OHIO E.P.A.
JUL 17 2014
ENTERED DIRECTOR'S JOURNAL

OHIO ENVIRONMENTAL PROTECTION AGENCY

OHIO HAZARDOUS WASTE FACILITY INSTALLATION AND OPERATION PERMIT RENEWAL

Permittee: Envirite of Ohio, Inc.

Mailing Address: Envirite of Ohio, Inc.
2050 Central Avenue, SE
Canton, OH 44707

Owner: Envirite of Ohio, Inc.
2050 Central Avenue, SE
Canton, OH 44707

Operator: Envirite of Ohio, Inc.
2050 Central Avenue, SE
Canton, OH 44707

Location: Envirite of Ohio, Inc.
2050 Central Avenue, SE
Canton, OH 44707

US EPA ID:	OHD 980 568 992
Issue Date:	July 17, 2014
Effective Date:	July 17, 2014
Expiration Date:	July 17, 2024

I certify this to be a true and accurate copy of the official documents as filed in the records of the Ohio Environmental Protection Agency.

By: _____ **Date:** 7-17-14

AUTHORIZED ACTIVITIES

In reference to the application of Envirite of Ohio, Inc. for an Ohio Hazardous Waste Facility Installation and Operation Renewal Permit under Ohio Revised Code (ORC) Chapter 3734 and the record in this matter, you are authorized to conduct at the above-named facility the following hazardous waste management activities:

- Storage in containers and tanks
- Treatment in tanks and miscellaneous units
- Corrective Action

PERMIT APPROVAL

Craig W. Butler, Director
Ohio Environmental Protection Agency

This permit approval is based upon the record in this matter which is maintained at the offices of the Ohio Environmental Protection Agency. The Director has considered the application, accompanying information, inspection reports of the facility, a report regarding the facility's compliance or noncompliance with the terms and conditions of its permit and rules adopted by the Director under this chapter, and such other information as is relevant to the operation of the facility. The Director has determined that the facility under the existing permit has a history of compliance with ORC Chapter 3734, rules adopted under it, the existing permit, or orders entered to enforce such requirements that demonstrate sufficient reliability, expertise, and competency to operate the facility henceforth under this chapter, rules adopted under it, and the renewal permit.

Entered into the Journal of the Director this 17th day of July, 2014

By _____ of the Ohio Environmental Protection Agency

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MODULE A - GENERAL PERMIT CONDITIONS

A. GENERAL PERMIT CONDITIONS

A.1 Effect of Permit
ORC Sections 3734.02 (E) and (F) and 3734.05
Ohio Administrative Code (OAC) Rule 3745-50-58(G)

(a) The Permittee is authorized to treat and/or store on-site hazardous waste in containers, tanks, and miscellaneous units 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 July 19, 2012 and last updated on January 27, 2014, 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 Journal. The permit expiration date is ten years after the date of journalization of this permit.

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A.4 Severability

The provisions of this permit are severable, and if any provision of this permit, or the application of any provision of this permit to any circumstance, is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.

A.5 Duty to Comply
OAC Rule 3745-50-58(A)

The Permittee must comply with all applicable provisions of ORC Chapter 3734, all applicable Ohio hazardous waste rules, and all terms and conditions of this permit, except to the extent and for the duration such noncompliance is authorized by the laws of the State of Ohio. Any permit noncompliance, other than noncompliance authorized by the laws of the State of Ohio, constitutes a violation of ORC Chapter 3734 and is grounds for enforcement action, revocation, modification, denial of a permit renewal application or other appropriate action.

A.6 Duty to Reapply and Permit Expiration
OAC Rules 3745-50-40(D), 3745-50-58(B), 3745-50-56 and ORC Section 3734.05(H)

(a) If the Permittee wishes to continue an activity allowed by this permit after the expiration date of this permit, the Permittee must submit a completed permit application for a hazardous waste facility installation and operation permit renewal and any necessary accompanying general plans, detailed plans, specifications, and such information as the Director may require, to the Director no later than one hundred eighty (180) days prior to the expiration date of this permit, unless a later submittal date has been authorized by the Director upon a showing of good cause.

(b) The Permittee may continue to operate in accordance with the terms and conditions of the expired permit until a renewal permit is issued or denied if:

(i) the Permittee has submitted a timely and complete permit application for a renewal permit under OAC Rule 3745-50-40; and

(ii) through no fault of the Permittee, a new permit has not been issued pursuant to OAC Rule 3745-50-40 on or before the expiration date of this permit.

(c) The Corrective Action obligations contained in this permit will continue regardless of whether the facility continues to operate or ceases operation and closes. The Permittee is obligated to complete facility-wide Corrective

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Action under the conditions of this permit regardless of the operational status of the facility. The Permittee must submit an application for permit renewal at least 180 days before the expiration date of this permit pursuant to OAC Rule 3745-50-40(D) unless a) the permit has been modified to terminate the Corrective Action schedule of compliance and the Permittee has been released from the requirements for financial assurance for Corrective Action; or b) a later submittal date has been authorized by the Director.

A.7 Need to Halt or Reduce Activity Not a Defense
OAC Rule 3745-50-58(C)

It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce a permitted activity in order to maintain compliance with the conditions of this permit.

