

2110 East Aurora Road
Twinsburg, OH 44087-1924

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

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

October 18, 2006

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

**RE: HAZARDOUS WASTE PERMIT MODIFICATION CLASS 1
ACKNOWLEDGMENT, CARBON ADSORPTION SYSTEM IN SERIES
VON ROLL AMERICA, INC. OHD 980 613 541 / 02-15-0589**

Dear Ms. Knowles:

Ohio EPA is in receipt of a notification dated September 1, and an addendum dated October 16, 2006, for a Class 1 hazardous waste permit modification from Von Roll America (VRA), Inc. The Class 1 permit modification was assigned a permit information tracking system (PITS) ID number of **OHD980613541 - 060906-1-1**. 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. VRA has modified their regenerable activated carbon adsorption cleaning system, hereafter called carbon adsorption system.

An explosion on July 7, 2006 in the carbon adsorption system resulted in a temporary system being installed while repairs to the system were made. VRA has also been required by the U.S. EPA to make additional changes to the system which are also included in this modification.

Changes to the Part B permit application include:

Section D - Process Description

Section D, cover page - Replace cover page with Revision 16, dated September 1, 2006;

Replace page D-94 with Revision 16, dated September 1, 2006;

Add page D-94a with Revision 16, dated September 1, 2006;

Replace Attachment D.28 cover page with Revision 16, dated September 1, 2006;

Replace P&ID I-01-1-00012 rev. 7 with I-01-1-00012 rev. 8

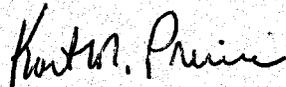
VON ROLL AMERICA, INC.
CLASS 1 ACKNOWLEDGMENT
PAGE - 2 -

Changes to the Ohio Facility Installation and Operation Permit include:

Page 95

Enclosed are copies of the revised permit and permit application pages for the VRA Part B permit application. This has been included to ensure that all involved parties have written confirmation of the changes. If you have any questions concerning this action, please contact Patricia Natali at the Ohio EPA Northeast District Office (330) 963-1279 or the East Liverpool Field Office (330) 385-8447.

Sincerely,



Kurt M. Princic
Environmental Manager
Division of Hazardous Waste Management

KMP:ddw

Enclosure

cc: Pamela Allen, Manager, ITTS, DHWM, CO
Jeremy Carroll, Supervisor, DHWM, CO
John Nyers, DHWM, CO
Patricia Natali, DHWM, NEDO
Michelle Tarka, DHWM, NEDO
Frank Popotnik, DHWM, NEDO
John Gaitskill, USEPA, Region V
ec: Sherry Slone, DHWM, NEDO

Keywords: acknowledgment, C adsorption system, series

RESERVED.

I(A).9. Re-Generable Activated Carbon Adsorption Cleaning System

The Permittee shall maintain the re-generable activated carbon adsorption cleaning system to ensure a removal of, at a minimum, 95% of the total organic vapors from the exhaust gas prior to being discharged from the system to the atmosphere and in accordance with the terms and conditions of this permit and Section D of the approved Part B permit application.

- (a) ~~Based on calculations performed by the manufacturer of the activated carbon elements or boxes, the boxes should meet the designed absorption removal efficiency for a minimum of sixty continuous days~~
- (b) ~~The results of the analysis performed on the carbon boxes and the replacement of the carbon boxes, IN ACCORDANCE WITH SECTION D OF THE APPROVED PART B PERMIT APPLICATION, shall be recorded in the facility's operating record.~~

I(A).10 Treatment Residual

Unless the Permittee can show otherwise, per OAC Rule 3745-51-03(D), residue from the incinerator is hazardous waste and the Permittee is considered the generator.

- (a) The Permittee shall sample and analyze the treatment residue generated from the incineration system and all ancillary systems in accordance with the procedures outlined in Section C of the approved Part B permit application.
- (b) The Permittee shall manage the treatment residue generated from the incineration system in accordance with procedures outlined in Section D of the approved Part B permit application and all applicable Ohio hazardous waste regulations.

End of Permit Conditions

OCT 18 2006
OHIO EPA NEDO