



State of Ohio Environmental Protection Agency

Northeast District Office

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Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

July 2, 2007

Curt Jerauld
Lubrizol-Painesville
155 Freedom Road
P.O. Box 428
Painesville, OH 44077-1234

RECEIVED
OHIO EPA
JUL 15 2007
DIV. OF HAZARDOUS
WASTE MGT.

**RE: HAZARDOUS WASTE PERMIT MODIFICATION, CLASS 1 ACKNOWLEDGMENT
LUBRIZOL PAINESVILLE, OHD 004172 623/ 02-43-0178**

Dear Mr. Jerauld:

On May 25, 2007, Ohio EPA received a notification for a Class 1 hazardous waste permit modification from Lubrizol-Painesville. With this letter, Ohio EPA acknowledges the above referenced Class 1 modification submitted pursuant to Ohio Administrative Code Rule 3745-50-51, and accordingly has updated the facility's Part B permit application and permit.

The administrative and informational change was assigned the following permit information tracking system (PITS) ID number:

1. Administrative and informational changes for removal of CPT plan from Part B Permit Application-070518-1-1

Enclosed is a copy of the permit application revision(s). This has been included to ensure that all involved parties have written confirmation of the change(s). If you have any questions concerning this action, please contact Ed D'Amato at the Ohio EPA's Northeast District Office at (330) 963-1170.

Sincerely,

Kurt M. Princic
Environmental Manager
Division of Hazardous Waste Management

KMP:ddw

Enclosure

cc: Jeremy Carroll, Supervisor, Engineering Unit, DHWM, CO
Ed D'Amato, DHWM, NEDO
ec: Frank Popotnik, DHWM, NEDO

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I(A).8 RESERVED

I(A).9 Treatment Residual

Unless the Permittee can show otherwise, per OAC Rule 3745-51-03(D), residue from the incinerator is hazardous waste and the Permittee is considered the generator.

- (i) The Permittee shall sample and analyze the treatment residue generated from the incineration system and all ancillary systems in accordance with the procedures outlined in Section C of the permit application.
- (ii) The Permittee shall manage the treatment residue generated from the incineration system in accordance with the procedures outlined in Section D of the permit application and all applicable Ohio hazardous waste regulations.

I(A).10 Compliance Schedule

In June, 2002, the Permittee submitted the "Comprehensive Performance Test Plan to Demonstrate Compliance with 40 CFR, Subpart EEE". This test plan includes a risk condition to collect emission data for site specific human health and ecological risk assessments.

In October, 2003 the Permittee conducted the Risk Burn Test (RBT) in conjunction with the Comprehensive Performance Test (CPT) as required by HWC MACT regulations. The RBT report was submitted in April, 2004.

Within one year after completion of the Ohio EPA's review of the first RBT report, the Permittee shall complete a site specific risk assessment and submit this assessment to Ohio EPA. Within 60-days of receipt of Ohio EPA's comments, the Permittee must submit either an amended or new site specific risk assessment that incorporates Ohio EPA's comments.

End of Permit Conditions

JUL 02 2007
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