



State of Ohio Environmental Protection Agency

Northeast District Office

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Bob Taft, Governor  
Bruce Johnson, Lieutenant Governor  
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May 25, 2005

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

**RE: HAZARDOUS WASTE PERMIT MODIFICATION, CLASS 1 ACKNOWLEDGMENT (TO INCLUDE STAGING TIME LIMITS TO SECTION D), VON ROLL AMERICA, INC. OHD 980 613 541 / 02-15-0589**

Dear Ms. Knowles:

Ohio EPA is in receipt of a notification dated February 22, 2005, from Von Roll America, Inc. (VRA), describing a Class 1 hazardous waste permit modification. With this letter, Ohio EPA acknowledges the above referenced Class 1 modification submitted pursuant to Ohio Administrative Code Rule 3745-50-51 and accordingly has updated the facility's Part B permit application and permit. This Class 1 permit modification was assigned a permit information tracking system (PITS) ID number of 050224-1-1.

This modification involves the addition of information to Section D - Process Description, to include staging time limits. The modification also affected the Ohio Hazardous Waste Facility Installation and Operation Permit Renewal journalized on March 23, 2005.

Changes to the Part B permit application include:

- **Replace the cover page for Section D with Revision 46 dated February 22, 2005**  
new revision date only
- **Replace the Table of Contents for Section D, page i, with Revision 46 dated February 22, 2005**  
added new section for Staging Areas and its location, added language 'And Receiving Conveyor' to Section D-2d(1), and added language 'Feed Conveyor 2<sup>nd</sup> Floor' to Section D-2d(9)
- **Replace the Table of Contents for Section D, page ii, with Revision 46 dated February 22, 2005**  
show correct location for Section D-2e(1) and D-2f(2)
- **Replace page D-4 with Revision 46 dated February 22, 2005**  
added word 'staging'
- **Replace page D-5 with Revision 46 dated February 22, 2005**  
added word 'staging'
- **Replace page D-6 with Revision 46 dated February 22, 2005**  
added word 'staging'
- **Replace page D-7 with Revision 46 dated February 22, 2005**  
added language regarding secondary containment
- **Replace page D-9 with Revision 46 dated February 22, 2005**  
added word 'staging'
- **Add page D-9a as Revision 46 dated February 22, 2005**  
added language to describe staging areas at the VRA facility
- **Add page D-9b as Revision 46 dated February 22, 2005**  
carry over language from page D-9a

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- **Replace page D-13 with Revision 46 dated February 22, 2005**  
added language for staging limit in Truck Hold and Sampling area
- **Replace page D-14 with Revision 46 dated February 22, 2005**  
added language for container storage and inspection
- **Add page D-14a as Revision 46 dated February 22, 2005**  
added language for staging in the Container Processing Building CPB and removed language that will be explained later in the section
- **Replace page D-15 with Revision 46 dated February 22, 2005**  
added language for staging in various areas within the CPB
- **Add page D-15a as Revision 46 dated February 22, 2005**  
carry over language from D-15
- **Replace page D-16 with Revision 46 dated February 22, 2005**  
added language for staging in Container Receiving Area
- **Add page D-16a as Revision 46 dated February 22, 2005**  
carry over language from D-16
- **Replace page D-17 with Revision 46 dated February 22, 2005**  
added language for staging in the Splitting Area
- **Replace page D-23 with Revision 46 dated February 22, 2005**  
added language for staging in the Queuing Lanes
- **Replace page D-24 with Revision 46 dated February 22, 2005**  
added language for staging in canopied Bulk Solid Unloading Area
- **Add page D-24a as Revision 46 dated February 22, 2005**  
carry over language from D-24
- **Replace page D-27 with Revision 46 dated February 22, 2005**  
added language for staging in bay #3 of the Incinerator Feed Building
- **Add page D-27a as Revision 46 dated February 22, 2005**  
carry over language from D-27
- **Replace page D-28 with Revision 46 dated February 22, 2005**  
added language for Bucket Hoist hopper processing and staging limits
- **Add page D-28a as Revision 46 dated February 22, 2005**  
added language for Bucket Hoist hopper processing and staging limits, carry over language from D-28
- **Replace page D-29 with Revision 46 dated February 22, 2005**  
added language for staging in Organic Tanker Unloading Stations
- **Add page D-29a as Revision 46 dated February 22, 2005**  
carry over language from D-29
- **Replace page D-30 with Revision 46 dated February 22, 2005**  
added language for staging in Direct Organic Tanker East
- **Add page D-30a as Revision 46 dated February 22, 2005**  
carry over language from D-30
- **Replace page D-39 with Revision 46 dated February 22, 2005**  
added language for staging in External Truck Wash
- **Add page D-39a as Revision 46 dated February 22, 2005**  
carry over language from D-39 and removal of language regarding stored on the floor of the ETW
- **Replace page D-41 with Revision 46 dated February 22, 2005**  
added language for staging in the Lab Pack Building
- **Add page D-41a as Revision 46 dated February 22, 2005**

