February 24, 2017

Mr. Derek Bedle
Veolia ES Technical Solutions LLC
4301 Infirmary Road
West Carrollton, Ohio 45449

RE: Veolia ES Technical Solutions LLC
Permit - Intermediate
Acknowledgment
RCRA C – Hazardous Waste
Montgomery County
OHD093945293

Subject: Hazardous Waste Permit Modification - Class 1 Acknowledgment

Dear Mr. Bedle:

On December 21, 2016, Ohio EPA received notification for a Class 1 hazardous waste permit modification from Veolia ES Technical Solutions LLC, dated December 22, 2016. The modification implemented the following changes to the permit:

- Revised approved permit application Section A- Replaced John Hannah, the previous Environmental, Health, and Safety (EH&S) Manager, with Regan Brunk the current EH&S Manager as the site contact in the Part A form (OEPA 9029/EPA 8700-12).
- Revised approved permit application Section B- Changed the person responsible for hazardous waste Management activities at Veolia from Jason Sowards, the previous Facility Manager, to Danny Sibert the current Facility Manager.
- Revised approved permit application Section D- Added "All VOC and organic HAP emissions from the DDU are vented to the thermal oxidizer then to the scrubber to achieve a minimum control efficiency of 95% (See Figure D-4.3)" to section D.2.4.2.
- Revised approved permit application Section D- Added reference to the new figures in section D.2.4.2.
- Revised approved permit application Section D- Included replacement page D-20 because the addition of the sentence and references to the figures into D.2.4.2 shifted the paragraph to the next page.
- Revised approved permit application DDU Figures- added drawing numbers to the figures for the DDU.

In addition, Module F of the Permit Terms and Conditions was modified. Please see the attached Module F page to update your copy of the permit.

With this letter, Ohio EPA acknowledges the above referenced Class 1 modification submitted pursuant to Ohio Administrative Code (OAC) rule 3745-50-51, and accordingly has updated the facility’s permit application and permit. The updated application and permit can be retrieved from the Agency’s eDocument Search web site: http://edocpub.epa.ohio.gov/publicportal/edochome.aspx. Using the search function, search under the document type of “Permit” and then refine the search using the facility’s RCRA ID number (Secondary ID) which is noted in the RE: block above.
Mr. Derek Bedle
February 24, 2017

If you have any questions concerning this letter, please contact Pat Willoughby of my staff at (937) 285-6648.

Sincerely,

[Signature]

Randall G. Kirkland
Manager, Southwest District Office
Division of Environmental Response and Revitalization
F. MODULE HIGHLIGHTS

The Permittee is permitted for one Miscellaneous Unit; the Drum Dispersion Unit (DDU). The DDU is used to remove hazardous waste and non-hazardous waste from containers and blend the waste into a pumpable liquid. This unit can process up to 75,000 gallons per day as reflected on Line 4, Process Code X02, of the Application Form 2050-0024, Box 7 Process Codes and Design Capabilities.

The Drum Dispersion Unit is located inside the Decant Building and houses one 2000-gallon tank TK-6002. This tank holds waste solvents that are used as a diluent in the Drum Dispersion Unit process. The DDU uses the solvent to keep the contents suspended in a pumpable state. The tank will contain flowable RCRA or non-RCRA regulated liquids. The liquids from the tank are pumped into the DDU during processing to keep the homogenized slurry in a rotating particle-sizer (the hyrapulper) in a pumpable state, as necessary.

The DDU has the ability to crush 55-gallon and 85-gallon containers. The DDU uses a conveyor system and platform to lift and feed drums into the main chamber which can hold four containers; two in the staging area and two in the crushing chamber. Once containers are in the crushing chamber, the atmosphere is purged with nitrogen. Then, the container bottoms are hydraulically pierced and waste falls into the hyrapulper below. After the bottom is pierced, the containers are crushed, forcing residual materials from the container. All of the emptying processes in the crushing chamber occur in an oxygen depleted atmosphere to prevent possible fires or explosions. The crushing chamber is equipped with an explosion vent rated at 7" of water column to protect the system from over pressurization. Per the Federal RCRA Permit, emissions for the DDU are controlled via a thermal oxidizer.

The wastes are then mixed and homogenized into a consistent solution by the hyrapulper. Once the batch of drums have been processed, the wastes will be piped out to the tank farm by pumping or by pressurizing the hyrapulper. A new batch of containers will then be run through the DDU.

The RCRA empty crushed drums are pneumatically pushed down a nitrogen purged chute that has two knife gates and then into a collection hopper. The RCRA empty drums are transferred from the hopper to a container suitable for transportation. The drums are then sent off-site for metals recycling or disposal.