



# Modified Ohio Hazardous Waste Facility Installation and Operation Permit

Division of Materials and Waste Management

Permittee: Heritage Thermal Services, Inc.

U.S. EPA ID: OHD 980 613 541

Facility Name: Heritage Thermal Services, Inc.

Mailing Address: 1250 Saint George Street

City: East Liverpool State: OH Zip: 43920-3400

Operator Name: Heritage Thermal Services, Inc.

Mailing Address: 1250 Saint George Street

City: East Liverpool State: OH Zip: 43920-3400

Facility Street Address: 1250 Saint George Street

City: East Liverpool State: OH Zip: 43920-3400

## Permit Modification

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 for the facility with the above-referenced ID 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in effect until such time as the Ohio Hazardous Waste Facility Installation and Operation Permit is renewed, modified, withdrawn, suspended, or revoked.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 October 3, 2014 and December 22, 2014. 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.

## Permit Modification Approval

Entered into the Journal of the Director on:

February 4, 2015

Date:

Craig W. Butler, Director  
Ohio Environmental Protection Agency

## B.12. Required Aisle Space

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) 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 smaller individual 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**

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, East Storage Area, and the Bulk Solid Storage Area (BSSA).

All container storage areas are 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 and the Bulk Solid Storage Area. Container storage areas within buildings or under roof/canopy are equipped with automated fire detection and suppression systems. The North and East Storage Areas and the Bulk Solid Storage Area 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. An exception is the Truck Holding and Sampling Area which is under a roof/canopy. The other exceptions are the North and East Storage Areas and the Bulk Solid Storage Area which are open without a roof/canopy.

Container storage and processing areas located within buildings have vapor collection points that are connected to the vapor recovery system described in Section D of the permit application. Storage areas that are open (without roof/canopy) do not have vapor recovery systems because the areas are not enclosed.

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 inside enclosed vehicles, all waste is inspected on a daily basis.

The Bulk Solid Storage Area (BSSA) will be located south of the Process Water Holding Tanks and east of the East Storage Area. The BSSA will be open (no roof or canopy), will not have a vapor recovery system, and will not have automatic fire detection or suppression systems. The BSSA will be constructed of concrete, with curbs and a sump.

The Permittee will not conduct dewatering activities, processing activities (such as repackaging, resizing, or similar processes), demolition/cutting activities, or cleaning or decontamination activities in the BSSA. However, the BSSA is permitted for fire-fighting exercises (drills), storage of empty containers, removal of spent carbon from Carbon Boxes from the Vapor Recovery System, and parking of facility equipment.

The BSSA has a permitted storage capacity of 343,345 gallons. The BSSA is permitted for storage of containers of waste that do not contain free liquids. The Permittee will not store oxidizers, organic peroxides, pyrophoric materials, Mixed Infectious and Hazardous Waste (MIHW), highly reactive wastes, highly volatile wastes, or odorous materials in this area. All individual 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 this area.

All waste will be stored in accordance with the Permittee's permit. Aisle space will not be required to be maintained between individual 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 in this area. All compatibility guidelines will be followed when storing wastes in this area 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 BSSA 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 BSSA will follow established procedures for waste receipt, container inspection, segregation of incompatible wastes, weighing, sampling if applicable, dating, labeling, palletizing, and data entry into a 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 BSSA. Individual containers of off-site generated waste may not be double-stacked within a trailer, with the exception of five (5) gallon pails and small stackable containers such as boxes. All waste containers inside enclosed vehicles, 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 BSSA as well.

C.1 Process Capacity / Annual Quantity Limitation

OAC Rule 3745-50-43(A)(7)

(a) The Permittee shall not store more than 855,475 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)	313,500	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
Bulk Solid Storage Area	343,345	gallons

C.16. Compliance Schedule for Bulk Solid Storage Area (BSSA)

Storage of hazardous waste in the BSSA cannot occur until:

- (a) The permittee submits a construction certification report for the BSSA which includes as-built drawings and other supporting information related to the construction of the unit and receives concurrence from Ohio EPA that the unit was constructed in accordance with the approved application and design.
- (b) The permittee has modified their closure cost estimate and financial assurance mechanism to account for the additional waste capacity authorized under the Class 2 permit modification for the BSSA.