A.8 Duty to Mitigate
OAC Rule 3745-50-58(D)

The Permittee must take all reasonable steps to minimize releases to the environment and must carry out such measures as are reasonable to prevent significant adverse impact on human health or the environment resulting from noncompliance with this permit.

A.9 Proper Operation and Maintenance
OAC Rule 3745-50-58(E)

The Permittee must at all times properly operate and maintain the facility (and related appurtenances) to achieve compliance with the terms and conditions of this permit. Proper operation and maintenance includes effective management practices, adequate funding, adequate operator staffing and training, and where appropriate, adequate laboratory and process controls, including appropriate quality assurance/quality control procedures. This provision requires the operation of back-up or auxiliary facilities or similar systems only when necessary to achieve compliance with the terms and conditions of this permit.

A.10 Duty to Provide Information
OAC Rule 3745-50-58(H)

The Permittee must furnish to the Director, within a reasonable time, any relevant information which the Director may request to determine whether cause exists for modifying or revoking, or to determine compliance with, this permit. The Permittee must also furnish to the Director, upon request, copies of records required to be kept by this permit.

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A.11 Inspection and Entry
OAC Rules 3745-50-58(I), 3745-49-03 and 3745-50-30, and ORC Section 3734.07

(a) The Permittee must allow the Director, or an authorized representative, upon stating the purpose and necessity of the inspection and upon proper identification, to:

(i) enter, at reasonable times, upon the Permittee's premises where a regulated facility or activity is located or conducted, or where records must be kept under the terms and conditions of this permit;

(ii) have access to and copy, at reasonable times, any records required to be kept under the terms and conditions of this permit;

(iii) inspect and photograph, at reasonable times, any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under the terms and conditions of this permit; and

(iv) sample, document, or monitor, at reasonable times, for the purposes of assuring permit compliance or as otherwise authorized by ORC Chapter 3734 and the rules adopted thereunder, any substances or parameter at any location.

(b) Any record, report or other information obtained under the hazardous waste rules or Chapter 3734 of the Revised Code shall not be available to the public upon the Permittee's satisfactory showing to Ohio EPA that all or part of the information would divulge methods or processes entitled to protection as trade secrets pursuant to Ohio Trade Secret Law and OAC Rules 3745-49-03 and 3745-50-30.

A.12 Monitoring and Records
OAC Rule 3745-50-58(J)

(a) Any sample and measurement taken for the purpose of monitoring must be representative of the monitored activity. Further, a sample must be a representative sample, as such term is defined and used in the Ohio hazardous waste rules. The method used to obtain a representative sample of the waste to be analyzed must be the appropriate method from Appendix I of OAC Rule 3745-51-20, Laboratory Methods. Laboratory methods must be those specified in Test Methods for the Evaluation of Solid Waste, Physical/Chemical Methods, EPA Publication SW-846, Third Edition, as amended by Updates I, II, IIA, IIB, III and IIIA, and additional supplements or editions thereof; Standard Methods for the Examination of Water and Wastewater: Twentieth Edition, 1999; or an equivalent method

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as specified in the approved waste analysis plan, or as this term is defined and used in the Ohio hazardous waste rules.

(b) Records of monitoring information must specify the:

(i) date(s), exact place(s), and time(s) of sampling or measurements;

(ii) individual(s) who performed the sampling or measurements;

(iii) date(s) analyses were performed;

(iv) individual(s) who performed the analyses;

(v) analytical technique(s) or method(s) used; and

(vi) results of such analyses.

A.13 Signatory Requirement and Certification of Records
OAC Rules 3745-50-58(K) and 3745-50-42

All applications, reports or information must be properly signed and certified in accordance with OAC Rule 3745-50-58(K).

A.14 Retention of Records and Information Repository
OAC Rules 3745-50-40(G), 3745-50-58(J), 3745-50-58(M) and 3745-50-58(N)

(a) The Permittee must retain records of all monitoring information, including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, copies of all reports and records required by this permit, the certification required by OAC Rule 3745-54-73(B)(9), and records of all data used to complete the application for this permit, for a period of at least three (3) years from the date of the sample, measurement, report, certification, or application.

(b) The record retention period may be extended by request of the Director at any time and is automatically extended during the course of any unresolved enforcement action regarding the facility.

(c) The Permittee must maintain, in accordance with the Ohio hazardous waste rules, records of all data used to complete the permit application and any amendments, supplements or modifications of such application. The Permittee must retain a complete copy of the current application for the effective life of the permit as indicated in Permit Condition A.3.

(d) The Permittee must maintain records from all ground water monitoring

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wells and associated ground water surface elevations for the active life of the facility and for disposal facilities for the post-closure care period as well.

(e) Reserved.

(f) Corrective Action records must be maintained at least three (3) years after all Corrective Action activities have been completed.

A.15 Planned Changes
OAC Rules 3745-50-51 and 3745-50-58(L)(1)

The Permittee must give notice to the Director as soon as possible of any planned physical alterations or additions to the facility. All such changes must be made in accordance with OAC Rule 3745-50-51.

