



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

June 6, 2007

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

RE: HAZARDOUS WASTE PERMIT MODIFICATION, CONSTRUCT A DECONTAMINATION BUILDING ON THE EAST SIDE OF THE ETW, CLASS 1A APPROVAL, VON ROLL AMERICA, INC. (VRA), U.S. EPA ID# OHD 980 613 541 / OHIO PERMIT # 02-15-0589

Dear Ms. Knowles:

On April 3, 2007, Ohio EPA received a request for a **Class 1A** (Class 1 requiring prior approval) hazardous waste permit modification (tracking number 070406-1-1) from Von Roll America, Inc. (VRA). On June 1, 2007, VRA submitted an addendum to this modification, to resubmit the entire Part A and to correct pages in Section I that were also affected by approval of the Class 2 modification to add a new container storage area. Ohio EPA received this addendum on June 5, 2007.

With this letter, Ohio EPA **approves** the above referenced Class 1A modification submitted pursuant to Ohio Administrative Code (OAC) Rule 3745-50-51.

Von Roll is permitted to use the External Truck Wash (ETW) for many uses including decontamination. Since VRA uses the ETW for activities such as storing waste and splitting waste, VRA would prefer to perform decontamination activities in a separate building. VRA plans to attach 14' x 12' building on the east side of the ETW to use as the Decontamination Building. The Decontamination Building will provide an area where equipment removed from service can be cleaned prior to going to the maintenance shop or to an outside vendor. This equipment can include, but is not limited to, pumps, fans, the clamshell bucket, piping, valves, instrumentation and other control components. VRA may also use the Decontamination Building to clean out totes or drums that once contained hazardous waste. To prevent an accumulation of vapors from decontamination activities, the Decontamination Building will be equipped with a roof vent.

The Decontamination Building will be equipped with electric, water, steam, and heat and will utilize steam and/or water as a decontamination agent(s). The rinseate will be collected in a metal catch basin that will drain to the sump located in the ETW, which is part of VRA's 'C' water system. VRA will empty the contents of the metal catch basin when the decontamination activities have been completed. Also, VRA will ensure that the secondary containment capacity of the ETW will not be exceeded when the decontamination fluids are transferred to the ETW sump.

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:

Please replace/add the following pages to the appropriate Sections of the facility's Part B permit application and Permit:

Part A Application

Replace the entire Part A application with Revision 8, dated April 3, 2007

Section B - Facility Description

The header for the pages in Section B will be Revision 6, dated April 3, 2007

Replace cover page - New revision number and date

Replace page i of the Table of Contents - Section B-1f(1) added for decon activities

Replace page B-9 - Section B-1f(1) was added for decontamination activities

Replace Attachment cover page B.3, B-20 - New revision number and date

Page B-21, P & ID C-03-1-00001 with C-03-1-00001, Rev 10 - Location of Decon Bldg

Replace Attachment B.5 cover page, page B-24 - New revision number and date

Replace page B-25, P & ID C-01-3-00001 with C-01-3-00001, Rev 6 - Decon Bldg

Replace Attachment B.6 cover page, B-26 - New revision number and date

Replace page B-27, P & ID DWG with DWG, Rev E - Location of Decon Bldg

Replace Attachment cover page B.7, B-28 - New revision number and date

Replace page B-29, P & ID C-01-1-00001 with C-01-1-00001, Rev 16 - Decon Bldg

Section D - Process Description

The header for the pages in Section D will be Revision 29, dated April 3, 2007

Replace cover page - New revision number and date

Replace page iii of the Table of Contents - Add section D-2m for Decon Bldg

Replace page ix of the Table of Contents - Add Attachment D.46 for Decon Bldg

Replace page D-72 - Add the section of the Decon Bldg

Add page D-72a - Carry over language from page D-72

Replace page D-181 - Corrections to show proper location of units in Part A

Replace page D-182 - Corrections to show proper location of units in Part A

Replace page D-183 - Corrections to show proper location of units in Part A

Replace Attachment cover page D.1 - New revision number and date

Replace P & ID C-01-1-00001 with C-01-1-00001, Rev 16 - Location of Decon Bldg

Replace Attachment cover page D.10 - New revision number and date

Replace P & ID A-01-3-00004 with A-01-3-00004, Rev 2 - Location of Decon Bldg

Replace P & ID I-01-1-00006 with I-01-1-00006, Rev 7 - Utilities added to Decon Bldg

