



eDocument Workflow Data Ingestion Form

DERR - Hazardous Waste Permitting

Note: All HW Permitting Documents fall under "Permit-Intermediate" doc type.

Keyword Summary:

Secondary ID:	OHD048415665	Stamped date on doc:	11/24/2023
Facility Name:	Ross Incineration Services, Inc.		
County:	Lorain	CBI/Trade Secret Info (see protocol below)	
Program:	RCRA C – Hazardous Waste	Request contains CBI/TS claim?	No
Permit Type:	Permit-to-Install and Operate	Was a "public" copy included?	Yes
Permit Subtype:	Application and Support	Financial Assurance Info (see protocol below)	
Permit Classification:	Permit Application	Request contains FA policy/account # info?	No
Permit Purpose:	Class 1 Modification	Contingency Plan Info (see protocol below)	
Confidentiality Status:	Public Record for Publication	Request contains facility staff pers/home phone #'s?	Yes

CBI/Trade Secret Protocol

Applications or requests that contain a claim of Confidential Business Information (CBI) or "trade secret" **are not be ingested** into the Agency's eDoc system. However, any claims must be made at the time of application submission, as required by both OAC rule 3745-49-03 and OAC rule 3745-50-30. Permittees must comply with the complete requirements of the above-cited rules, which include, among other things, submission of a corresponding "public" copy of the application or request which should be ingested into eDocs.

Financial Assurance Info Protocol

If the application contains "original signature" financial assurance documents, these documents **must be forwarded** to CO FA staff (Shawn Sellers or Melissa Cheung) as these types of documents must be secured in CO's fireproof file cabinet. Also, even if the FA information included in a mod application is not "original signature", if it includes information like insurance policy, bank account, letter of credit or bond numbers, these impacted pages should simply be physically removed and not scanned/included as a part of the ingested application. In place of the removed page, a page can be inserted which states: "Pages of this application which contain financial assurance mechanism details specific to policy or account numbers have been removed from this web-available version of the document."

Regarding review of FA components of mods, ERAS has set up a [tracking/request system](#) on SharePoint where DO staff can make a review request the HW FA Review Request list which can be accessed from the DMWM's Financial Assurance site.

Contingency Plan Info Protocol

If the application contains facility staff personal/home phone number information, the impacted pages should simply be physically removed and not scanned/included as a part of the ingested application. In place of the removed page, a page can be inserted which states: "Pages of this application which contain facility staff personal/home phone number information have been removed from this web-available version of the document."

Form Completed by: Elijah Lucas 11/28/2023

Comments



Ross Environmental Services, Inc.

A member of The RossWay Group®

150 Innovation Dr.
Elyria, OH 44035
www.rossincineration.com



Susan K. Kaiser
Director, Corporate EHS
skaiser@rossenvironmental.com
Direct Phone: (440)748-5847
Direct Fax: (440)366-2347

November 9, 2023

Public Information Version

Via Electronic Submittal

Mr. Bradley Mitchell
Hazardous Waste Program
Division of Environmental Response and Revitalization
The Ohio Environmental Protection Agency
Lazarus Government Center
50 West Town Street, Suite 700
Columbus, OH 43215

Re: Ross Incineration Services, Inc.
EPA ID No.: OHD 048 415 665
Ohio ID No.: 02-47-0295
Class 1 Permit Modification Request – Section G Contingency Plan Administrative Update

Dear Mr. Mitchell:

Ross Environmental Services, Inc. on behalf of Ross Incineration Services, Inc. ("RIS") hereby submits a Class 1 permit modification request ("PMR") without prior Director's approval to make emergency coordinator changes in its Ohio Hazardous Waste Facility Resource Conservation and Recovery Act ("RCRA") Part B Permit Application ("Application"). Specifically, contact information changes will be made to RIS' Application Section G - Contingency Plan pursuant to the Appendix to OAC 3745-50-51 (C)(6) - *Contingency Plan*.