A.16 Waste Shipments
OAC Rule 3745-53-11, ORC Section 3734.15(C)

The Permittee must only use properly registered transporters of hazardous waste to remove hazardous waste from the facility, in accordance with all applicable laws and rules.

A.17 Anticipated Noncompliance
OAC Rule 3745-50-58(L)(2)

The Permittee must give advance notice to the Director of any planned changes in the permitted facility or operations which may result in noncompliance with the terms and conditions of this permit. Such notification does not waive the Permittee's duty to comply with this permit pursuant to Permit Condition A.5.

A.18 Transfer of Permits
OAC Rules 3745-50-52, 3745-50-58(L)(3) and 3745-54-12

(a) The permit may be transferred to a new owner or operator only if such transfer is conducted in accordance with ORC Chapter 3734 and the rules adopted thereunder. This permit may be transferred by the Permittee to a new owner or operator only if the permit has been modified under OAC Rule 3745-50-51. Before transferring ownership or operation of the facility, the Permittee must notify the new owner or operator in writing of the requirements of ORC Chapter 3734 and the rules adopted thereunder (including all applicable Corrective Action requirements).

(b) The Permittee's failure to notify the new owner or operator of the requirements of the applicable Ohio law or hazardous waste rules does not relieve the new owner or operator of its obligation to comply with all

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applicable requirements.

A.19 Compliance Reports
OAC Rules 3745-50-58(L)(5) and 3745-50-50

Reports of compliance or noncompliance with, or any progress reports on, interim and final requirements contained in any compliance schedule (developed in accordance with OAC Rule 3745-50-50) of this permit must be submitted to the Director no later than fourteen (14) days following each scheduled date.

A.20 Immediate Reporting of Noncompliance
OAC Rule 3745-50-58(L)(6)

(a) The Permittee must report orally to Ohio EPA's Division of Environmental Response and Revitalization within twenty-four (24) hours from the time the Permittee becomes aware of any noncompliance with this permit, ORC Chapter 3734 or the rules adopted thereunder, which may endanger human health or the environment, including:

(i) information concerning the release of any hazardous waste that may cause an endangerment to public drinking water supplies; and

(ii) any information of a release or discharge of hazardous waste or a fire or explosion from the hazardous waste facility, which could threaten the environment or human health outside the facility.

(b) The report must consist of the following information (if such information is available at the time of the oral report):

(i) name, address, and telephone number of the owner or operator;

(ii) name, address, and telephone number of the facility;

(iii) date, time, and type of incident;

(iv) name and quantity of material(s) involved;

(v) the extent of injuries, if any;

(vi) an assessment of actual or potential hazards to the environment and human health outside the facility, where this is applicable; and

(vii) estimated quantity and disposition of recovered material that resulted from the incident.

A.21 Follow-Up Written Report of Noncompliance

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OAC Rule 3745-50-58(L)(6)(c)

(a) A written report must also be provided to Ohio EPA's Division of Environmental Response and Revitalization and the Division of Materials and Waste Management Northeast District Office within five (5) days of the time the Permittee becomes aware of the circumstances reported in Permit Condition A.20.

(b) The written report must address the items in Permit Condition A.20 and must contain a description of such noncompliance and its cause; the period(s) of noncompliance (including exact dates and times); whether the noncompliance has been corrected; and, if not, the anticipated time it is expected to continue; and steps taken or planned to minimize the impact on human health and the environment and to reduce, eliminate, and prevent recurrence of the noncompliance.

(c) The Permittee need not comply with the five (5) day written report requirement if the Director, upon good cause shown by the Permittee, waives that requirement and the Permittee submits a written report within fifteen (15) days of the time the Permittee becomes aware of the circumstances.

A.22 Other Noncompliance
OAC Rules 3745-50-58(L)(10) and 3745-50-58(L)(4)

The Permittee must report to the Director all other instances of noncompliance not provided for in Permit Conditions A.19 and A.20. These reports must be submitted within thirty (30) days of the time at which the Permittee is aware of such noncompliance. Such reports must contain all information set forth within Permit Condition A.20.

A.23 Certification of Construction or Modification
OAC Rule 3745-50-58(L)(2)

Except as provided in OAC Rule 3745-50-51, the Permittee may not commence treatment or storage of hazardous waste in the modified portion of the facility until the Permittee has submitted to the Director, by certified mail or hand delivery, a letter signed by the Permittee and a registered professional engineer stating that the facility has been constructed or modified in compliance with the permit; and

(a) the Director has inspected the modified or newly constructed facility and finds it is in compliance with the conditions of the permit; or

(b) the Director has either waived the inspection or has not, within fifteen (15) days of the date of the submittal of the letter, notified the Permittee of his

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intent to inspect.

A.24 Other Information
OAC Rule 3745-50-58(L)(11)

If at any time the Permittee becomes aware that it failed to submit any relevant facts, or submitted incorrect information, to the Director, the Permittee must promptly submit such facts, information or corrected information to the Director.

A.25 Confidential Information
OAC Rules 3745-49-03 and 3745-50-30

In accordance with ORC Chapter 3734 and the rules adopted thereunder, the Permittee may request confidentiality for any information required to be submitted by the terms and conditions of this permit, or any information obtained by the Director, or an authorized representative, pursuant to the authority provided under Permit Condition A.11.

