



State of Ohio Environmental Protection Agency

**STREET ADDRESS:**

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Columbus, Ohio 43215

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**MAILING ADDRESS:**

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

**CERTIFIED MAIL**

August 23, 2005

**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 45920

Dear Ms. Knowles:

On June 25, 2002, Ohio EPA received Von Roll America, Inc.'s (Von Roll) request to modify one of their existing direct tanker unloading stations in order to feed a specific compressed gaseous waste stream directly to the incinerator. The gas, called Telomer, is nonflammable and not hazardous according to RCRA definitions. For this modification, Von Roll submitted a Class 3 modification application<sup>1</sup>. The Agency did not receive written comments concerning this Class 3 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 Please note that the modified Permit remains in effect until it is renewed, withdrawn, suspended or revoked.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 have the right to appeal this Permit decision to the Environmental Review Appeals Commission (ERAC) no later than 30 days after the public notice (See Ohio Revised Code § 3745.04). You may file your appeal with ERAC at the following address: Environmental Review Appeals Commission, 309 South Fourth Street, Room 222, Columbus, Ohio 43215.

If you file an appeal, you must put it in writing. Your appeal must explain why you are appealing the action and the grounds you are using for your appeal. You must send a copy of the appeal to the director of the Ohio Environmental Protection Agency no later than three (3) days after you file it with ERAC.

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<sup>1</sup>Ohio EPA assigned tracking # 020625-3B-1 to this modification application.

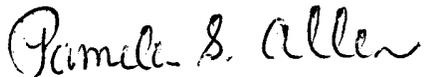
Bob Taft, Governor  
Bruce Johnson, Lieutenant Governor  
Joseph P. Koncelik, Director

Allison Knowles  
Von Roll America, Inc.  
August 23, 2005  
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If you have any questions, please contact Patricia Natali of Ohio EPA's Northeast District Office at (330) 385-8447.

Sincerely,



Pamela S. Allen, Manager  
Regulatory and Information Services  
Division of Hazardous Waste Management

cc: Jeremy Carroll/John Nyers, ERAS, DHWM  
Harriet Croke, 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 CLASS 3 HAZARDOUS WASTE PERMIT MODIFICATION TO  
VON ROLL AMERICA, INC.**

On August 23, 2005, Ohio EPA issued a final class 3 Hazardous Waste Facility Installation and Operation Permit (Permit) Modification to Von Roll America, Inc., for its facility at 1250 St. George Street, East Liverpool, Ohio 43920. The EPA Identification Number for this facility is OHD980613541.

**Why is Von Roll America, Inc., Modifying its Permit?**

Von Roll America, Inc., operates a commercial hazardous waste incinerator with associated waste management activities and needs a Permit to store and treat hazardous waste in containers and tanks, and to incinerate hazardous waste. Von Roll wishes to modify one of their existing direct tanker unloading stations in order to feed a specific compressed gaseous waste stream directly to the incinerator. The gas, called Telomer, is nonflammable and not hazardous according to RCRA definitions. 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 **September 23, 2005**. Your appeal must explain why you are appealing the action and the grounds you are using for your appeal. 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, 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: ***Joseph P. Koncelik, Director of Ohio EPA***, P.O. Box 1049, Columbus, Ohio 43216-1049.

OHIO E.P.A.  
AUG 23 2005  
OHIO ENVIRONMENTAL PROTECTION AGENCY  
MODIFIED OHIO HAZARDOUS WASTE FACILITY  
INSTALLATION AND OPERATION PERMIT  
ENTERED DIRECTOR'S JOURNAL

Date of Issuance: August 23, 2005  
Effective Date: August 23, 2005

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

**Name of Permittee:** Von Roll America, Inc., a/k/a Waste Technologies Industries (VRAWTI)

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

**Facility Location:** 1250 St. George Street  
East Liverpool, Ohio 43920-5919

**Person to Contact:** Ms. Allison Knowles  
Environmental, Health, & Safety Manager

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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 on March 23, 2005, and as subsequently modified by the Ohio Environmental Protection Agency, 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.

