OhioEPA

State of Ohio Environmental Protection Agency

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P.O. Box 1049
Columbus, Ohio 43216-1049

CERTIFIED MAIL

May 29, 2007

Re: **Von Roll America, Inc.**
EPA ID No: OHD 980 613 541
Ohio ID No: 02-15-0589
Modified Hazardous Waste Permit

Ms. Allison Knowles
Von Roll America, Inc.
1250 St. George Street
East Liverpool, Ohio 43920-3400

Dear Ms. Knowles:

On January 29, 2007, Ohio EPA received Von Roll America, Inc.'s request to permit the Truck Holding and Sampling area for storage of trailers of containerized waste and containers of bulk solid waste. This final action results into an additional 46,000 gallons of storage capacity. For this modification, Von Roll America, Inc. submitted a Class 2 modification application[1]. The Agency did not receive any verbal or written comments concerning this Class 2 modification application. I have enclosed the final modified Ohio hazardous waste facility installation and operation permit (Permit) that was issued by the director today. Please note that the modified Permit remains in effect until it is renewed, withdrawn, suspended or revoked.

You are hereby notified that this action of the Director is final and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of $70.00 which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

[1]Ohio EPA assigned tracking # 070129-2-1 to this modification application.

Environmental Review Appeals Commission
309 South Fourth Street, Room 222
Columbus, OH 43215

If you have any questions, please contact Patricia Natali of Ohio EPA's Northeast District at (330) 385-8447.

Sincerely,

Dave Sholtis, Assistant Chief
Division of Hazardous Waste Management

Enclosures

cc: Ed Lim, ERAS, DHWM, CO
Jeremy Carroll/John Nyers, ERAS, DHWM
Dale Meyer, U.S. EPA, Region V
Frank Popotnik/Patricia Natali,/NEDO, DHWM
Carol Hester, Ohio EPA, PIC

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PUBLIC NOTICE

Columbiana County

OHIO EPA ISSUES FINAL MODIFIED HAZARDOUS WASTE PERMIT

On May 29, 2007, Ohio EPA issued a final class 2 modified Hazardous Waste Facility Installation and Operation Permit (Permit) to Von Roll America, Inc. for its facility at 1250 St. George Street, East Liverpool, Ohio 43920-3400. The EPA Identification Number for this facility is OHD980613541.

Why is Von Roll America, Inc. modifying its Permit?

Von Roll America, Inc. is permitted to operate a hazardous waste incinerator and other related hazardous waste management units at its facility. Von Roll America, Inc. wishes to permit the Truck Holding and Sampling area for storage of trailers of containerized waste and containers of bulk solid waste. This final action results into an additional 46,000 gallons of storage capacity. This final modified permit will allow Von Roll America, Inc. to make the requested changes. To issue this final modified Permit, Ohio EPA determined that the modification application is complete and meets appropriate standards.

Can I appeal this final modified Permit?

Yes, if you are an officer of an agency of the state or of a political subdivision, acting in a representative capacity, or any person who would be aggrieved or adversely affected by this modified Permit, you have the right to appeal this Permit decision to the Environmental Review Appeals Commission (ERAC).

If I decide to appeal this final modified Permit, how and when must I make the appeal?

If you file an appeal, you must put it in writing no later than **June 29, 2007.** Your appeal must explain why you are appealing the action and the grounds you are using for your appeal. The appeal must be accompanied by a filing fee of $70.00 which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. You must file your appeal, according to Ohio Revised Code § 3745.04 with ERAC at the following address: ***Environmental Review Appeals Commission***, 309 South Fourth Street, Room 222, Columbus, Ohio 43215. You must send a copy of the appeal to the director of Ohio EPA at the following address no later than three (3) days after you file it with ERAC: ***Chris Korleski, Director of Ohio EPA***, P.O. Box 1049, Columbus, Ohio 43216-1049.

OHIO ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF HAZARDOUS WASTE MANAGEMENT

SUMMARY OF MODIFICATIONS TO HAZARDOUS WASTE INSTALLATION AND OPERATION PERMIT

Von Roll America, Inc.
U.S. EPA ID #: OHD 980 613 541
Ohio ID #: 02 - 15 - 0589

Modification of the Hazardous Waste Facility Installation and Operation Permit will authorize Von Roll America, Inc., to make the following change:

Class 2 Modification:

The modification will permit the Truck Holding and Sampling area for storage of trailers of containerized waste and containers of bulk solid waste. This change will facilitate preparation of wastes for incineration on-site or for shipment off-site to a third party treatment facility. The additional storage capacity of 46,000 gallons will result in less than a 25% increase in the facility's permitted container storage capacity.