A.26 Ohio Annual Permit, Disposal, and Treatment Fees
OAC Rules 3745-50-33 through 3745-50-36

The annual permit fee, calculated pursuant to OAC Rule 3745-50-36 and payable to the Treasurer of the State, must be submitted to the Director on or before the anniversary of the date of issuance during the term of the permit. For the purpose of the payment of the Ohio Annual Permit Fee, the date of issuance is the date the permit was entered into the Journal of the Director of Ohio EPA.

A.27 Compliance Schedule - Documents
OAC Rules 3745-50-50 and 3745-50-51

(a) Unless specified otherwise, the Permittee must submit the documents listed below to:

Ohio EPA, Director
c/o DMWM, Engineering, Remediation, and Authorizations Section
P.O. Box 1049
Columbus, Ohio 43216-1049

Ohio EPA, Northeast District Office
c/o DMWM
2110 East Aurora Road
Twinsburg, OH 44087

(b) The Permittee must submit to the Ohio EPA within sixty (60) days after

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permit journalization, in accordance with Ohio's hazardous waste rules, the following information to be incorporated in the permit application:

(i) Updated Closure Cost Estimate
OAC Rule 3745-55-42

Section 7 of the permit application containing the financial assurance mechanism for closure must be updated to include a copy of the current closure/post-closure cost estimate as set forth in OAC Rules 3745-55-42.

(ii) Updated Financial Assurance Mechanism for Closure
OAC Rule 3745-55-43

Section 7 of the permit application containing the financial assurance mechanism for closure must be updated to include a copy of the current financial assurance mechanism, as set forth in OAC Rule 3745-55-43, and as specified by the wording requirements of OAC Rule 3745-55-51. The value of the financial assurance mechanism must reflect at least the current amount of the closure cost estimate.

During the life of the permit, the Permittee may change the financial assurance mechanism as stated in OAC Rule 3745-55-43. The Permittee must submit the financial assurance mechanism documentation to the Director of Ohio EPA in accordance with the parameters set forth in OAC Rule 3745-55-43.

(iii) Updated Liability Requirements
OAC Rule 3745-55-47

Section 7 of the permit application containing the mechanism used to demonstrate third party liability coverage must be updated to include a copy of the current liability mechanism as set forth in OAC Rule 3745-55-47 and as specified by the wording requirements of OAC Rule 3745-55-51.

During the life of the permit, the Permittee may change the mechanism used to demonstrate liability coverage as stated in OAC Rule 3745-55-47. The Permittee must submit the liability mechanism documentation to the Director of Ohio EPA in accordance with the parameters set forth in OAC Rule 3745-55-47.

(c) The Permittee must not manage hazardous waste in the to be constructed portions of the facility until compliance is achieved with the Ohio hazardous waste rules and the terms and conditions of this permit, and

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with the following:

(i) Documents required by this condition shall be submitted as follows:

(a) At least thirty (30) days prior to commencing construction at the facility, the Permittee must submit to Ohio EPA all relevant detailed final design and construction plans as approved by the Building Official in accordance with OAC Rule 4101:2-1-23 (including ancillary equipment, blue prints, material of the construction, etc.) covering each aspect of the proposed construction. The final design and construction plans mean final design and specifications necessary for the commencement of the construction.

(b) A schedule of construction including the estimated starting and completion dates.

(ii) If the final plans, as submitted, are inconsistent with the conceptual and/or preliminary plans contained in the approved Part B permit application and with the terms and conditions of this permit, such submittal may be considered by Ohio EPA as information constituting a change to the permitted facility and thus require submission of a permit modification.

(iii) Upon completion of construction, the Permittee must submit to Ohio EPA, by certified mail or hand delivery, a "certificate of use and occupancy" issued by the Building Official in accordance with OAC Rule 4101:2-1-27 and a certification stating that the facility has been constructed in compliance with applicable rules, the terms and conditions of this permit, applicable state building codes (including codes for fire, electrical service, and plumbing), and the approved application.

(iv) Within sixty (60) days after completion of construction, "as built" drawings must be submitted to Ohio EPA. If submitted "as built" drawings appear inconsistent with the construction design plans submitted under Condition A.27(c)(i), such submittal may be considered by Ohio EPA as information constituting a change to the permitted facility and thus require submission of a permit modification.

(v) No hazardous waste must be managed at the newly constructed portion(s) of the facility until Ohio EPA, in accordance with OAC Rule 3745-50-58(L), has inspected such portion(s) of the facility and finds that it is in compliance with all applicable rules, the terms and conditions of this permit and the approved application.

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(vi) At least sixty (60) days prior to the storage of hazardous waste in the modified portions of the facility, the Permittee must submit updated financial requirements for closure of the facility and liability requirements. This includes the cost estimate for closure as required by OAC Rule 3745-55-42, financial assurance for facility closure as required by OAC Rule 3745-55-43, and liability insurance as required by OAC Rule 3745-55-47.

This information must be submitted in accordance with OAC Rule 3745-50-51.

