



State of Ohio Environmental Protection Agency

Northeast District Office

2110 East Aurora Rd.
Twinsburg, Ohio 44087

TELE: (330) 963-1200 FAX: (330) 487-0769
www.epa.state.oh.us

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

March 5, 2008

Mr. John Peterka
Heritage - WTI, Inc. (WTI)
1250 Saint George Street
East Liverpool, OH 43920

**RE: HAZARDOUS WASTE PERMIT MODIFICATION, CLASS 1A APPROVAL
(PITS #080211-1A-1), HERITAGE - WTI, INC. (WTI), OHD 980 613 541 / 02-15-0589**

Dear Mr. Peterka:

On February 11, 2008, Ohio EPA received a request for a **Class 1A** (Class 1 requiring prior approval) hazardous waste permit modification dated February 6, 2008, from Heritage-WTI, Inc. (WTI). WTI sent an addendum dated February 28, 2008, which included 3 pages (2 corrected pages, 1 additional page). This modification request has been assigned a tracking number of 080211-1A-1. 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:

WTI intends to modify the Truck Holding and Sampling Area (TH &S Area) in order to expand current unloading capacities and expand the third party business. The modification is to add a canopied loading/unloading dock and ramp to the east side of the TH &S Area. This canopied dock and ramp will be located east of bays 3, 4, and 5. Bays 1, 2 and 6 will be left in their current state to allow for facility operations, such as sampling bulk waste shipments. The loading/unloading dock and ramp will be used to off-load containerized shipments destined for WTI and to build/load containerized shipments destined to an alternate facility. The dock will not be "portable" but can be moved if necessary. The dock will be anchored to the existing concrete, and equipped with automatic dock levelers to gain access to vehicles at bays 3, 4, and 5. The canopy will be tied directly into the existing roof structure of the TH &S Area.

No additional storage capacity is requested. The current storage capacity of 46,000 gallons is sufficient. WTI is not requesting to conduct treatment in this area that is not currently in their permits. WTI is not permitted to store containers of hazardous waste on the dock/ramp structure. Containers may be staged on the structure during the loading/unloading process, but must be removed at the end of each shift. Containers cannot be staged for more than 24 hours on the structure. The dock and ramp must be inspected at the end of the shift to ensure all containers have been removed.

During the initial modification classification request dated 12/14/2007, WTI requested that bay 6 of the TH & S Area be utilized for bulking of non-hazardous materials. By letter dated 01/09/2008, WTI eliminated the bulking of non-hazardous materials from the classification request. As a result, bulking of non-hazardous materials in bay 6 cannot be conducted under this modification.

Please replace the following pages in the appropriate sections of the facility's Part B permit application and Permit, as instructed below:

Part A (replace entire Part A):

The header for the pages in the Part A is Revision 13, dated February 6, 2008.

- **Page A-32, P&ID C-01-1-00001A Rev 17** - show ramp/dock at Truck Holding and Sampling Area (Note: photo of the TH & S Area on Page A-35 will need to be updated upon completion of dock/ramp)

Section B - Facility Description:

The header for the pages in Section B is Revision 10 dated February 6, 2008, except for Attachment B.5, P&ID C-01-3-00001 which is Revision 7.

- **Replace Section B Cover Page** - new revision number/date
- **Replace Attachment B.3 Cover Page (page B-20)** - new revision number/date
- **Replace in Attachment B.3, P&ID C-03-1-00001 Rev 10 with P&ID C-03-1-00001 Rev 11** - show ramp/dock
- **Replace Attachment B.5 Cover Page (page B-24)** - new revision number/date
- **Replace Page B-25 in Attachment B.5, P&ID C-01-3-00001 Rev 6 with P&ID C-01-3-00001 Rev 7** - show ramp/dock
- **Replace Attachment B.6 Cover Page (page B-26)** - new revision number/date
- **Replace Page B-27 in Attachment B.6, P&ID DWG Rev E with P&ID DWG Rev F** - show ramp/dock
- **Replace Attachment B.7 Cover Page (page B-28)** - new revision number/date
- **Replace Page B-29 in Attachment B.7, P&ID C-01-1-00001 Rev 16 with P&ID C-01-1-00001 Rev 17** - show ramp/dock

Section D - Process Description:

The header for the pages in Section D is Revision 37 dated February 6, 2008.