Currently, the Truck Holding and Sampling area is primarily a sampling station for bulk waste shipments. Secondary uses include staging waste shipments destined for processing at VRA, staging shipments destined to a third party treatment facility, storing commercial products used by VRA such as carbon and salt, repairing damaged bulk containers, and dewatering bulk solid waste containers. These current uses will not change.

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OHIO E.P.A.

MAY 29 2007

ENTERED DIRECTOR'S JOURNAL

OHIO ENVIRONMENTAL PROTECTION AGENCY

MODIFIED OHIO HAZARDOUS WASTE FACILITY INSTALLATION AND OPERATION PERMIT

I certify this to be a true and accurate copy of the official documents as filed in the records of the Ohio Environmental Protection Agency.

By: [signature] Date: 5-29-07

Date of Issuance: May 29, 2007
Effective Date: May 29, 2007

U.S. EPA ID No.: OHD 980 613 541
Ohio Permit No.: 02 - 15 - 0589

Name of Permittee: Von Roll America, Inc.

Mailing Address: 1250 St. George Street
East Liverpool, OH 43920-3400

Facility Location: 1250 St. George Street
East Liverpool, OH 43920-3400

Person to Contact: Ms. Allison Knowles

This Modified Ohio Hazardous Waste Facility Installation and Operation Permit is issued pursuant and subject to Section 3734.05(I) of the Ohio Revised Code and Rule 3745-50-51(D) of the Ohio Administrative Code.

The Ohio Hazardous Waste Facility Installation and Operation Permit with the above-referenced permit number as issued by the Ohio Environmental Protection Agency and journalized on March 23, 2005, is hereby incorporated by reference in its entirety, except as it may be modified herein.

This modification of the permit shall remain in effect until such time as the Ohio Hazardous Waste Facility Installation and Operation Permit is renewed, modified, withdrawn, suspended or revoked.

The Permittee shall comply with all requirements of the modified Part B permit application as amended or supplemented on January 29, May 14, and May 17, 2007. The information contained in the modified Part A and Part B permit applications is incorporated herein by reference. Specifically, all written statements regarding the specifications, locations or capabilities of the processes, equipment, containment devices, safety devices or programs or other matters made by the applicant in the permit modification application are hereby incorporated as express, binding terms and conditions of this modified permit.

The modified Terms and Conditions of this permit are attached hereto and are incorporated herein by reference. The modified Terms and Conditions supersede and replace the corresponding pages found in the March 23, 2005 renewal permit.

Chris Korleski
Director

permitpg.wpd

C. CONTAINER STORAGE AND TREATMENT

General Overview

Containerized waste, generated from off-site as well as on-site, is stored at several locations throughout the facility as described in Section D of the approved Part B permit application. Most container storage areas are located in buildings. All have bases constructed of reinforced concrete treated to resist chemical attack. All container storage areas are equipped with automated fire detection and suppression systems, secondary containment, liquid collection systems, and berms to control run-on/run-off. Most storage areas are fully enclosed and equipped with forced air ventilation to prevent the accumulation of vapors and fumes. Container processing areas have vapor collection points that are tied into the vapor recovery system which is described in Section D of the permit application. Aisle space is maintained to allow for the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment. Aisle space specific to each container storage area is described in Section D of the permit application. All stored containers will be placed on a pallet or other appropriate means to keep the bottom of the container above the concrete surface to facilitate identification of leaking containers. The permitted container storage areas are Building A (Drum Warehouse of the Container Processing Building), Building B (External Truck Wash), Building C (Lab Pack Building), Container Holding Building (Slag Canopy) and Truck Holding and Sampling. In all cases, containers are inspected for integrity prior to storage and on a daily basis.

Building A is located in the northern-most section of the facility's Container Processing Building. The building is 100' x 210' with racks installed to store a variety of containers equivalent to approximately 6,000 fifty-five gallon drums. The permitted storage capacity for this building is 510,000 gallons. The waste is segregated according to waste types with incompatible waste stored in areas with separate spill collection systems. Total secondary containment in this building is 79,497 gallons and is described in Section D of the permit application. The building is equipped with forced air ventilation.