A.28 Information to be Maintained at the Facility
OAC Rule 3745-54-74

(a) Unless otherwise specified by the hazardous waste rules, the Permittee must maintain at the facility, until closure is completed and certified by an independent, registered professional engineer, pursuant to OAC Rule 3745-55-15, and until the Director releases the Permittee from financial assurance requirements pursuant to OAC Rule 3745-55-43, the following documents (including amendments, revisions and modifications):

(i) waste analysis plan, developed and maintained in accordance with OAC Rule 3745-54-13 and the terms and conditions of this permit;

(ii) contingency plan, developed and maintained in accordance with OAC Rule 3745-54-53 and the terms and conditions of this permit;

(iii) closure plan, developed and maintained in accordance with OAC Rule 3745-55-12 and the terms and conditions of this permit;

(iv) cost estimate for facility closure, developed and maintained in accordance with OAC Rule 3745-55-42 and the terms and conditions of this permit;

(v) personnel training plan and the training records, developed and maintained in accordance with OAC Rule 3745-54-16 and the terms and conditions of this permit;

(vi) operating record, required by OAC Rule 3745-54-73 and the terms and conditions of this permit; and

(vii) inspection schedules, developed in accordance with OAC Rules 3745-54-15, 3745-55-74 and 3745-55-95 and the terms and conditions of this permit.

(viii) annually-adjusted cost estimate for facility closure, as required by

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OAC Rules 3745-55-42 and 3745-55-44 and the terms and conditions of this permit.

(ix) all other documents required by Module A, Permit Condition A.12 and Modules D, Permit Condition D.2.

(b) The Permittee must maintain copies of all inspection logs at the facility for a period not less than three (3) years from the date of inspection.

A.29 Waste Minimization Report
OAC Rules 3745-54-73 and 3745-54-75

(a) The Permittee must submit a Waste Minimization Report describing the waste minimization program required by OAC Rules 3745-54-75(H), (I), and (J); 3745-54-73(B)(9); and 3745-52-20(A) at least once every five years. The provisions of OAC Rules 3745-54-75(H), (I) and (J); and 3745-54-73(B)(9) must be satisfied biennially.

(b) The Permittee must submit the Waste Minimization Report to Ohio EPA's Office of Compliance Assistance and Pollution Prevention within one hundred eighty (180) days of the effective date of this permit, and must submit updates to this report once every five years thereafter.

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MODULE B - GENERAL FACILITY CONDITIONS

B. GENERAL FACILITY CONDITIONS

B.1 Design and Operation of Facility
OAC Rule 3745-54-31

(a) The Permittee must design, construct, maintain and operate the facility to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, ground water or surface waters which could threaten human health or the environment.

(b) The Permittee must not accept more than 94,900,000 gallons in any one calendar year from off-site sources during the life of the permit, until such time as this permit condition is modified or renewed. This is a facility wide limitation and includes all units.

B.2 Required Notices
OAC Rule 3745-54-12

(a) Hazardous Waste from Off-Site Sources

When the Permittee is to receive hazardous waste from an off-site source (except where the Permittee is also the generator), he must inform the generator in writing that he has the appropriate permits, and will accept the waste the generator is shipping. The Permittee must keep a copy of this written notice as part of the operating record.

(b) Hazardous Wastes from Foreign Sources

The Permittee must notify the Director in writing at least four weeks in advance of the date the Permittee expects to receive hazardous waste from a foreign source, as required by OAC Rule 3745-54-12(A). Notice of subsequent shipments of the same waste from the same foreign source is not required.

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B.3 General Waste Analysis Plan
OAC Rule 3745-54-13

(a) Before treating, storing, or disposing of any hazardous wastes, or nonhazardous wastes if applicable under OAC Rule 3745-55-13(D), the Permittee must obtain a detailed chemical and physical analysis of a representative sample of the wastes. At a minimum, this analysis must contain all the information which must be known to treat, store, or dispose of the waste in accordance with the requirements of OAC Chapters 3745-54 to 3745-57, 3745-205, and 3745-270.

(b) The Permittee must follow the procedures described in the waste analysis plan found in Section 2 of the permit application and the terms and conditions of this permit.

(c) The Permittee must verify the analysis of each waste stream annually as part of its quality assurance program, in accordance with Test Methods for Evaluating Solid Waste: Physical/Chemical Methods, EPA Publication SW-846, or equivalent methods approved by the Director. At a minimum, the Permittee must maintain proper functional instruments, use approved sampling and analytical methods, verify the validity of sampling and analytical procedures, and perform correct calculations. If the Permittee uses a contract laboratory to perform analyses, then the Permittee must inform the laboratory in writing that it must operate under the waste analysis conditions set forth in this permit.

B.4 Security
OAC Rule 3745-54-14

The Permittee must comply with the security provisions of OAC Rule 3745-54-14(B)(1) or (2), and (C) and Section 4 of the permit application.

B.5 General Inspection Requirements
OAC Rules 3745-54-15 and 3745-54-73

The Permittee must inspect the facility in accordance with OAC Rule 3745-54-15 and the inspection schedule set forth in Section 4 of the permit application. The Permittee must remedy any deterioration or malfunction discovered by an inspection, as required by OAC Rule 3745-54-15(C). Records of inspection must be kept for a minimum of three years from the date of inspection. These records must be a part of the facility's operating record as required by OAC Rule 3745-54-73.

