



eDocument Workflow Data Ingestion Form

DERR - Hazardous Waste Permitting

Note: All HW Permitting Documents fall under "Permit-Intermediate" doc type.

Keyword Summary:

Secondary ID:	OHD 071 654 958	Stamped date on doc:	2/4/2020
Facility Name:	Retrieve Technologies		
County:	Fairfield	CBI/Trade Secret Info (see protocol below)	
Program:	RCRA C – Hazardous Waste	Request contains CBI/TS claim?	No
Permit Type:	Permit to Install & Operate	Was a "public" copy included?	No
Permit Subtype:	Application & Support	Financial Assurance Info (see protocol below)	
Permit Classification:	Permit Application	Request contains FA policy/account # info?	No
Permit Purpose:	Class 2 Mod	Contingency Plan Info (see protocol below)	
Confidentiality Status:	Public Record for Publication	Request contains facility staff pers/home phone #'s?	No

CBI/Trade Secret Protocol

Applications or requests that contain a claim of Confidential Business Information (CBI) or "trade secret" **are not be ingested** into the Agency's eDoc system. However, any claims must be made at the time of application submission, as required by both OAC rule 3745-49-03 and OAC rule 3745-50-30. Permittees must comply with the complete requirements of the above-cited rules, which include, among other things, submission of a corresponding "public" copy of the application or request which should be ingested into eDocs.

Financial Assurance Info Protocol

If the application contains "original signature" financial assurance documents, these documents **must be forwarded** to CO FA staff (Shawn Sellers or Melissa Cheung) as these types of documents must be secured in CO's fireproof file cabinet. Also, even if the FA information included in a mod application is not "original signature", if it includes information like insurance policy, bank account, letter of credit or bond numbers, these impacted pages should simply be physically removed and not scanned/included as a part of the ingested application. In place of the removed page, a page can be inserted which states: "Pages of this application which contain financial assurance mechanism details specific to policy or account numbers have been removed from this web-available version of the document."

Regarding review of FA components of mods, ERAS has set up a [tracking/request system](#) on SharePoint where DO staff can make a review request the HW FA Review Request list which can be accessed from the DMWM's Financial Assurance site.

Contingency Plan Info Protocol

If the application contains facility staff personal/home phone number information, the impacted pages should simply be physically removed and not scanned/included as a part of the ingested application. In place of the removed page, a page can be inserted which states: "Pages of this application which contain facility staff personal/home phone number information have been removed from this web-available version of the document."

Form Completed by: Chloé Mercier

2/5/2020

Comments

RETRIEV

TECHNOLOGIES

January 31, 2020

Ohio EPA Director
c/o Brad Mitchell, DERR, Hazardous Waste Permitting Section
50 West Town Street, Suite 700
Columbus, Ohio 43215

RE: Class 2 Modification Request for Change in Inspection Frequency and Points of Inspection, RCRA Permit Renewal Application, Retrieval Technologies, Inc., Lancaster, Ohio, OHD071654958

On November 14, 2017, Ohio EPA journalized the Retrieval Technologies, Inc. (Retrieval) Hazardous Waste Facility Installation and Operation Renewal Permit. Table 5-1 of the Permit Renewal Application identifies the inspection schedule, including frequency and points of inspection. When Retrieval originally prepared the Renewal Application, all points of inspection were identified for a daily frequency. Additionally, some of the included points of inspection were unrelated to our RCRA Permit. OAC 3745-54-15 and the referenced regulations therein, allow for inspection frequencies other than daily unless subject to spills (e.g., loading and unloading areas, tanks, etc.). Therefore, Retrieval is requesting a transition to a weekly inspection frequency for various points of inspections that are not required by regulation to be performed daily. Additionally, Retrieval is requesting the removal of various points of inspection that have no relevance to our RCRA Permit, as these items pertain to health and safety or permitted air emissions and are addressed by other regulatory programs (OSHA, PTIO). Points of inspection that are similar/duplicative of others or related to the no longer relevant flood plain are also proposed to be removed.

The proposed changes are reflected in Table 5-1 of the Permit Renewal Application. These proposed changes are not only in line with regulatory requirements but will help Retrieval ensure manpower is available to adequately perform inspections without unnecessary burden. A redline and clean version of Table 5-1 is attached. A complete updated PDF of the renewal application is also provided on CD. The revision log has also been updated appropriately and is attached.

