



State of Ohio Environmental Protection Agency

Northeast District Office

RECEIVED
OHIO EPA

APR 14 2010

DIV. OF HAZARDOUS
WASTE MGT.

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

April 8, 2010

Ms. Carrie Beringer
Heritage-WTI, Inc.
1250 St. George Street
East Liverpool, OH 43920

**RE: HAZARDOUS WASTE PERMIT MODIFICATION, CLASS 1 ACKNOWLEDGMENT,
VACATE ATTACHMENT 10 OF THE PERMIT, HERITAGE-WTI, INC.
OHD 980 613 541 / 02-15-0589**

Dear Ms. Beringer:

On March 22, 2010, Ohio EPA received a notification dated March 18, 2010 for a Class 1 hazardous waste permit modification from Heritage-WTI, Inc. (WTI). The Class 1 permit modification was assigned permit information tracking system (PITS) ID number, OHD980613541 - 100311-1-1. The modification is an informational change to vacate Attachment 10 to the Ohio Hazardous Waste Facility Installation and Operation Permit.

As background information, in a letter dated July 21, 2009, the Ohio EPA approved a Class 2 permit modification request from WTI dated March 16, 2009 to make the following temporary changes: (1) increase permitted storage capacity from 684,380 gallons to 729,215 gallons; (2) store containerized waste in areas not currently permitted for storage; and (3) increase storage time up to a maximum of eighteen months for specific containerized waste. This permit modification was necessary to accommodate possible waste receipt during an extended maintenance outage to replace the kiln that occurred in the Fall of 2009.

Attachment 10 contains temporary permit requirements for the duration of the extended maintenance outage. WTI has completed the outage and associated activities and is requesting to vacate the conditions in Attachment 10 and to void any temporary conditions associated with the Class 2 permit modification approved July 21, 2009.

With this letter, Ohio EPA acknowledges the above referenced Class 1 modification submitted pursuant to Ohio Administrative Code (OAC) Rule 3745-50-51, and accordingly has updated the WTI Hazardous Waste Facility Installation and Operation permit.

There are no changes to the Part B permit application. Changes to the Heritage-WTI, Inc. Ohio Hazardous Waste Installation and Operation Permit include:

- Replace Permit Page 14
- Replace Permit Page 18
- Replace Permit Page 34
- Replace Permit Page 114b
- Replace Permit Attachment 10 Cover Page, Page 121

All modified permit pages for this permit modification are date-stamped with the date of this letter from Ohio EPA.

HERITAGE – WTI, INC.
APRIL 8, 2010
PAGE 2 OF 2

Enclosed are copies of the revised permit pages for the Heritage-WTI, Inc. Ohio Hazardous Waste Installation and Operation Permit. 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 Michelle Tarka at the East Liverpool Field Office (330) 385-8421.

Sincerely,



Natalie Oryshkewych
Environmental Manager
Division of Hazardous Waste Management

NO:ddw

Enclosure

cc: Michelle Tarka, DHWM, NEDO
Frank Popotnik, DHWM, NEDO
Patricia Natali, DHWM, NEDO
John Nyers, DHWM, CO
Wen Huang, USEPA, Region V

ec: Sherry Slone, DHWM, NEDO
Jeremy Carroll, Manager, ITTS, DHWM, CO
Mike Allen, DHWM, CO

Keywords: Attachment 10, outage, temporary storage

(d) Reserved.

(i) Reserved.

(ii) Reserved.

(iii) Reserved.

(iv) The Permittee submitted a Class 1 permit modification dated March 9, 2010 to remove language in the permit, vacate the conditions in Attachment 10 to the permit, and void any temporary conditions associated with the Class 2 permit modification received 03/18/2009.

(e) Reserved.

APR 8 2010

B. GENERAL FACILITY CONDITIONS

B.1 Design, Maintenance, and Operation of Facility
OAC Rule 3745-54-31

- (a) The Permittee shall design, construct, maintain, and operate the facility to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste constituents to air, soil, and ground or surface waters which could threaten human health or the environment.
- (b) The Permittee is limited to treating the following quantities of hazardous waste in any one calendar year from any off-site sources during the life of the permit, until such time as this Condition is modified, renewed, or revised. This is a facility wide limitation and includes all units.
 - (i) The two incinerators (1 existing, 1 not yet constructed) may treat a combined total of 176,000 tons per year of hazardous waste. Each individual incinerator may treat 88,000 tons per year.
 - (ii) The Inorganic Waste Treatment System (not yet constructed) may treat 83,000 tons per year of hazardous waste; and
 - (iii) The General Wastewater Treatment System (not yet constructed) may treat up to ten percent of the total waste received at the facility. This ten percent limitation will be subject to revision as required by any agreements between the facility and the city of East Liverpool.
- (c) The Permittee may receive off-site generated non-hazardous wastewater (NHW) for use on-site as process water. When needed, the NHW may be treated through the general wastewater treatment system prior to use at the facility.
- (d) The Permittee may receive off-site generated waste to be used in fuel blending operations. This waste may, or may not, be blended and stored in permitted tanks prior to transport off-site to permitted facilities for treatment.

APR 8 2010

C. CONTAINER STORAGE AND TREATMENT

General Overview

Containerized waste generated from off-site as well as on-site, is stored at several locations throughout the facility as described in Section D of the approved Part B permit application. Most container storage areas are located in buildings. All have bases constructed of reinforced concrete treated to resist chemical attack. All container storage areas are equipped with automated fire detection and suppression systems, secondary containment, liquid collection systems, and berms to control run-on/run-off. Most storage areas are fully enclosed and equipped with forced air ventilation to prevent the accumulation of vapors and fumes. Container processing areas have vapor collection points that are tied into the vapor recovery system which is described in Section D of the permit application. Aisle space is maintained to allow for the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment. 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. 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) and Truck Holding and Sampling. In all cases, containers are inspected for integrity prior to storage and on a daily basis.

APR 8 2010

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.

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.

Attachment 10 - Temporary Management and Operating
Conditions during 2009 Outage to Replace the Kiln

Heritage-WTI, Inc.
Installation and Operation Hazardous Waste Permit

Class 1 Permit Modification

Vacate Attachment 10

PITS # 100311-1-1

Acknowledged April 8, 2010

APR 8 2010