



State of Ohio Environmental Protection Agency

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MAILING ADDRESS:

P.O. Box 1049
Columbus, OH 43216-1049

CERTIFIED MAIL

July 21, 2009

Re: **Heritage-WTI, Inc.**
EPA ID No: OHD 980 613 541
Ohio ID No: 02-15-0589
Modified Hazardous Waste Permit

Mr. John Peterka
Heritage-WTI, Inc.
1250 St. George Street
East Liverpool, Ohio 43920-3400

Dear Mr. Peterka:

On March 18, 2009, Ohio EPA received Heritage-WTI, Inc.'s (Heritage) request to make the following temporary changes: (1) increase their permitted container storage capacity from 684,380 to 729,215 gallons (an increase of 44,835 gallons which is approximately 6% of their current capacity); (2) store containerized waste in areas not currently permitted for storage; and, (3) increase storage time up to a maximum of eighteen (18) months for specific containerized waste. For this modification, Heritage submitted a Class 2 modification application¹. The Agency received written comments concerning this Class 2 modification application and these comments were addressed in the responsiveness summary. I have enclosed 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 Please note that the modified Permit remains in effect until it is renewed, withdrawn, suspended or revoked.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

¹ Ohio EPA assigned tracking # 090318-2-1 to this modification application.

Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

Ohio EPA is an Equal Opportunity Employer

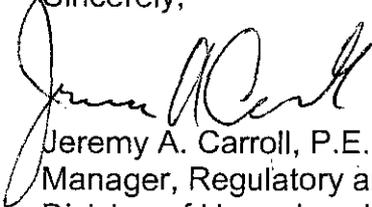
Mr. John Peterka
Heritage-WTI, Inc.
July 21, 2009
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General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
309 South Fourth Street, Room 222
Columbus, Ohio 43215

If you have any questions, please contact Patricia Natali of Ohio EPA's Northeast District at (330) 385-8447.

Sincerely,



Jeremy A. Carroll, P.E.
Manager, Regulatory and Information Services Section
Division of Hazardous Waste Management

Enclosures

cc: Ed Lim, ERAS, DHWM, CO
Mike Allen/John Nyers, ERAS, DHWM
Dale Meyer, U.S. EPA, Region V
Frank Popotnik/Patricia Natali, DHWM, NEDO
Carol Hester, PIC, Ohio EPA

PUBLIC NOTICE

Columbiana County

OHIO EPA ISSUES FINAL MODIFIED HAZARDOUS WASTE PERMIT

On July 21, 2009, Ohio EPA issued a final class 2 modified Hazardous Waste Facility Installation and Operation Permit (Permit) to Heritage-WTI, Inc., fka Von Roll America, Inc., for its facility at 1250 St. George Street, East Liverpool, Ohio 43920-3400. The EPA Identification Number for this facility is OHD980613541.

Why is Heritage-WTI, Inc. modifying its Permit?

Heritage-WTI, Inc., is permitted to operate a hazardous waste incinerator and other related hazardous waste management units at its facility. Heritage-WTI, Inc. requests to make the following temporary changes: (1) increase their permitted container storage capacity from 684,380 to 729,215 gallons (an increase of 44,835 gallons which is approximately 6% of their current capacity); (2) store containerized waste in areas not currently permitted for storage; and, (3) increase storage time up to a maximum of eighteen (18) months for specific containerized waste. This final modified permit will allow Heritage-WTI, Inc., to make the requested changes. To issue this final modified Permit, Ohio EPA determined that the modification application is complete and meets appropriate standards.

Can I appeal this final modified Permit?

Yes, if you are an officer of an agency of the state or of a political subdivision, acting in a representative capacity, or any person who would be aggrieved or adversely affected by this modified Permit, you have the right to appeal this Permit decision to the Environmental Review Appeals Commission (ERAC).

If I decide to appeal this final modified Permit, how and when must I make the appeal?

If you file an appeal, you must put it in writing no later than **August 24, 2009**. Your appeal must explain why you are appealing the action and the grounds you are using for your appeal. 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. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. You must file your appeal, according to Ohio Revised Code § 3745.04 with ERAC at the following address: **Environmental Review Appeals Commission**, 309 South Fourth Street, Room 222, Columbus, Ohio 43215. You must send a copy of the appeal to the director of Ohio EPA at the following address no later than three (3) days after you file it with ERAC: **Chris Korleski, Director of Ohio EPA**, P.O. Box 1049, Columbus, Ohio 43216-1049.

OHIO E.P.A.
JUL 21 2009
ENTERED DIRECTOR'S JOURNAL

OHIO ENVIRONMENTAL PROTECTION AGENCY
MODIFIED OHIO HAZARDOUS WASTE FACILITY
INSTALLATION AND OPERATION PERMIT

I certify this to be a true and accurate copy of the official documents as filed in the records of the Ohio Environmental Protection Agency.

By: *Doug Lassiter* Date: 7-21-09

Date of Issuance: July 21, 2009
Effective Date: July 21, 2009

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

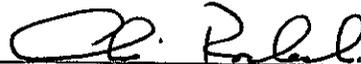
The Ohio Hazardous Waste Facility Installation and Operation Permit with the above-referenced permit number as issued by the Ohio Environmental Protection Agency and journalized on March 23, 2005, is hereby incorporated by reference in its entirety, except as it may be modified herein.

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 18, June 1, and June 16, 2009. 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.



Chris Korleski
Director

OHIO EPA DHWM

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(d) *The Permittee shall conduct an extended maintenance outage fall 2009 in order to replace the incineration system's primary combustion chamber (kiln). During the extended outage, the Permittee is authorized to temporarily: (1) increase their container storage capacity from 684,380 to 729,215 gallons (approximately 6% of their current permitted storage capacity); (2) extend their storage time limit for specific containerized waste up to eighteen months; and (3) store containerized hazardous waste in areas not currently permitted for storage.*

During the extended outage, the Permittee may temporarily store containerized waste in the following unpermitted areas: (1) the Container Process Building; (2) trailers in the two generator < 90 day storage areas; (3) Direct Organic Tanker Unload East; (4) Direct Tanker Unload South; and (5) in a B-area south of the Pump-Out Tank unit. Container management procedures, as described in this permit and the Part B permit application will be adhered to during the extended outage and storage period. Other details, as well as restrictions imposed, are listed below and in Attachment 10 to this permit.

- (i) *The fall 2009 extended outage shall commence on the date the Permittee initiates shut-down procedures to begin the replacement operations; and will terminate when the Permittee begins feeding hazardous waste to the Incineration System.*
- (ii) *The extended storage period will begin on the first day of the outage and terminate eighteen (18) months later. At that time, the twelve (12) month storage limit shall resume and all waste on-site at the facility shall have been in storage less, than or equal to, twelve months.*
- (iii) *The Permittee will be granted three (3) months from the termination of the outage to remove all hazardous waste from unpermitted areas of the facility and to resume storage of hazardous waste in accordance with the permit.*
- (iv) *The Permittee will submit a Class 1 permit modification upon completion of the extended outage and the elimination of the backlog of waste due to the outage (approximately 18 months). The Class 1 permit modification will remove language in the permit, vacate the conditions in Attachment 10 to this permit, and void any temporary conditions associated with the Class 2 permit modification received 03/18/2009.*
- (e) *Reserved.*

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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.
- (i) *The Permittee shall conduct an extended maintenance outage fall 2009 in order to replace the incineration system's primary combustion chamber (kiln). During the extended outage, the Permittee will be authorized to temporarily: (1) increase their container storage capacity from 684,380 to 729,215 gallons; (2) extend their storage limit for specific containerized waste up to eighteen months; and (3) store containerized hazardous waste in areas not currently permitted for storage. For more details, refer to Attachment 10 to this permit.*
- (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.

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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.

