Ohio Environmental Protection Agency
John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

CERTIFIED MAIL

November 1, 2011

Re: Heritage-WTI, Inc.
EPA ID No: OHD 980 613 541
Modified Hazardous Waste Permit

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

Dear Mr. Peterka:

On March 21, 2011, Ohio EPA received Heritage-WTI, Inc.'s (Heritage) Class 2 permit modification to store off-site generated hazardous waste that does not contain free liquids in two areas (North and East Storage Areas) that are currently used for storage of on-site generated waste (for example: wash water, slag and ash). For this modification, Heritage submitted a Class 2 modification application.[1] Enclosed is 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 Please note that the modified Permit remains in effect until it is renewed, withdrawn, suspended or revoked.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 are hereby notified that this action of the Director is final and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of $70.00 which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

[1] Ohio EPA assigned tracking number OHD980613541-#110321-2-1

50 West Town Street, Suite 700
P.O. Box 1049
Columbus, OH 43216-1049

614 | 644 3020
614 | 644 3184 (fax)
www.epa.ohio.gov

Environmental Review Appeals Commission
77 South High Street, 17th Floor
Columbus, OH 43215

If you have any questions, please contact Michelle Tarka of Ohio EPA's Northeast District Office at (330) 963-1200.

Sincerely,

Brian Dearth, Management Analyst Supervisor
Division of Materials & Waste Management

BD/gf

cc: Jeremy Carroll/John Nyers, DMWM, CO
Natalie Oryshkewych/Michelle Tarka, DMWM, NEDO
Frank Popotnik, DHWM, NEDO

ITS Programming

PUBLIC NOTICE RECORD

Notification Type: HAZARDOUS WASTE FACILITY PERMIT ACTION

Entity Info

Name: Heritage-WTI, Inc.

Address: 1250 St. George Street

City/Township/Zip: East Liverpool, OH 43920 **County:** Columbiana

Description: Hazardous Waste

Notice Info

☑ **Weekly Review**

☑ **Public Notice**

Date Of Action: 11/01/2011

Notification Number: OHD980613541

Receiving Waters:

Meeting Details:

Standard Remark:

Other Remark:

Notice is hereby given that pursuant and subject to Section 3734-05(I) of the Ohio Revised Code and Rule 3745-50-51(D) of the Ohio Administrative Code, on November 1, 2011, the director of Ohio EPA issued a Modified Ohio Hazardous Waste Facility Installation and Operation Permit to Heritage-WTI, Inc., 1250 St. George Street, East Liverpool, OH 43920. This Class 2 permit modification authorizes Heritage-WTI to store off-site generated hazardous waste that does not contain free liquids in two areas (North and East Storage Areas) that are currently used for storage of on-site generated waste (for example: wash water, slag and ash). This authorization is subject to all rules, regulations, and specified conditions.

OHIO ENVIRONMENTAL PROTECTION AGENCY

MODIFIED OHIO HAZARDOUS WASTE FACILITY INSTALLATION AND OPERATION PERMIT

Date of Issuance: **November 1, 2011**
Effective Date: **November 1, 2011**

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

Name of Permittee: Heritage-WTI, Inc.

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

Facility Location: 1250 St. George Street
East Liverpool, OH 43920-3400

Person to Contact: Mr. John Peterka

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 and journalized on March 23, 2005, 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 permit application as amended or supplemented on March 21, 2011, June 24, 2011, July 15, 2011 and August 12, 2011. The information contained in the modified permit application is incorporated herein by reference. Specifically, all written statements regarding the specifications, locations or capabilities of the processes, equipment, containment devices, safety devices or programs or other matters made by the applicant in the permit modification application are hereby incorporated as express, binding terms and conditions of this modified permit.

The modified Terms and Conditions of this permit are attached hereto and are incorporated herein by reference. The modified Terms and Conditions supersede and replace the corresponding pages found in the March 23, 2005 renewal permit.

Scott J. Nally
Director

B.9. Required Equipment
OAC Rule 3745-54-32

At a minimum, the Permittee shall maintain at the facility all the equipment required by OAC Rule 3745-54-32 and all applicable sections of the approved Part B permit application including the equipment set forth in the approved contingency plan contained in Section G.