Per C.4 of the Appendix to OAC 3745-50-51, the proposed changes to inspection frequency and items of inspection are considered a Class 2 Modification. Within seven days of the date of this modification request, Retrieval will complete the necessary notifications identified in OAC 3745-50-51(D)(2)(b). A copy of the modification request will also be placed in the Lancaster public library, a 60-day public comment period will be established, and a public meeting will be held as required by OAC 3745-50-51(D)(2).

If you have any questions or require additional information, please contact Tom Plute of Retrieval at 740-653-6290.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Component of RCRA Part B Renewal Application	Subject to Revision - Refer to Letter Referenced Endnotes
Certification Statement	X (Rev 6)
1.0 Introduction	
1.1 Applicable Rules and Regulations	
1.2 Excluded and Exempt Activities	
1.3 Terminology	
1.4 Application Content and Format	C1 (Rev 0.1); I (Rev 0.4); V (Rev 1)
2.0 Facility Description	
2.1 Facility Location	
2.2 Facility Layout	
2.2.1 265 Quarry Road Building Construction	
2.2.2 295 Quarry Road Building Construction	
2.3 Traffic Information	
2.4 Floodplain Information	B (Rev 0.2); T (Rev 4)
2.5 Waste Placement Prohibitions and Seismic Considerations	
3.0 Waste Characteristics	
4.0 Process Information	C1 (Rev 0.1); I (Rev 0.4); V (Rev 5)
4.1 Hazardous Waste Receiving	A (Rev 0.1); C1 (Rev 0.2); I (Rev 0.4); P (Rev 1); V (Rev 5)
4.2 Hazardous Waste Shipping	A (Rev 0.1); C1 (Rev 0.2); V (Rev 5)
4.3 Hazardous Waste Transfer and Staging Associated with Recycling	A (Rev 0.1); C1 (Rev 0.2); I (Rev 0.4); V (Rev 5)
4.4 Description of Permitted Storage Units	I (Rev 0.4); L (Rev 0.5); Q (Rev 2); V (Rev 5)
4.4.1 265 Storage Unit	C1 (Rev 0.1); R (Rev 3); V (Rev 5)
4.4.2 295 Storage Unit	A (Rev 0.1); C1 (Rev 0.2); Q (Rev 2); R (Rev 3); V (Rev 5)
4.5 Containers	V (Rev 5)
4.5.1 Container Management Practices	V (Rev 5)
4.5.2 Special Requirements for Ignitable, Reactive, or Incompatible Wastes	V (Rev 5)
4.5.3 Tracking and Recordkeeping	I (Rev 0.4); T (Rev 4); V (Rev 5)
5.0 Procedures to Prevent Hazards	
5.1 Security Information	
5.2 Inspections	
5.2.1 Frequency of Inspection	
5.2.2 Inspection Logs	
5.3 Design and Operation of Facility	
5.4 Equipment Requirements	
5.4.1 Internal and External Communication Systems	
5.4.2 Emergency Equipment	
5.4.3 Water for Fire Control	
5.4.4 Aisle Space Requirements	
5.5 Arrangements with Local Authorities	
5.6 Preventive Procedures, Structures, and Equipment	
5.6.1 Loading and Unloading Operations	
5.6.2 Run-off	
5.6.3 Water Supplies	
5.6.4 Equipment and Power Failure	
5.6.5 Personnel Protective Equipment	
5.7 Prevention of Reaction of Ignitable, Reactive, and Incompatible Wastes	
6.0 Contingency Plan	
7.0 Personnel Training	
8.0 Closure	
9.0 Groundwater Protection	
10.0 Corrective Action	
Figures	
2-1	
2-2	
2-3	
2-4	I (Rev 0.1)
2-5	A (Rev 0.1); C1 (Rev 0.2); R (Rev 1); V (Rev 2)
4-1	
4-2	
Tables	
1-1	
1-2	C1 (Rev 0.1); V (Rev 1)
4-1	R (Rev 1)
5-1	C1 & C2 (Rev 0.1); R (Rev 1); T (Rev 2); Y (Rev 3); Z (Rev 4)
7-1	C2 (Rev 0.1); I (Rev 0.2); T (Rev 1)
10-1	A (Rev 0.1); C1 (Rev 0.2); I (Rev 0.3); R (Rev 1); V (Rev 2)
Appendices	
A Supporting Documentation for Floodplain	T (Removed Entire Appendix)
Floodplain Evaluation Report (Stone Environmental)	B (Rev 0, New)
MuscleWall Design Package	B (Rev 0, New); F (Rev 0.1)
Plates	
1	
2	A (Rev 0.1); C1 (Rev 0.2); I (Rev 0.3); R (Rev 1); V (Rev 2)
3	R (Rev 1); T (Rev 2)
4	A (Rev 0.1); C1 (Rev 0.2); I (Rev 0.4); R (Rev 1); V (Rev 2)