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B.6 Personnel Training
OAC Rule 3745-54-16

The Permittee must conduct personnel training, as required by OAC Rule 3745-54-16. This training program must contain at least the elements set forth in Section 6 of the permit application. The Permittee must maintain training documents and records as required by OAC Rule 3745-54-16(D) and (E).

B.7 General Requirements for Ignitable, Reactive, or Incompatible Wastes
OAC Rule 3745-54-17

(a) The Permittee must comply with the requirements of OAC Rule 3745-54-17 and must follow the procedures for handling ignitable, reactive, and incompatible wastes set forth in Section 4 of the permit application.

(b) The Permittee must provide electrical grounding for all containers, tanks, and transport vehicles during all operations involving the handling of ignitable or reactive wastes.

(c) The Permittee must provide, and require the use of, spark proof tools during all operations involving the handling of all ignitable or reactive wastes.

(d) The Permittee must prohibit smoking and open flames in each area where ignitable, reactive or incompatible hazardous wastes are managed and must post appropriate signs.

(e) All wiring and electrical equipment at the modified or newly constructed units must meet the National Fire Protection Association's standards for hazardous locations (See National Fire Protection Association, "National Electric Code" National Fire Codes, 1985 Edition, Vol. 3, Chapter 5, Special Occupancies, Articles 500-503, pp.176 through 189).

B.8 Reserved

B.9 Required Equipment
OAC Rule 3745-54-32

At a minimum, the Permittee must maintain at the facility all the equipment required by OAC Rule 3745-54-32 and the equipment set forth in the contingency plan contained in Section 5 of the permit application.

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B.10 Testing and Maintenance of Equipment
OAC Rule 3745-54-33

The Permittee must inspect, test and maintain the equipment required by Permit Condition B.9 as necessary to assure its proper operation in time of emergency, as specified in OAC Rule 3745-54-33, Section 4 of the permit application and the terms and conditions of this permit.

B.11 Access to Communications or Alarm System
OAC Rule 3745-54-34

The Permittee must maintain access to the communications and alarm systems, as required by OAC Rule 3745-54-34, Section 4 of the permit application and the terms and conditions of this permit.

B.12 Required Aisle Space
OAC Rule 3745-54-35

At a minimum, the Permittee must maintain aisle space to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment to any area of facility operation in an emergency, as required by OAC Rule 3745-54-35.

B.13 Arrangements with Local Authorities
OAC Rule 3745-54-37

(a) The Permittee must comply with the requirements of OAC Rule 3745-54-37(A) by making a diligent effort to:

(i) make arrangements and familiarize all emergency response agencies which are likely to respond in an emergency with the location and layout of the facility, properties of hazardous waste managed at the facility and associated hazards, places where facility personnel will normally be working, entrances to and roads inside the facility, and possible evacuation routes as depicted and explained in Section 5 of the permit application;

(ii) make arrangements with Ohio EPA emergency response teams, emergency response contractors, and equipment suppliers;

(iii) make arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and types of injuries or illnesses which could result from fires, explosions, or releases at the facility; and

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(iv) make agreements designating primary emergency authority to a specific police and a specific fire department and make agreements with any others to provide support to the primary emergency authority, where more than one police and fire department may respond to an emergency.

(b) Where authorities decline to enter into such agreements or arrangements set forth in OAC Rule 3745-54-37(A), the Permittee must document the refusal in the operating record as required by OAC Rule 3745-54-37(B).

B.14 Implementation of Contingency Plan
OAC Rules 3745-54-51 and 3745-54-56

The Permittee must immediately carry out the provisions of the contingency plan, and follow the emergency procedures described in OAC Rule 3745-54-56, whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents which threatens or could threaten human health or the environment.

In regard to spills and related toxic gas releases, the plan must describe the criteria to be used by the emergency coordinator to determine when the plan will be implemented. At a minimum, the plan must be implemented in the following situations:

(a) Any fire involving hazardous waste; or

(b) Any explosion involving hazardous waste; or

(c) Any uncontrolled hazardous waste reaction that produces or has the potential to produce hazardous conditions, including noxious, poisonous, flammable and/or explosive gases, fumes, or vapors; harmful dust; or explosive conditions; or

(d) Any hazardous waste release, outside of a secondary containment system, that causes or has the potential to cause off-site soil and/or surface water contamination; or

(e) Any hazardous waste release that produces or has the potential to produce hazardous conditions, including noxious, poisonous, flammable and/or explosive gases, fumes, or vapors; harmful dust; or explosive conditions.

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B.15 Content of the Contingency Plan
OAC Rule 3745-54-52

The Permittee must comply with OAC Rule 3745-54-52 and the contingency plan, as set forth in Section 5 of the permit application.

B.16 Contingency Plan - Released Material and Emergency Response Material and By-products
OAC Rule 3745-54-56(G)

(a) Immediately after an emergency, the emergency coordinator must provide for treating, storing, or disposing of recovered waste, contaminated soil or surface water, or any other material that results from a release, fire, or explosion at the facility.