- **Replace Section D Cover Page** - new revision number/date
- **Replace page D-15** - add language for loading/unloading containers at TH&S
- **Replace page D-16** - add language for loading/unloading containers at TH&S, replace VRA references
- **Replace page D-16a** - carry over language, add language for loading/unloading containers at TH&S, replace VRA references
- **Replace page D-20** - new revision number/date, revise text
- **Replace Attachment D.1 Cover Page** - new revision number/date
- **Replace in Attachment D.1, P&ID C-01-1-00001 Rev 16 with P&ID C-01-1-00001 Rev 17** - show ramp/dock
- **Replace Attachment D.2 Cover Page** - new revision number/date
- **Replace in Attachment D.2, P&ID G-01-1-00005 Rev 1 with P&ID G-01-1-00005 Rev 2** - show ramp/dock

Section F - Procedures to Prevent Hazards:

The header for the pages in Section F is Revision 16 dated February 6, 2008.

- **Replace Section F Cover Page** - new revision number/date
- **Replace Attachment F.3 Cover Page (Page F-38)** - new revision number/date
- **Replace in Attachment F.3, P&ID C-01-1-00001 Rev 16 with P&ID C-01-1-00001 Rev 17** - show ramp/dock

Section G - Contingency Plan:

The header for the pages in Section G is Revision 21 dated February 6, 2008.

- **Replace Section G Cover Page** - new revision number/date
- **Replace page G-46, P&ID C-01-1-00001 Rev 16 with P&ID C-01-1-00001 Rev 17**
- **Replace page G-47, P&ID P-01-3-00007 Rev 3 with P&ID P-01-3-00007 Rev 4**
- **Replace Attachment G.2 Cover Page** - new revision number/date
- **Replace page G.2-1, P&ID C-01-3-00001A Rev 8 with P&ID C-01-3-00001A Rev 9** - show ramp/dock
- **Replace page G.2-2, P&ID C-01-3-00001B Rev 8 with P&ID C-01-3-00001B Rev 9** - show ramp/dock
- **Replace page G.2-6, P&ID A-01-3-00005 Rev 1 with P&ID A-01-3-00005 Rev 2** - show ramp/dock

Section I - Closure Plans, Post-Closure Plans, and Financial Requirements:

The header for the pages in Section I is Revision 18 dated February 6, 2008.

- **Replace Section I Cover Page** - new revision number/date
- **Replace page I-1** - add language for loading/unloading containers at TH&S, correct text/format from previous modification, replace VRA references
- **Replace page I-14a** - add language for loading/unloading containers at TH&S, correct text/format
- **Replace Figure Cover Page** - new revision number/date
- **Replace Figure I.2, page I-37, P&ID C-01-1-00001 Rev 16 with P&ID C-01-1-00001 Rev 17** - show ramp/dock
- **Replace Attachment I.14 Cover Page** - new revision number/date
- **Replace P&ID G-01-1-00005 Rev 1 with P&ID G-01-1-00005 Rev 2** - show ramp/dock

Section J - Corrective Action:

The header for the pages in Section J is Revision 6 dated February 6, 2008.

- **Replace Section J Cover Page** - new revision number/date
- **Replace Figure Cover Page** - new revision number/date
- **Replace Figure J.1 (page J-8), P&ID SWMU Locations Rev 1 with SWMU Locations Rev 2** - show ramp/dock
- **Replace Figure J.3 (page J-10), P&ID C-01-1-00001 Rev 16 with C-01-1-00001 Rev 17** - show ramp/dock

Part B Permit:

- **Replace Page 35** - new language added
- **Replace Page 42** - new language added
- **Replace Page 42a** - text overflow from previous page
- **Replace Page 42b** - text overflow from previous page

RECEIVED
OHIO EPA

MAR - 7 2008

DIV. OF HAZARDOUS
WASTE MGT.

