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, 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in effect until such time as the Ohio Hazardous Waste Facility Installation and Operation Permit is renewed, modified, withdrawn, suspended, or revoked.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 October 5, 2018 and January 28, 2019. 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

Laurie A. Stevenson, Director
Ohio Environmental Protection Agency

Date: 2/18/19
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 No. 1 and No. 2).

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 up to 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 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.
Each of the Waste Storage Bays (WSB No. 1 and No. 2) unit consists of 10 bays, is outdoors on concrete containment, with approximate dimensions of 126 feet by 56 to 60 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 No. 1 and No. 2). 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.
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 (WSB No. 1 and No. 2).