359, U364, U367, U372, U373, U387, U389, U394, U395, U404, U409-U411

\* Waste codes to be treated by separation and consolidation in containers and preblending in Area 4:

D001, D002, D004-D043

F001-F012, F019-F028, F032, F034, F035, F037-F039

K001-K011, K013-K043, K048-K052, K060-K062, K064-K066, K069, K071, K073, K083, K085-K088, K090, K091, K093-K100, K103-K118, K123-K126, K131, K132, K136, K141-K145, K147, K148, K169-K172, K174-K178, K181

P059

U001-U005, U007-U012, U014-U019, U021, U022, U024-U032, U034-U039, U041-U053, U055-U064, U066-U095, U097-U099, U101-U103, U105-U114, U116-U120, U121 (non-gas), U122-U132, U134-U138, U140-U159, U161-U174, U176-U188, U190-U194, U196, U197, U200-U204, U206-U211, U213-U222, U225-U228, U235-U240, U243, U244, U246-U249, U271, U278-U280, U328, U353, U359, U364, U367, U372, U373, U387, U389, U394, U395, U404, U409-U411

\* Waste code to be treated by deactivation in tanks in Area 4: D001, F003, U001, U002, U008, U031, U055, U056, U057, U092, U110, U112; U113, U117, U124, U125; U154, U161, U186, U213, U239

\* Waste codes to be treated by deactivation in containers in Area 4: D001, D002, F003, U001, U002, U008, U031, U055, U056, U057, U092, U110, U112, U113, U117, U124, U125, U154, U161, U186, U213, U239

\* Waste codes to be treated by fuel blending (and subsequently stored in tanks) in Area 4:

D001, D004-D043

F001-F012, F019-F028, F032, F034, F035, F037-F039

K001-K011, K013-K043, K048-K052, K060-K062, K064-K066, K069, K071, K073, K083, K085-K088, K090, K091, K093-K100, K103-K118, K123-K126, K131, K132, K136, K141-K145, K147, K148, K169-K172, K174-K178, K181

P059

U001-U005, U007-U012, U014-U019, U021, U022, U024-U032, U034-U039, U041-U053, U055-U064, U066-U095, U097-U099, U101-U103, U105-U114, U116-U120, U121 (non-gas), U122-U132, U134-U138, U140-U159, U161-174, U176-U188, U190-U194, U196, U197, U200-U204, U206-U211, U213-U222, U225 U228, U235-U240, U243, U244, U246-U249, U271, U278-U280, U328, U353, U359, U364, U367, U372, U373, U387, U39. U394, U395, U404, U409-U411

#### Area 5

\* Waste codes to be stored in tanks 26, 51, 52, 53, 54 (not yet installed) of Area 5:

D001, D002, D004-D043

F001-F012, F019-F028, F032, F034, F035, F037-F039

K001-K011, K013-K043, K048-K052, K060-K062, K064-K066, K069, K071, K073, K083, K085-K088, K090, K091, K093-K100, K103-K118, K123-K126, K131, K132, K136, K141-K145, K147, K148, K169-K172, K174-K178, K181

P062, P122, P123, P127, P128, P185, P188-P192, P194, P196-P199, P201-205

U001-U005, U007-U012, U014-U019, U021, U022, U024-U032, U034-U039, U041-U053, U055-U064, U066-U095, U097-U099, U101-U103, U105-U114, U116-U120, U121 (non-gas), U122-U132, U134-U138 U140-U159, U161-U174, U176-U188, U190-U194, U196, U197, U200-U204, U206-U211, U213-U222, U225-U228, U235-U240, U243, U244, U246-U249, U271, U278-U280, U328, U353, U359, U364, U367, U372, U373, U387, U389, U394, U395, U404, U409-U411

\* Waste codes to be stored in containers in Area 5 including in Lab Pack Rooms 1 and 2:

D001, D002, D003 (non-water reactives), D004-D043

F001-F012, F019-F028, F032, F034, F035, F037-F039

K001-K011, K013-K043, K048-K052, K060-K062, K064-K066, K069, K071, K073, K083, K085-K088, K090, K091, K093-K100, K103-K118, K123-K126, K131, K132, K136, K141-K145, K147, K148 K169-K172, K174-K178, K181

P013, P021, P029, P030, P031, P033, P062, P063, P064, P074, P098, P099, P101, P104, P106, P120, P122, P123, P127, P128, P185, P188- P192, P194, P196-P199, P201-P205