HERITAGE - WTI, INC.
CLASS 1A APPROVAL
MARCH 5, 2008
PAGE - 4 -

- **Replace Page 42c** - text overflow from previous page
- **Replace Page 42d** - text overflow, allowed blank space for future language
- **Add Page 42e** - text overflow from previous page
- **Replace Page 108** - new language added
- **Replace Page 109** - text overflow from previous page
- **Replace Page 109a** - text overflow from previous page

Enclosed is a copy of the permit application revision(s). This has 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.

Sincerely,



William T. Skowronski
District Chief
Northeast District Office

WTS:ddw

Enclosure

cc: Dave Sholtis, Assistant Chief, DHWM, CO
Jeremy Carroll, Supervisor, Engineering Unit, DHWM, CO
Frank Popotnik, DHWM, NEDO
Patricia Natali, DHWM, NEDO
Wen Huang, U.S. EPA, Region V
ec: Sherry Slone, DHWM, NEDO
John Nyers, DHWM, CO
Jeri Savelle, DHWM, CO

*Also, in accordance with Ohio Administrative Code Rule 3745-50-51(D)(1)(a)(ii), the Permittee must send a notice within 90 days of an approved Class 1A Modification to all persons on the Agency mailing list. An updated mailing list can be obtained by contacting Dave Sholtis at (614) 644-2917, or by e-mail at dave.sholtis@epa.state.oh.us.

Building C, also known as the Lab Pack Building, is 56' x 60' with racks installed to store up to 13,200 gallons in a variety of container types and sizes. Total secondary containment in this building is 11,200 gallons. The building is used primarily for the storage and management of lab pack and loose pack waste as well as processing third party waste as described in Permit Condition C.(d) and Section C in the permit application. The building is also used for other processing activities as described in Section D of the permit application. Containers processed or staged in Building C will be no more than five (5) cubic yards in size. The building is equipped with forced air ventilation, a breathing airline, and vapor recovery collection points used during processing activities.

The Container Holding Building, also known as the Slag Canopy, is 50' x 50' with a storage capacity of 100,000 gallons. The building is enclosed on three sides to minimize the accumulation of storm water. Total secondary containment is 10,520 gallons. Containers, on pallets or an equivalent device, can be stored on the floor and in heavy duty racks installed on the east and west side of the building. The height of stacked containers on pallets cannot exceed the equivalent height of two (2) stacked pallets of 55 gallon containers. The Permittee will ensure that double-stacked pallets are stable and level. Waste stored in this building must be non-reactive and compatible. Processing of waste for use in the Bucket Hoist may be conducted in this building in accordance with Section D-2e(4) of the permit application.

The Truck Holding and Sampling Area, a canopied building, is located west of the Container Processing Building. The building is approximately 60' x 96', has a storage capacity of approximately 46,000 gallons, and is permitted for storing containerized and bulk solid wastes. The area is divided into six bays or stations that share a common reinforced concrete sump. Total secondary containment is 22,000 gallons. A canopied loading/unloading dock and ramp, approximately 23 feet by 78 feet, is located east of bays 3, 4, and 5. The dock and ramp are used to off-load containerized shipments and build/load containerized shipments destined for alternate facilities. Containerized waste will not be stored on the dock and ramp, the floor of this building nor in the racks which are used for consumer products and raw materials. Containers of Mixed Infectious and Hazardous Waste (MIHW), highly reactive waste, and/or pyrophoric hazardous wastes are prohibited from storage in this area. All waste will be stored according to compatibility guidelines and, if incompatible wastes are stored in adjacent bays, the Permittee will take action as described in Section D of the Part B Permit Application to prevent mixing should a release occur. In addition to storage, this area is also used for sampling, staging, and processing waste, decontamination of equipment, and dewatering of bulk solid waste containers.

