Modified Ohio Hazardous Waste Facility Installation and Operation Permit

Permittee: Ross Incineration Services, Inc.  
U.S. EPA ID: OHD048415665

Facility Name: Ross Incineration Services, Inc.

Mailing Address: 36790 Giles Road

City: Grafton  State: OH  Zip: 44044

Operator Name: Ross Incineration Services, Inc.

Mailing Address: 36790 Giles Road

City: Grafton  State: OH  Zip: 44044

Facility Street Address: 36790 Giles Road

City: Grafton  State: OH  Zip: 44044

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 January 29, 2014, 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in effect until such time as the Ohio Hazardous Waste Facility Installation and Operation Permit is renewed, modified, withdrawn, suspended, or revoked.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 May 29, 2014 and August 15, 2014, September 12, 2014, and October 6, 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 January 29, 2014 renewal permit.

Permit Modification Approval

Craig W. Butler, Director  
Ohio Environmental Protection Agency

Entered into the Journal of the Director on: 5/28/15

Date:
MODULE C - CONTAINERS STORAGE & TREATMENT

C. CONTAINER STORAGE AND MANAGEMENT

Containers of hazardous waste are stored in the 1) Bulk Storage Areas (BSA No. 1 and No. 2), 2) Oxidizer Storage Building (OSB), 3) Container Storage Facility (CSF), and, 4) Waste Storage Bays (WSB).

BSA No. 1 is outdoors on concrete containment with approximate dimensions of 51 feet by 99 feet and used for storage of hazardous waste without free liquids in roll-offs and other containers. It can store the equivalent of 16 twenty cubic yard roll-offs (i.e., 64,632 gallons).

BSA No. 2 is outdoors on concrete containment with approximate dimensions of 60 feet by 125 feet and used for storage of hazardous waste without free liquids in roll-offs and other containers. It can store the equivalent of 20 twenty cubic yard roll-offs (i.e., 80,790 gallons).

The OSB is a 21 feet by 80 feet steel building used to store containers of oxidizer and organic peroxide waste, in addition to the permitted oxidizer waste storage in the CSF. The OSB is designed to hold 144 fifty-five gallon drums (i.e., 7,920 gallons).

The Container Storage Facility is an open-sided covered building with dimensions of approximately 257 feet by 60 feet that is used for storage of containers of wastes from off-site generators and certain on-site generated wastes. Containers stored in the Container Storage Facility include various types of steel, plastic and composite drums, pails, buckets and boxes as well as bulk containers such as roll-offs and truck tankers. Containers with and without free liquids may be stored in the Container Storage Facility. The Container Storage Facility has adequate secondary containment.

The Container Storage Facility includes 11 separate storage bays (i.e., 8 bays with individual segregated sumps and 3 bays with a common set of sumps). Containers accepted from off-site generators for storage in the Container Storage Facility must meet the US-DOT specifications found in 49 CFR 178. Non-bulk containers such as drums, pails, buckets and boxes are stored in racks.

The Waste Storage Bays (WSB) unit consists of 10 bays, is outdoors on concrete containment, with approximate dimensions of 126 feet by 56 feet, and is used for storage of containers of wastes from off-site generators and certain on-site generated wastes. The WSB design capacity allows for the storage of 121,180 gallons (equivalent to twenty 30 cubic yard roll-offs). Containers stored in the WSB include van trailers, roll-offs, truck tankers, various types of drums, pails, buckets and boxes. Containers with and without free liquids may be stored in the WSB. The WSB has adequate secondary containment.
Typical hazardous waste types received at the facility in containers include: halogenated and non-halogenated spent solvents, paint wastes, off-specification commercial chemical products and spill residues. Waste generated at the facility and stored in containers consists primarily of treatment residuals from the incineration process.

Containers of hazardous waste may be accepted for storage and re-shipment to other hazardous waste treatment, storage and disposal facilities. The wastes in re-shiped containers typically carry waste codes that the facility is permitted to store, but not to incinerate.

Containers of hazardous waste may be repackaged at designated locations within the facility into alternate containers to facilitate management of the waste. Liquid wastes received in tanker trucks may be transferred to tankers operated by the facility (i.e., yard tankers) for direct feeding from a tanker into the incinerator.