NOTE: The Permittee shall conduct an extended maintenance outage fall 2009 in order to replace the incineration system's primary combustion chamber (kiln). During the extended outage, as described in the permit modification request received March 18, 2009, the Permittee will be authorized to temporarily: (1) increase their container storage capacity from 684,380 to 729,215 gallons; (2) extend their storage time limit for specific containerized waste up to eighteen months; and (3) store containerized hazardous waste in areas not currently permitted for storage.

During the extended outage, the Permittee may temporarily store containerized waste: (1) in the Container Process Building; (2) in trailers in the two generator < 90 day storage areas; (3) in Direct Organic Tanker Unload East; (4) in Direct Tanker Unload South; and (5) south of the Pump-Out Tank unit in a designated B-area. Each of these areas have reinforced concrete floors, treated to resist chemicals; have adequate secondary containment for the volume of waste to be stored; and have berms or other devices to control run-off or run-on. Areas (1), (3), and (4) are inside buildings equipped with automatic fire detection and suppression and vapor recovery capabilities.

Container management procedures as described in this permit and the Part B permit application will be adhered to during the extended outage; other details as well as restrictions applied can be found in Attachment 10 to this permit.

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Building A is located in the northern-most section of the facility's Container Processing Building. The building is 100' x 210' with racks installed to store a variety of containers equivalent to approximately 6,000 fifty-five gallon drums. The permitted storage capacity for this building is 510,000 gallons. The waste is segregated according to waste types with incompatible waste stored in areas with separate spill collection systems. Total secondary containment in this building is 79,497 gallons and is described in Section D of the permit application. The building is equipped with forced air ventilation.

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Building B, also known as the External Truck Wash, is 25' x 70' with racks installed to store up to 15,180 gallons in a variety of container types and sizes. Total secondary containment in this building is 10,000 gallons. The building is permitted for storage in racks, a wash station for containers and equipment, and processing of specific waste streams (described in Section D). Containers will only be located on the floor during processing or staging activities. A minimum of five (5) feet of aisle space will be maintained between pallets of containerized waste when they are on the floor to be processed. All waste stored or processed in Building B will be compatible. The building is equipped with forced air ventilation. Fugitive emissions from processing activities are captured by the vapor recovery system.

Building C, also known as the Lab Pack Building, is 56' x 60' with racks installed to store up to 13,200 gallons in a variety of container types and sizes. Total secondary containment in this building is 11,200 gallons. The building is used primarily for the storage and management of lab pack and loose pack waste described in Section C in the permit application. The building is also used for other processing activities as described in Section D of the permit application. Containers processed or staged in Building C will be no more than five (5) cubic yards in size. The building is equipped with forced air ventilation, a breathing airline, and vapor recovery collection points used during processing activities.

The Container Holding Building, also known as the Slag Canopy, is 50' x 50' with a storage capacity of 100,000 gallons. The building is enclosed to minimize the accumulation of storm water. Total secondary containment is 10,520 gallons. Containers, on pallets or an equivalent device, can be stored on the floor and in heavy duty racks installed in the building. The height of stacked containers on pallets cannot exceed the equivalent height of two (2) stacked pallets of 55 gallon containers. The Permittee will ensure that double-stacked pallets are stable and level. Waste in this building will be similar to that stored and processed in the Container Processing Building (CPB) and the Container Warehouse. This will include incompatible wastes such as water reactives, oxidizers, organic peroxides, reactives, flammables (except Class 1A flammables), and corrosives, as well as non-reactive and non-hazardous waste. Mixed infectious and hazardous waste (MIHW) will not be managed in this area. Processing activities may include, but not limited to, receiving, weighing, labeling, and storage of waste; consolidation of material (superpacking); splitting of material; repacking; sampling for analysis for inbound and outbound scheduled waste; removing pumpable materials; solidifying waste; lab pack activities as described in Section C, the WAP; and third party waste management as described in Permit Condition C.1.(d). The building is equipped with adequate health and safety equipment such as automatic fire detection and suppression systems, forced air ventilation, a breathing airline, and safety showers. Vapor recovery collection points are available to be used during processing activities when necessary.

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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.

NOTE: The Permittee will conduct an extended maintenance outage fall 2009 in order to replace the incineration system's primary combustion chamber (kiln). During the extended outage, the Permittee will be authorized to temporarily: (1) increase their container storage capacity from 684,380 to 729,215 gallons; (2) extend their storage limit for specific containerized waste up to eighteen months; and (3) store containerized hazardous waste in areas not currently permitted for storage.

In addition to the permitted container storage areas listed above, during the extended outage the Permittee may temporarily store containerized waste in: (a) Container Process Building (WMU 10); (b) trailers in the two generator < 90 day storage areas (WMU 16); (c) Direct Organic Tanker Unload East (WMU 3); (d) Direct Tanker Unload South (WMU 20); and (e) B-area south of the Pump-Out Tank unit. Container management procedures as described in this permit and the Part B permit application will be adhered to during the extended outage and storage period. Other details, as well as restrictions applied, can be found in Attachment 10 to this permit. The storage in these areas (a through e above) is permitted only during the time approved in the modification received March 18, 2009. At the termination of the outage, the elimination of the backlog of waste received during the outage, and the resumption of normal operating conditions; this modified language to the permit will be removed.

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.

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Attachment 10

Temporary Changes to “Part A” and “Part B” of the Permit Application Associated with the Fall of 2009 Extended Maintenance Outage to Replace the Facility’s Primary Combustion Chamber (Kiln).

Heritage-WTI, Inc. (WTI) will replace the primary combustion chamber (kiln) of the Incineration System during an extended outage, Fall of 2009. With the approval of the permit modification received 3/18/09, WTI has been granted permission to temporarily:

- store on-site, an additional 44,835 gallons of waste in containers. The additional volume of waste temporarily increases the permitted container storage capacity of 684,380 gallons to 729,215 gallons;
- store waste in several areas of the facility not currently permitted for storage;
- increase the storage time of containers received during the outage up to a maximum of eighteen (18) months.

Several sections of WTI’s Part B Permit Application are affected by the outage. Since this is a temporary condition, modifications to facility procedures, operations, and/or management of waste associated with the outage are included in this attachment. Language in the permit application will not be modified. At the termination of the outage, the completion of the extended storage period, and the return to normal operations, this attachment will be vacated and all temporary conditions approved by the class 2 permit modification received March 18, 2009 will terminate.

In the pages that follow, sections of the Part A and Part B permit applications are listed with the changes approved in the permit modification received March 18, 2009.

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Part A Permit Application

The modification affects the following pages of the Part A permit application:

- Cover Page
- RCRA Subtitle C Site Identification Form (3 pages)
- Hazardous Waste Permit Information Form (8 pages)
- Page A-2
- Add page A-7a
- Add page A-36 thru A-40

All pages of the Part A are revision 15, dated March 16, 2009.

The modified pages listed above are incorporated into Attachment 10 and can be found after the final section to the Part B permit application, i.e., Section K – Other Federal Laws.

Part B Permit Application

1. Section B – Facility Description

Not affected by the permit modification

2. Section C – Waste Characteristics and Waste Analysis Plan

Not affected

3. Section D – Process Description

All permanent storage areas are located under a roof or canopy, are paved with reinforced concrete treated to resist chemical attack, are constructed with berms to control run-on and run-off, have secondary containment with liquid collection systems (sumps), and have automated fire detection and suppression systems. Most storage areas are fully enclosed and most have vapor collection points connected to the Vapor Recovery System (VRS).

Three of the temporary storage areas are not under a roof or canopy and consequently, do not have automated fire detection and suppression systems. These areas do not have vapor collection points connected to the VRS. They are paved with reinforced concrete, are constructed with berms to control run-on and run-off, and have adequate secondary containment with sumps.