U001-U005, U007-U012, U014-U019, U021, U022, U024-U032, U034-U039, U041-U053, U055-U064, U066-U095, U097-U099, U101-U103, U105-U114, U116-U120, U121 (non-gas), U122-U132, U134-U138 U140-U159, U161-U174, U176-U188, U190-U194, U196, U197, U200-U204, U205, U206-U211, U213-U222, U225-U228, U235-U240, U243, U244, U246-U249, U271, U278-U280, U328, U353, U359, U364, U367, U372, U373, U387, U389, U394, U395, U404, U409-U411

\* Additional waste codes *to* be stored in the reactive waste cell (Lab Pack Room 1) of Area 5: all waste codes noted above for container storage in Area 5 and these additional codes:

Formulations which are not capable of denotation or explosions of the waste codes:

D003

P001-P018, P020-P024, P026-P030, P034, P036-P051, P054, P057-P060, P064-P075, P077, P082, P084, P085, P087-P089, P092-P094, P097-P099, P101-P106, P108-P111, P113-P116, P118-P121

U006, U020, U023, U033, U096, U133, U160, U189, U223

\* Additional waste codes to be stored in the organic lab pack cell (Lab Pack Room 2) in Area 5: all waste codes noted above for container storage in Area 5 and these additional codes:

Formulations which are not capable of denotation or explosions of the waste codes:  
D003

P001-P018, P020-P024, P026-P030, P034, P036-P051, P054, P057, P058-P060, P064-P075, P077, P082, P084, P085, P087-P089, P092-P094, P097-P099, P101-P106, P108-P111, P113-P116, P118-P121

U006, U020, U023, U033, U096, U133, U160, U189, U223

\* Waste codes to be treated by neutralization in tank 26 (not yet installed) of Area 5;

D001, D002, D004-D043

F001-F012, F019-F028, F032, F034, F035, F037-F039

K001-K011, K013-K043, K048-K052, K060-K062, K064-K066, K069, K071, K073, K083, K085-K088, K090, K091, K093-K100, K103-K118, K123-126, K131, K132, K136, K141-K145, K147, K148, K169-K172, K174-K178, K181

P062, P122, P123, P127, P128, P185, P188-P192, P194, P196-P199, P201-205

U001-U005, U007-U012, U014-U019, U021, U022, U024-U032, U034-U039, U041-U053, U055-U064, U066-U095, U097-U099, U101-U103, U105-U114, U116-U120, U121 (non-gas), U122-U132, U134-U138, U140-U159, U161-U174, U176-U188, U190-U194, U196, U197, U200-U204, U206-U211, U213-U222, U225-U228, U235-U240, U243, U244, U246-U249, U271, U278-U280, U328, U353, U359, U364, U367, U372, U373, U387, U389, U394, U395, U404, U409-U411

\* Waste codes to be treated by deactivation in Area 5 in tanks or containers:

D001, D002,

F003,

U001, U002, U008, U031, U055, U056, U057, U092, U110, U112, U113, U117, U124, U125, U154, U161, U186, U213, U239

\* Waste codes to be treated by shredding in Area 5;

D001, D002, D004-D043

F001-F012, F019-F028, F032, F034, F035, F037, F038, 0039

K001-K011, K013-K043, K048-K052, K060-K062, K064-K066, K069, K071, K073, K083, K085-K088, K090, K091, K093-K100, K103-K118, K123-K126, K131, K132, K136, 141-K145, K147, K148, K169-K172, K174-K178, K181

U001-U005, U007-U012, U014-U019, U021, U022, U024-U032, U034-U039, U041-U053, U055-U064, U066-U095, U097-U099, U101-U103, U105-U114, U116-U120, U121 (non-gas), U122-U132, U134-U138, U140-U159, U161-174, U176-U188, U190-U194, U196, U197, U200-U204, U206-U211, U213-U222, U225-U228, U235-U240, U243, U244, U246-U249, U271, U278-U280, U328, U353, U359, U364, U367, U372, U373, U387, U389, U394, U395, U404, U409-U411

\* Waste codes to be stored in aerosol containers in Area 5:

D001, D002, D004-D043

F001-F012, F019-F028, F032, F034, F035, F037, F038, D039

K001-K011, K013-K043, K048-K052, K060-K062, K064-K066, K069, K071, K073, K083, K085-K088, K090, K091, K093-K100, K103-K118, K123-K126, K131, K132, K136, K141-K145, K147, K148, K169-K172, K174-K178, K181