Replace Attachment cover page D.46 - New attachment for the Decon Bldg

Add P & ID A-01-3-00009, Rev 0 - New P & ID for the Decon Bldg

Add P & ID A-01-3-000010, Rev 0 - New P & ID for the Decon Bldg

Section F - Procedures to Prevent Hazards

The header for the pages in Section F will be Revision 10, dated April 3, 2007

Replace cover page - New revision number and date

Replace Attachment cover page F.3 (page F-38) - New revision number and date

Replace P & ID C-01-1-00001 with C-01-1-00001, Rev 16 - location of Decon Bldg

Replace Attachment cover page F.4 (page F-39) - New revision number and date

Replace BOP Daily/Weekly Inspection form - add BOP daily inspection, Item V.

Section G - Contingency Plan

The header for the pages in Section G will be Revision 13, dated April 3, 2007

Replace cover page - New revision number and date

Replace Figure G.2 (page G-46) P & ID C-01-1-00001 with C-01-1-00001, Rev 16 - Location of Decon Bldg

Replace Figure G.3 (page G-47) P & ID P-01-3-00007 with P-01-3-00007, Rev 3 - Location of Decon Bldg

Replace Attachment cover page G.2 - New revision number and date

Replace page G.2-1, P & ID C-01-3-00001A with C-01-3-00001A, Rev 8 - Location of Decon Bldg.

Replace page G.2-2, P & ID C-01-3-00001B with C-01-3-00001B, Rev 8 - Location of Decon Bldg.

Replace page G.2-7, P & ID A-01-3-00004 with A-01-3-00004, Rev 2 - Location of Decon Bldg. The P & ID currently approved as G.2-7 is Revision 0. This should have been Revision 1. The wrong Revision was supplied for G.2-7. With this modification, this error is being corrected.

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

The header for the pages in Section I will be Revision 12, dated April 3, 2007

Replace cover page - New revision number and date

Replace page i of the Table of Contents - Add new section, I-1e(4)(e), for Decon Bldg

Replace page iii of the Table of Contents - Add new attachment, I.14, for Decon Bldg

Add page I-14a - Add new section for Decontamination Bldg

Add page I-14b - Carry over language from previous page

Replace page I-30 - In Section I-4, revise the ILOC amount to reflect the addition of the Decontamination Bldg. Note - in Section I-5, the Financial Assurance Mechanism For Closure must be adjusted to include the increase prior to utilization of the Decontamination Bldg. VRA will not utilize the Decontamination Bldg until the revised ILOC has been reviewed and approved by Ohio EPA

Replace Tables cover page (before page I-33) - New revision number and date

Replace Table I.3 on page I-35 - Revise Summary of Closure Costs to include Decon.

Replace Figures cover page - New revision number and date

Replace page I-37, P & ID C-01-1-00001 (Figure I.2) with C-01-1-00001, Rev 16 - Location of Decon Bldg.

Replace Attachment Cover Page I.6 - New revision number and date

Replace P & ID G-01-1-00004 with G-01-1-00004, Rev 2 - Location of Decon Bldg

Replace P & ID A-01-3-00004 with A-01-3-00004, Rev 2 - Location of Decon Bldg

Replace Attachment Cover Page I.11 - New revision number and date

Replace Facility Summary - Decon Building was added under Containment Building heading

Add Closure Cost Estimate for Decontamination Building - Decon Bldg was added as a separate unit, Unit Sequence 6.

Add Attachment Cover Page I.15 - New attachment created for Decon Bldg

Add P & ID A-01-3-00009, Rev 0 - New P & ID for Decon Bldg.

Add P & ID A-01-3-00010, Rev 0 - New P & ID for Decon Bldg.

The Irrevocable Letter of Credit (ILOC) will need to be increased by \$8,400 for closure costs associated with the Decontamination Building. VRA must submit a modification to include the new updated ILOC and affected pages into Section I of the Part B permit application. Ohio EPA must review and approve the updated ILOC prior to VRA utilizing the Decontamination Building.