MAR - 5 2008

OHIO EPA NEDO

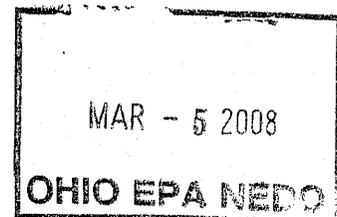
C.14 Container Staging

As applied to this permit, staging refers to the temporary placement of off-site generated waste within the facility. Staging areas are identified and described in the Part B permit application. Staging areas must meet secondary containment standards, have automatic fire detection and suppression systems, and have a roof or canopy whenever possible. The Permittee will ensure that the volume of containers staged in permitted areas does not exceed the secondary containment capacities for each area. The volume of hazardous waste placed in any staging area will be accrued toward the maximum storage inventory limit established by this permit.

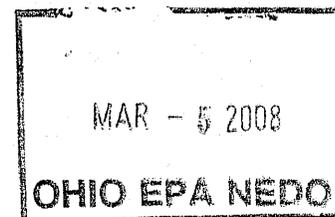
Time limits for staging have been designated in the Part B permit application and are described below. Anticipated time for staging containers over these periods must be brought to the attention of Ohio EPA on-site inspectors in advance. Additional time may be acceptable under certain circumstances. Ohio EPA retains the right to disallow staging of waste in any portion of the facility and require the Permittee to incinerate the waste or place it into storage. Please refer to Section D of the Part B permit application for more information regarding specific staging requirements and conditions.

The facility is permitted to manage mixed infectious and hazardous waste (MIHW) in accordance with Sections C and D of the Part B permit application and Module I(B) of this permit. Refer to Sections C and D of the Part B permit application and Module I(B) of this permit for specific staging requirements for MIHW.

- (a) Waste may be staged in the Truck Holding and Sampling area for up to 3 days. See permit application section D-2c.
 - (1) Containers of waste may be staged on the dock/ramp structure located east of the Truck Holding and Sampling area, during the loading/unloading process, but must be removed at the end of each shift. Containers cannot be staged for more than 24 hours.
- (b) Containers in the Container Processing Building (CPB) shall be staged according to the specific processes being performed. Staging areas have different uses that include, but are not limited to, containers destined for processing through various means and staging or orphan and discrepant containers. See permit application section D-2d.



- (1) Container Receiving Area (Unloading Docks) and Receiving Conveyor – Containers can be staged at the Container Receiving Area for up to 1 day. Bulk waste containers and container trucks may be staged in the Unloading Dock for up to 3 days. Containers may be staged on the Receiving Conveyor up to 1 day. See permit application section D-2d and D-2d(1).
- (2) Splitting Station (split staging area/area north of splitting station) – Containers may be staged in this area up to 14 days. All split containers must be managed following compatibility rules and be inspected daily. See permit application section D-2d(2) and section D-2d.
- (3) Container Pump-Out Stations – A container can be staged at the Container Pump-out Stations for up to 1 day. See permit application section D-2d and D-2d(3).
- (4) Queuing Lanes (Feed Conveyor 2nd Floor) – Containers staged on the 2nd Floor Feed Conveyors do not have a time limit when the incinerator is in operation. Containers must be removed from the Feed Conveyor carriages within 24 hours of initiating shutdown procedures during an outage. Containers may be loaded on the Feed Conveyor carriages 48 hours prior to start-up after an outage. The containers in this area must be inspected once per shift. See permit application section D-2 and D-2d(9).
- (5) North Wall of the CPB – Containers awaiting discrepancy resolution, not related to manifest discrepancies, and drums destined for direct drum pump-out may be placed in designated locations along the North Wall of the CPB. A container may be staged at the North Wall for up to 5 days. See permit application section D-2d.
- (6) All other containers in the CPB shall be processed, which includes placement in permitted storage areas, within 1 day of receipt at the facility. Up to 3 days is acceptable under certain circumstances when Ohio EPA on-site inspectors are informed of the situation. See permit application section D-2d.