The following information applies to all storage buildings/areas:

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Aisle space in each of the container storage areas will be adequate to allow for the unobstructed movement of personnel, fire protection equipment, spill control equipment and decontamination equipment. All containers in the storage areas will have a facility label and will be placed on a pallet or other appropriate means to keep the bottom of the container above the paved surface. All containers will be in good condition and kept closed, except when adding or removing waste. The Permittee may store waste received during the extended outage up to 18 months and this will be tracked via the facility's waste tracking system. Waste will be received and handled in accordance with the Permit and Part B permit application.

The Permittee will **not** receive, accept, or store mixed infectious and hazardous waste during this extended outage; **nor** will they schedule or receive waste that cannot be placed into storage, such as Class IA flammable or certain explosives.

Waste received by the Permittee is categorized as: general (flammable); acid; alkali/base; oxidizer; and organic peroxide type wastes. WTI's tracking system prohibits incompatible waste to be stored together. General (flammable) wastes are assigned 0; acids - 1; bases - 2; oxidizers - 3; and organic peroxides - 4.

CONTAINER PROCESS BUILDING (CPB)

WTI will temporarily store waste in the Container Processing Building (CPB) in designated areas on the 1st, 2nd, and 3rd floors. The total temporary permitted capacity of the CPB is 92,400 gallons.

1st Floor

The 1st floor has a temporary permitted capacity of 44,000 gallons. WTI is permitted to store all types of waste (types 0 – 4) in the areas listed below according to compatibility guidelines. Most 1st floor storage will be limited to containers stacked two (2) high, except in the Split Area. WTI may stack pallets of waste three high, provided the stack is stable. The secondary containment of this floor is 68,386 gallons, which is sufficient to accommodate the total proposed storage capacity of 44,000 gallons.

WTI proposes the following separation of waste on the 1st floor. In each of the areas, WTI will provide adequate aisle space between rows when applicable.

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North Wall

WTI may store 7,920 gallons on the North Wall. Due to overhead obstacle, containers may only be stacked two high. Containers may be stacked one pallet deep.

Container Pump Out Area

WTI may store 5,500 gallons in this area. Due to overhead obstacle, containers may only be stacked two pallets high. Containers may be stacked two pallets wide, two to three pallets deep.

North of Split Station

WTI may store 14,080 gallons in this area. Due to overhead obstacle, containers may only be stacked two pallets high. Containers may be stacked two pallet wide and two to three pallets deep.

Split Area

WTI may store 3,960 gallons in this area. Containers may be stacked two to three pallets high. Containers may be stacked two pallet wide and two to three pallets deep.

West of Receiving Conveyor

WTI may store 5,500 gallons containers in this area. Due to overhead obstacle, containers may only be stacked two pallets high. Containers will be stacked two pallet wide and two to three pallets deep.

Container Receiving Area (unloading docks and receiving conveyor)

WTI may store 7,040 gallons in this area. Due to overhead obstacle, containers may only be stacked two pallets high. Containers may be stacked one pallet wide, two pallets deep.

2nd Floor

The temporary permitted storage capacity for the 2nd floor is 42,900 gallons. Containers may be stacked two pallets wide, two pallets high.

The secondary containment of this floor is 39,476 gallons. The secondary containment of this floor is sufficient to accommodate the total proposed storage capacity of 42,900 gallons.

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WTI may store waste types 0 - 4 on the 2nd floor; compatibility guidelines will be followed.

3rd Floor

The temporary permitted storage capacity of the 3rd floor is 5,500 gallons. Containers may be stored one pallet wide and one pallet high.

The secondary containment of this floor is 5,722 gallons. The secondary containment of this floor is sufficient to accommodate the total proposed storage capacity (5,500 gallons).

WTI may store waste types 0 - 2 on the 3rd floor provided compatibility guidelines are followed.

DRUM WAREHOUSE OF THE CONTAINER PROCESS BUILDING

The Drum Warehouse is currently permitted for 510,000 gallons of containerized waste. The physical layout/design of this building limits storage to 313,000 gallons. Storage in this building consists of rack storage and floor storage. Rack storage is covered in Section D, Process Description, Section D-2d. WTI may temporarily store waste on the East and West walls of the Drum Warehouse during the extended outage. This storage will be limited to two pallets high, and one pallet deep. WTI may store up to 22,000 gallons on each wall.

The secondary containment of the Drum Warehouse is 79,497 gallons. The secondary containment of this building is sufficient to accommodate the permitted storage capacity plus the additional proposed storage capacity (313,000 + 44,000 = 357,000 gallons).

This building is permitted to store all waste types (types 0 – 4); compatibility guidelines will be followed.

CONTAINER HOLDING BUILDING (SLAG CANOPY)

This building is permitted for 100,000 gallons of container storage. The physical layout/design of this building limits storage to 47,250 gallons. Storage in this building consists of rack storage and floor storage. WTI may temporarily store pallets of containers three (3) high on the floor of the Slag Canopy, provided the pallets are stable and cannot tip over. This will add an additional 26,400 gallons of container storage capacity to this building.

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The secondary containment of this building is 10,520 gallons and is sufficient to accommodate the total proposed storage capacity of 73,650 gallons (47,250 + 26,400 = 73,650 gallons).

WTI may store waste types 0 – 2; compatibility guidelines will be followed.

BUILDING B (EXTERNAL TRUCK WASH)

This building is permitted for 15,180 gallons of container storage. The physical layout/design of this building limits storage to 8,000 gallons. Storage in this building consists of rack storage and floor storage. WTI may temporarily store one row of pallets three (3) pallets high on the floor of Building B. Pallets of containers must be stacked so that they are stable and cannot tip over. This will add additional 11,440 gallons of container storage capacity to this building.

The secondary containment of this building is 4,860 gallons and is sufficient to accommodate the total proposed storage capacity of 19,440 gallons (8,000 + 11,440 = 19,440 gallons).

WTI may store waste types 0 – 2; compatibility guidelines will be followed

BUILDING C (LAB PACK BUILDING)

This building is permitted for 13,200 gallons of container storage. The physical layout/design of this building limits storage to 7,040 gallons. Storage in this building consists of rack storage and floor storage. Containers may temporarily be stacked two pallets wide and three pallets high, provided the stacked containers are stable and unable to tip over. Adequate aisle space must be provided between rows. This will add an additional 15,785-gallon of container storage capacity to this building.

The secondary containment of this building is 2,287 gallons and is sufficient to accommodate the total proposed storage capacity of 22,825 gallons (7,040 + 15,785 = 22,825 gallons).

WTI may store waste types 0 – 4; compatibility guidelines will be followed.

DIRECT ORGANIC TANKER EAST (E-BAY/BAY #1)

WTI may temporarily store one row of pallets, two pallets wide, and 3 pallets high on the scale located in the bay. This will add 13,200 gallons of container storage capacity to this bay.

The secondary containment of this bay is 7,883 gallons. The secondary containment of this bay is sufficient to accommodate the total proposed storage capacity of 13,200 gallons.

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WTI may store waste types 0 – 4 in this bay; compatibility guidelines will be followed.

DIRECT TANKER SOUTH (SOUTH BAY)

WTI may temporarily store one row of pallets, two pallets wide, and 3 pallets high on the scale located in the bay. This will add 13,200 gallons of container storage capacity to this bay.

The secondary containment of this bay is 5,837 gallons. The secondary containment of this bay is sufficient to accommodate the total proposed storage capacity (13,200 gallons).

WTI may store waste types 0 – 4 in this bay; compatibility guidelines will be followed.

90-DAY NORTH

WTI may temporarily store waste containers in trailers in this area. Pallets of containers may not be double-stacked (with the exception of pallets of five gallon pails) and must be arranged such that WTI personnel are able to inspect the containers daily. WTI may temporarily store up to fifteen (15) trailers in 90-Day North and is not permitted to store waste containers on the ground. WTI estimates each trailer may hold up to 100, 55-gallon equivalent containers, which is approximately 5,500 gallons per trailer.

The secondary containment for this area is 71,402 gallons. The secondary containment of this area is sufficient to accommodate the total proposed storage capacity of 82,500 gallons (15 trailer x 5,500 gallons per trailer = 82,500 gallons).

