



**John R. Kasich**, Governor  
**Mary Taylor**, Lt. Governor  
**Craig W. Butler**, Director

February 15, 2018

Mr. Jeff Hunyor  
Systech Environmental Corporation  
P.O. Box 266  
Paulding, Ohio 45879-0266

Re: Systech Environmental Corp  
Permit - Intermediate  
Approval  
RCRA C – Hazardous Waste  
Paulding  
OHD005048947

**Subject: Hazardous Waste Permit Modification - Class 1A Approval**

Dear Mr. Hunyor:

On December 19, 2017, Ohio EPA received a request for a Class 1A (Class 1 requiring prior approval) hazardous waste permit modification from Systech Environmental Corporation dated December 18, 2017. The modification requested the following change to the permit:

- Modification to change the references in the permit from Lafarge North America Paulding Plant to Geocycle LLC

With this letter, Ohio EPA approves the above referenced Class 1A modification<sup>1</sup> submitted pursuant to Ohio Administrative Code (OAC) Rule 3745-50-51, and accordingly has updated the facility's permit application and/or permit. The updated application/permit can be retrieved from the Agency's eDocument Search website: <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.

If you have any questions concerning this letter, please contact Kara Reynolds of my staff at (419) 373-3065.

Sincerely,

Eric Getz  
Assistant Chief, Northwest District Office  
For Craig W. Butler  
Director, Ohio EPA

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<sup>1</sup> Please note: If the modification application included a claim for confidentiality, Ohio EPA will retain the confidentiality of the document(s) until the Director makes a final determination in accordance with OAC Chapters 3745-49 and 3745-50 as to whether the document(s) constitutes a trade secret and must remain confidential. Ohio EPA will notify you of any determination made as to the confidentiality of the document(s).

the waste shipment is accepted. The shipment may be accepted at the facility as long as the limits, as set forth in the cement kiln operating permits (e.g. Permit to Operate) can be achieved by blending the waste with other hazardous waste fuel.

The limits on variations between incoming shipment analysis and Waste Profile Sheet information that defines a discrepancy are:

<u>Concentration</u>	<u>Variation</u>
0 – 20 ppm	+/- 10 ppm
21 – 50 ppm	+/- 20 ppm
51 – 100 ppm	+/- 30 ppm
101 – 250 ppm	+/- 75 ppm
251 – 500 ppm	+/- 150 ppm
501 – 1,000 ppm	+/- 300 ppm
1,001 – 10,000 ppm	+/- 500 ppm
>10,000 ppm	+/- 1,000 ppm

(ii) Blended Fuel Metal Analysis

The Permittee must sample and analyze each batch of blended hazardous waste fuel for the metals listed in Condition (B)(3)(f)(i) of this permit. The analysis must be conducted in accordance with "Test Methods for Evaluating Solid Waste: Physical/Chemical Methods, EPA Publication SW-846, July 1998," and additional supplements or editions thereof, hereby incorporated by reference in this permit. The results of this analysis must be obtained prior to the blended hazardous waste being used as a supplemental fuel for the cement kilns at the OHD987048733 facility (f.k.a. Lafarge).

(g) Acceptance criteria for Volatile Organic Compounds (VOC)

The Permittee must perform analysis of incoming hazardous waste fuel shipments for VOCs as specified in the waste analysis plan. In the event that a previously undetected component is found and constitutes more than ten (10) percent of the mixture, the following shall apply:

- (i) If the Permittee demonstrates that the component in question is normally present in mixtures of hydrocarbons (e.g. mineral spirits, diesel fuel, fuel oil, etc.) and these mixtures of hydrocarbons are listed

## MODULE C - CONTAINERS STORAGE & TREATMENT

### C. CONTAINER STORAGE AND MANAGEMENT

Systech Environmental Corporation's permitted container storage, treatment and management areas are located in three areas; the container processing building, the direct-burn unloading pad, and the drop and hook storage pad. Containers managed at the facility include 55 gallon steel drums, 500 gallon portable steel containers referred to as "Systanks," bulk rail tankers and bulk truck tankers. Shipments of hazardous waste arrive on-site via rail and truck. All shipments are weighed, sampled, and stored or off-loaded in designated areas. Bulk rail and truck shipments are also discussed in Module D of this permit. Container treatment processes employed at the facility include dissolving or re-suspending semi-solid and viscous materials using solvents or industrial dispersers and mechanical mixing and agitating devices. Wastes received and managed in the container processing building are pumped via dedicated piping to one of the blend tanks discussed further in Module D of this permit. Wastes received and managed at the direct-burn unloading pad are pumped via dedicated piping directly to the adjacent cement kilns located at the OHD987048733 facility (f.k.a. Lafarge). Wastes that cannot be pumped, such as rags and bolts, are removed from the process via filters, grinders and knock out boxes and are managed as hazardous waste to be disposed of at off-site facilities. Wastes treated, stored and managed at the facility are primarily organic liquids and sludge from painting, coating, and ink industries. The hazardous waste codes associated with these wastes are listed in permit Condition C2. below.

The container processing building, which is designed to be approximately 155 feet by 165 feet in size, is to be divided into three bays with a maximum storage capacity of 228,000 gallons of hazardous waste when completed. The storage areas are designated the west, middle, and east bays. The west bay has dimensions of approximately 90 feet by 40 feet and a storage capacity of 63,000 gallons. The middle bay has dimensions of approximately 90 feet by 75 feet and a storage capacity of 120,000 gallons. The east bay has dimensions of approximately 50 feet by 50 feet and a storage capacity of 45,000 gallons. The maximum storage capacity of each bay is based on one 500 gallon portable container per 4 foot by 4 foot area minus 4 foot aisles between every two containers and 8 foot aisles for major passageways. The secondary containment for each of the storage bays consists of a concrete floor and curbing sloped to a sump to contain spills.