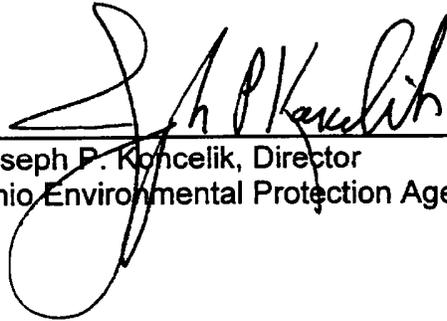
The permittee shall comply with all requirements of the modified Part B permit application as amended or supplemented on June 25, 2002, February 3, 2003, September 19, 2003, April 8, 2004, May 19, 2004, July 23, 2004, October 22, 2004 and January 14, 2005. The information contained in the modified Part B permit application is incorporated herein by reference. Specifically, all written statements regarding the specifications, locations, or

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

By:  Date 8/23/05

capabilities of the processes, equipment, containment devices, safety devices or programs or other matters made by the applicant in the revised permit application are hereby incorporated as express, binding terms and conditions of this revised permit.

The modified Terms and Conditions of this permit, included in Attachment 7, are attached hereto and are incorporated herein by reference.



Joseph P. Koncelik, Director  
Ohio Environmental Protection Agency

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

By: David J. Pepler Date: 8/23/05

**Attachment 7**  
**Von Roll America, Inc., a/k/a WTI**  
**Ohio Hazardous Waste Facility Installation and Operation Permit**

**Additional Terms and Conditions**

**Class 3B Permit Modification to process compressed gas**

- A. Compressed gaseous material, known as the Telomer gas, must only be fed directly to the incineration system via the direct tanker unloading station. All modifications to current processing equipment used to manage the waste will be made following the Ohio Fire Codes, including NFPA 55 (Standards for the Storage, Use, and Handling of Compressed and Liquefied Gases in Portable Cylinders). The Permittee will submit a certification from the East Liverpool Fire Department to that effect at least 10 days prior to commencing use of the direct tanker unloading station for the feeding of compressed gases to the incinerator.
- B. The Permittee will require the generator of the specific gaseous waste stream to provide analytical data characterizing the waste stream for each shipment of waste to the Permittee.
- C. The Permittee is not authorized for storage of compressed gas at the facility. The Permittee will schedule shipments of the waste such that only one tanker of the compressed gas will be on-site at any time.
- D. Gaseous waste treated in the incinerator must be included in permitted total feed treatment limits.

OHIO ENVIRONMENTAL PROTECTION AGENCY  
DIVISION OF HAZARDOUS WASTE MANAGEMENT

SUMMARY OF MODIFICATIONS TO HAZARDOUS WASTE  
INSTALLATION AND OPERATION PERMIT

Von Roll America (VRA), Inc., a/k/a  
Waste Technologies Industries (WTI)  
U.S. EPA ID #: OHD 980 613 541  
Ohio ID #: 02-15-0589

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Modification of the Hazardous Waste Facility Installation and Operation Permit will authorize Von Roll America, Inc., a/k/a Waste Technologies Industries (VRAWTI) to make the following changes:

Class 3B Modification:

VRAWTI will modify one of their existing direct tanker unloading stations in order to feed a specific compressed gaseous waste stream directly to the incinerator. The gas, called Telomer, is nonflammable and not hazardous according to RCRA definitions.

The physical changes requested, piping changes, installation of valves to reduce the pressure of the gas, and steam tracing of the pipes, constitute minor modifications and have been implemented in the past. The unique aspect of this modification is the request to process and thermally treat a compressed gaseous waste stream. During the initial permitting process and the risk assessment conducted by the U.S. EPA, the processing of compressed gaseous waste streams was not evaluated. Concern existed that accepting a compressed gas could change the nature of accidental risks at the facility.

At the request of both the Ohio EPA and U.S. EPA, VRAWTI performed accident analysis modeling for off-site impact. The modeling evaluated the potential impact of four accidental release scenarios. The assessment was performed by IT Corporation in March of 2002. This assessment, and several other analyses that were also performed, was evaluated by Ohio EPA and U.S. EPA. As a result of a review of the permit modification application and the accident analysis modeling, Ohio EPA believes VRA can be approved to accept and process tank trucks of the Telomer gas.

VRAWTI also had destruction removal efficiency (DRE) testing conducted on the Telomer gas. The University of Dayton Research Institute determined DRE of 99.99% for major components of the Telomer gas at operating conditions currently utilized by VRAWTI. Consequently, incineration is an acceptable treatment technology for this waste stream.

OHIO EPA DHWM

AUG 23 2005