WTI may store waste types 0 – 2 in this area; compatibility guidelines will be followed.

90-DAY EAST

WTI may temporarily store waste containers in trailers in this area. Pallets of containers may not be double-stacked (with the exception of pallets of five gallon pails) and must be arranged such that WTI personnel are able to inspect the containers daily. WTI may temporarily store up to seven (7) trailers and is not permitted to store waste containers on the ground. WTI estimates each trailer may hold up to 100, 55-gallon equivalent containers, which is approximately 5,500 gallons per trailer.

The secondary containment for this area is shared with 90-Day North, which has a secondary containment capacity of 71,402 gallons. The secondary

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containment is sufficient to accommodate the total storage capacity of 38,500 gallons (7 trailer x 5,500 gallons per trailer = 38,500 gallons) for this area plus 90-Day North total proposed storage capacity of 82,500 gallons (15 trailer x 5,500 gallons per trailer = 82,500 gallons).

WTI may store waste types 0 – 2 in this area; compatibility guidelines will be followed.

B-Area Outside Pump Out Tank Farm

WTI may temporarily store waste containers in trailers in this area. Pallets of containers may not be double-stacked (with the exception of pallets of five gallon pails) and must be arranged such that WTI personnel are able to inspect the containers daily. WTI may temporarily store up to three (3) trailers in this area and is not permitted to store waste containers on the ground. WTI estimates each trailer may hold up to 100, 55-gallon equivalent containers, which is approximately 5,500 gallons per trailer.

The secondary containment for this area is 7,730 gallons and is sufficient to accommodate the total proposed storage capacity 16,500 gallons(3 trailer x 5,500 gallons per trailer = 16,500 gallons).

WTI may store waste types 0 – 2 in this area; compatibility guidelines will be followed.

4. Section F – Procedures to Prevent Hazards

This permit modification will not affect Section F of the Part B permit application. Although facility inspections are described in Section F, specific inspection forms are not included in the permit application. However, special inspection forms will be created to instruct facility personnel in the modified operations as a result of the extended outage.

5. Section G – Contingency Plan

Not Affected

6. Section H – Personnel Training

Not Affected

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7. Section I – Closure Plans, Post-Closure Plans, and Financial Requirements

The Closure Plan encompasses the removal and disposal of hazardous waste managed in permitted units at the facility. No additional structures or equipment will be required as a result of the temporary storage modification. The maximum waste inventory at the facility during this modification may increase up to 44,835 gallons. This increased volume of waste will require WTI to update the financial assurance mechanism (Irrevocable Letter of Credit, ILOC) upon approval of this permit modification. Once this permit modification expires, WTI will submit a Class 1 permit modification to adjust the ILOC.

8. Section J – Corrective Action

Section J lists and describes waste management units (WMUs) identified at the facility. The temporary storage modification will affect several WMUs and will temporarily add one area to the list that is not currently included as a WMU. Changes that affect Section J are as follows:

- 1) Increasing the permitted storage capacity and/or allowing temporary storage capacity at several currently identified WMUs:
 - Incineration System (WMU#1) – South Bay (Bay#3) of the Incinerator Building, no current permitted storage capacity, modification will temporarily add storage capacity of 13,200 gallons;
 - Organic Tanker Unload Station (WMU#3) – E-Bay (Bay#1), no current permitted storage capacity, modification will temporarily add storage capacity of 13,200 gallons;
 - Building B (External Truck Wash, WMU#5) – increasing storage capacity from 15,180 gallons to 19,440 gallons;
 - Container Processing Building (WMU#10) – no current permitted storage capacity, modification will temporarily add storage capacity of 92,400 gallons;
 - Building A (Drum Warehouse of Container Processing Building, WMU#11) – increasing storage capacity from 510,000 gallons to 554,000 gallons;
 - Treatment Residual Handling Areas - (WMU#16) – no current permitted off-site hazardous waste storage capacity, modification will temporarily add storage capacity of 121,000 gallons;
 - Building C (Lab Pack Building, WMU#18) – increasing storage capacity from 13,200 gallons to 22,825 gallons.

- 2) WMU#16 (90-Day North and 90-Day East), WTI may temporarily store off-site generated containerized hazardous waste in these units. The waste will be stored in trailers and not double stacked. WTI will not store reactive (D003) material in these areas or material that may pose a reactivity threat.

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- 3) WTI may temporarily store off-site generated containerized hazardous waste in the B-area located on the south side of the Container Processing Building (south of the Pump Out Tanks). This area is not currently permitted for storage; the modification will allow storage of 16,500 gallons. The waste will be stored in trailers and not double stacked. WTI will not store reactive (D003) material in these areas or material that may pose a reactivity threat.

As described in Section D of the Part B permit application and in the paragraphs above, all areas (permanent and temporary) are paved with reinforced concrete, are constructed with berms to control run-on and run-off, and have adequate secondary containment with sumps.

9. Section K – Other Federal laws

Not Affected

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Part A
Hazardous Waste Permit Application

Heritage – WTI, Inc.
East Liverpool, Ohio

November 1, 2001
Revision 15 – March 16, 2009

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<p>SEND COMPLETED FORM TO: The Appropriate State or EPA Regional Office.</p>	<p>United States Environmental Protection Agency RCRA SUBTITLE C SITE IDENTIFICATION FORM</p> <p style="text-align: right;">OHIO EPA DHWM JUL 21 2009</p>	
<p>1. Reason for Submittal (See instructions on page 14.)</p> <p>MARK ALL BOX(ES) THAT APPLY</p>	<p>Reason for Submittal:</p> <p><input type="checkbox"/> To provide Initial Notification of Regulated Waste Activity (to obtain an EPA ID Number for hazardous waste, universal waste, or used oil activities)</p> <p><input type="checkbox"/> To provide Subsequent Notification of Regulated Waste Activity (to update site identification information)</p> <p><input type="checkbox"/> As a component of a First RCRA Hazardous Waste Part A Permit Application</p> <p><input checked="" type="checkbox"/> As a component of a Revised RCRA Hazardous Waste Part A Permit Application (Amendment #15)</p> <p><input type="checkbox"/> As a component of the Hazardous Waste Report</p>	
<p>2. Site EPA ID Number (page 15)</p>	<p>EPA ID Number</p> <p style="text-align: center;">O H D 9 8 0 6 1 3 5 4 1</p>	
<p>3. Site Name (page 15)</p>	<p>Name:</p> <p>Heritage - WTI, Inc.</p>	
<p>4. Site Location Information (page 15)</p>	<p>Street Address: 1250 Saint George Street</p> <p>City, Town, or Village: East Liverpool State: Ohio</p> <p>County Name: Columbiana Zip Code: 43920</p>	
<p>5. Site Land Type (page 15)</p>	<p>Site Land Type: <input checked="" type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other</p>	
<p>6. North American Industry Classification System (NAICS) Code(s) for the Site (page 15)</p>	<p>A.</p> <p style="text-align: center;">15 6 2 2 1 1</p>	<p>B.</p> <p style="text-align: center;">15 6 2 1 1 2</p>
	<p>C.</p> <p style="text-align: center;">15 6 2 2 1 3</p>	<p>D.</p> <p style="text-align: center;">15 6 2 9 9 8 1</p>
<p>7. Site Mailing Address (page 16)</p>	<p>Street or P. O. Box: 1250 Saint George Street</p> <p>City, Town, or Village: East Liverpool</p> <p>State: Ohio</p> <p>Country: United States of America Zip Code: 43920</p>	
<p>8. Site Contact Person (page 16)</p>	<p>First Name: Frank MI Last Name: Murray</p> <p>Phone Number: 330.385.7337 Extension: 2154 Email address: fmurray@vonrollwti.com</p>	
<p>9. Operator and Legal Owner of the Site (pages 16 and 17)</p>	<p>A. Name of Site's Operator: Heritage - WTI, Inc.. Date Became Operator (mm/dd/yyyy): 11/13/1992</p> <p>Operator Type: <input checked="" type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other</p> <p>B. Name of Site's Legal Owner: Heritage - WTI, Inc.. Date Became Owner (mm/dd/yyyy): 11/13/1992</p> <p>Owner Type: <input checked="" type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other</p>	

9. Legal Owner (Continued) Address	Street or P. O. Box: <u>1250 Saint George Street</u>		OHIO EPA-DHWM
	City, Town, or Village: <u>East Liverpool</u>		
	State: <u>Ohio</u>		
	Country: <u>United States of America</u>		Zip Code: <u>43920</u>

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10. Type of Regulated Waste Activity

Mark "Yes" or "No" for all activities; complete any additional boxes as instructed. (See instructions on pages 18 to 21.)