The secondary containment capacity of each bay, 13,464 gallons for the west bay, 25,245 gallons for the middle bay, and 9,350 gallons for the east bay, exceeds 20% of the total waste storage capacity for each bay. The permitted container

## MODULE D - TANK STORAGE, TREATMENT AND MANAGEMENT

### D. MODULE HIGHLIGHTS

Systech Environmental Corporation's tank storage, treatment and management system consists of eleven permitted tanks designated OL-1 through OL-11. Tanks OL-1, OL-2, OL-3, and OL-4 are above-ground steel tanks of dimensions approximately 12 feet in diameter and 30 feet in height with a storage capacity of 25,000 gallons each. Tanks OL-5 and OL-6 are above ground steel tanks of dimensions approximately 12 feet in diameter and 35 feet in height with a storage capacity of 30,000 gallons each. Tanks OL-7, OL-8, OL-9, OL-10, and OL-11 are above ground steel tanks of dimensions approximately 30 feet in diameter by 30 feet in height with a storage capacity of 150,000 gallons each. Tanks OL-10 and OL-11 are permitted but not constructed. The total permitted tank storage capacity at the facility is 910,000 gallons.

All tanks are equipped with high level alarms which are audible at the offloading locations and the laboratory. The high level alarms are set to trigger automatic pump feed cut-off devices to prevent overfilling the tanks. In addition, the amount of hazardous waste added to and removed from each tank is recorded in the facility operating log on a daily basis.

Each of the tanks is surrounded by a concrete secondary containment structure which is capable of capturing greater than 100% of the largest tank volume plus accumulated rain from a 25 year, 24 hour storm event. Hazardous wastes stored and managed in the tanks are primarily organic liquids and sludges composed primarily of waste solvents from paint, coating, and ink industries. These wastes are often ignitable and contain metals and organic compounds. Tanks OL-1 through OL-6 are the primary receiving and blending tanks at the facility. Tanks OL-7 through OL-11 are primarily used for further blending of the wastes received to ensure a consistent fuel to the adjacent cement kilns at the OHD987048733 facility (f.k.a. Lafarge). Tanks OL-7 through OL-11 are commonly referred to as the facility's burn tanks. All ancillary equipment is located above ground or in below grade trenches equipped with sumps and manual pumps to prevent routine contact with soil or water.

Bulk shipments received at the facility by rail or truck are weighed, sampled and off-loaded at dedicated areas which are lined in concrete. Bulk shipments are off-loaded adjacent to the blend tanks. To facilitate better emptying of the bulk shipments, a pump may be lowered into the rail tanker or truck tanker to circulate the waste within the tanker and re-suspend solids which may have settled out during transportation. The off-loaded waste is transferred to one of the blend tanks (Tanks OL-1 through OL-6) via dedicated piping. The piping contains grinders to reduce the size of solids in the waste and knock out boxes to remove non-pumpable

## MODULE E – CORRECTIVE ACTION REQUIREMENTS

### E. Corrective Action Summary

On August 26 and 27, 1992, a RCRA Facility Assessment (RFA) was performed at the OHD987048733 facility (f.k.a. Lafarge Corporation), Paulding county, located on County Road 176 by A.T. Kearney, Incorporated, a contractor for the United States Environmental Protection Agency (U.S. EPA). The RFA consisted of a preliminary review of existing facility information and a visual site inspection. Systech Environmental Corporation, a wholly-owned subsidiary of the OHD987048733 facility (f.k.a. Lafarge Corporation), operates within the boundaries of the OHD987048733 facility and was included as part of the RFA. An RFA report was submitted to U.S. EPA on November 10, 1992. The RFA report identified 37 Solid Waste Management Units (SWMU's), twenty (20) of which are on Systech Property. Based on the information in the RFA report, U.S. EPA determined that 9 of the SWMU's require further investigation under a RCRA Facility Investigation (RFI).

On July 17, 1995, an RFI workplan was submitted to U.S. EPA by Midwest Environmental Consultants, Inc. on behalf of Systech. The RFI Workplan was never reviewed or approved by U.S. EPA.

U.S. EPA transferred authority for oversight of corrective action to Ohio EPA upon issuance of the permit by Ohio EPA on August 8, 2003. SWMU is a term used by U.S. EPA and is equivalent to the term Waste Management Unit (WMU) used by Ohio EPA. The two terms are considered interchangeable.

The nine WMUs and four locations were ultimately combined into two investigatory groups as follows:

#### Group A

1. Organic Liquid Storage Tanks Nos. 1-6 (SWMUs 5-10)
2. Oil/Water Separator (SWMU No. 18)
3. Rail Off Loading Area (SWMU No. 21)

#### Group B

4. Organic Liquid Burn Tanks No. 7 (SWMUs 11, 11A, 11B)

The 2003 permit required Systech to conduct a RCRA Facility Investigation (RFI). On October 31, 2003, Systech (or Permittee) submitted to Ohio EPA a Phase I RFI Work Plan for its Facility. The RFI work plan was revised on April 27, 2005, June 10, 2005, and June 16, 2005, and approved on June 23, 2005. The completed Phase I report was accepted by Ohio EPA in 2006. Following completion of the Phase I RFI, Systech submitted a Phase II RFI work plan that was accepted in July 2006. The completed Phase II RFI Report was submitted on January 12, 2009, revised on December 3, 2009, September 7, 2010, May 17, 2011, and