Cox-Colvin & Associates, Inc.

Clean Changed Pages

Table 5-1. Inspection Schedule, Retrieval Technologies, Inc., Lancaster, Ohio

Revision 4

Inspection Category	Frequency	Points of Inspection		
General	Daily	<ul style="list-style-type: none">• Container time limit in staging adjacent to recycling process ⁽¹⁾• Visual condition of 90 day storage tank (leaks present) ⁽²⁾• 90 day storage tank properly labeled ⁽²⁾	<ul style="list-style-type: none">• Container time limit in staging prior to storage or shipping ⁽¹⁾• Sufficient freeboard in 90 day storage tank based on alarm ⁽²⁾• Visual condition of 90 day storage tank containment (leaks present) ⁽²⁾	<ul style="list-style-type: none">• Sump in truck bays empty ⁽¹⁾• Liquids present in interstitial space of 90 day storage tank based on alarm ⁽²⁾
General	Weekly	<ul style="list-style-type: none">• Waste-related warning signage is in place• Minimum 30 inches of aisle space maintained• Floor clean and free of debris• Water, fire, service, and gas lines properly marked• Proper stacking height of waste containers• Waste container condition (visual deterioration)• Personnel protective equipment inventoried and functional	<ul style="list-style-type: none">• Eye wash and shower stations clean and functional• Oil storage area clean and drums properly marked• Evidence of leaks near waste containers• Emergency equipment containers full and accessible• Sump in recycling areas free of liquid and debris• Emergency equipment inventoried• Waste container time limit in less than 90 day storage areas	<ul style="list-style-type: none">• Waste containers properly closed• Fire extinguishers charged, tagged, and accessible• Hazardous conditions observed• Lighting working properly• Waste containers properly labeled• Audible and visual alarms functional• Perimeter Fence/Security (Quarterly)
265 Permitted Storage Unit	Weekly	<ul style="list-style-type: none">• Leaking containers• Container condition• Berm and ramp condition• Incompatible wastes properly segregated• Container time limit in temporary staging area/battery sorting	<ul style="list-style-type: none">• Spills observed• Containers properly labeled• Cracks or gaps in base• Proper aisle space• Available capacity	<ul style="list-style-type: none">• General cleanliness• Containers closed• Coating condition• Proper stacking height• Container storage time limit
295 Permitted Storage Unit	Weekly	<ul style="list-style-type: none">• Only containers without free liquids present• Container condition• Cracks or gaps in base of unit• Incompatible wastes properly segregated	<ul style="list-style-type: none">• Spills observed• Containers properly labeled• Proper aisle space• Available capacity	<ul style="list-style-type: none">• General cleanliness• Containers closed• Proper stacking height• Container storage time limit

Notes:

Daily frequency means within a 24-hour period, regardless of facility operation schedule, when the applicable area/item is in use

Weekly frequency means at least once between Sunday through Saturday, regardless of facility operation schedule, when the applicable area/item is in use

Refer to actual inspection procedure and log for additional information on points of inspection

Corrective actions will be performed if necessary based on inspection observations

⁽¹⁾ Daily inspection relevant to loading/unloading areas only when in use

⁽²⁾ Daily inspection may be performed remotely via Virtual Tank Inspection SOP VT01 (1/13/2020 and subsequent revisions) by viewing live feed from camera(s) that can: identify presence of leakage within and outside of secondary containment, identify actuated visible alarm for freeboard, identify actuated audible alarm for liquids in interstitial space, and identify presence of label; remote inspections require recordkeeping similar to non-remote inspections; at least once per week the inspection must be non-remote; inspection relevant only when a tank is in use