A. Hazardous Waste Activities

Complete all parts for I through 6.

- | | |
|--|---|
| <p>Y <input checked="" type="checkbox"/> N <input type="checkbox"/> 1. Generator of Hazardous Waste
 If "Yes", choose only one of the following - a b or c.</p> <p><input checked="" type="checkbox"/> a. LQG: Greater than 1,000 kg/mo (2,200 lbs./mo.) of non-acute hazardous waste; or</p> <p><input type="checkbox"/> b. SQG: 100 to 1,000 kg/mo (220 - 2,200 lbs./mo.) of non-acute hazardous waste; or</p> <p><input type="checkbox"/> c. CESQG: Less than 100 kg/mo (220 lbs./mo.) of non-acute hazardous waste</p> <p>In addition, indicate other generator activities.</p> <p>Y <input type="checkbox"/> N <input checked="" type="checkbox"/> d. United States Importer of Hazardous Waste</p> <p>Y <input type="checkbox"/> N <input checked="" type="checkbox"/> e. Mixed Waste (hazardous and radioactive) Generator</p> | <p>Y <input type="checkbox"/> N <input checked="" type="checkbox"/> 2. Transporter of Hazardous Waste</p> <p>Y <input checked="" type="checkbox"/> N <input type="checkbox"/> 3. Treater, Storer, or Disposer of Hazardous Waste (at your site) Note: A hazardous waste permit is required for this activity.</p> <p>Y <input type="checkbox"/> N <input checked="" type="checkbox"/> 4. Recycler of Hazardous Waste (at your site)</p> <p>Y <input type="checkbox"/> N <input checked="" type="checkbox"/> 5. Exempt Boiler and/or Industrial Furnace
 If "Yes", mark each that applies.
 <input type="checkbox"/> a. Small Quantity On-site Burner Exemption
 <input type="checkbox"/> b. Smelting, Melting, and Refining Furnace Exemption</p> <p>Y <input type="checkbox"/> N <input checked="" type="checkbox"/> 6. Underground Injection Control</p> |
|--|---|

B. Universal Waste Activities

Y N 1. Large Quantity Handler of Universal Waste (accumulate 5,000 kg or more) [refer to your State regulations to determine what is regulated]. Indicate types of universal waste generated and/or accumulated at your site. If "Yes", mark all boxes that apply:

	<u>Generate</u>	<u>Accumulate</u>
a. Batteries	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
b. Pesticides	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Thermostats	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Lamps	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
e. Other (specify) _____	<input type="checkbox"/>	<input type="checkbox"/>
f. Other (specify) _____	<input type="checkbox"/>	<input type="checkbox"/>
g. Other (specify) _____	<input type="checkbox"/>	<input type="checkbox"/>

Y N 2. Destination Facility for Universal Waste
 Note: A hazardous waste! permit may be required for this activity.

C. Used Oil Activities

Mark all boxes that apply.

- Y N 1. Used Oil Transporter**
 If "Yes", mark each that applies.
 a. Transporter
 b. Transfer Facility
- Y N 2. Used Oil Processor and/or Re-refiner**
 If "Yes", mark each that applies.
 a. Processor
 b. Re-refiner
- Y N 3. Off-Specification Used Oil Burner**
- Y N 4. Used Oil Fuel Marketer**
 If "Yes", mark each that applies.
 a. Marketer Who Directs Shipment of Off-Specification Used Oil to Off-Specification Used Oil Burner
 b. Marketer Who First Claims the Used Oil Meets the Specifications

**United States Environmental Protection Agency
HAZARDOUS WASTE PERMIT INFORMATION FORM**

1. Facility Permit Contact (See instructions on page 23)	First Name: Frank	MI:	Last Name: Murray											
	Phone Number: 330.385.7337		Phone Number Extension: 2154											
2. Facility Permit Contact Mailing Address (See instructions on page 23)	Street or P.O. Box: 1250 Saint George Street													
	City, Town, or Village: East Liverpool													
	State: Ohio													
	Country: United States of America		Zip Code: 43920											
3. Operator Mailing Address and Telephone Number (See instructions on page 23)	Street or P.O. Box: 1250 Saint George Street													
	City, Town, or Village: East Liverpool													
	State: Ohio													
	Country: United States of America	Zip Code: 43920	Phone Number 330.385.7337											
4. Legal Owner Mailing Address and Telephone Number (See instructions on page 23)	Street or P.O. Box: 1250 Saint George Street													
	City, Town, or Village: East Liverpool													
	State: Ohio													
	Country: United States of America	Zip Code: 43920	Phone Number 330.385.7337											
5. Facility Existence Date (See instructions on page 24)	Facility Existence Date (mm/dd/yyyy): November 13, 1992													
6. Other Environmental Permits (See instructions on page :24)														
A. Permit Type (Enter code)	B. Permit Number							C. Description						
N	O	H	3	I	N	0	0	1	7	0	*	D	D	NPDES Permit
P	1	7	-	1	0	4								PTI Application No.
P	1	7	-	8	2	5								PTI Application No.
P	1	7	-	1	0	0	9							PTI Application No.
P	1	7	-	1	1	2	3							PTI Application No.
7. Nature of Business (Provide a brief description; see Instructions on page 24)														
Services provided														

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8. Process Codes and Design Capacities (See instructions, on page 24) - Enter information in the Sections on Form Page 3.

A. PROCESS CODE - Enter the code from the list of process codes in the table below that best describes each process to be used at the facility. Fifteen lines are provided for entering codes. If more lines are needed, attach a separate sheet of paper with the additional information. For "other" processes (i.e., D99, S99, T04 and X99), enter the process information in Item 9 (including a description).

B. PROCESS DESIGN CAPACITY- For each code entered in Section A, enter the capacity of the process.

11. AMOUNT -Enter the amount. In a case where design capacity is not applicable (such as in a closure (post-closure or enforcement action) enter the total amount of waste for that process.

2. UNIT OF MEASURE -For each amount entered in Section B(1), enter the code in Section B(2) from the list of unit of measure codes below that describes the unit of measure used. Select only from the units of measure in this list.