(d) Changes in name, address, or phone number of coordinators or other persons or agencies identified in the plan.....1."

Class 1 modifications apply to minor changes that keep the permit current with routine changes to the facility or its operation. These changes do not substantially alter the permit conditions or reduce the capacity of the facility to protect human health and the environment.

BACKGROUND: On January 29, 2014, RIS was issued a Permit renewal from the Ohio Environmental Protection Agency (“Ohio EPA” or “the Agency”). Section G of RIS’ Application contains the *Contingency Plan*, as is required under OAC 3745-50-44(A)(7) and 3745-54-50 to 3745-54-56. RIS’ Application Section G – *Contingency Plan* includes information concerning emergency equipment, emergency procedures, a list of organizations with which RIS has Coordination Agreements, and a list of emergency coordinators.

DESCRIPTION OF MODIFICATION: RIS requests permission to amend Table G-1, Emergency Coordinators in Section G – *Contingency Plan*, of its Application to replace the primary contact, remove two (2) Emergency Coordinators, and update the address for one (1) Emergency Coordinator.

ATTACHMENTS: The following revised pages to RIS’ Application are being submitted in accordance with these changes:

Attachment 1: “Strike-out / underlined” version of the revised Application: Section G – *Contingency Plan* - Table G-1 – Emergency Coordinators page G-4. Each page where changes have been made uses the editorial protocol to delineate the changes made. Deleted language has been struck through in blue. Added language is underlined in red.

Attachment 2: “Clean” copies of the following Application pages have been included: Section G – *Contingency Plan* cover page, page G-iii, Table G-1 – Emergency Coordinators on page G-4. Page headers on pages where changes have been made indicate the new revision number and the “November 2023” revision date.

Attachment 3: An updated RIS RCRA Contingency Plan Quick Reference Guide.

Public Information Version: Under the provisions of OAC 3745-49-03 and OAC 3745-50-30, RIS has removed Confidential Information from pages of this submittal marked “PUBLIC INFORMATION VERSION.”

ADMINISTRATIVE COMPLETENESS CHECKLIST: As indicated in Ohio EPA’s letter of December 30, 2003 (“Submitting Documents as Permit Modification Requests” – M. A. Savage, Chief, DHWM), RIS has included a complete Administrative Completeness Checklist for this permit modification request in **Attachment 5**.

PUBLIC PARTICIPATION REQUIREMENT: In accordance with OAC 3745-50-51 (D)(1)(a)(ii), RIS will comply with the public mailing requirements for a Class 1 permit modification. All persons on the facility mailing list and the appropriate units of State and local governments shall be notified within 90 days after the change is put into effect.

OAC RULE 3745-50-42(D) CERTIFICATION: A certification statement is contained in **Attachment 4**, in accordance with OAC 3745-50-42(D).

Should you have any questions regarding this submittal, please contact me at 440.748.5847.

Sincerely yours,



Susan K. Kaiser
Director, Corporate Environmental, Health and Safety
Ross Environmental Services, Inc.

Enclosure (5)

cc: Karen Nesbit, Ohio EPA, NEDO, DERR Electronic Submittal

ATTACHMENT 1

["Strikeout / Underlined" version of revised Application page G-4]

PUBLIC INFORMATION VERSION

The information on this page contains personal phone numbers and addresses. For this reason, RIS has removed all confidential information from this page.

use of control equipment and techniques of coordination with other employees and outside responders. The emergency response team will receive training to a level of competence to:

- Protect themselves and other employees in the recognition of health and safety hazards.
- Minimize the risk from safety and health hazards.
- Use control equipment safely.
- Select and use appropriate PPE.
- Use safe operating procedures at the incident scene.
- Use techniques of coordination with other employees and outside responders to minimize risk.
- Initiate appropriate response to over-exposure from health hazards or injury to themselves and other employees.
- Recognize subsequent symptoms which may result from over-exposure.