(b) All liquid or solid material resulting from fire, explosion, released material or emergency response material and by-products that the Permittee is required to evaluate to determine whether such material is hazardous waste in accordance with OAC Rule 3745-52-11, must be collected and managed as a hazardous waste unless the Permittee can demonstrate that such waste is not hazardous in accordance with OAC Rule 3745-51-03(C) and (D).

B.17 Amendments to Plan
OAC Rule 3745-54-54

The Permittee must review the contingency plan at least annually and upon the occurrence of any event listed in OAC Rule 3745-54-54. If necessary or appropriate, the Permittee must amend the contingency plan as required by OAC Rule 3745-54-54 in accordance with OAC Rule 3745-50-51.

B.18 Copies of Plan
OAC Rule 3745-54-53

(a) The Permittee must comply with the requirements set forth in OAC Rule 3745-54-53 regarding contingency plan distribution. The Permittee must maintain at the facility a copy of the contingency plan and all revisions to the plan.

(b) The Permittee must, in accordance with OAC Rule 3745-54-53, submit a copy of the contingency plan to all local police departments, fire departments, hospitals and local emergency response teams that may be called upon to provide emergency services. The Permittee must notify such agencies and the local authorities, in writing, within ten (10) days of the effective date of any amendments of, revisions to, or modifications to the contingency plan.

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(c) The Permittee must, in accordance with OAC Rule 3745-54-53, submit a copy of the contingency plan to the Ohio Environmental Protection Agency's Division of Environmental Response and Revitalization.

B.19 Emergency Coordinator
OAC Rule 3745-54-55

The Permittee must comply with the requirements set forth in OAC Rule 3745-54-55 regarding the emergency coordinator.

B.20 Emergency Procedures
OAC Rule 3745-54-56

The Permittee must comply with the requirements regarding emergency procedures set forth in OAC Rule 3745-54-56, Section 5 of the permit application and the terms and conditions of this permit.

B.21 Availability, Retention and Disposition of Records
OAC Rule 3745-54-74

All records shall be furnished by the Permittee upon request to, and made available at all reasonable times for inspection by, Ohio EPA, in accordance with OAC Rule 3745-54-74.

B.22 Operating Record
OAC Rule 3745-54-73

The Permittee must comply with the requirements set forth in OAC Rule 3745-54-73 regarding an operating record, including information to be recorded and the maintenance thereof.

B.23 Contingency Plan Records
OAC Rule 3745-54-56(J)

The Permittee must note in the operating record the time, date, and details of any incident that requires the implementation of the contingency plan. Within fifteen (15) days after any such incident, the Permittee must submit to the Director a written report of the incident containing the elements set forth in OAC Rule 3745-54-56(J).

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B.24 Manifest System
OAC Rules 3745-54-70, 3745-54-71, 3745-54-72 and 3745-54-76

(a) In managing waste at the facility, the Permittee must comply with OAC Chapter 3745-52 and OAC Rules 3745-54-71, 3745-54-72 and 3745-54-76 with regard to the manifest system.

(b) Manifest discrepancy report. If a significant discrepancy in a manifest is discovered, the Permittee must attempt to reconcile the discrepancy. If not resolved with fifteen (15) days after receiving the waste, the Permittee must submit a letter describing the discrepancy and attempts to reconcile it, and a copy of the manifest, to the Director in accordance with OAC Rule 3745-54-72.

(c) Unmanifested waste report. If the Permittee receives unmanifested waste which is not excluded from the manifest requirements of OAC Rule 3745-51-05, then the Permittee must submit an unmanifested waste report to the Director within fifteen (15) days after receipt of the waste. The report must include the information required under OAC Rule 3745-54-76.

B.25 Biennial Report and Additional Reports
OAC Rules 3745-54-75 and 3745-54-77

The Permittee must comply with the report requirements set forth in OAC Rule 3745-54-75 and the additional report requirements set forth in OAC Rule 3745-54-77.

B.26 Closure Performance Standard
OAC Rule 3745-55-11

During facility closure, the Permittee must implement the provisions of the closure plan found in Section 7 of the permit application in such a manner as to achieve compliance with OAC Rule 3745-55-11.

B.27 Closure Plan
OAC Rules 3745-55-10, 3745-55-11 and 3745-55-13

The Permittee must implement those procedures detailed within Section 7 of the permit application, in accordance with OAC Rules 3745-55-10 through 3745-55-20.

B.28 Amendment of Closure Plan
OAC Rules 3745-55-12 and 3745-50-51

Should a change in the facility closure plan become necessary, the Permittee must amend the closure plan in accordance with OAC Rule 3745-55-12 (C).

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B.29 Content of Closure Plan
OAC Rule 3745-55-12

The Permittee must maintain at the facility the closure plan which contains the elements set forth in OAC Rule 3745-55-12 and all elements required by the terms and conditions of this permit.

B.30 Notification of Closure
OAC Rule 3745-55-12

The Permittee must notify the Director in writing at least 45 days prior to the date on which he expects to begin final closure of a facility, as required by OAC Rule 3745-55-12(D).