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Redline Changed Pages

Table 5-1. Inspection Schedule, Retrieval Technologies, Inc., Lancaster, Ohio

Revision 3 4

Inspection Category	Frequency	Points of Inspection		
General	Daily	<ul style="list-style-type: none">• Container time limit in staging adjacent to recycling process ⁽¹⁾• Visual condition of 90 day storage tank (leaks present) ⁽²⁾• 90 day storage tank properly labeled ⁽²⁾	<ul style="list-style-type: none">• Container time limit in staging prior to storage or shipping ⁽¹⁾• Sufficient freeboard in 90 day storage tank based on alarm ⁽²⁾• Visual condition of 90 day storage tank containment (leaks present) ⁽²⁾	<ul style="list-style-type: none">• Sump in truck bays empty ⁽¹⁾• Liquids present in interstitial space of 90 day storage tank based on alarm ⁽²⁾
General	Daily Weekly	<ul style="list-style-type: none">• Waste-related warning signage is in place• Machine guards in place and working properly• Minimum 30 inches of aisle space maintained• Floor clean and free of debris• Water, fire, service, and gas lines properly marked• Outside conditions do not interfere with work• Guard, deadman switches, and machine safety devices operating correctly• Perimeter inspection• Floor greating structural condition• Proper stacking height of waste containers• Container time limit in staging adjacent to recycling process• Material storage tanks properly labeled• Storage tank level switches operational• Waste container time limit in less than 90 day storage areas	<ul style="list-style-type: none">• Eye wash and shower stations clean and functional• Oil storage area clean and drums properly marked• Evidence of leaks near waste containers• Emergency equipment containers full and accessible• Sump in recycling areas free of liquid and debris• Rain event in last 24 hours• Parameters of scrubber checked and recorded• Emergency equipment inventoried• Waste container condition (visual deterioration)• Container time limit in staging prior to storage or shipping• Personnel protective equipment inventoried and functional• Materials are properly label and segregated• Visual condition of storage tanks• Perimeter Fence/Security (Quarterly)	<ul style="list-style-type: none">• Sump in truck bays empty• Waste containers properly closed• Fire extinguishers charged, tagged, and accessible• Hazardous conditions observed• Lighting working properly• Overhead hazards• Supply room cleaned• Air pollution control equipment operating correctly• Waste containers properly labeled• Container time limit in temporary staging prior to shipment• Audible and visual alarms functional• Sufficient freeboard present in storage tanks• Tank secondary containment condition and liquids present
265 Permitted Storage Unit	Daily Weekly	<ul style="list-style-type: none">• Leaking containers• Container condition• Berm and ramp condition• Incompatible wastes properly segregated• Container time limit in temporary staging area/battery sorting	<ul style="list-style-type: none">• Spills observed• Containers properly labeled• Cracks or gaps in base• Proper aisle space• Available capacity	<ul style="list-style-type: none">• General cleanliness• Containers closed• Coating condition• Proper stacking height• Container storage time limit
295 Permitted Storage Unit	Daily Weekly	<ul style="list-style-type: none">• Only containers without free liquids present• Container condition• Cracks or gaps in base of unit• Incompatible wastes properly segregated	<ul style="list-style-type: none">• Spills observed• Containers properly labeled• Proper aisle space• Available capacity	<ul style="list-style-type: none">• General cleanliness• Containers closed• Proper stacking height• Container storage time limit

Notes:

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Daily frequency means within a 24-hour period, regardless of facility operation schedule, when the applicable area/item is in use

Weekly frequency means at least once between Sunday through Saturday, regardless of facility operation schedule, when the applicable area/item is in use

Refer to actual inspection procedure and log for additional information on points of inspection

Corrective actions will be performed if necessary based on inspection observations; flood control corrective actions will be completed within 45 days of initial documentation

⁽¹⁾ Daily inspection relevant to loading/unloading areas only when in use

⁽²⁾ Daily inspection may be performed remotely via Virtual Tank Inspection SOP VT01 (1/13/2020 and subsequent revisions) by viewing live feed from camera(s) that can: identify presence of leakage within and outside of secondary containment, identify actuated visible alarm for freeboard, identify actuated audiblevisible alarm for liquids in interstitial space, and identify precence of label; remote inspections require recordkeeping similar to non-remote inspections; at least once per week the inspection must be non-remote; inspection relevent only when a tank is in use