Table G-1 Emergency Coordinators

Name	Home Address	Work Phone No.*	Home Phone No.*
Jim Larson Neil Gorman**		748-5802 748-5816	
Bob Kleinhenz		748-5814	
Chad Colman		366-2082	
George Croftcheck		748-5804	
Jason Burandt		748-5885	
Jon Grosse		748-5832	
Josh Young		748-5821	
Kevin Culligan		748-5826	
Maryann Veyon		748-5884	
Michael Christian		748-5874	
Nick Pakosz		748-5811	
Ron Brown		748-5858	

* Area codes are 440 unless noted otherwise.

** ~~Jim Larson~~Neil Gorman is the primary contact while he is at the office. If Mr. ~~Larson~~Gorman is not available, the assigned, alternate Emergency Coordinator should be contacted next.

ATTACHMENT 2

[“Clean” copy of revised Permit and Application pages: Section G – *Contingency Plan* cover page, page G-iii, Table G-1 – Emergency Coordinators page G-4]

**Ross Incineration Services, Inc.
RCRA Part B Application
Section G - Contingency Plan
November 2023**

PUBLIC INFORMATION VERSION

Section G - Contingency Plan Revision Log

Page	Previous Revision #	Previous Revision Date	Current Rev. #	Current Rev. Date	New to current revision	Deleted from current revision	Updated for current revision	Notes for current revision
Section G – Contingency Plan								
G-i	--	--	0	April, 2013	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Table of Contents
G-ii	--	--	0	April, 2013	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Figures / Tables
G-iii	21	June 2023	22	November 2023	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Revision Log
G-iv	11	Dec. 14, 2021	12	June 2023	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
G-v	3	July, 2017	4	June, 2020	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
G-vi	0	April, 2013	1	December, 2014	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
G-1	--	--	0	April, 2013	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
G-2	--	--	0	April, 2013	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
G-3	--	--	0	April, 2013	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
G-4	10	April 2023	11	November 2023	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Administrative Update
G-5	--	--	0	April, 2013	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
G-6	--	--	0	April, 2013	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
G-7	0	April, 2013	1	June 2020	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
G-8	0	April, 2013	1	June 2020	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
G-9	0	April, 2013	1	March 2019	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
G-10	0	April, 2013	1	March 2019	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
G-11	--	--	0	April, 2013	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
G-12	--	--	0	April, 2013	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
G-13	0	April, 2013	1	March, 2019	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
G-14	1	Sept. 28, 2018	2	June 2020	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
G-15	--	--	0	April, 2013	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
G-16	0	April, 2013	1	March, 2019	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
G-17	--	--	0	April, 2013	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
G-18	0	April, 2013	1	March, 2019	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
G-19	--	--	0	April, 2013	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
G-20	--	--	0	April, 2013	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
G-21	--	--	0	April, 2013	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
G-22	4	Dec. 14, 2021	5	June 2023	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
G-23	5	June, 2020	6	Dec. 14, 2021	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
G-24	4	Dec. 14, 2021	1	June 2023	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
G-25	--	--	0	April, 2013	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
G-26	--	--	0	April, 2013	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
G-27	0	April, 2013	1	June 2020	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

PUBLIC INFORMATION VERSION

*The information on this page contains personal phone numbers and addresses.
For this reason, RIS has removed all confidential information from this page.*

use of control equipment and techniques of coordination with other employees and outside responders. The emergency response team will receive training to a level of competence to:

- Protect themselves and other employees in the recognition of health and safety hazards.
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- Select and use appropriate PPE.
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Table G-1 Emergency Coordinators

Name	Home Address	Work Phone No.*	Home Phone No.*
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Jon Grosse		748-5832	
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Kevin Culligan		748-5826	
Maryann Veyon		748-5884	
Michael Christian		748-5874	
Ron Brown		748-5858	

* Area codes are 440 unless noted otherwise.