U001-U005, U007-U012, U014-U019, U021, U022, U024-U032, U034-U039  
U041-U053, U055-U064, U066-U095, U097-U099, U101-U103, U105-U114, U116-U120, U121 (non gas), U122-U132, U134-U138, U140-U159, U161-174, U176-U188, U190-U194, U196, U197, U200-U204, U206-U211, U213-U222, U225-U228, U235-U240, U243, U244, U246-U249, U271, U278-U280, U328, U353, U359, U364, U367, U372, U373, U387, U389, U394, U395, U404, U409-U411

\* Waste codes to be treated by pre-blending in Area 5 including in Lab Pack Rooms 1 and 2:

D001, D002, D004-D043

F001-F012, F019-F028, F032, F034, F035, F037, F038, F039

K001-K011, K013-K043, K048-K052, K060-K062, K064-K066, K069, K071, K073, K083, K085-K088, K090, K091, K093-K100, K103-K118, K123-K126, K131, K132, K136, K141-K145, K147, K148, K169-K172, K174-K178, K181

U001-U005, U007-U012, U014-U019, U021, U022, U024-U032, U034-U039, U041-U053, U055-U064, U066-U095, U097-U099, U101-U103, U105-U114, U116-U120, U121 (non-gas), U122-U132, U134-U138, U140-U159, U161-174, U176-U188, U190-U194, U196, U197, U200-U204, U205, U206-U211, U213-U222, U225-U228, U235-U240, U243, U244, U246-U249, U271, U278-U280, U328, U353, U359, U364, U367, U372, U373, U387, U389, U394, U395, U404, U409-U411

\* Additional waste codes to be pre-blended in the reactive waste cell (Lab Pack Room 1) of Area 5: all waste codes noted above for pre-blending in Area 5 and these additional codes:

Formulations which are not capable of denotation or explosions of the waste codes:

D003

P001-P018, P020-P024, P026-P030, P034, P036-P051, P054, P057-P060,  
P064- P075, P077, P082, P084, P085, P087-P089, P092-P094, P097-P099, P101-  
P106,  
P108-P111, P113-P116, P118-P121

U006, U020, U023, U033, U096, U133, U160, U189, U223

\*Additional waste codes to be pre-blended in the organic lab pack cell (Lab Pack Room 2) in Area 5: all waste codes noted above for pre-blending in Area 5 and these additional codes:

Formulations which are not capable of denotation or explosions of the waste codes:  
D003

P001-P018, P020-P024, P026-P030, P034, P036-P051, P054, P057, P058-P060,  
P064-P075, P077, P082, P084, P085, P087-P089, P092-P094, P097-P099, P101-  
P106, P108-P111, P113-P116, P118-P121

U006, U020, U023, U033, U096, U133, U160, U189, U223

\*Waste codes to be treated by separation/consolidation in tanks or containers in Area 5:

D001, D002, D004-D043

F001-F012, F019-F028, F032, F034, F035, F037, F038, F039

K001-K011, K013-K043, K048-K052, K060-K062, K064-K066, K069, K071, K073,  
K083, K085-K088, K090, K091, K093-K100, K103-K118, K123-K126, K131, K132,  
K136, K141-K145, K147, K148, K169-K172, K174-K178, K181

U001-U005, U007-U012, U014-U019, U021, U022, U024-U032, U034-U039, U041-  
U053, U055-U064, U066-U095, U097-U099, U101-U103, U105-U114, U116-U120,  
U121 (non-gas), U122-U132, U134-U138, U140-U159, U161-174, U176-U188,  
U190-U194, U196, U197, U200-U204, U206-U211, U213-U222, U225-U228, U235-  
U240, U243, U244, U246-U249, U271, U278-U280, U328, U353, U359, U364,  
U367, U372, U373, U387, U389, U394, U395, U404, U409-U411

\* Waste codes to be treated by compaction in Area 5:

D001, D002, D004-D043.

