

**Northeast District Office**

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

January 22, 2007

**CERTIFIED MAIL**  
**RETURNED RECEIPT REQUESTED**

Ms. Allison Knowles  
Von Roll America, Inc.  
1250 Saint George Street  
East Liverpool, OH 43920

**RE: HAZARDOUS WASTE PERMIT MODIFICATION - CLASS 1A APPROVAL  
CHANGES TO WASTE APPROVAL PROCESS - NOT REQUIRE OHIO EPA REVIEW  
AND APPROVAL OF CERTAIN WASTE STREAMS (LAB PACKS, LOOSEPACKS,  
AND TEMPLATE WASTE PROFILES), VON ROLL AMERICA, INC., OHD 980 613 541  
/ 02-15-0589**

Dear Ms. Knowles:

On December 15, 2006, Ohio EPA received a request (dated December 13, 2006) for a Class 1A (Class 1 requiring prior approval) hazardous waste permit modification (tracking number 061215-1A-1) from Von Roll America, Inc. (VRA). With this letter, Ohio EPA approves the above referenced Class 1A modification submitted pursuant to Ohio Administrative Code (OAC) Rule 3745-50-51.

**FOR APPROVAL**

The following modification has been made to your Ohio Hazardous Waste Facility Installation and Operation Permit, journalized on March 23, 2005. Also, the records of Ohio EPA have been changed accordingly:

The Class 1A permit modification was requested to revise the waste approval process so that VRA would remove step 4, Ohio EPA approval, from waste profiles that are copied from one of the approved template waste streams. The approved template waste streams include loose pack templates, generic waste templates, and lab pack profiles. With approval of this modification, Ohio EPA will no longer review and approve waste profile sheets that are copied from an approved template. This modification will eliminate review time for waste streams that are profiled on a waste template (or "common").

The following changes have been made to the Permit and the Part B permit application:

- replace Permit page 19 with revision (page heading indicates class 1A modification received on 12/15/2006) to revise permit condition B.3.(a).

**Section C:**

- replace cover page with Revision 6 dated December 13, 2006
- replace Table of Contents, page I, with Revision 6 dated December 13, 2006
- replace page C -17 with Revision 6 dated December 13, 2006
- replace page C - 25 with Revision 6 dated December 13, 2006

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DIV. OF HAZARDOUS  
WASTE MGT.

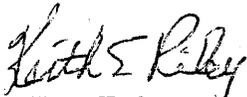
VON ROLL AMERICA, INC. (WTI)  
CLASS 1A APPROVAL  
PAGE 2 OF 2

- replace page C - 27 with Revision 6 dated December 13, 2006
- replace page C - 27a with Revision 6 dated December 13, 2006
- replace page C - 27b with Revision 6 dated December 13, 2006
- replace page C - 27c with Revision 6 dated December 13, 2006
- replace page C - 27d with Revision 6 dated December 13, 2006
- replace page C - 27e with Revision 6 dated December 13, 2006
- replace page C - 28 with Revision 6 dated December 13, 2006
- replace page C - 29 with Revision 6 dated December 13, 2006

Enclosed are copies of the revised Permit page 19 and the revised pages of the Part B permit application. These have been included to ensure that all involved parties have written confirmation of the change(s)\*.

If you have any questions concerning this action, please contact Michelle Tarka at the Ohio EPA East Liverpool field office at (330) 385-8421 or at the Ohio EPA Northeast District Office at (330) 963-1234.

Sincerely,



*WTS*  
William T. Skowronski  
District Chief  
Northeast District Office

WTS:ddw

Enclosure

cc: Pamela Allen, Manager, RIS, DHWM, CO  
Jeremy Carroll, Supervisor, Engineering Unit, DHWM, CO  
John Nyers, DHWM, CO  
Frank Popotnik, DHWM, NEDO  
Patricia Natali, DHWM, NEDO  
Michelle Tarka, DHWM, NEDO  
Wen Huang, US EPA, Region V  
ec: Sherry Slone, DHWM, NEDO

keywords: signature, removal, profiles

\*Also, in accordance with Ohio Administrative Code Rule 3745-50-51(D)(1)(a)(ii), [Facility Name] shall send a notice within 90 days of an approved Class 1A Modification to all persons on the Agency mailing list. An updated mailing list can be obtained by contacting Pamela Allen at (614) 644-2917, or by e-mail at [pam.allen@epa.state.oh.us](mailto:pam.allen@epa.state.oh.us).

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(b) Hazardous Waste from Off-Site Sources

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

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

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