Section J - Corrective Action

The header for the pages in Section J will be Revision 4, dated April 3, 2007

Replace cover page - New revision number and date

Replace Figure cover page - New revision number and date

Replace page J-8, P&ID SWMU (Figure J.1) with SWMU, Rev 1 - Decon Bldg

Replace page J-10, P & ID C-01-1-00001(Figure J.3) with C-01-1-00001, Rev 16 - location of Decon Bldg.

Replace Attachments cover page - New revision number and date

Replace page J-13 - Include the Decon Bldg as a SWMU

JUN - 8 2007

DIV. OF HAZARDOUS
WASTE MGT.

Permit

In addition to the permit application pages, this permit modification also requires a modification to VRA's Hazardous Waste Facility Installation and Operation Permit. The following pages of the permit have been modified in Attachment 4 - Waste Management Units:

Replace page 36 of 117 - Correction to include Truck Holding and Sampling volume

Replace page 114 of 117 - Add "Section S - Reserved" to correspond to Section J, and revise Section S to "Section T - WMU 20 and 21" to correspond to the information listed in Section J (see page J-13) of the permit application

Replace page 114a of 117 - Add "Section U - WMU 22" to include the Decon Bldg

Replace page 114b of 117 - Carry over language from previous page

Enclosed is a copy of the permit and permit application revision(s). 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, Northeast District Office, at (330) 963-1234.

Sincerely,



William T. Skowronski
District Chief
Northeast District Office

WTS:ddw

Enclosure

cc: Dave Sholtis, DHWM, CO
John Nyers, DHWM, CO
Jeremy Carroll, Supervisor, Engineering Unit, DHWM, CO
Michelle Tarka, DHWM, NEDO
Frank Popotnik, DHWM, NEDO
Patricia Natali, DHWM, NEDO
Wen Huang, U.S. EPA, Region V

ec: Sherry Slone, DHWM, NEDO

*Also, in accordance with Ohio Administrative Code Rule 3745-50-51(D)(1)(a)(ii), Von Roll America, Inc. 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.

keywords: plotplans, decon, building

RECEIVED
OHIO EPA

JUN - 8 2007

DIV. OF HAZARDOUS
WASTE MGT.

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.

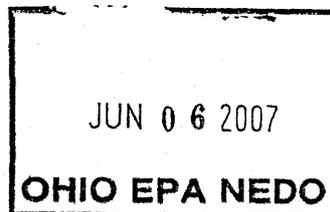
Several types of mechanical processing are included in the Part A permit application, all of which are described in Section D of the permit application. These include: (1) extrusion of waste at a rate of 18,000 pounds per hour per extruder; and (2) extruding (or pushing) of solid waste from drums at 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. Currently, 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)

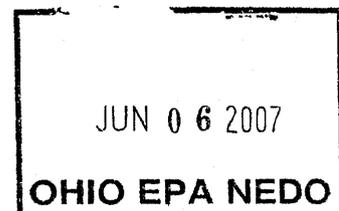
- (a) The Permittee shall not store more than 684,380 total gallons of containerized waste at any given time in the permitted container storage areas and waste staging areas at the facility. Waste staging areas at the facility are described in Section D of the approved permit application. Container storage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



- Q) WMU 17- Bulk Solid Waste Storage Tanks- This unit consists of two reinforced concrete tanks located inside the Incinerator Feed Building. The units are open topped tanks separated by a center wall to prevent the co-mingling of waste. The total capacity of the two existing tanks is approximately 1,200 cubic yards. Bulk solid waste is unloaded from trucks or roll-offs into the tanks through doors located on the east side of the tanks. The waste is blended and transferred via an overhead crane from the tanks to the incineration system (SWMU 1) for treatment. Vapors released from the waste are collected by vapor recovery vents in the tank area and conveyed to the 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.
- R) WMU 18 - Building C (Lab Pack Building)- Building C is located east of the Container Processing Building (WMU 10). The building is fully enclosed with exterior containment curbing. The base of the interior of the building is sloped to a sump located in the northwest corner. The containment capacity of this building is 11,200 gallons. Containers of waste stored in this building are placed on pallets (or equivalent) and /or in heavy duty storage racks to prevent contact with the building floor. This area has two-level racks with the ability to store an equivalent of 240 fifty five gallon drums or 13,200 gallons. The primary use for this unit is for auditing lab packs but other processing activities and the storage of lab packs are also permitted. The unit is connected to the vapor recovery system and is used during auditing lab packs or other waste processing activities when there is a potential for the release of vapors or fugitive emissions. 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.
- S) WMU 19 - Reserved.
- T) WMU 20 and 21 - Incinerator Feed Building - In addition to containing the Bulk Solid Waste Storage Tanks (WMU 17) and the feed mechanisms to the Incinerator System (WMU 1), this unit also includes two direct feed units. These two direct feed units are the Direct Organic Tanker South and the Direct Drum Pump-out.

