



**Environmental
Protection Agency**

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

June 15, 2011

Ms. Carrie Beringer
Heritage - WTI, Inc. (WTI)
1250 Saint George Street
East Liverpool, Ohio 43920

**RE: HAZARDOUS WASTE PERMIT MODIFICATION
CLASS 1A APPROVAL
REDUCE SOME OF THE RESTRICTIONS FOR MANAGING MIHW
HERITAGE-WTI, INC. (WTI)
OHD 980 613 541 / 02-15-0589**

Dear Ms. Beringer:

On April 19, 2011, Ohio EPA received a request dated April 15, 2011 for a Class 1A (Class 1 requiring prior approval) hazardous waste permit modification from Heritage-WTI, Inc. (WTI). The modification was assigned permit information tracking system (PITS) ID number OHD 980 613 541 - #110419-1A-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. Also the records of Ohio EPA have been changed accordingly:

WTI has been permitted to accept and process Mixed Infectious and Hazardous Waste (MIHW) since January 8, 2008. WTI is revising the Part B permit language regarding MIHW as detailed below.

Revised pages in Section C, Waste Characteristics and Waste Analysis Plan, of the Part B permit application are Revision 27, dated April 15, 2011, and include:

- Replace **Section C Cover Page**, revision number and date.
- Replace **Page C-101**, removed requirement to discuss safety precautions and applicable SOPs with facility personnel prior to unloading and processing each shipment of MIHW; added language stating all personnel who handle MIHW will be trained in accordance with Section H, Personnel Training, of the

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facility's Part B permit and any applicable SOPs prior to managing MIHW waste streams; removed requirement to notify Ohio EPA of the arrival of each MIHW shipment; revision number and date.

- Replace **Page C-117**, reduced inspection frequency of MIHW containers to once per day; reduced inspection frequency for treatment residual (slag) to every two hours while MIHW containers are being incinerated and a final inspection be conducted one to two hours after the last container of MIHW is incinerated; revision number and date.

Revised pages in Section D, Process Description, of the Part B permit application are Revision 49, dated April 15, 2011, and include:

- Replace **Section D Cover Page**, revision number and date.
- Replace **Page D-35**, removed requirement to feed containers of MIHW via the emergency lane; revision number and date.

Revised pages in Section F, Procedures to Prevent Hazards, of the Part B permit application are Revision 29, dated April 15, 2011, and include:

- Replace **Section F Cover Page**, revision number and date.
- Replace **Page F-41**, removed requirement to discuss safety precautions and applicable SOPs with facility personnel prior to unloading and processing each shipment of MIHW; added language stating all personnel who handle MIHW will be trained in accordance with Section H, Personnel Training, of the facility's Part B permit and any applicable SOPs prior to managing MIHW waste streams; revision number and date.
- Replace **Page F-44**, reduced inspection frequency of MIHW containers to once per day; reduced inspection frequency for treatment residual (slag) to every two hours while MIHW containers are being incinerated and a final inspection be conducted one to two hours after the last container of MIHW is incinerated; revision number and date.
- Replace **Attachment F.3 Cover Page**, new revision number and date.
- Replace **Residual Inspection Form for Mixed Infectious and Hazardous Waste**, revised form for frequency of inspection, revision number and date.
- Replace **Mixed Infectious and Hazardous Waste Inspection Form**, revised form to complete one section per day, added time, revision number and date.

Changes to the Ohio Hazardous Waste Facility Installation and Operation Permit include:

- Replace page x of 117

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The affected permit pages are modified in the upper left corner of each page as well as modified in the text, and all affected application pages and permit pages are date-stamped with the date of this letter from Ohio EPA.

Enclosed is a copy of the revised application and permit pages for the WTI Part B permit application and Ohio Hazardous Waste Facility Installation and Operation Permit. These pages have been included to ensure that all involved parties have written confirmation of the change. If you have any questions concerning this action, please contact Michelle Tarka at the Ohio EPA East Liverpool Field Office (330) 385-8421.

Sincerely,



for Kurt Princic
District Office Chief
Northeast District Office

KP:cl
Enclosure

cc: John Nyers, DMWM, CO
Michelle Tarka, DMWM, NEDO
Frank Popotnik, DMWM, NEDO
Jae Lee, US EPA, Region V

ec: Sherry Slone, DMWM, NEDO
Jeremy Carroll, DMWM, CO

*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 Jeremy A. Carroll, P.E., Manager, Regulatory and Information Services Section at (614) 644-2917, or by e-mail at Jeremy.carroll@epa.state.oh.us.

Keywords: MIHW, reduce, restrictions

I(B).4. Process Capacity

MIHW must be scheduled for receipt only when the incinerator is operational. MIHW must be received at the facility in accordance with the requirements stated in the Part B permit application in Section C-2e(4).

- (a) The Permittee must consider potential scheduling conflicts, operational capacity, processing and/or operating conditions, and equipment availability when scheduling MIHW.
- (b) The Permittee must not schedule for receipt or receive more than 35,000 gallons (292,000 pounds) per day of MIHW at the facility and must not have onsite more than 100,000 gallons (834,000 pounds) total of MIHW in permitted container storage and waste staging areas. Shipments of MIHW must be re-scheduled if the existing accordance with facility guidelines and the requirements listed in the Part B permit application.
- (c) All efforts will be made to immediately re-schedule MIHW from arriving at the facility if an unplanned outage occurs. If shipments inadvertently arrive during an outage, the waste may be staged and/or stored in designated areas in accordance with Sections C and D of the Part B permit application.
- (d) Facility personnel who unload or process MIHW will be trained in accordance with Section H, Personnel Training Plan, of the Part B permit application, and any applicable standard operating procedures prior to managing MIHW.
- (e) If MIHW arrives as unscheduled waste, the generator/customer will be contacted immediately by facility personnel and additional training provided. If unscheduled waste arrives on a regular basis, Ohio EPA may take action to reduce the volume of MIHW which may be received by the Permittee.

JUN 15 2011