C.1 Container Storage/Quantity Limitation

(a) The Permittee is authorized to store 851,840 gallons of hazardous waste at any given time in the permitted container areas: Container Storage Facility (CSF), Bulk Storage Areas (BSA No. 1 and No. 2), Oxidizer Storage Building (OSB), and Waste Storage Bays (WSB). The hazardous waste container storage volume in each of the five permitted container storage units will at no time exceed the unit's respective design storage volume. The Permittee shall store hazardous waste in the types of containers (size and type) described in Section D of the permit application. The Permittee may not store containers for more than one year.

(b) The Permittee shall at all times have access to its current container storage volume via its computer tracking system and be able to demonstrate compliance with its permitted container storage capacity limitation.

(c) Permit Conditions C.1(a), C.2 and C.3 shall not apply to the Permittee’s activities as a generator accumulating hazardous waste on-site in compliance with OAC Rule 3745-52-34 and 40 CFR Part 265, subparts AA, BB, and CC. However, when accumulating waste within the permitted container storage areas, in accordance with OAC Rule 3745-52-34 and 40 CFR Part 265, subparts AA, BB, and CC, the Permittee must not, for the total amount of hazardous waste stored and accumulated, exceed the maximum container storage inventory established under this permit condition.

(d) The Permittee may receive and store wastes in containers without intending to treat said wastes. The Permittee may ship these wastes to another permitted facility for treatment, storage or disposal. The Permittee will handle said wastes in accordance with the practices and procedures in
Sections C and D of the permit application.

C.2 Limitations on Treatment of Hazardous Waste in Containers

(a) The Permittee shall not treat wastes in containers, except by processing in the incineration unit.

(b) Permit Condition C.2(a) shall not apply to the Permittee's activities as a generator treating hazardous waste in containers on-site in compliance with OAC Rule 3745-52-34.

C.3 Waste Identification

The Permittee must store in containers only the hazardous waste codes specified with process code SO1 in Section A of the permit application. The Permittee is prohibited from storing wastes in containers inconsistent with the restrictions and prohibitions in Table C1-1 of Section C of the permit application.

C.4 Condition of Containers

OAC Rule 3745-55-71

If a container holding hazardous waste is not in good condition (e.g., severe rusting, apparent structural defects) or if it begins to leak, the Permittee must transfer the hazardous waste from such container to a container that is in good condition or otherwise manage the waste in compliance with Sections D and F of the permit application, the conditions of this permit and the hazardous waste facility chapters of the OAC.

C.5 Compatibility of Waste with Containers

OAC Rule 3745-55-72

The Permittee must use a container made of or lined with materials which will not react with, and are otherwise compatible with, the hazardous waste to be stored, so that the ability of the container to contain the waste is not impaired.

C.6 Management of Containers

OAC Rule 3745-55-73

(a) All container storage shall be conducted within the container storage units as described in Condition C.1. of this permit and Section D of the permit application.

(b) The Permittee must keep all containers closed during storage, except when it is necessary to add or remove waste, and must not open, handle, or store containers in a manner which may rupture the container or cause it to leak.
(c) Lab-pack wastes received at the facility shall be handled in compliance with applicable storage requirements and Sections C and D of the permit application.

(d) The Permittee shall conduct the following container management activities in accordance with the procedures and practices specified in Section D of the permit application: container storage and receiving, repackaging of wastes, transportation of wastes through the facility and special handling of containers. Repackaging of wastes may only be conducted in the following areas:

(i) All concrete areas surrounding the incinerator;
(ii) Concrete pad west of the old process dock;
(iii) Concrete pads east or west of the process dock;
(iv) Concrete pad at the staging areas in the Container Storage Facility;
(v) The concrete loading/unloading area by the closed loop scrubber water system;
(vi) The concrete loading/unloading area by and in the Caustic Building;
(vii) Repackaging room;
(viii) Within the Process Dock Building;
(ix) Within the Waste Storage Bays.

C.7 Containment Systems
OAC Rule 3745-55-75

(a) The Permittee must maintain the containment systems in accordance with the plans and specifications contained in Section D of the permit application.

(b) For units storing wastes with free liquids, the Permittee must maintain the containment systems as described in the permit application, designed with sufficient capacity to contain ten percent of the total volume of the containers or the volume of the largest container, whichever is greater. The containment system must be free of cracks and gaps and sufficiently impervious to contain leaks and spills and accumulated precipitation until the collected material is detected and removed.