(c) Incinerator Feed Building –

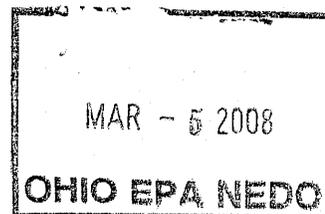
- (1) The canopied bulk waste unloading area (in front of the Bulk Solid Waste Tanks) may be used to stage both bulk containers and other containers. See permit application section D-2e.
 - (i) Bulk deliveries may be staged up to 3 days.
 - (ii) Containers being staged before dumping to the dump-to-pit roll-off can be staged for up to 1 day.
 - (ii) Containers being staged for Bucket Hoist processing can be staged in this location. See Permit (c)(4)(iii) for specific time restrictions on filling Bucket Hoist hoppers.
- (2) Direct Organic Tanker Unloading Station (Bay 3/South Bay) – when not in use feeding waste to the incinerator, bulk waste containers may be staged in Bay #3 up to 3 days. See permit application section D-2e(2).
- (3) Direct Drum Pump-Out Stations – A container can be staged at the Container Pump-Out Stations for up to 1 day. See permit application section D-2d.
- (4) Bucket Hoist (Skip Hoist) – Loading of Bucket Hoist hoppers may occur in any canopied “C” containment area equipped with automated fire detection and suppression systems. Examples of those areas include the canopied bulk waste unloading area in front of the Bulk Solid Waste Tanks, in Building B, in Building C, in the Container Holding Building, and in the CPB. If the material has the potential to emit organic vapors, it will be processed under vapor recovery. Additional restrictions regarding processing of waste, compatibilities, and aisle space apply. See permit application section D-2 and D-2e(4).
 - (i) Prior to processing or storage, all filled Bucket Hoist hoppers must remain in a canopied “C” containment area equipped with automated fire detection and

MAR - 5 2008

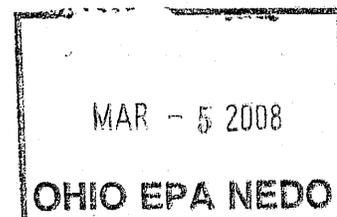
OHIO EPA NEDO

suppression and vapor recovery if the material has the potential to emit organic vapors.

- (ii) Hoppers may be staged on the Bucket Hoist Containment Platform for up to 1 day. A person must be present at the Direct Drum Station during the time a hopper is staged on the Containment Platform. Hoppers must be sent to the incinerator or removed from the platform and sent back to a staging or storage area prior to the person at the Direct Drum Station leaving that position.
 - (iii) Hoppers must be processed or placed into storage within 2 days (48 hours) of first initiating the filling of the hopper. The 48 hour time period begins when the individual containers are first staged in an area and includes consolidation in the hoppers. By the end of the 48 hours, the filled hoppers must be processed or stored in a permitted storage area.
- (d) Organic Tanker Unload Stations (East Bay/Bay 1, Bay 2, Bay 3) – The Organic Tanker Unloading Bays may be used to stage bulk waste containers for up to 3 days. See permit application section D-2f.
 - (e) Building B (External Truck Wash) – Staging of bulk containers is permitted for up to 3 days. Staging of other containers is permitted for up to 1 day, in accordance with restrictions regarding compatibilities and aisle space. See permit application section D-2h.
 - (f) Building C (Lab Pack Building) – Containers, other than lab packs or loose packs, processed or staged in Building C will be no more than five cubic yards in size, with the required aisle space, prior to further processing. Containers, other than lab packs or loose packs, may be staged in the Lab Pack Building for up to 5 days. See permit application section D-2i.



- (g) Container Holding Building (Slag Canopy) – Containers may be staged in the Container Holding Building for Bucket Hoist hopper filling for up to 1 day. While being filled, Bucket Hoist hoppers may be staged for up to 48 hours. The 48 hour time period begins when the individual containers are first staged until the hoppers must be processed to the hoist or stored. See permit application section D-2j.

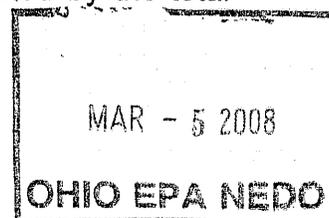


- (h) Containers of waste designated as direct feed waste (not to be stored on-site) will be processed within 24 hours of receipt at the facility. Bulk containers of direct feed waste may be staged, if necessary, in areas of the facility which are covered, have automatic fire detection and suppression systems, and are in "C" storm water management areas. Locations include Truck Holding and Sampling Bays, Organic Tanker Unloading Bays, Direct Organic Tanker Unloading Areas, Container Receiving Unloading Docks.
- (i) The Permittee shall remove all containers being staged for processing and treatment and place them in permitted storage areas within 24 hours of beginning a scheduled or unscheduled outage. However, if the designated time limits for staging will not be exceeded before the incinerator is operating, the Permittee may continue processing and staging activities in accordance with time limits specified here and in Section D of the Part B permit application.
- (j) All other containers staged for processing activities or at locations not previously specified shall be processed within 24 hours of receipt at the facility.