** Neil Gorman is the primary contact while he is at the office. If Mr. Gorman is not available, the assigned, alternate Emergency Coordinator should be contacted next.

ATTACHMENT 3

[RIS' RCRA Contingency Plan Quick Reference Guide]



PUBLIC INFORMATION VERSION

*Confidential Information has been
Removed from this Page*

ROSS INCINERATION SERVICES, INC.

**36790 Giles Road,
Eaton Township, OH 44044
EPA ID# OHD048415665**

RIS' RCRA Contingency Plan Quick Reference Guide

Facility Emergency Coordinators (40 CFR 262.262(b)(8))

Name	Home Address	Office #	Cell #
Neil Gorman *		(440) 748-5816	
Bob Kleinhenz		(440) 748-5814	
Chad Colman		(440) 366-2082	
George Croftcheck		(440) 748-5804	
Jason Burandt		(440) 748-5885	
Jon Grosse		(440) 748-5832	
Josh Young		(440) 748-5821	
Kevin Culligan		(440) 748-5826	
Maryann Veyon		(440) 748-5884	
Michael Christian		(440) 748-5874	
Ron Brown		(440) 748-5858	

* Neil Gorman is the primary contact while he is at the office. If Mr. Gorman is not available, the assigned, alternate Emergency Coordinator should be contacted next.

One Mile Radius Street Map (40 CFR 262.262(b)(4), (5))

Ross Incineration Services, Inc. is located at 36790 Giles Road Grafton, OH 44044

- The main gate to the plant is located off Giles Road and marked with a star on the map below
- There are additional access points into the facility at locked gated locations that are accessible by non-public accessways.

Evacuation Routes

Northwest on Giles towards Durkee Rd (0.9 mi)

Heading North:

- Turn right on Durkee Rd

Heading South:

- Turn Left on Durkee Rd

Heading East:

- Turn Left on Durkee Rd to Route 82 (0.9 mi)
- Turn Left on Route 82E

Heading West:

- Turn Left on Durkee Rd to Route 82 (0.9 mi)
- Turn Right on Route 82 W

Southeast on Giles towards Route 82 (0.7 mi)

Heading North:

- Turn left on Route 82E (0.3 mi)
- Turn left on Route 83N

Heading South:

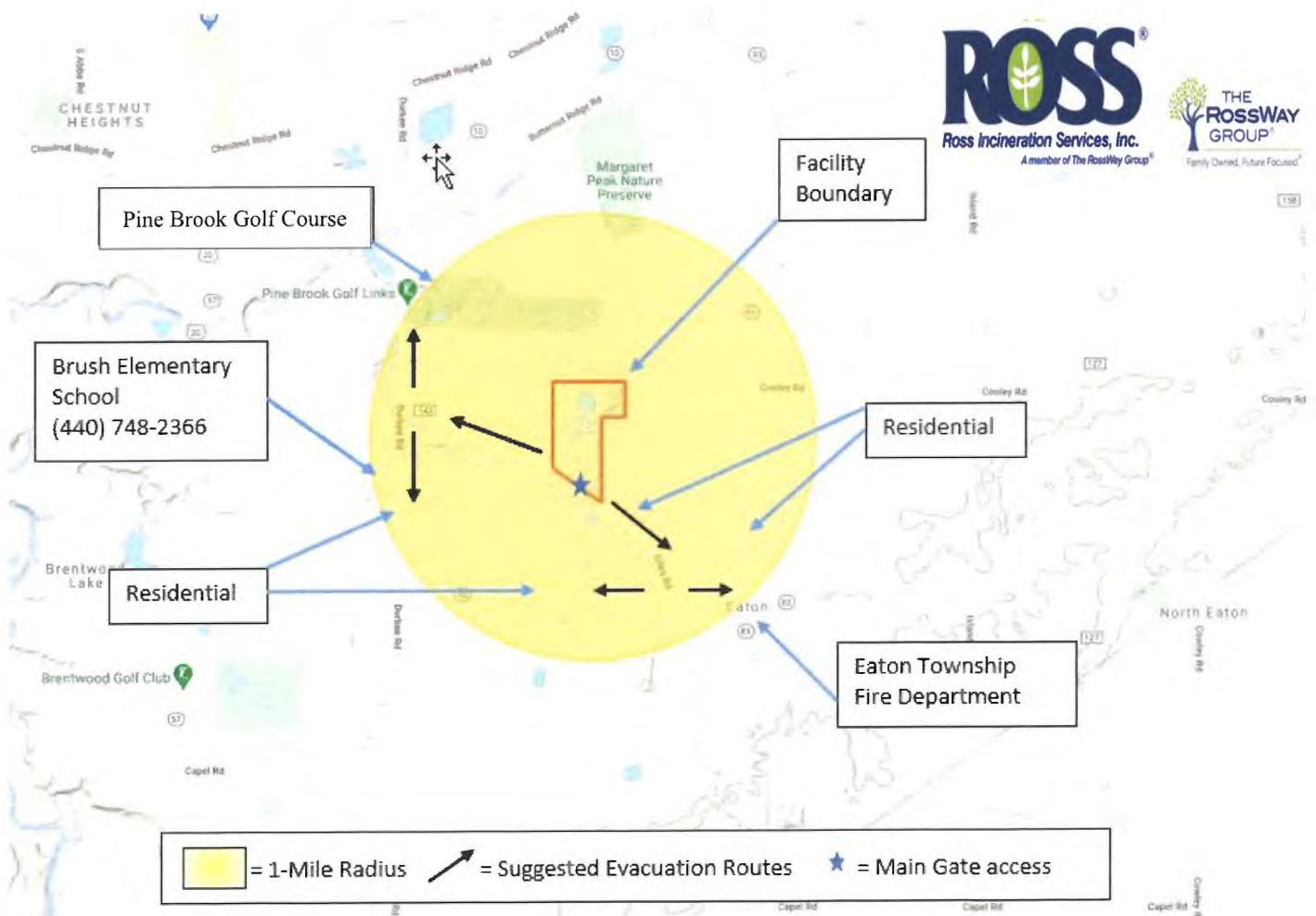
- Turn left on Route 82E (0.3 mi)
- Turn left on Route 83S

Heading East:

- Turn left on Route 82E

Heading West:

- Turn right on Route 82W



Hazardous Waste (40 CFR 262.262(b)(1), (2) & (3))