B.10. Testing and Maintenance of Equipment
OAC Rule 3745-54-33

The Permittee shall inspect, test, and maintain the equipment required by Permit Condition B.9. as necessary to assure its proper operation in time of emergency, as specified in OAC Rule 3745-54-33, and the applicable sections of the approved Part B permit application, such as Sections F and G, and the terms and conditions of this permit.

B.11. Access to Communications or Alarm System
OAC Rule 3745-54-34

The Permittee shall maintain access to the communications and alarm systems as required by OAC Rule 3745-54-34, applicable sections of the approved Part B permit application, such as Sections F and G, and the terms and conditions of this permit.

B.12. Required Aisle Space
OAC Rule 3745-54-35

At a minimum, the Permittee shall maintain aisle space to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment to any area of the facility in an emergency as required by OAC Rule 3745-54-35, applicable sections of the approved Part B permit application, and terms and conditions of this permit.

The required aisle space in permitted process and storage areas at the facility is described in Section D of the approved Part B permit application.

(a) In accordance with a class 2 permit modification (PITs # 110321-2-1), off-site generated waste may be stored inside enclosed vehicles only in the areas of the facility specified in the approved Part B permit application.

(i) Aisle space will not be required to be maintained between containers stored inside enclosed vehicles provided the procedures specified in the approved Part B permit application are followed before storage and periodically while waste is in storage.

(ii) Individual containers will be inspected in accordance with the requirements specified for off-site generated waste stored in enclosed vehicles in accordance with Sections D and F.

(iii) Conditions specified in the approved Part B permit application and applicable requirements of the Ohio Fire Code must be followed while storing waste within enclosed vehicles.

C. CONTAINER STORAGE AND TREATMENT

General Overview

Containerized waste generated from both on-site and off-site is stored at several locations throughout the facility as described in Section D of the approved Part B permit application.

The permitted container storage areas are Building A (Drum Warehouse of the Container Processing Building), Building B (External Truck Wash), Building C (Lab Pack Building), Container Holding Building (Slag Canopy), Truck Holding and Sampling Area, North Storage Area, and East Storage Area.

All container storage areas were constructed as containment areas, meeting secondary containment standards with reinforced concrete treated to resist chemical attack. Curbing, liquid collection systems (sumps or troughs), and sloped berms control run-on and run-off as part of the containment system.

Most container storage areas are located in buildings or under roof/canopy, with the exception of the North and East Storage Areas. Container storage areas within buildings or under roof/canopy are equipped with automated fire detection and suppression systems. The North and East Storage Areas have portable fire suppression and emergency response equipment readily available nearby as well as cameras to monitor activities.

Most storage areas are fully enclosed and equipped with forced air ventilation to prevent the accumulation of vapors and fumes, with the exception of the Truck Holding and Sampling Area which are under roof/canopy and the North and East Storage Areas which are open with no roof/canopy.

Most container storage and processing areas have vapor collection points that are connected to the vapor recovery system described in Section D of the permit application.

Adequate aisle space shall be maintained to allow for the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment. Aisle space will not be required to be maintained between containers stored inside enclosed vehicles as a result of the stringent procedures implemented before storage and periodically while waste is in storage. Aisle space specific to each container storage area is described in Section D of the permit application.

All stored containers will be placed on a pallet or other appropriate means to keep the bottom of the container above the concrete surface to facilitate identification of leaking containers. In all cases, containers are inspected for integrity prior to storage. With the exception of waste stored on enclosed vehicles, all waste is inspected on a daily basis.

The Truck Holding and Sampling Area, a canopied building, is located west of the Container Processing Building. The building is approximately 60' x 96', has a storage capacity of approximately 46,000 gallons, and is permitted for storing containerized and bulk solid wastes. The area is divided into six bays or stations that share a common reinforced concrete sump. Total secondary containment is 22,000 gallons. Containerized waste will not be stored on the floor of this building nor in the racks which are used for consumer products and raw materials. Containers of Mixed Infectious and Hazardous Waste (MIHW), highly reactive waste, and/or pyrophoric wastes are prohibited from storage in this area. All waste will be stored according to compatibility guidelines and, if incompatible wastes are stored in adjacent bays, the Permittee will take action as described in Section D of the Part B permit application to prevent mixing should a release occur. In addition to storage, this area is also used for sampling, staging, and processing waste, decontamination of equipment, and dewatering of bulk solid waste containers.