F001-F012, F019-F028, F032, F034, F035, F037, F038, F039

K001-K011, K013-K043, K048-K052, K060-K062, K064-K066, K069, K071, K073, K083, K085-K088, K090, K091, K093-K100, K103-K118, K123-K126, K131, K132, K136, K141-K145, K147, K148, K169-K172, K174-K178, K181

U001-U005, U007-U012, U014-U019, U021, U022, U024-U032, U034-U039, U041-U053, U055-U064, U066-U095, U097-U099, U101-U103, U105-U114, U116-U120, U121 (non-gas), U122-U132, U134-U138, U140-U159, U161-174, U176-U188, U190-U194, U196, U197, U200-U204, U206-U211, U213-U222, U225-U228, U235-U240, U243, U244, U246-U249, U271, U278-U280, U328, U353, U359, U364, U367, U372, U373, U387, U389, U394, U395, U404, U409-U411

Area 6:

\* Waste codes to be stored in tanks U, V, W, X, and Y (presently used for nonhazardous waste) in Area 6;

D004-043

F001-F005, F007-F012, F019-F028, F032, F034, F035, F037-F039

K001-K011, K013-K043, K048-K052, K060-K062, K064-K066, K069, K071, K073, K083, K085-K088, K090, K091, K093-K100, K103-K118, K123-K126, K131, K132, K136, K141-K145, K147, K148, K169-K172, K174-K178, K181

P059

U001-U005, U007-U012, U014-U019, U021, U022, U024-U032, U034-U039, U041-U053, U055-U064, U066-U095, U097-U099, U101-U103, U105-U114, U116-U120, U121 (non-gas), U122-U132, U134-U138, U140-U159, U161-U174, U176-U188, U190-U194, U196, U197, U200-U204, U206-U211, U210, U213-U222, U225-U228, U235-240, U243, U244, U246-U249, U271, U278-U280, U328, U353, U359, U364, U367, U372, U373, U387, U389, U394, U395, U404, U409-U411

\* Waste codes to be stored in containers in Area 6;

D002, D004-D043

F001-F005, F007-F012, F019-F028, F032, F034, F035, F037-F039

K001-K011, K013-K043, K048-K052, K060-K062, K064-K066, K069, K071, K073, K083, K085-K088, K090, K091, K093-K100, K103-K118, K123-K126, K131, K132, K136, K141-K145, K147, K148, K169-K172, K174-K178, K181

P059

U001-U005, U007-U012,U014-U019, U021, U022, U024-U032, U034-U039, U041-U053, U055-U064, U066-U095, U097-U099, U101-U103, U105-U114, U116-U120, U121 (non-gas), U122-U132, U134-U138, U140-U159, U161-U174, U176-U188; U190-U194, U196, U197, U200-U204, U206-U211, U213-U222, U225-U228, U235-240, U243, U244, U246-U249, U271, U278-U280, U328, U353, U359, U364, U367, U372, U373, U387, U389, U394, U395, U404, U409-U411

\* Waste codes to be treated by separation and consolidation in tanks and containers in Area 6;

D002, D004-D043

F001-F005, F007-F012, F019-F028, F032, F034, F035, F037-F039

K001-K011, K013-K043, K048-K052, K060-K062, K064-K066, K069, K071, K073, K083, K085-K088, K090, K091, K093-K100, K103-K118, K123-K126, K131, K132, K136, K141-K145, K147, K148, K169-K172, K174-K178, K181

P059

U001-U005, U007, U012, U014-U019, U021, U022, U024-U032, U034-U039, U041-U053, U055-U064, U066-U095, U097-U099, U101-U103, U105-U114, U116-U120, U121 (non-gas), U122-U132, U134-U138, U140-U159, U161-U174, U176-U188, U190-U194, U196, U197, U200-U204, U206-U211, U213-U222; U225-U228, U235-240, U243, U244, U246-U249, U271, U278-U280, U328, U353, U359, U364, U367, U372, U373, U387, U389, U394, U395, U404, U409-U411

\* Waste codes to be treated by deactivation in Area 6: D002, U001, U002, U008, U031, U055, U056, U057, U092, U097, U110, U112, U113, U117, U124, U125, U154, U161, U186, U213, U239

ATTACHMENT III  
Chemtron Corporation  
OHD 066 060 609

HAZARDOUS WASTE TREATMENT AREAS

Treatment	Area(s)	Quantity
Separation and Consolidation in Containers	2, 3, 4, 5, 6	100 Tons per day*
Separation and Consolidation in Tanks	1, 2, 4, 5, 6	100 Tons per day*
Neutralization in Tanks	Tank 26 in Area 5	9,000 gallons per day
Fuel Blending in Tanks	4	10,000 gallons per day
Shredding	5	100 tons per day*
Pre-blending in Containers	4, 5	0.15 tons per day*
Pre-blending in Tanks	4, 5	0.15 tons per day*
Deactivation in containers	2, 3, 4, 5, 6	3,000 gallons per day*
Deactivation in tanks	1, 2, 4, 5, 6	3,000 gallons per day*
Compaction	2, 5	10 tons per day

\*Total amount for both containers and tanks.