Modified Ohio Hazardous Waste Facility Installation and Operation Permit

Permittee: Ross Incineration Services, Inc.  
Facility Name: Ross Incineration Services, Inc.  
Mailing Address: 36790 Giles Road  
City: Grafton  
State: OH  
Zip: 44044

Facility Street Address: 36790 Giles Road  
City: Grafton  
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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, and as subsequently modified by the Ohio Environmental Protection Agency, 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in effect until such time as the Ohio Hazardous Waste Facility Installation and Operation Permit is renewed, modified, withdrawn, suspended, or revoked.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 September 22, 2015 and December 9, 2015 and December 15, 2015. 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

Entered into the Journal of the Director on: January 15, 2016

Craig W. Butler, Director
Ohio Environmental Protection Agency
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 with or 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). The storage of hazardous waste with free liquids must be in containers placed within commercially available containment systems or containment boxes with adequate containment capacity and integrity.

BSA No. 2 is outdoors on concrete containment with approximate dimensions of 60 feet by 125 feet and used for storage of hazardous waste with or 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 storage of hazardous waste with free liquids must be in containers placed within commercially available containment systems or containment boxes with adequate containment capacity and integrity.

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, boxes, and totes. Containers with and without free liquids may be stored in the Container Storage Facility. The Container Storage Facility has adequate secondary containment, although specific areas as described in Section D of the permit application require the use of commercially available containment systems or containment boxes with adequate containment capacity and integrity.

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 or in commercially available containment systems or containment boxes with adequate containment capacity and integrity.
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-shipped containers typically carry waste codes that the facility is permitted to store.

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 S01 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 pads east or west of the process dock;
(iii) Concrete pad at the staging areas in the Container Storage Facility;
(iv) The concrete loading/unloading area by the closed loop scrubber water system;
(v) The concrete loading/unloading area by and in the Caustic Building;
(vi) Repackaging room;
(vii) Within the Process Dock Building;
(viii) 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.

(c) For units storing wastes with free liquids, the base of each containment system must be sloped or the containment system must be otherwise designed and operated to drain and remove liquids resulting from leaks, spills, or precipitation, unless the containers are elevated or are otherwise protected from contact with accumulated liquids.

(d) For units storing wastes with free liquids, run-on into the containment system must be prevented unless the collection system has sufficient excess capacity in addition to that required in Permit Condition C.7(b) above to contain any run-on which might enter the system.

(e) Spilled or leaked waste and accumulated precipitation must be removed from the sump or collection area in a timely manner and in accordance with the procedures and practices specified in Section D of the permit application.

(f) No hazardous wastes with free liquids shall be stored in the Bulk Storage Areas (BSA No. 1 and No. 2), unless the containers storing the hazardous waste free liquids are within the commercially available containment systems or containment boxes with adequate containment capacity and integrity.

(g) Storage areas that store containers holding only wastes that do not contain free liquids need not have a containment system described in Conditions C.7(b), (c), and (d) above, provided that:

(i) The storage area is sloped or is otherwise designed and operated to drain and remove liquid resulting from precipitation;

(ii) The containers are elevated or are otherwise protected from contact with accumulated liquid.
C.8 Reserved

C.9 Inspection Schedules and Procedures
OAC Rules 3745-54-15 and 3745-54-73

The Permittee must inspect the container storage areas in accordance with the inspection schedule contained in Section F of the permit application and in accordance with OAC Rule 3745-54-15. The inspection schedule must be designed to detect for leaking containers, deteriorating containers, and/or containment systems. The Permittee must note the results of these inspections in the inspection log along with any remedial action taken. Each container in storage for six months or more shall be inspected and stored in accordance with Section F-2b(1) of the permit application and the inspection results shall be recorded in the facility operating record.

C.10 Recordkeeping
OAC Rule 3745-54-73

The Permittee must comply with all recordkeeping requirements of OAC Rule 3745-54-73 as part of the facility operating record.

C.11 Special Container Provisions for Ignitable or Reactive Waste
OAC Rules 3745-54-17 and 3745-55-76

(a) The Permittee must not store ignitable or reactive waste except in accordance with OAC Rules 3745-54-17 and 3745-55-76.

(b) The Permittee must not locate containers holding ignitable or reactive waste within 15 meters (50 feet) of the facility's property line.

(c) The Permittee must take precautions to prevent accidental ignition or reaction of ignitable or reactive waste and shall follow the storage procedures specified in Sections C, D and F of the permit application.

C.12 Special Container Provisions for Incompatible Waste
OAC Rules 3745-54-17(B) and 3745-55-77

(a) The Permittee must not store incompatible waste except in accordance with OAC Rules 3745 54 17(B) and 3745 55 77.

(b) The Permittee must not place hazardous waste in an unwashed container that previously held an incompatible waste or material.

(c) The Permittee must separate or protect (by means of a dike, berm, wall, or other device) a storage container holding a hazardous waste that is
incompatible with any waste or other material stored nearby in other containers, piles, open tanks, or surface impoundments.

(d) Only oxidizer and organic peroxide wastes shall be stored in the Oxidizer Storage Building. Such storage shall be in accordance with the procedures and practices specified in Section D of the permit application.

C.13 Reserved

C.14 Closure and Post-Closure

OAC Rules 3745-55-10 through 3745-55-20, and 3745-55-78

At closure of the container areas, the Permittee shall remove all hazardous waste and hazardous waste residues from the containment systems, in accordance with the procedures in the Closure Plan set forth in Section I of the permit application.