C. PROCESS TOTAL NUMBER OF UNITS - Enter the total number of units for each corresponding process code.

PROCESS CODE	PROCESS	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY	PROCESS CODE	PROCESS	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
D79	<u>Disposal:</u> Underground Injection Well Disposal	Gallons; Liters; Gallons Per Day, ; or Liters Per Day	T81	<u>Treatment (continued):</u> Cement Kiln	For T81-T93:
D80	Landfill	Acre-feet; Hectare-meter; Acres; Cubic Meters; Hectares; Cubic Yards	T82	Lime Kiln	
D81	Land Treatment	Acres or Hectares	T83	Aggregate Kiln	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; Btu Per Hour
D82	Ocean Disposal	Gallons Per Day or Liters Per Day	T84	Phosphate Kiln	
D83	Surface Impoundment Disposal	Gallons; Liters; Cubic Meters; or Cubic Yards	T85	Coke Oven	
D99	Other Disposal	Any Unit of Measure in Code Table Below	T86	Blast Furnace	
S01	<u>Storage:</u> Container	Gallons; Liters; Cubic Meters; or Cubic Yards	T87	Smelting, Melting, or Refining Furnace	Hour; Liters Per Hour; Kilograms Per Hour; or Million Btu Per Hour
S02	Tank Storage	Gallons; Liters; Cubic Meters; or Cubic Yards	T88	Titanium Dioxide Chloride Oxidation Reactor	
S03	Waste Pile	Cubic Yards or Cubic Meters	T89	Methane Reforming Furnace	
S04	Surface Impoundment Storage	Gallons; Liters; Cubic Meters; or Cubic Yards	T90	Pulping Liquor Recovery Furnace	
S05	Drip Pad	Gallons; Liters; Acres; Cubic Meters; Hectares; or Cubic Yards	T91	Combustion Device Used In The Recovery Of Sulfur Values From Spent Sulfuric Acid	
S06	Containment Building Storage	Cubic Yards or Cubic Meters	T92	Halogen Acid Furnaces	
S99	Other Storage	Any Unit of Measure in Code Table Below	T93	Other Industrial Furnaces Listed In 40 CFR §260.10	
T01	<u>Treatment:</u> Tank Treatment	Gallons Per Day; Liters Per Day	T94	Containment Building - Treatment	Cubic Yards; Cubic Meters; Short Tons Per Hour; Gallons Per Hour; Liters Per Hour; Btu Per Hour; Pounds Per Hour; Short Tons Per Day; Kilograms Per Hour; Metric Tons Per Day; Gallons Per Day; Liters Per Day; Metric Tons Per Hour; or Million Btu Per Hour
T02	Surface Impoundment Treatment	Gallons Per Day; Liters Per Day		<u>Miscellaneous (Subpart X):</u>	
T03	Incinerator	Short Tons Per Hour; Metric Tons Per Hour; Gallons Per Hour; Liters Per Hour; Btu Per Hour; Pounds Per Hour; Short Tons Per Day; Kilograms Per Hour; Gallons Per Day; Liters Per Day; Metric Tons Per Hour; or Million Btu Per Hour	X01	Open Burning/Open Detonation	Any Unit of Measure in Code Table Below
T04	Other Treatment	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; Btu Per Hour; Gallons Per Day; Liters Per Hour; or Million Btu Per Hour	X02	Mechanical Processing	Short Tons Per Hour; Metric Tons Per Hour; Short Tons Per Day; Metric Tons Per Day; Pounds Per Hour; Kilograms Per Hour; Gallons Per Hour; Liters Per Hour; or Gallons Per Day
T80	Boiler	Gallons; Liters; Gallons Per Hour; Liters Per Hour; Btu Per Hour; or Million Btu Per Hour	X03	Thermal Unit	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; Btu Per Hour; or Million Btu Per Hour
			X04	Geologic Repository	Cubic Yards; Cubic Meters; Acre-feet; Hectare-meter; Gallons; or Liters
			X99	Other Subpart X	Any Unit of Measure Listed Below

UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE
Gallons.....	G	Short Tons Per Hour.....	D	Cubic Yards.....	Y
Gallons Per Hour.....	E	Metric Tons Per Hour.....	W	Cubic Meters.....	C
Gallons Per Day.....	U	Short Tons Per Day.....	B	Acres.....	B
Liters.....	L	Metric Tons Per Day.....	S	Acre-feet.....	A
Liters Per Hour.....	H	Pounds Per Hour.....	R	Hectares.....	Q
Liters Per Day.....	V	Kilograms Per Hour.....	R	Hectare-meter.....	F
		Million Btu Per Hour.....	X	Btu Per Hour.....	I

3. Process Code and Design Capacities (Continued)

EXAMPLE FOR COMPLETING Item * (shown in line X-1 below): A facility has a storage tank, which can hold 533,788 gallons.

Line Number	A. Process Code (From List Above)				B. PROCESS DESIGN CAPACITY		C. Process Total Number of Units	For official Use Only				
	(1) Amount (specify)	(2) Units of Measure (Enter code)										
X 1	S	0	2	533,788	G		0 0 1					
1	T	0	3	195.6	X		0 0 2					
2	T	0	1	11,400	E		0 0 6					
3	S	0	2	94,000	G		0 0 6					
4	S	0	2*	2,400	Y		0 0 4					
5	S	0	1	73,650**	G		0 0 1					
6	S	0	1	399,265**	G		0 0 3					
7	S	0	1	92,400**	G		0 0 1					
7	S	0	2*	25,800	G		0 0 9					
8	S	0	2*	612,300	G		0 5 2					
9	T	0	1	600	E		0 0 1					
1 0	S	0	2	16,900	G		0 0 8					
1 1	S	0	2	15,300	G		0 0 2					
1 2	S	0	1	0**	G		0 0 1					
1 3	T	0	1	52,500	E		0 1 5					
1 4	S	0	2	4,000	G		0 0 1					

NOTE: If you need to list more than 15 process codes, attach an additional sheet(s) with the information in the same format as above. Number the lines sequentially, taking into account any lines that will be used for "other" processes (i.e., D99, S99, T04, and X99) in item 8

9. Other Processes (See instructions on page 25 and follow instructions from Item 8 for D99, S99, T04, and X99 process codes)

Line Number (Enter #s in sequence with Item 8)	A. Process Code (From List above)				B. PROCESS DESIGN CAPACITY		C. Process Total Number of Units	D. Description of Process
	(1) Amount (Specify)	(2) Units of Measure (Enter Code)						
x 2	T	0	4	100	U		OO1	In-situ Vitrification
1 B	T	0	4	1,000	U		OO1	Treatment of isocyanates through polymerization
x 5	T	0	4	100,000	G		OO1	
								Splitting, repackaging, consolidating, solidifying and removing pumpable liquids from containers

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1 0. Description of Hazardous Wastes (See instructions on page 20) - Enter Information In the Sections on Form Page 5.

- A- EPA HAZARDOUS WASTE NUMBER - Enter the four-digit number from 40 CFR, Part 261 Subpart D of each listed hazardous waste you will handle. For hazardous wastes which are not listed In 40 CFR, Part 261 Subpart D, enter the four-digit number(s) from 40 CFR Part 261, Subpart C that describes the characteristics and (or the? toxic contaminants of those hazardous wastes.
- B. ESTIMATED ANNUAL QUANTITY - For each listed waste entered in Section A, estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in Section A, estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.
- C. UNIT OF MEASURE - For each quantity entered in Section 0, enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS	P	KILOGRAMS	K
TONS	T	METRIC TONS	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure, taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES

1. PROCESS CODES:

For listed hazardous waste: For each listed hazardous waste entered in Section A, select the code(s) from the list of process codes contained in Items 8A and 9A on page 3 to indicate all the processes that will be used to store, treat, and/or dispose of all the listed hazardous wastes.
 For non-listed hazardous waste: For each characteristic or toxic contaminant entered in Section A, select the code(s) from the list of process codes contained in Items 8A and 9A on page 3 to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

NOTE: THREE SPACES ARE PROVIDED FOR ENTERING PROCESS CODES. IF MORE ARE NEEDED:

1. Enter the first two as described above.
2. Enter "000" in the extreme right box of Item 101)(1).
3. Use additional sheet, enter line number from previous sheet, and enter additional code(s) in Item 10.E.

2. PROCESS DESCRIPTION: if a code is not listed for a process that will be used, describe the process in Item 10.D(2) or In Item 10.E(2).