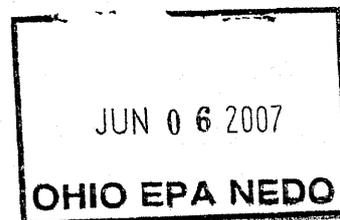
The Direct Organic Tanker South is located in a bay south of and adjacent to the Bulk Solid Waste Storage Tanks. The unit includes an unloading system to transfer liquid waste from tanker trucks directly to WMU1 by pressurizing the tanker truck with nitrogen thus displacing the contents. The feed rate is determined using the scale located in the Bay. The unit has an automated fire detection and suppression system capable of extinguishing Class 1A flammable liquids. The Direct Organic Tanker South is equipped with vapor recovery and



all doors are kept closed during off-loading to ensure a negative pressure thus controlling possible fugitive emissions and the release of odors during unloading activities. Direct Organic Tanker South is isolated from the rest of the incinerator feed building by walls to the north, south, and west, with a roll-up door located on the east side for tanker entry. The floor is curbed to contain 10,000 gallons and includes a small sump to contain minor spills or leaks. The bay is paved with reinforced concrete treated to resist chemicals that are managed in the unit. When not feeding waste to WMU 1, bulk waste containers may be staged in this bay 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.

The Direct Drum Pump-out unit is located west of and adjacent to the Direct Organic Tanker South and is enclosed and isolated from the rest of the Incineration Feed Building. The unit has two stations for feeding containerized liquids to WMU 1 via lances. Waste feed rates are measured using a scale. The unit has an automated fire detection and suppression system capable of extinguishing Class 1A flammable liquids. The types of waste processed in this unit include odorous waste, water-reactive waste, Class 1A flammable liquids, and highly reactive waste streams. Direct Drum Pump-out is isolated from the rest of the Incinerator Feed Building by walls to the north, east, and west, with a roll-up door located on the south side for transfer of containers into the unit. The doors are kept closed during processing to control fugitive emissions and to maximize the efforts of the vapor recovery system in the form of snorkels over each station. The unit has secondary containment with a capacity of 1,125 gallons that includes a sump. The floor is paved with reinforced concrete treated to resist chemicals that are managed in the unit. Hoses and lines used to feed the waste are flushed between transfer of each waste stream using a compatible material. 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.

- U) WMU 22 - Decontamination Building - The Decontamination Building is a 14 foot by 12 foot completely enclosed structure attached to the eastern side of the External Truck Wash (WMU 5). A 6 inch deep metal catch basin collects the rinseate generated from decontamination activities and a grating is used to support equipment or containers being cleaned. Rinseate in the catch basin is drained to the sump located in the External Truck Wash after each decontamination activity has been completed. Decontamination activities may be conducted as described in Section D of the approved Part B permit application. Equipment can be cleaned in the Decontamination Building, and it



may also be used for cleaning out containers that once held hazardous waste. The Permittee will not decontaminate containers that previously held odorous or low odor threshold waste in the Decontamination Building. To prevent accumulation of vapors, the Decontamination Building is equipped with a roof vent. 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.

Area Of Concern (AOC) - Former Charter Oil Facility Release Area

The property where VRA is located was formerly occupied by Charter Oil. The Charter Oil facility included approximately 7.2 acres of property which consisted of a building, the barge off-loading pier which extended into the Ohio River and a petrochemical terminal. The petrochemical terminal, approximately two acres, consisted of ten large capacity above ground storage tanks surrounded by an earthen dike, a metal transfer pipeline ten inches in diameter and a tanker truck terminal. The transfer pipeline connected the storage tanks to a barge terminal in the Ohio River, and also to a truck load-out area north of the storage tank area. The petrochemical terminal and tanks have since been removed. Additional information regarding Charter Oil can be found in Section E of this permit.