The North and East Storage Areas (formerly known as the North and East Less Than 90 Day Areas) are located near the General Waste Water Treatment Building. These areas are open (no roof or canopy), do not have a vapor recovery system, and do not have automatic fire detection or suppression in either area. Secondary containment is shared between the areas. These two areas have three purposes: (1) as 90 Day accumulation areas for on-site generated wastes including liquids; (2) as permitted storage areas for off-site generated wastes that do not contain free liquids, and; (3) as areas for specific waste processing activities. Off-site generated waste oxidizers, organic peroxides, pyrophoric materials, Mixed Infectious and Hazardous Waste (MIHW), highly reactive wastes, highly volatile wastes, or odorous materials cannot be stored in these areas. All containers of off-site generated waste must be stored within enclosed vehicles. Waste cannot be stored on open trailers. Off-site generated waste liquids in bulk tankers cannot be stored in either of these areas. All off-site generated waste will be stored in accordance with the Permittee's permit and with the requirements in the state regulations, with the exception of aisle space within vehicles holding containerized waste. Aisle space will not be required to be maintained between containers inside enclosed vehicles provided the procedures specified in the approved Part B permit application are followed before storage and periodically while waste is in storage in these areas. All compatibility guidelines will be followed when storing wastes in these areas and the Ohio Fire Code will be followed for applicable separation distances. Incompatible wastes will not be stored within a single vehicle. Aisle space between vehicles storing waste in the North and East Storage Areas will be adequate to allow for unobstructed movement of personnel, fire protection equipment, spill control equipment, decontamination equipment, and inspection as necessary. All individual containers of off-site generated waste to be stored within vehicles in the North and East Storage Areas will follow established procedures for waste receipt,

container inspection, segregation of incompatible wastes, weighing, sampling if applicable, dating, labeling, palletizing, and data entry into tracking system. An initial inspection of each container of off-site generated waste will be conducted in accordance with Section F prior to placing containers in enclosed vehicles for storage in the North and East Storage Areas. Individual containers of off-site generated waste may not be double-stacked within the trailer, with the exception of five (5) gallon pails and small stackable containers such as boxes. All waste containers inside the vehicle, whether individual or stacked, must be no more than six (6) feet high. Bulk containers such as roll-offs or end-dumps will also follow established procedures and may be directed to the North and East Storage Areas as well. Permitted capacity for off-site generated waste storage in the North Storage Area is 55, 000 gallons or up to a maximum of ten (10) trailers, roll-offs, or end-dumps with up to 5,500 gallons per vehicle. Permitted capacity for off-site generated waste storage in the East Storage Area is 22, 000 gallons or up to a maximum of four (4) trailers, roll-offs, or end-dumps with up to 5,500 gallons per vehicle. These limits are based upon the Ohio Fire Code regarding Highly Toxic and Toxic Materials, which is 2,500 cubic feet per pile (vehicle, trailer). As such, each vehicle will be limited to waste storage of approximately eight (8) feet wide by fifty-two (52) feet long by six (6) feet high or the equivalent. A daily inspection of the exterior and interior of each vehicle (trailer or bulk container) storing off-site generated waste will be conducted for evidence of deterioration, leaks or spills. Vehicle doors will be opened and a visual check of the vehicle interior and visible containers will be conducted. All spills or leaks will be addressed immediately upon discovery. Vehicles will be kept closed at all times while in storage, except during the daily inspection. After six (6) months in storage, and every thirty (30) days after that point, each container will be removed from the trailer and individual containers will be inspected in accordance with Section F and the requirements specified for off-site generated waste stored in the North and East Storage Areas. As a third purpose, the North and East Storage Areas are also permitted for certain waste processing activities. The Permittee will not conduct processing activities in these areas on certain waste streams, such as highly volatile material, pyrophoric material, or odorous material. Processing activities will not interfere with the primary use of the North and East Storage Areas as storage for on-site and off-site generated wastes.

The amount of waste stored in each area will not exceed the permitted capacity at any time. All waste stored, processed, or treated will ultimately be fed to the incineration system for thermal treatment with the exception of third party waste as described in Permit condition C.1(d). Treatment processes currently permitted at the facility will not render the waste non-hazardous.

The Permittee is not permitted to store Class 1A Flammable Liquids, defined by National Fire Protection Association (NFPA) code as liquids with a flashpoint <73 degrees Fahrenheit and a boiling point >100 degrees Fahrenheit anywhere on-site. The Permittee may treat Class 1A Flammable Liquids through the direct feed mechanisms including direct to kiln processing.

Container types received at the facility may include, but are not limited to, drums, pails, boxes, totes, cylinders, consumer packages, lab packs, roll-offs, tanker trucks, and refrigerated trucks. Containers that may be received, stored and processed at the facility are composed of materials such as steel, wood, fiber, and plastic. Sizes and volumes of waste containers vary from millimeter vials in lab packs to cubic yard boxes, tanker trucks, and end-dump trailers.

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)	485,750	gallons
Building B (External Truck Wash)	15,180	gallons
Building C (Lab Pack Building)	13,200	gallons
Container Holding Building (Slag Canopy)	47,250	gallons
Truck Holding and Sampling Area	46,000	gallons
North Storage Area	55,000	gallons
East Storage Area	22,000	gallons

deemed incompatible with the liner material, the Permittee shall install a separate secondary containment structure, located within the existing structure, possessing the appropriate liner in order to withstand any degrading effects imposed through initial and/or prolonged contact (e.g., twenty four hours) with released waste materials.

(c) Spilled or leaked waste and accumulated precipitation shall be removed from the sump or collection area in a timely manner. This time period is not to exceed twenty four hours from the time spilled and/or leaked waste is discovered in the containment system.

C.7. Reserved

C.8. Inspection Schedules and Procedures
OAC Rules 3745-54-15 and 3745-54-73

As required by OAC Rule 3745-54-15, the Permittee shall inspect all container storage areas in accordance with the inspection schedule contained in Section F of the approved Part B permit application, to detect leaking containers and deterioration of containers and the containment system caused by corrosion or other factors. The Permittee shall note the results of these inspections in the inspection log along with any remedial action taken in accordance with the procedures contained in Section F of the approved Part B permit application.

On days when containerized wastes are added to, or removed from, any of the permitted storage areas, the Permittee shall conduct an inspection as described in Section F of the approved Part B permit application, and maintain the inspection results in the facility operating record.

(a) An initial inspection of each container of off-site generated waste will be conducted prior to placing containers inside enclosed vehicles for storage.

(b) A daily inspection of the exterior and interior of each vehicle storing off-site generated waste will be conducted for evidence of deterioration, leaks, or spills. Vehicle doors will be opened and a visual check of the vehicle interior and visible containers will be conducted.

(c) After six months in storage, and every thirty days thereafter, each container will be removed from the enclosed vehicles. Individual containers will be inspected in accordance with the requirements specified for off-site generated waste stored in enclosed vehicles in accordance with Sections D and F of the approved Part B permit application. The inspection results shall be recorded in the facility operating record.

(d) Aisle space will not be required to be maintained between containers stored inside enclosed vehicles as a result of the stringent procedures implemented before storage and periodically while waste is in storage.

(e) Conditions specified in the approved Part B permit application and applicable requirements of the Ohio Fire Code must be followed while storing waste within enclosed vehicles.

C.9. Record Keeping
OAC Rule 3745-54-73

The Permittee shall comply with all record keeping requirements of OAC Rule 3745-54-73 and Permit Conditions, such as A.14 and A.28, as part of the facility's operating record and maintain documentation showing compliance with the requirements of Permit Condition C.13. and OAC Rules 3745-54-17(B) and 3745-55-77.

C.10. Special Container Provisions for Ignitable or Reactive Waste
OAC Rule 3745-54-17 and 55-76

(a) The Permittee shall not locate containers holding ignitable or reactive waste within fifteen meters (50 feet) of the facility's property line.

(b) The Permittee shall take precautions to prevent accidental ignition or reaction of ignitable or reactive waste and shall follow the storage and processing procedures specified in Section D of the approved Part B permit application and Permit Condition B.7.

C.11. Special Container Provisions for Incompatible Waste
OAC Rules 3745-55-77 and 3745-54-17

(a) The Permittee shall not store incompatible waste except in accordance with OAC Rules 3745-54-17(B) and 3745-55-77.

(b) The Permittee shall not place hazardous waste in an unwashed container that previously held an incompatible waste or material.

(c) The Permittee shall separate containers of incompatible wastes from each other.

(d) The Permittee shall not place incompatible wastes in the same container during consolidation activities.

C.12. Reserved

C.13. Closure and Post-Closure
OAC Rules 3745-55-10 through 3745-55-20 and 3745-55-78

(a) At closure of any or all of the container storage areas, the Permittee shall remove all hazardous waste and hazardous waste residues from the containment system, in accordance with the procedures in the closure plan set forth in Section I of the approved Part B permit application.

(b) If the Permittee demonstrates that not all contaminated soils can be practically removed or decontaminated in accordance with the closure plan, the Permittee shall close the unit and perform post-closure care following a plan approved by the Director of Ohio EPA.

other areas of concern (AOC) at the facility in East Liverpool, Columbiana County, Ohio. The PA was completed on August 8, 1993, and the VSI was conducted on August 25 and 26, 1993. The PA/VSI identified eighteen SWMUs and one AOC at the facility. Since the PA/VSI activities conducted in 1993, five additional waste management units have been identified at the facility. One SWMU, the Decontamination Building, has not yet been constructed. Descriptions of the SWMU and AOC given in the PA/VSI and updated by Ohio EPA are provided in Attachment 4 to this permit. The AOC is the Former Charter Oil Facility Release Area which is under an Administrative Consent Agreement with Ohio EPA. Except for the AOC, no other releases were documented in the PA/VSI. No further action is needed at the other WMUs at this time.

Transition of corrective action authority from U.S. EPA to Ohio EPA occurred on March 23, 2005, the date of the state permit renewal issuance. Subsequent to the transition of corrective action authority, the Permittee performed a focused RCRA Facility Investigation (RFI) in 2007 and 2008 to investigate the releases from the AOC, also known as the Charter Oil Facility Release Area (COFRA). During the RFI, the Permittee sampled and analyzed soil and ground water samples at the facility. The results of the investigation were documented through the submittal of a RFI Report, which was approved by Ohio EPA on April 20, 2009. Based on the findings in the RFI Report, it was determined that Corrective Measures would be necessary at the facility in order to protect human health and the environment.

Ohio EPA required the Permittee to submit either a Corrective Measures Study to evaluate potential remedies or submit a Presumptive Remedy proposing a specific remedy for the facility. Since the Permittee had already been conducting an Interim measure to recover contamination from the subsurface in the COFRA area, the Permittee submitted a Final Remedy Workplan on July 17, 2009. The Final Remedy Workplan included a Presumptive Remedy, which built upon the proposed continuation of their current interim measure. Ohio EPA evaluated the proposed remedy and believes that continuation of the interim measure, along with additional conditions and restrictions would be protective of human health and the environment.

In brief, Ohio EPA proposes the following measures:

- The Permittee and Ohio EPA enter into an Environmental Covenant for the facility restricting future use of the facility and also restricting the use of ground water.

The Permittee must institute corrective action as necessary to protect human health and the environment for all releases of hazardous waste(s) or hazardous constituent(s) from any waste management units (WMUs) at the facility, regardless of the time at which waste was placed in such units.

E.2. Corrective Action Beyond the Facility Boundary

OAC Rule 3745-54-101

The Permittee must implement corrective action(s) beyond the facility property boundary, where necessary to protect human health and the environment, unless the Permittee demonstrates to the satisfaction of Ohio EPA that, despite the Permittee's best efforts, the Permittee was unable to obtain the necessary permission to undertake such actions. The Permittee is not relieved of all responsibility to clean up a release that has migrated beyond the facility boundary where off-site access is denied. On-site measures to address such releases will be addressed under the RFI, CMS, and CMI phases, as determined to be necessary on a case-by-case basis.

E.3 Identification Of Waste Management Units (WMUs)
OAC Rules 3745-50-44(D) and 3745-54-101

The 1993 PA/VSI documented releases to soil and groundwater at one area of concern (AOC), the former Charter Oil Facility Release Area (COFRA). A previous Interim Measures related to contamination at the former COFRA was ongoing pursuant to a consent agreement with Ohio EPA. This AOC will now be addressed through the Corrective Action process. The previous Interim Measure related to contamination at the former COFRA will be replaced by full implementation of a Final Remedy. No corrective action is being required at the other WMUs at this time.

The following WMUs and AOC have been identified at this facility:

1.	WMU 1:	Incinerator System
2.	WMU 2:	Organic Waste Tank Farm
3.	WMU 3:	Organic Tanker Unload Station
4.	WMU 4:	Truck Holding and Sampling Area
5.	WMU 5:	Building B (External Truck Wash)
6.	WMU 6:	Wastewater Treatment
7.	WMU 7:	Storm Water Storage Tank Farm
8.	WMU 8:	Process Water Tanks
9.	WMU 9:	Laboratory Waste Storage Tank
10.	WMU 10:	Container Processing Building
11.	WMU 11:	Building A Storage Area (Drum Warehouse of the Container Processing Area)
12.	WMU 12:	Pump Out Tank (PT) Farm
13.	WMU 13:	Extruder
14.	WMU 14:	Container Receiving Area (unloading docks)
15.	WMU 15:	Container Holding Building (Slag Canopy)
16.	WMU 16:	North Storage Area
17.	WMU 17:	Bulk Solid Waste Storage Tanks
18.	WMU 18:	Building C (Lab Pack Building)
19.	WMU 19:	Satellite Accumulation Areas
20.	WMU 20:	Incinerator Feed Building (Direct Organic Tanker South)
21.	WMU 21:	Incinerator Feed Building (Direct Drum Pump Out)
22.	WMU 22:	Decontamination Building
23.	WMU 23:	East Storage Area
24.	AOC:	Former Charter Oil Facility Release Area

See Attachment 4 of this permit for a list and description of all WMUs and AOCs.

E.4 Reserved

E.5 RCRA Facility Investigation (RFI)
OAC Rule 3745-54-101

In the event of a newly discovered unit, the Permittee must conduct an RFI to thoroughly evaluate the nature and extent of the release of hazardous waste(s) and hazardous constituent(s) from any newly identified units per Permit Condition E.10. The major tasks and required submittal dates are shown below. The scope of work for each of the tasks is found in Attachment 5 (U.S. EPA's CAP).

(a) RFI Workplan

The Permittee must submit a written RFI Workplan to Ohio EPA in case of a newly discovered waste management unit, on a time frame established by Ohio EPA.

(i) If necessary, Ohio EPA will provide written comments on the RFI Workplan to the Permittee.

(ii) Within forty-five days of receipt of Ohio EPA's comments, the Permittee must submit either an amended or new RFI Workplan that addresses Ohio EPA's comments.

(iii) Ohio EPA must approve or modify and approve, in writing, the amended or new RFI Workplan. The RFI Workplan, as approved or

on the south side of an enclosed building with operations on three levels. Level one is the ground floor of the unit and slopes to area sumps. Level two is the intermediate conveyor floor and slopes to area floor drains that discharge to sumps on level one. Level three is the conveyor gallery with a curbed floor to contain spills. The floors are constructed of reinforced concrete treated to resist chemicals that are managed in this unit. This unit is surrounded by a six inch high reinforced concrete curb with 1.5 inch speed bumps located at interior doors and at the unloading platform. The floor area is sloped towards three reinforced concrete sumps. The contained areas and sumps for this unit have a capacity of about 50,000 gallons. Organic vapors from specific process areas in this unit are vented to a vapor recovery system.

Activities within WMU 10 include off-loading, weighing, sampling, labeling, and palletizing containers; container pump-out stations; a station for splitting of materials into smaller charges; consolidation of wastes into superpacks; filling bucket hoist hoppers and heating of waste in drums. Containers may be transferred from this unit to: (1) the incineration system; (2) any of the container storage areas; (3) direct drum feed unit in the Incinerator Feed Building; (4) Building B (External Truck Wash) for processing; (5) Building C (Lab Pack Building) for processing; (6) the extruder; (7) directly to the bucket hoist feed mechanism. Within WMU 10, containers of waste are moved by means of a conveyor system or fork lift. Containerized wastes generated on-site such as contaminated debris and PPE are also managed in this unit. There have been no documented releases from WMU 10. The potential for release to ground water, surface water, on-site soils, and air is low.

K) WMU 11 – Building A Storage Area (Drum Warehouse of the Container Processing Building) – This unit constitutes the north side of the Container Processing Building (WMU 10). WMU 10 and WMU 11 are separated by a concrete fire wall and doors. The dimensions are 100 foot by 210 foot. Building A is designed to store containerized waste from on-site and off-site sources before incineration at WMU 1. Containers are placed on pallets and stored on racks or staged in accordance with Section D of the approved Part B permit application. The unit has the capacity to store approximately six thousand 55-gallon drums or the equivalent of any combination of different sized containers. The storage area has been designed to have separate concrete containment curbs for each set of racks and waste is segregated according to compatibilities. The entire combined containment area is surrounded on three sides by exterior concrete walls. The fourth side consists of a fire wall with three doors that have 1.5 inch high speed bumps. The floor is constructed of reinforced concrete treated to resist chemicals that are managed in this unit. The floor in each area is sloped toward

N) WMU 14 - Container Receiving Area (unloading docks) - This unit consists of two covered truck unloading docks that abut the northeast side of the Container Processing Building (WMU 10). The unloading docks are paved with reinforced concrete treated to resist chemicals that are managed in this unit. A reinforced concrete containment wall and speed bump border the north and east edges of the unit along the two sides not bordered by the Container Processing Building (WMU 10). A reinforced concrete containment trench is located along the south side of each unloading station. The paved surface of each dock is sloped toward these trenches. This unit manages containerized wastes generated off-site. Tankers may also be staged in this unit in accordance with Section D of the approved Part B permit application and this permit. The wastes are subsequently unloaded to the Container Processing Building (WMU 10). 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.

O) WMU 15 - Container Holding Building (Slag Canopy)- This unit is a 50 foot by 50 foot structure used to store containers of a wide range of waste types. Staging and processing activities are also conducted, in accordance with Section D of the approved Part B permit application and this permit. WMU 15 is located just north of the incineration system (WMU 1). The unit is fully enclosed and equipped with adequate health and safety equipment such as automatic fire detection and suppression, safety showers, and vapor recovery. The floor of this unit is constructed of reinforced concrete treated to resist chemicals managed in the unit. A combination of six inch high speed bumps and curbs surround the unit and are integral to the containment system and minimizing the accumulation of storm water. The floor is sloped towards a concrete sump, part of the 10, 520 gallon capacity containment 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.

P) WMU 16 – North Storage Area (formerly known as North Less Than 90 Day Area) - This unit is located west of Wastewater Treatment (WMU 6). On-site generated waste such as incineration treatment residuals (slag, ash), used brick and debris, spent activated carbon, and process water may be stored in this area. Off-site generated wastes that do not contain free liquids may be stored in containers within enclosed vehicles or within bulk containers. Specific processing activities may also be conducted. The Permittee must follow the requirements in Sections D and F of the approved Part B permit application in regards to storage and processing activities. The area is open, uncovered, and located over reinforced concrete in constructed containment areas. Curbing, sumps, and sloped berms control run-on and are part of the containment 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.

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.

V) WMU 23 – East Storage Area (formerly known as East Less Than 90 Day Area) – The East Storage Area is located south of the North Storage Area (WMU 16). On-site generated waste such as incineration treatment residuals (slag, ash), used brick and debris, spent activated carbon, and process water may be stored in this area. Off-site generated wastes that do not contain free liquids may be stored in containers within enclosed vehicles or within bulk containers. Specific processing activities may also be conducted. The Permittee must follow the requirements as described in Sections D and F of the approved Part B permit application in regards to storage and processing activities. The area is open, uncovered, and located over reinforced concrete in constructed containment areas. Curbing, sumps, and sloped berms control run-on and are part of the containment 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.

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

The property where the Permittee 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.