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER - Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in Section A. On the same line complete Sections B, C and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
2. In Section A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In Section D(2) on that line enter "included with above" and make no other entries ion that line.
3. Repeat step 2 for each EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING Item 10 (shown in line numbers X-1, X-2, X-3, and X-4 below) - A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operations. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

Line Number	A. EPA Hazardous Waste No. (Enter code)				B. Estimated Annual Quantity of Waste	C. Unit of Measure (Enter code)	D. PROCESSES														
	(1) PROCESS CODES (Enter code)						(2) PROCESS DESCRIPTION- (if a code is not entered in D(1))														
X	1	K	0	5	4	900	P	T	0	3	D	8	0								
X	2	D	0	0	2	400	P	T	0	3	D	8	0								
X	3	D	0	0	1	100	p	T	0	3	D	8	0								
X	4	D	0	0	2																Included With Above

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11. Map (See instructions on pages 25 and 26)

Attach to this application a topographic map, or other equivalent map, of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing and proposed Intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in this map area. See Instructions for precise requirements.

12. Facility Drawing (See Instructions on page 26)

All existing facilities must include a scale drawing of the facility (see instructions for more detail).

13. Photographs (See Instructions on page 26)

All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment and disposal areas, and sites of future storage, treatment or disposal areas (see instructions for more detail).

14. Comments (See Instructions on page 26)

The hazardous waste codes for Section 10 are listed in Table 1 and Table 2.

See Attachment A and B for additional descriptions of units listed in Section 8.

The following applies to all hazardous waste nos. or codes in Section 10:

The estimated annual quantity of waste is 154,000 tons per year;
Storage codes S01 and S02 apply; and
Process codes T01, T03, T04, and X02 apply.

For Section 8, Attachment A details all the tank information including EPA ID.

*Tanks with this designation are used for both storage and treatment. A breakdown of storage and treatment capacities are described in Attachment A.

** - indicates temporary storage capacity for containers. See Attachment A for the breakdown.

As described in the permit modification request submitted March 16, 2009, the Permittee plans to replace the kiln (primary combustion chamber), located in the hazardous waste incineration system, during the fall of 2009. The replacement of the kiln, and any necessary ancillary maintenance, is scheduled to be completed within thirty days of shutdown operations. Hazardous waste management operations at the facility during the extended outage will be modified in accordance with the terms and conditions listed in Attachment 10 to the Ohio Hazardous Waste Facility Installation and Operation permit. Since the revised operations are temporary, the Part A and Part B permit applications were not modified. Alterations to permitted activity such as, but not limited to, an increase in container storage capacity, container storage locations, and container storage times, are outlined in detail in Attachment 10.

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Item	Description	Code	Total Capacity
4	<p>Feed Building</p> <p>Four (2 currently existing, 2 future) rectangular, concrete, open top tanks for accumulating loose solid non-reactive waste. Each tank has a capacity of 600 cubic yards. Four shredders are planned for future installation. See attachment B for process code and capacity of shredders.</p>	S02/T01	2,400 cubic yards
5	<p>Container Holding Building (Slag Canopy)</p> <p>Holds a maximum of 100,000 gallons of a combination of drums, fiber packs, cans, pails and lined cardboard containers. Processing activities such as, but not limited to, splitting, consolidating, solidifying, and repacking may take place in this building</p>	S01/TT04	100,000 gallons 73,650 GALLONS**
6	<p>Container Storage Buildings</p> <p>Building A (Drum Warehouse)- Approximately 6,000 drums or the equivalent (510,000 gallons) of a combination of drums, fiber packs, cans, pails and lined cardboard containers.</p> <p>Building B (External Truck Wash Building)- Approximately 276 drums or the equivalent (19,440 gallons) in a variety of containers.</p> <p>Building C (Lab Pack Building) -This building has a capacity of 22,825 gallons of waste.</p>	S01	538,380 gallons 399,265 GALLONS**
7	<p>Container Processing Building</p> <p>There are nine total tanks in the container processing building. Five are existing container pump-out tanks used to accumulate free liquids removed from containers with one serving as an overflow tank. Two additional container pump-out tanks are permitted for future installation. The final two tanks are associated with the extruder. One is currently installed (PT-6) the other is planned for the future when the second extruder is constructed. The extruder is described in Attachment B.</p>	S02/T01 S01	25,800 gallons 92,400 GALLONS**

1ST FLOOR - CONTAINER STORAGE WITH A PERMITTED CAPACITY OF 44,000 GALLONS**
 2ND FLOOR - CONTAINER STORAGE WITH A PERMITTED CAPACITY OF 42,900 GALLONS**
 3RD FLOOR - CONTAINER STORAGE WITH A PERMITTED CAPACITY OF 5,500 GALLONS**

** - PLEASE REFER TO PAGE 6 OF 6 OF THE PART A PERMIT APPLICATION AND ATTACHMENT 10 OF THE HAZARDOUS WASTE FACILITY INSTALLATION AND OPERATION PERMIT.

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<u>Item</u>	<u>Description</u>	<u>Code</u>	<u>Total Capacity</u>
Truck Wash (all truck wash equipment is not currently installed, but permitted for future installation):			
9	Truck Wash Exhaust Air and Vent Gas Cleaning System	T01	600 gallons per hour
	Scrubber neutralization tank		
10	Internal Truck Wash	S02	16,900 gallons
	<u>Quantity</u>	<u>Description</u>	<u>Capacity</u>
	3	Accumulation tanks	13,265 gallons
	3	Reusable solvent tanks	1,500 gallons
	1	Recirculation tank	1,835 gallons
	1	Overflow tank	300 gallons
11	External Truck Wash	S02	15,300 gallons
	<u>Quantity</u>	<u>Description</u>	<u>Capacity</u>
	1	Holding tank	15,000 gallons
	1	Overflow tank	300 gallons
12	Truck Holding and Sampling Area	S01	46,000 gallons 0 GALLONS**

This area can store containerized trailers of waste and bulk solid containers of waste. This area may also be used for sampling, processing, or staging waste.

** - PLEASE REFER TO PAGE 6 OF 6 OF THE PART A PERMIT APPLICATION AND ATTACHMENT 10 OF THE HAZARDOUS WASTE FACILITY INSTALLATION AND OPERATION PERMIT.

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23	90-DAY NORTH	S01	82,500 GALLONS**
	WTI STORES ON-SITE GENERATED WASTE IN THIS AREA. WTI IS TEMPORARILY PERMITTED TO STORE CONTAINERS ON TRAILER IN THIS AREA. NO FLOOR STORAGE IS PERMITTED. WTI MAY STORE UP TO 15 TRAILERS IN 90-DAY NORTH.		
24	90-DAY EAST	S01	38,500 GALLONS **
	WTI STORES ON-SITE GENERATED WASTE IN THIS AREA. WTI IS TEMPORARILY PERMITTED TO STORE CONTAINERS ON TRAILER IN THIS AREA. NO FLOOR STORAGE IS PERMITTED. WTI MAY STORE UP TO 7 TRAILERS IN 90-DAY EAST.		
25	DIRECT TANKER SOUTH (SOUTH BAY)	S01	13,200 GALLONS**
	WTI MAY TEMPORARILY STORE CONTAINERS OF OFF-SITE GENERATED WASTE ON THE SCALE IN THIS UNIT; ONE ROW, TWO PALLETS WIDE, AND 3 PALLETS HIGH.		
26	DIRECT ORGANIC TANKER EAST (E-BAY/BAY #1)	S01	13,200 GALLONS**
	WTI MAY TEMPORARILY STORE CONTAINERS OF OFF-SITE GENERATED WASTE ON THE SCALE IN THIS UNIT; ONE ROW, TWO PALLETS WIDE, AND 3 PALLETS HIGH.		
27	B-AREA SOUTH OF CONTAINER PROCESSING BUILDING	S01	16,500 GALLONS**
	WTI IS TEMPORARILY PERMITTED TO STORE CONTAINERS OF OFF-SITE GENERATED WASTE ON TRAILER IN THIS AREA. NO FLOOR STORAGE IS PERMITTED. WTI MAY STORE UP TO 3 TRAILERS IN THIS AREA.		