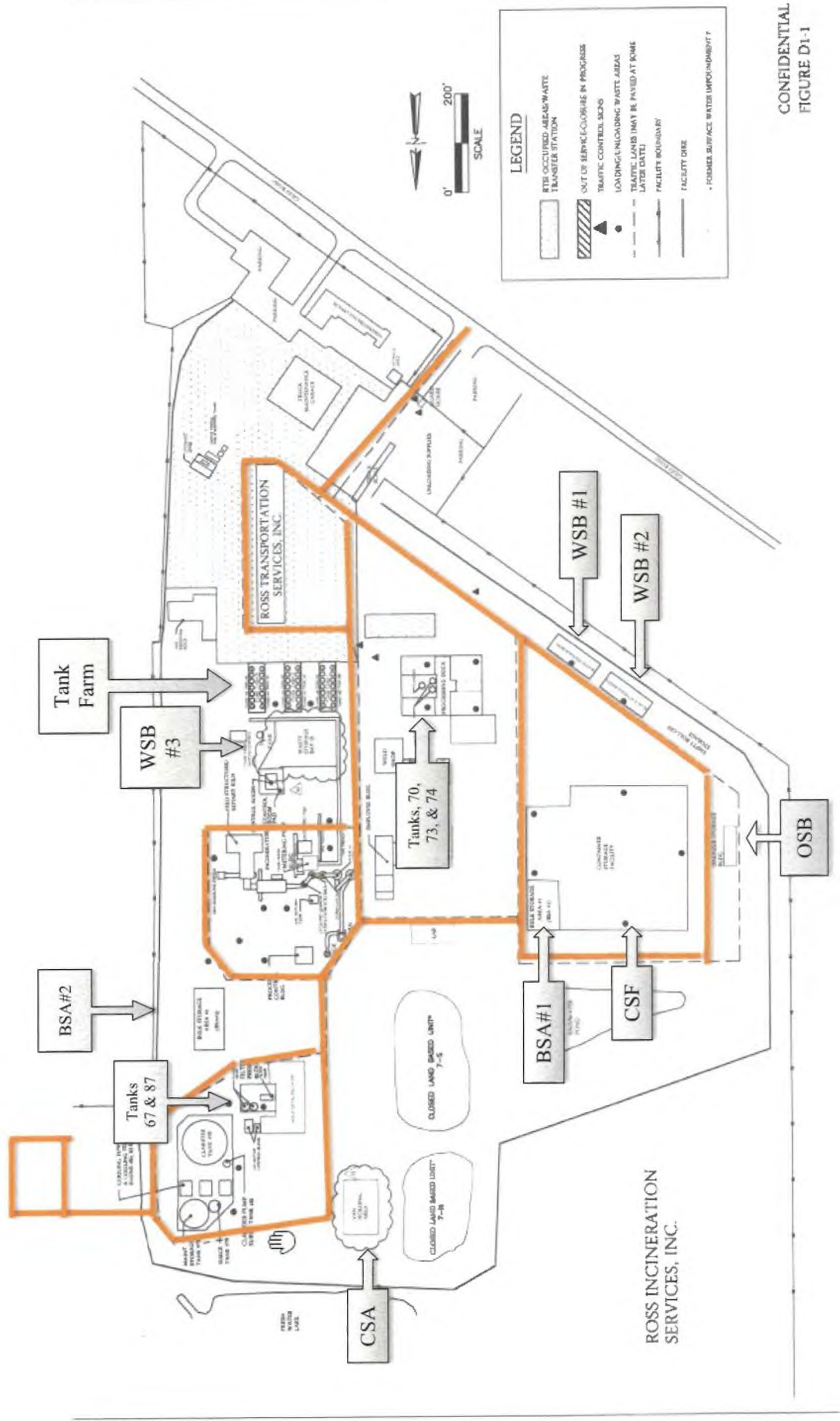
RIS is a commercial hazardous waste treatment and storage facility. Wastes received and generated at the RIS facility vary widely in chemical and physical characteristics. Typical hazardous and non-hazardous waste types received at the RIS facility include halogenated and non-halogenated spent solvents, paint wastes, off-specification commercial chemical products, consumer products and spill residues. Waste generated at the RIS facility primarily consist of residues resulting from the incineration process including kiln ash, bottom ash, fly ash sludge, filter cake and scrubber water.

Hazards associated with these waste materials include acute (immediate) health hazard (e.g., waste that are corrosive, highly toxic, irritant, sensitizer, toxic); chronic (delayed) health hazard (may include carcinogens and other hazardous chemicals), fire hazard (includes combustibles and flammables); reactive hazard (including organic peroxide, unstable/reactive, water reactive), and sudden release of pressure hazards (e.g., compressed gas).

Hazardous Waste can be stored in the following locations around the plant and up to the following quantities listed below in the chart. At no time will the total accumulated quantity of hazardous waste stored at RIS exceed 851,840 gallons.

