



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

July 15, 2008

Mr. John Peterka
Heritage - WTI, Inc. (WTI)
1250 Saint George Street
East Liverpool, OH 43920

RE: HAZARDOUS WASTE PERMIT MODIFICATION, CLASS 1A APPROVAL (PITS #080625-1A-1), HERITAGE - WTI, INC. (WTI), OHD 980 613 541 / 02-15-0589

Dear Mr. Peterka:

On June 25, 2008, Ohio EPA received a request for a **Class 1A** (Class 1 requiring prior approval) hazardous waste permit modification dated June 24, 2008, from Heritage-WTI, Inc. (WTI). This modification request has been assigned a tracking number of 080625-1A-1. With this letter, Ohio EPA approves the above referenced Class 1A modification submitted pursuant to Ohio Administrative Code (OAC) Rule 3745-50-51.

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:

To clarify language describing the 10% household bleach solution (5250 ppm) sodium hypochlorite required for cleaning a spill of mixed infectious and hazardous waste (MIHW) or disinfecting MIHW contaminated surfaces or equipment, should that occur.

Please replace the following pages in the appropriate sections of the facility's Part B permit application and Permit, as instructed below:

Section C – Waste Characteristics and Waste Analysis Plan:

The header for the pages in Section C is Revision 17 dated June 24, 2008.

- **Replace Cover Page** - new revision number and date
- **Replace Page C-77aa** - modify language to reflect 10% household bleach
- **Replace Page C-77bb** – modify language to reflect 10% household bleach

Section G – Contingency Plan:

The header for the pages in Section G is Revision 23 dated June 24, 2008.

- **Replace Cover Page** - new revision number and date
- **Replace Page G-33b** – modify language to reflect 10% household bleach

JUL 17 2008

DIV. OF HAZARDOUS
WASTE MGT.

Part B Permit:

- Replace Page 95h
- Replace Page 95j

Enclosed is a copy of the permit application revision(s). This has 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 East Liverpool Field Office at (330) 385-8421.

Sincerely,



William T. Skowronski
District Chief
Northeast District Office

WTS:ddw

Enclosure

cc: Dave Sholtis, Assistant Chief, DHWM, CO
Jeremy Carroll, Supervisor, Engineering Unit, DHWM, CO
John Nyers, DHWM, CO
Frank Popotnik, DHWM, NEDO
Patricia Natali, DHWM, NEDO
Wen Huang, U.S. EPA, Region V
Carrie Beringer, Heritage-WTI, Inc.

ec: Sherry Slone, DHWM, NEDO

*Also, in accordance with Ohio Administrative Code Rule 3745-50-51(D)(1)(a)(ii), the Permittee must 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 Dave Sholtis at (614) 644-2917, or by e-mail at dave.sholtis@epa.state.oh.us.

(iii) reserved

- (c) Inspection records associated with the management of MIHW will be maintained by the Permittee and provided to Ohio EPA on a routine basis and upon request.

I(B).7. Response to Leaks or Spills

Additional precautions are required for the management of MIHW at the facility. The Permittee shall respond to any releases of MIHW in accordance with SOPs and the Part B permit application.

- (a) Releases of MIHW shall be cleaned by utilizing either a U.S. EPA registered hospital disinfectant that is also tuberculocidal, for a contact time as specified by the manufacturer, or materials necessary to prepare a minimum 10% household bleach solution prepared immediately prior to use with a minimum thirty minutes of contact time with the waste.
- (b) Any wastewater or other materials resulting from a spill of MIHW or debris resulting from the cleanup of a spill of MIHW shall be managed as MIHW.
- (c) Spill kits will be stationed and maintained at designated locations and in areas where MIHW will be managed. Spill kits will be easily accessible when processing MIHW, in accordance with SOPs and the Part B permit application.

I(B).8. Record Keeping
OAC Rule 3745-54-73

The Permittee shall record and maintain, in the operating record for the facility, all monitoring and inspection data compiled under the requirements of this permit and in accordance with OAC Rule 3745-54-73 and all applicable sections of the Part B permit application.

- (b) an unexpired dated stabilized bleach product that is also a U.S. EPA registered hospital disinfectant that is also tuberculocidal, for a contact time as specified by the manufacturer, or
- (c) a minimum ten percent household bleach solution prepared immediately prior to use with a minimum thirty minutes of contact time with the waste.
- (ii) Remove and properly dispose of any quench pit or liquid residues remaining at the facility.
- (d) Not later than thirty days after completing the requirements as specified, or before the closed facility may be converted to other uses, whichever occurs first, the Permittee shall submit to the appropriate Ohio EPA district office, written certification that the facility has been closed in accordance with these requirements.

I(B).11. Treatment Residuals

Unless the Permittee can show otherwise, per OAC Rule 3745-51-03(D), treatment residual from the incinerator is hazardous waste and the Permittee is considered the generator. The Permittee shall ensure the treatment residual does not contain any incompletely combusted MIHW, in accordance with the Part B permit application.

The Permittee shall manage the treatment residue generated from the incineration system and all ancillary systems in accordance with the procedures outlined in Sections C and D of the permit application, SOPs, and all applicable Ohio hazardous waste regulations.

End of Permit Conditions