** - PLEASE REFER TO PAGE 6 OF 6 OF THE PART A PERMIT APPLICATION AND ATTACHMENT 10 OF THE HAZARDOUS WASTE FACILITY INSTALLATION AND OPERATION PERMIT.

HAZARDOUS WASTE PERMIT APPLICATION
PART A

SECTION 13 PHOTOGRAPHS

The numbers associated with the photographs correspond to line numbers in Section 8, Process Codes and Design Capabilities, and Attachments A and B. The locations of the units can be found on the facility plot plan, page B-36, required in Section 12.

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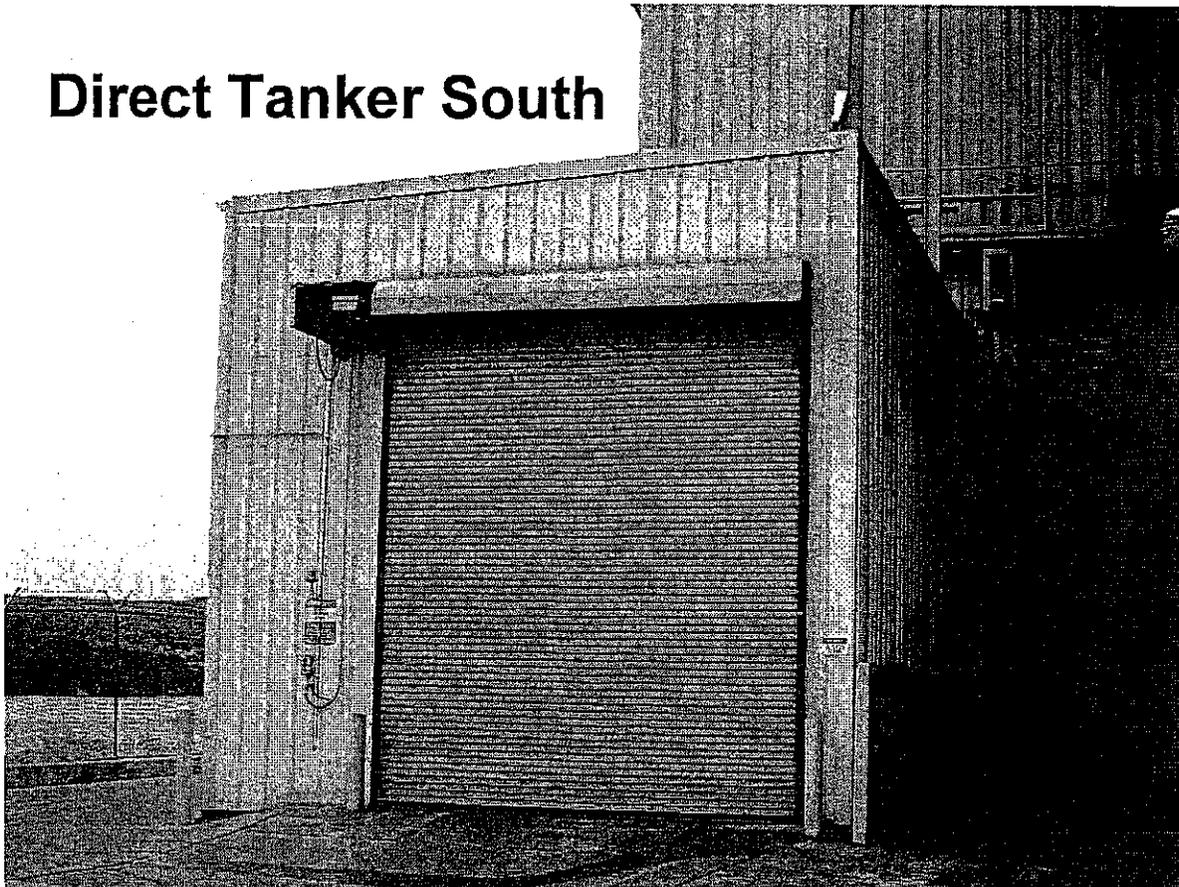


ATTACHMENT A, #23 - 90-DAY NORTH AREA

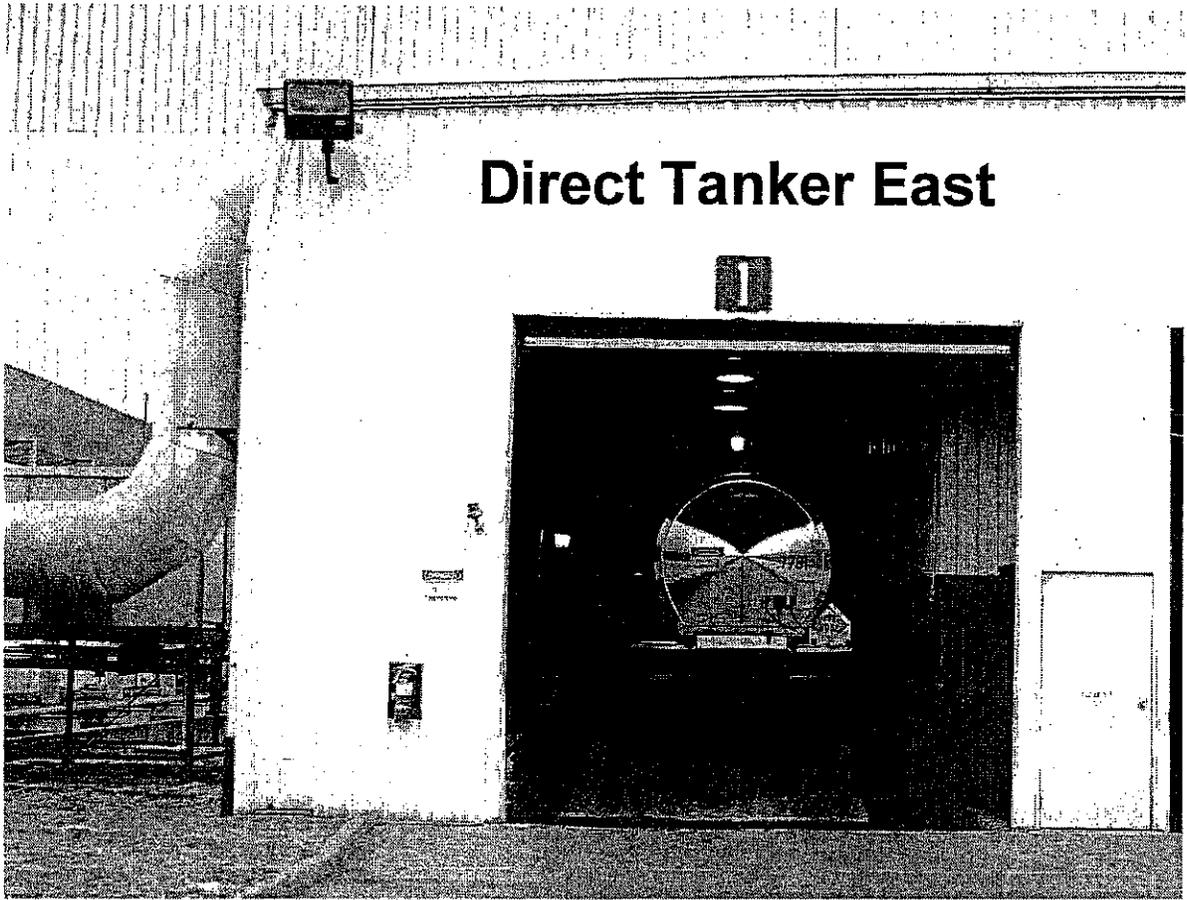


ATTACHMENT A, #24 - 90-DAY EAST AREA

Direct Tanker South



ATTACHMENT A, #25 – DIRECT TANKER SOUTH (SOUTH BAY)



ATTACHMENT A, #26 – DIRECT ORGANIC TANKER EAST (E-BAY/BAY #1



ATTACHMENT A, #27 – B-AREA SOUTH OF CONTAINER PROCESSING BUILDING

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