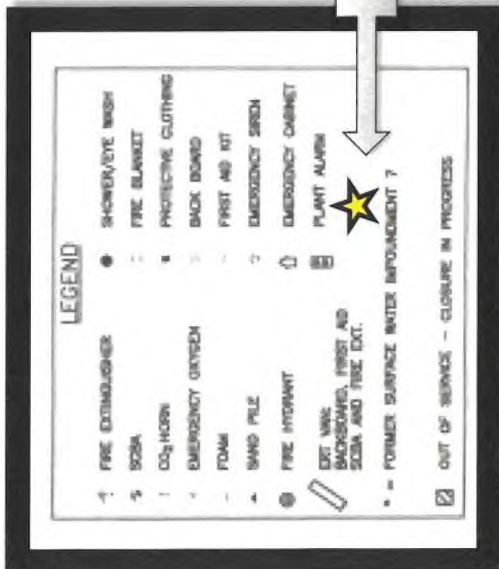
Location	Storable Quantity
Container Storage Facility (CSF)	702,350 gallons
Bulk Storage Area (BSA) #1	64, 632 gallons
Bulk Storage Area (BSA) #2	80, 790 gallons
Waste Storage Bays (WSB) #1	121, 180 gallons
Waste Storage Bays (WSB) #2	121,180 gallons
Waste Storage Bays (WSB) #3	80,000 gallons
Oxidizer Storage Bay (OSB)	7,920 gallons
Container Storage Area (CSA)	33,000 gallons
Tank Farm	416,640 gallons
Tank 67 & 68	7,254 gallons
Tank 70	10,000 gallons
Tank 73 & 74	15,000 gallons

Map of Hazardous Waste Storage Locations (40 CFR 262.262(b)(4))