C.15 Processing Compressed Gases and Gas Mixtures

The Permittee is authorized to accept and treat approved compressed gases and gas mixtures through the incineration system. The approved gases are listed in Section C, Waste Characteristics and Waste Analysis Plan, of the approved Part B permit application. The compressed gaseous wastes are received in various types of tanker trucks and are off-loaded and fed directly to the incineration systems (kiln) through the Direct Organic Tanker East (Bay 1/E-Bay). E-bay is described in Section D, Process Description, of the approved Part B permit application. During the off-loading process, all doors to E-bay must be closed and the roof exhaust system must be operating adequately. At all times during off-loading, ventilation in the bay will be maintained at the rate of six air changes per hour.

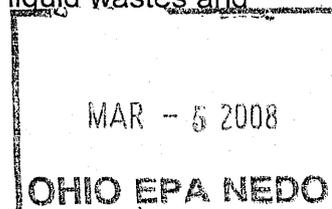
The Permittee is not authorized to store compressed gaseous waste on-site, but may stage the waste in approved staging areas as described in Section D. The annual maximum quantity of gaseous waste treated will be limited by the total volume of waste permitted to be treated by incineration.



gallon epoxy-phenolic lined carbon steel blending tank, two 2,000 gallon carbon steel overflow tanks, and one 20,000 gallon carbon steel fuel oil storage tank. The unit is divided into two containment areas by a raised concrete aisle running east to west lengthwise down the center of the building, separating the unit into two tank groups, nine in each group.

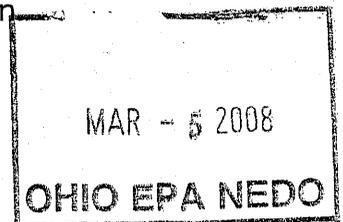
The floor of this unit is constructed of reinforced concrete that has been treated to resist chemicals that are managed in this unit. The entire combined containment area is surrounded by an exterior concrete dike wall. Each separate containment area, including sumps, has a containment capacity of about 21,500 gallons. Organic vapors from this unit are vented to a vapor recovery system which is described in Section D of the approved Part B permit application. This unit manages bulk liquid wastes generated off-site and liquid wastes generated on-site before transfer to the incinerator system for treatment. There has been one release from this unit on December 29, 1999. The Contingency Plan was activated and the area was remediated. Approximately 50 gallons of a mixture of waste solvent and water was released to the gravel/soil area adjacent to, and on the west side of, the Organic Waste Tank Farm. A total of 87,061 pounds of gravel and clay were excavated and removed. The potential for release to ground water, surface water, on-site soils, and air is low.

- C) WMU 3: Organic Tanker Unload Station – This unit is a 60 foot by 75 foot building used to unload bulk liquid waste from tank trucks after the waste shipment has been approved. The unit is also used for transferring specific approved gaseous waste streams directly to the incineration system as described in Sections C and D of the approved Part B permit application. It is adjacent to, and north of, the Organic Waste Tank Farm (WMU 2). The unit is divided into three stations separated by fire walls. The east station is used to direct feed liquid waste and specific approved gaseous waste streams to the incineration system. The floor of this unit is constructed of reinforced concrete that has been treated to resist chemicals. A combination of 7.5 inch speed bumps, and 8 inch curbs surrounds each unloading station. The paved surface in each station is sloped toward a reinforced concrete sump. Each separate containment area, including sumps, curbs, contoured surfaces, and speed bumps, has a containment capacity of about 10,000 gallons. Each station is facilitated to collect vapors that may be emitted during off loading procedures. These fugitive emissions are transferred to the facility's vapor recovery system. This unit manages tank trucks containing bulk liquid wastes and



specific approved gaseous waste streams generated off-site. Wastes are unloaded from tank trucks at this WMU into the Organic Waste Tank Farm (WMU 2) or directly to the kiln (WMU 1). Tankers may be staged in this unit in accordance with Section D of the approved Part B permit application and this permit. Designated processing of waste is also permitted in this unit in accordance with the approved Part B permit application. There have been no documented releases from this unit. The potential for release to ground water, surface water, on-site soils, and air is low.