- carry over language from D-41
- **Replace page D-42 with Revision 46 dated February 22, 2005**  
added language for staging in the Slag Canopy
- **Add page D-42a as Revision 46 dated February 22, 2005**  
carry over language from D-42

Changes to the Ohio Hazardous Waste Facility Installation and Operation Permit Renewal journalized on March 23, 2005, include:

- **Revisions to page 42 of 117, C.14. Container Staging**  
to reflect the language in Section D of the Part B permit application revised with this modification

Enclosed are copies of the permit application revisions and also the permit renewal revisions. These have been included to ensure that all involved parties have written confirmation of the changes. If you have any questions concerning this action, please contact Michelle Tarka at the Ohio EPA Northeast District Office (330) 963-1234 or the East Liverpool Field Office (330) 385-8421.

Sincerely,



Kurt M. Prinic  
Environmental Manager  
Division of Hazardous Waste Management

KMP:ddw

- cc: Pamela Allen, Manager, ITTSS, DHWM, CO  
Jeremy Carroll, Supervisor, Engineering Unit, DHWM, CO  
John Nyers, DHWM, CO  
Gary Victorine, USEPA, Region V
- ec: Frank Popotnik, DHWM, NEDO  
Michelle Tarka, DHWM, NEDO  
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keywords: Class 1, Section D, staging

#### 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 . AT A MINIMUM , STAGING AREAS MUST MEET SECONDARY CONTAINMENT STANDARDS. 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 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 .

- (a) WASTE MAY BE STAGED IN THE TRUCK HOLDING AND SAMPLING AREA FOR UP TO 3 DAYS. SEE PERMIT APPLICATION SECTION D-2C.
- (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 OF 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 2<sup>ND</sup> FLOOR) - CONTAINERS STAGED ON THE 2<sup>ND</sup> 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 , AND AT A MINIMUM, ONCE EVERY 12 HOURS. 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.
    - (iii) 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 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 LESS THAN (<)85 GALLONS 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.
- ~~(d)(h) Off-site generated waste in containers greater than (>) 85 gallons may be stored in the Container Holding Building, Building B, and Building C. 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.~~
- (e)(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. The Permittee may begin staging of waste 24 hours prior to the end of an outage.~~

- (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.
- ~~(a) Containers in the Container Processing Building (CPB) shall be staged and processed within twenty-four hours of receipt. Up to seventy-two (72) hours is acceptable under certain circumstances when the Ohio EPA on-site inspectors are informed of the situation.~~
- ~~(b) Containers staged for processing at other locations will be processed within 24 hours. Time over this period must be brought to the attention of Ohio EPA on-site inspectors.~~
- ~~(c) Containers awaiting discrepancy resolution, not related to manifest discrepancies, may be placed in designated locations in the Container Processing Building. A holding period of up to 120 hours is permitted. Time over this period must be brought to the attention of Ohio EPA on-site inspectors.~~