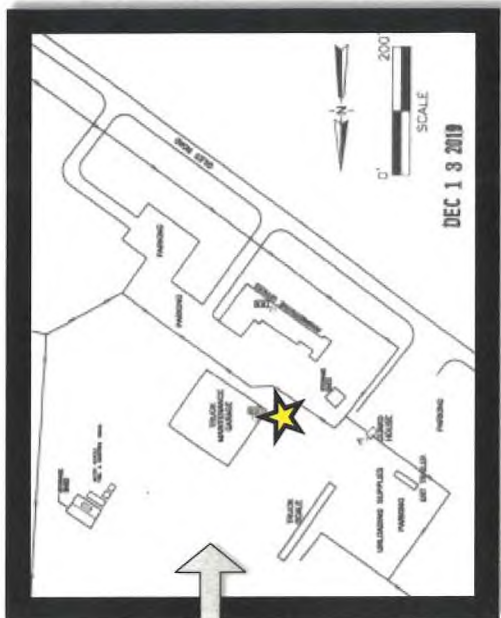


CONFIDENTIAL
FIGURE D1-1

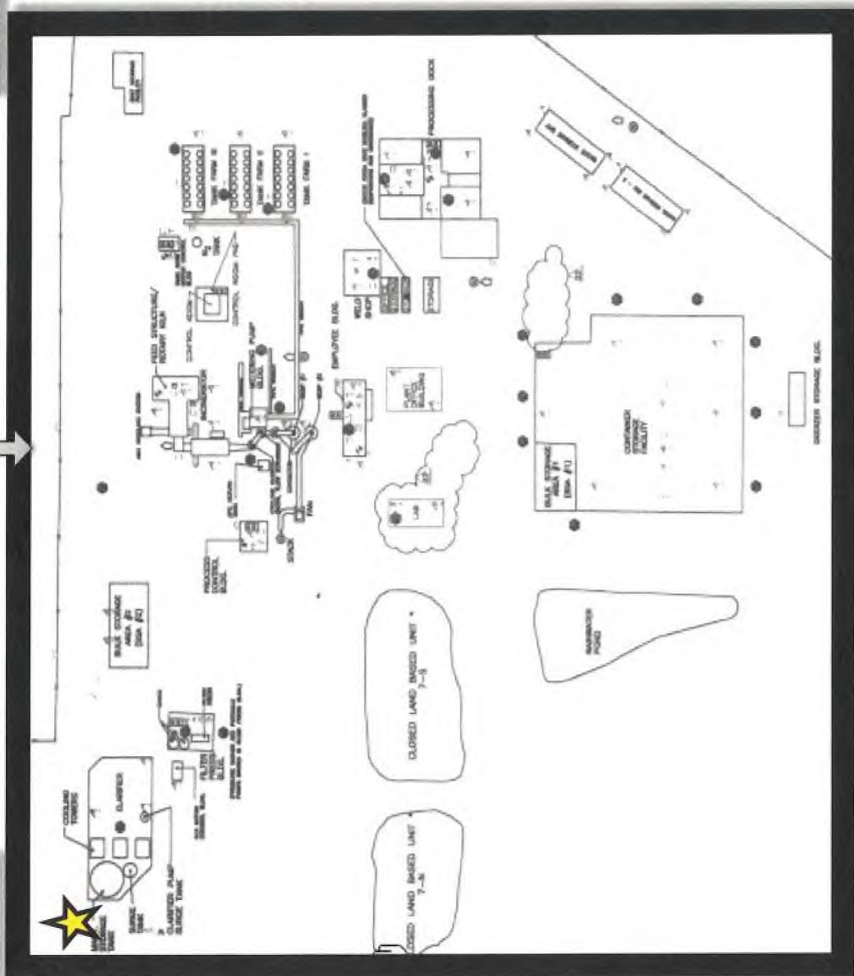
Notification/Alarm Systems and Water Supply (40 CFR 262.262(b)(6) &(7))



RTS and
RIS Giles
House
(Primary)



Main Facility



ATTACHMENT 4
[Certification Statement]

**Class 1 Permit Modification Request
Contingency Plan Emergency Coordinator Administrative Changes
CERTIFICATION**

In accordance with OAC 3745-50-42(D), the following certification is provided:

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted, is to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Date: 11-20-23

Name: Neil E. Gorman

Signature: 

Title: Vice President, Ross Incineration Services, Inc.

ATTACHMENT 4
[Administrative Completeness Checklist]

Administrative Completeness Checklist for Permit Modification Request or Notification

Facility Name	Ross Incineration Services, Inc.	Ohio ID No.	02-47-0295
	Contingency Plan Emergency Coordinator Administrative Changes	US EPA ID No.	OHD 048 415 665
Contact Name	Susan K. Kaiser	Date	November 2023

This checklist is intended to assist permit holders in submitting permit modification requests or notifications that are administratively complete. The use of this checklist does not relieve the applicant of the responsibility to comply with applicable requirements outlined in OAC Rule 3745-50-51.

Item	Yes	N/A
1) Cover letter including (per OAC Rule 3745-50-51(D)):	✓	
A) Classification (1, 1*, 2, 3) and identification of specific listing in appendix to OAC Rule 3745-50-51, or classification as determined by director	✓	
B) Summary of changes to permit and application	✓	
C) Explanation of why changes are necessary	✓	
D) Paragraph listing the applicable public notification/participation requirements (including implementation schedule)	✓	
2) Red-line/strike-out version of pages to be revised	✓	
3) Clean copies of pages to be revised	✓	
A) Include date of revision in page corner	✓	
4) All other applicable information and supporting documentation	✓	
5) Certification including:		
A) Specific language in OAC Rule 3745-50-42 (D)	✓	
B) Signature of responsible person under OAC Rule 3745-50-42 (A)	✓	
6) Copies sent to:		
A) Ohio EPA Central Office Regulatory Information Services Section	✓	
B) Ohio EPA District Office Contact	✓	
C) U.S. EPA Contact (if applicable)		✓
7) Other Attachments:		
Attachment 1: "Strike-out / underlined" Application pages	✓	
Attachment 2: "Clean" copy of Application pages	✓	
Attachment 3: RIS' RCRA Contingency Plan Quick Reference Guide	✓	
Attachment 4: Certification Statement	✓	
Attachment 5: Administrative Completeness Checklist	✓	