B.31 Time Allowed For Closure
OAC Rule 3745-55-13

Within ninety (90) days after receiving the final volume of hazardous waste, the Permittee must remove from the facility, or treat or dispose of on-site, all hazardous waste in accordance with the closure plan. The Director may approve a longer closure period if the Permittee complies with all applicable requirements for requesting a modification to the permit as set forth in OAC Rule 3745-55-13(A). The Permittee must complete all closure activities within one hundred eighty (180) days after receiving the final volume of hazardous waste in accordance with OAC Rule 3745-55-13. The Director may approve a longer closure period if the Permittee complies with all applicable requirements for requesting a modification to the permit as set forth in OAC Rule 3745-55-13 (B).

B.32 Disposal or Decontamination of Equipment, Structures, and Soils
OAC Rule 3745-55-14

(a) The Permittee must decontaminate or dispose of all contaminated facility equipment, structures, and soils, as required by OAC Rule 3745-55-14, the closure plan and the terms and conditions of this permit.

(b) The Permittee must notify the Ohio EPA Northeast District Office within five (5) working days prior to all rinseate and soil sampling.

B.33 Certification of Closure
OAC Rule 3745-55-15

The Permittee and an independent, registered professional engineer must certify that each hazardous waste management unit or the facility has been closed in accordance with the specifications in the closure plan and the terms and conditions of this permit, as required by OAC Rule 3745-55-15. The Permittee

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must furnish to the Director, upon request, documentation supporting the certification.

B.34 Reserved

B.35 Reserved

B.36 Cost Estimate for Facility Closure
OAC Rule 3745-55-42

(a) The Permittee's most recent closure cost estimate, prepared in accordance with OAC Rule 3745-55-42 is specified in Section 7 of the permit application.

(b) The Permittee must adjust the closure cost estimate for inflation within 60 days prior to the anniversary date of the establishment of the financial instrument(s) used to comply with OAC Rule 3745-55-43.

(c) The Permittee must revise the closure cost estimate whenever there is a change in the facility's closure plan that increases the cost of closure as required by OAC Rule 3745-55-42(C).

(d) The Permittee must submit to the Ohio EPA and keep at the facility the latest closure cost estimate as required by OAC Rule 3745-55-42(D) and (E).

B.37 Financial Assurance for Facility Closure

The Permittee must maintain continuous compliance with OAC Rule 3745-55-43, and provide documentation of financial assurance, which meets the requirements of OAC Rule 3745-55-51, in at least the amount of the cost estimates required by Permit Condition B.36.

B.38 Liability Requirements

The Permittee must maintain continuous compliance with the requirements of OAC Rule 3745-55-47 and the documentation of liability by providing liability coverage which meets the requirements of OAC Rule 3745-55-51 for sudden accidental occurrences in the amount of at least $1 million per occurrence, with an annual aggregate of at least $2 million, exclusive of legal defense costs.

B.39 Incapacity of Owners or Operators, Guarantors, or Financial Institutions
OAC Rule 3745-55-48

The Permittee must comply with requirements set forth in OAC Rule 3745-55-48 regarding the incapacity of owners, operators, guarantors or financial institutions.

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B.40 General Requirements for Land Disposal Restrictions
OAC Chapter 3745-270

The Permittee must comply with all applicable regulations regarding land disposal prohibitions and restrictions as required by OAC Chapter 3745-270.

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MODULE C - CONTAINER STORAGE

C. CONTAINER STORAGE AND MANAGEMENT

The Permittee stores a variety of bulk shipping containers including smaller portable bins, bulk bags, gaylord boxes, open-top drums, or similar DOT-approved shipping containers. These containers are stored on the floor of **Solids Processing Unit #1 (SPU #1)**. Only wastes containing no free liquids are stored on the floor of SPU #1, as determined by method 9095, Paint Filter Liquids Test, "Test Methods for Evaluating Solid Waste, Physical and Chemical Methods" (EPA Publication Number SW-846 Second Edition). Therefore, secondary containment is not required. Containers will be staged in this area until the contents can be emptied into one of six tanks (T30-T35). A maximum equivalent of 35, one (1) cubic yard bags (5,830 gallons at one ton per bag with a density of 90 pounds per cubic foot) is permitted to be stored on the floor of SPU #1.

The Permittee operates an outdoor container storage unit on the **Liquids Unloading Hazardous Waste Container Storage Pad**. Both alkaline and acid wastes are stored here in separate, specific areas. Both liquid wastes and wastes with no free liquids may be stored in this area. The dimensions for the Liquids Unloading Hazardous Waste Storage Pad (three areas) are 60 feet by 50 feet for the alkaline pad, 40 feet by 50 feet for acid storage pad #1, and 28 feet by 50 feet for acid storage pad #2. There is a maximum storage capacity for ten (10), five thousand (5000) gallon tanker trucks or the equivalent. The total containment capacity for the area is 31,419 gallons for the Acid Unloading Pads, and 16,434 gallons for the Alkaline Unloading Pad.

The Permittee operates an outdoor no free liquids container storage pad known as **(Hazardous) Container Storage Pad #2**. The dimensions of the unit are 180 feet by 28 feet. The 18 parking spaces on the pad are designated as hazardous waste storage for containers of hazardous waste that contain no free liquids as determined by the Paint Filter Liquids Test. