



# Modified Ohio Hazardous Waste Facility Installation and Operation Permit

Division of Environmental Response and Revitalization

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in effect until such time as the Ohio Hazardous Waste Facility Installation and Operation Permit is renewed, modified, withdrawn, suspended, or revoked.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 November 22, 2021 and March 16, 2022. 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:

3/22/2022

Date:

Laurie A. Stevenson, Director  
Ohio Environmental Protection Agency

## MODULE A - GENERAL PERMIT CONDITIONS

### A. GENERAL PERMIT CONDITIONS

#### A.1 Effect of Permit

ORC Sections 3734.02 (E) and (F) and 3734.05

OAC Rule 3745-50-58(G)

- (a) The Permittee is authorized to store hazardous waste in containers and tanks, to treat hazardous waste in tanks, to treat hazardous waste in a Subpart X unit referred to as the filter press, to conduct miscellaneous hazardous waste activities in a Subpart X unit referred to as the barge, and to treat hazardous waste by incineration in accordance with the terms and conditions of this Ohio hazardous waste permit (hereinafter "permit"), ORC Chapter 3734, all applicable Ohio hazardous waste rules, all applicable regulations promulgated under the Resource Conservation and Recovery Act (RCRA), as amended, and the permit application. The permit application, as submitted to Ohio EPA on April 1, 2013 and last updated on September 18, 2013, is hereby incorporated into this permit. In the instance of inconsistent language or discrepancies between the above, the language of the more stringent provision shall govern.
- (b) Any management of hazardous waste not authorized by this permit is prohibited, unless otherwise expressly authorized or specifically exempted by law. Issuance of this permit does not convey property rights of any sort or any exclusive privilege; nor does it authorize any injury to persons or property, or invasion of other private rights. Compliance with the terms and conditions of this permit does not obviate Permittee's obligation to comply with other applicable provisions of law governing protection of public health or the environment including but not limited to the Community Right to Know law under ORC Chapter 3750.

#### A.2 Permit Actions

OAC Rule 3745-50-58(F)

This permit may be modified or revoked as specified by Ohio law. The filing of a request by the Permittee for a permit modification, or the notification of planned changes or anticipated noncompliance on the part of the Permittee, does not stay any permit term or condition.

#### A.3 Permit Effective/Expiration Date

OAC Rule 3745-50-54

The effective date of this permit is the date the permit is entered into the Director's

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.
  - (i) The Container Storage Area is constructed to be a permitted hazardous waste storage area. RIS will store Ross Generated Waste in compliance with applicable hazardous waste management requirements and Sections C, D, and J 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 be conducted in the barge and 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

## MODULE G - MISCELLANEOUS UNITS

### G. MODULE HIGHLIGHTS

The filter press treats scrubber water from the closed loop scrubber water system by physical removal of solids from the scrubber water feed stream. A damp cake of compressed solids is generated, dropped into a container, and transported to an offsite treatment or disposal facility. The liquid filtrate is recycled back to the closed loop scrubber water system. The filter press is located in the Filter Press Building. The filter press has a 2.4 cubic yard per batch capacity. Secondary containment for the filter press is provided by the Filter Press Building liner and sump system which has a total capacity of 22,493 gallons.

The barge is a three-sided open top box used for the repackaging of hazardous waste from roll-offs, vacuum boxes (vac box), dump trailers, flatbeds, tankers and other vehicles. The barge is not a waste storage unit. Rather, the barge allows for repackaging of hazardous and non-hazardous wastes. RIS uses the barge to repackage discrete quantities or batches of waste intermittently. Waste is dumped into the barge from over-the-road transport vehicles. Operators will remove waste from the barge using heavy equipment (e.g., excavator) to place the waste into other containers, typically drums or totes. The Operators performing the unloading and loading operation do not leave the immediate vicinity of the barge. The barge has a 36.3 cubic yard per batch capacity.

#### G.1 Miscellaneous Unit – Filter Press

##### (a) Process Capacity/Annual Limitation

The Permittee must not exceed a maximum process treatment capacity of 111,000 gallons per day of scrubber water feed to the filter press.

##### (b) Waste Identification OAC Rule 3745-57-90

The Permittee must treat in the permitted hazardous waste filter press only scrubber water and scrubber water sludges from blow-down operations of the closed loop scrubber water system carrying the hazardous waste codes specified in Section A of the permit application under the process codes of T04 and T03 and for which incineration is permissible under the restrictions and prohibitions in Table C1-1 of Section C of the permit application.

##### (c) Assessment/Certification of Miscellaneous Unit OAC Rules 3745-57-91 and 3745-50-42(D)

The Permittee must keep on file at the facility a written statement by a qualified, registered professional engineer that attests that the filter press system was properly designed and installed. The written statement must also include the certification as required by OAC Rule 3745-50-42(D).

(d) Containment System OAC  
Rule 3745-57-91

- (1) Secondary containment must be designed, installed and operated to

prevent any migration of waste or accumulated liquid out of the system to soil, groundwater or surface water.

- (2) Secondary containment must be capable of detecting and collecting releases and accumulated liquids until the collected material is removed.
- (3) The secondary containment must meet the requirements of OAC Rule 3745-55-93.

(e) General Operating Requirements  
OAC Rule 3745-57-91

- (1) Hazardous waste or treatment reagents must not be placed in the filter press system if they could cause the filter press, its ancillary equipment, or the secondary containment system to rupture, leak, corrode or otherwise fail, as required by OAC Rule 3745-55-94.
- (2) The Permittee must use appropriate controls and practices to prevent spills or overflows from the filter press or containment system.
- (3) The filter press must be operated in accordance with the procedures and practices in Section D of the permit application, manufacturer's instructions and accepted industry practice.
- (4) The filter press must be maintained in accordance with manufacturer's recommendations and accepted industry practice.
- (5) The Permittee must comply with the requirements of OAC Rule 3745-55-96 if a leak or spill occurs in the filter press system.

(f) Inspections  
OAC Rule 3745-57-92

- (1) The Permittee must inspect the hazardous waste filter press system daily in accordance with OAC Rule 3745-55-95 and Pages 26 and 27 of 49 of Appendix F-2 of Section F of the permit application.
- (2) The Permittee must document compliance with Condition G.1(f)(1) in an inspection log.

(g) Response to Leaks or Spills and Disposition of Leaking or Unfit for Use Miscellaneous System  
OAC Rule 3745-57-92

A hazardous waste filter press system or secondary containment system from

which there has been a leak or spill, or which is unfit for use, must be removed from service immediately and the Permittee must satisfy the following requirements in accordance with OAC Rule 3745-55-96.

(1) Cessation of Use

The Permittee must immediately stop the flow of hazardous waste into the filter press system or secondary containment system and inspect the system to determine the cause of the release.

(2) Removal of Waste From the Miscellaneous Unit or Secondary Containment System

- (i) If the release was from the filter press system, the Permittee must, within twenty-four hours after detection of the leak, remove as much waste as necessary to prevent further release of hazardous waste to the environment and to allow inspection and repair of the filter press system to be performed.
- (ii) If the material released was to a secondary containment system, all released materials must be removed within twenty-four hours of the release to prevent harm to human health and the environment.

(3) Containment of Visible Releases to the Environment

The Permittee must immediately conduct a visual inspection of the release and, based upon that inspection, prevent further migration of the leak or spill to soil or surface water and remove, and properly dispose of, any visible contamination of the soil or surface water.

(4) Notifications

Any release to the environment, except as provided in OAC Rule 3745-55-96 (D)(2), must be reported to the Director of Ohio EPA within twenty-four hours of detection.

- (5) The Permittee must obtain a certification by an independent, qualified professional engineer that any major repair has been satisfactorily performed and the unit is capable of handling hazardous waste without release for the intended life of the system. The certification must be submitted to the Director of Ohio EPA within seven days after returning the filter press system to use.

(h) Special Requirements

(1) Ignitable or Reactive Waste

The Permittee must not place ignitable or reactive waste in the filter press.

(2) Incompatible Waste

- (i) The Permittee must not place incompatible waste in the same filter press system or place hazardous waste in a filter press system that previously held an incompatible waste or material unless it is done in accordance with OAC Rule 3745-55-99.
- (ii) The Permittee must document compliance with Condition G.1 (h)(2)(i) of this permit, as required by OAC Rule 3745-55-99, and place this documentation in the operating record.

(i) Closure and Post-Closure Care  
OAC Rule 3745-57-91 and 3745-57-93

At closure of the filter press system, the Permittee must follow the procedures in Section I of the permit application in accordance with OAC Rules 3745-55-10 through 3745-55-40.



## G.2 Miscellaneous Unit- Barge for Repackaging

### (a) Process Capacity/Annual Limitation

The Permittee must not exceed a maximum process treatment capacity of 400 tons of hazardous waste repackaged per day.

### (b) Waste Identification

OAC Rule 3745-57-92

The Permittee must repackage in the permitted miscellaneous unit only waste carrying the hazardous waste codes specified in Section A of the permit application under the process codes of T04 and T03 and for which incineration is permissible under the restrictions and prohibitions in Table C1-1 of Section C of the permit application.

### (c) Reserved

### (d) Containment System

OAC Rule 3745-57-91

The barge is used to repackage solids. Secondary containment is not required prevent any migration of waste or accumulated liquid out of the system to soil, groundwater, or surface water.

### (e) General Operating Requirements

OAC Rule 3745-57-91

- (1) Hazardous waste must not be placed in the barge if they could cause the barge to rupture, leak, corrode or otherwise fail, as required by OAC Rule 3745-55-94.
- (2) The Permittee must use appropriate controls and practices to prevent spills or overflows from the barge.
- (3) The barge must be operated in accordance with the procedures and practices in Section D of the permit application.
- (4) The barge must be maintained in accordance with accepted industry practice.

- (5) The Permittee must comply with the requirements of OAC Rule 3745-55-96 if a leak or spill occurs in the barge.

(f) Inspections

OAC Rule 3745-57-92

- (1) The Permittee must inspect the barge daily in accordance with OAC Rule 3745-55-95 and Appendix F-2 of Section F of the permit application.
- (2) The Permittee must document compliance with Condition G.2 (f)(1) in an inspection log.

(g) Response to Leaks or Spills and Disposition of Leaking or Unfit for Use Miscellaneous System

OAC Rule 3745-57-91

The barge, a miscellaneous hazardous waste unit from which there has been a leak or spill, or which is unfit for use, must be removed from service immediately and the Permittee must satisfy the following requirements in accordance with OAC Rule 3745-55-96.

(1) Cessation of Use

The Permittee must immediately stop use of the barge for hazardous waste repackaging and inspect the system to determine the cause of the release.

(2) Removal of Waste From the Miscellaneous Unit

If the release was from the barge, the Permittee must, within twenty four hours after detection of the leak, remove as much waste as necessary to prevent further release of hazardous waste to the environment and to allow inspection and repair of the barge to be performed.

(3) Containment of Visible Releases to the Environment

The Permittee must immediately conduct a visual inspection of the release and based upon that inspection, prevent further migration of the leak or spill to soil or surface water and remove, and properly dispose of any visible contamination of the soil or surface water.

(4) Notifications

Any release to the environment, except as provided in OAC Rule 3745-55-96 (D)(2), must be reported to the Director of Ohio EPA within twenty-four hours of detection.

- (5) The Permittee must obtain a certification by an independent, qualified professional engineer that any major repair has been satisfactorily performed and the unit is capable of handling hazardous waste without release for the intended life of the system. The certification must be submitted to the Director of Ohio EPA within seven days after returning the barge to use.

(h) Special Requirements

(1) Reactive Waste

The Permittee must not place reactive waste in the barge.

(2) Incompatible Waste

- (i) The Permittee must not place incompatible waste in the barge or place hazardous waste in the barge that previously held an incompatible waste or material unless it is done in accordance with OAC Rule 3745-55-99.
- (ii) The Permittee must document compliance with Condition G.2(h)(2)(i) of this permit, as required by OAC Rule 3745-55-99, and place this documentation in the operating record.

(i) Closure and Post-Closure Care  
OAC Rule 3745-57-91 and 3745-57-93

At closure of the barge, the Permittee must follow the procedures in Section I of the permit application in accordance with OAC Rules 3745-55-10 through 3745-55-40.