Building B, also known as the External Truck Wash, is 25' x 70' with racks installed to store up to 15,180 gallons in a variety of container types and sizes. Total secondary containment in this building is 10,000 gallons. The building is permitted for storage in racks, a wash station for containers and equipment, and processing of specific waste streams (described in Section D). Containers will only be located on the floor during processing or staging activities. A minimum of five (5) feet of aisle space will be maintained between pallets of containerized waste when they are on the floor to be processed. All waste stored or processed in Building B will be compatible. The building is equipped with forced air ventilation. Fugitive emissions from processing activities are captured by the vapor recovery system.

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, greater than 85 gallons, can be stored on the floor and in heavy duty racks installed on the east and west side of the building. 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 (see 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 feet by 96 feet, 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. Containerized waste will not be stored on the floor of this building nor in the racks which are used for consumer products and raw materials. Containerized highly reactive and 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.

The amount of waste stored in each area will not exceed the permitted capacity at any time. All waste stored, processed, or treated will ultimately be fed to the incineration system for thermal treatment with the exception of third party waste as described in Permit Condition C.1(d). Treatment processes currently permitted at the facility will not render the waste non-hazardous. The Permittee is not permitted to store Class 1A Flammable Liquids, defined by National Fire Protection Association (NFPA) codes as liquids with a flashpoint <73 degrees Fahrenheit and a boiling point <100 degrees Fahrenheit anywhere on-site. The Permittee may treat Class 1A Flammable Liquids through the direct feed mechanisms including direct to kiln processing.

Container types received at the facility may include, but are not limited to, drums, pails, boxes, totes, cylinders, consumer packages, lab packs, rolloffs, tanker trucks, and refrigerated trucks. Containers that may be received, stored, and processed at the facility are composed of materials such as steel, wood, fiber, and plastic. Sizes and volumes of waste containers vary from millimeter vials in lab packs to cubic yard boxes, tanker trucks, and end dump trailers.

The volume of all wastes received and stored is limited by storage capacity as defined in this permit; the total volume of waste treated is limited by the permitted process flow of the incineration system. Additional treatment processes employed at the facility, or permitted as future activities, prior to incineration include: (1) polymerization of isocyanates with a permitted treatment capacity of 1,000 gallons per day; (2) blending of wastes; (3) consolidation of waste in the facility's bucket hoist and in containers; (4) splitting of waste; (5) addition of absorbent material; (6) size reduction; (7) steam heating in the facility's drum heater; and (8) slurrification of some waste streams.

Several types of mechanical processing are included in the Part A permit application, all of which are described in Section D of the permit application. These include: (1) extrusion of waste at a rate of 18,000 pounds per hour per extruder; and (2) extruding (or pushing) of solid waste from drums at a rate of 18,000 pounds per hour using a pusher. One of two permitted extruders currently exists and one is planned for construction in the future. The pusher unit has not been constructed.

The facility is permitted to accept lab packs in containers less than 85 gallons in size. Lab packs typically are received in drums of varying composition, pails, and fiber boxes. A predetermined number of lab packs are audited by the Permittee and compared to the generator's inventory sheet. The facility also accepts waste in containers described as loose packs. Loose pack waste constitutes the consolidation of consumer packaged waste. Management of loose pack and lab pack waste is described in Section C of the permit application.

C.1. Process Capacity/Annual Quantity Limitation
OAC Rule 3745-50-43(A)(7)

(a) The Permittee shall not store more than 684,380 total gallons of containerized waste at any given time in the permitted container storage areas and waste staging areas at the facility. Waste staging areas at the facility are described in Section D of the approved permit application. Container storage areas are listed below:

Building A (Drum Warehouse)	510,000 gallons
Building B (External Truck Wash Building)	15,180 gallons
Building C (Lab Pack Building)	13,200 gallons
Container Holding Building (Slag Canopy)	100,000 gallons
Truck Holding and Sampling	46,000 gallons

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. 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 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 facilitized 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

Attachment 9
Von Roll America, Inc. ("VRA"), Installation and Operation Hazardous Waste Permit

Class 2 Permit Modification, Pits# 070129 -2-1
Convert Existing Structure for Storage
And Increase Storage Capacity Not More Than 25%
Terms and Conditions

1. Prior to storage of waste in the Truck Holding and Sampling Building, VRA will update their irrevocable standby letter of credit (number S574689) to accommodate any changes in the cost estimate for Section I, Closure Plan, of the Part B permit application and update Attachment I.12, Financial Assurance in Section I.

2. Prior to storage of waste in the Truck Holding and Sampling Building, VRA will submit all standard operating procedures for activities associated with this modification to the Ohio EPA for review and evaluation.