- D) WMU 4: Truck Holding and Sampling Area - This unit is a 60 foot by 96 foot open-sided, roofed area used to hold and sample incoming trucks containing bulk liquid or solid waste. This unit is also permitted for storage of containerized waste in trailers and bulk solid waste. The permitted storage capacity is 46,000 gallons. The unit is divided into six stations. The floor of this unit is constructed of reinforced concrete that has been treated to resist chemicals that are managed in this unit. A combination of 6 inch speed bumps and 6 inch curbs surround the unit. The paved surface of the unit is sloped toward a reinforced concrete sump. This unit has a containment capacity of approximately 22,000 gallons. A canopied loading/unloading dock and ramp, approximately 23 feet by 78 feet, is located east of bays 3, 4, and 5. The dock and ramp are used to off-load containerized shipments and build/load containerized shipments destined for alternate facilities. Trucks are held at this unit until sample analyses are completed and the shipment has been approved or rejected. Tankers may also be staged in this unit in accordance with Section D of the approved Part B permit application and this permit. Other activities conducted in this unit include decontaminating equipment, dewatering bulk solid waste containers, storing commercial products and raw materials, and repairing damaged containers. There have been no documented releases from this unit. The potential for release to ground water, surface water, on-site soils, and air is low.
- E) WMU 5: Building B (External Truck Wash) – This unit is a 25 foot by 70 foot building that is used for storage and processing of wastes. This enclosed unit has a reinforced concrete floor that has been treated to resist chemicals that are managed and stored in this unit. Containers, including tankers and roll-offs, may be staged in this unit in accordance with Section D of the approved Part B permit application and this permit. Designated processing of waste is also permitted in this unit in accordance with Section D of the approved Part B permit application.



Four inch speed bumps are located at the entrance and exit of the building. The paved surface inside the unit is sloped toward a reinforced concrete sump and trench. The contoured floor surface, sump, and trench have a containment capacity of about 7,000 gallons. The building is facilitated to collect vapors that may be released during processing activities. These fugitive emissions are transferred to the facility's vapor recovery system. There have been no documented releases from this unit. The potential for release to ground water, surface water, on-site soils, and air is low.

- F) WMU 6: Wastewater Treatment – This unit, which consists of a sand and carbon filter and a back wash settling tank, is used to treat liquids from clean-up activities and/or spills, or storm water collected from “C” and rejected “B” containment systems. The storm water collection systems, “A”, “B” and “C” are described in Section B of the approved Part B permit application. Liquids from the “C” containment areas at the facility are transferred to Tank W-5 in the Storm Water Storage Tank Farm (WMU 7). From Tank W-5, the water is transferred to Tank W-4 where it may be incinerated at WMU 1 or used as make-up water for, but not limited to, the scrubber or in the DeNox System. Non-hazardous wastewater generated off-site may be received and accumulated in Tank W-5 for use as process water in designated units at the facility. If analytical of this water indicates it is in need of treatment prior to use, it is piped through the sand filter (W-9) followed by the carbon filter (W-10) prior to transfer to Tank W-4. The filter system is occasionally back washed to a tank within the Process Water Tanks (WMU 8). The Wastewater Treatment System is located in an indoor 25 foot by 60.33 foot concrete containment area with a 3.66 foot high berm, a concrete sump and a reinforced concrete floor that has been treated to resist chemicals that are managed in this unit. There have been no documented releases from this unit. The potential for release to ground water, surface water, on-site soils, and air is low.
- G) WMU 7: Storm Water Storage Tank Farm – This unit is a 46.5 foot by 202 foot

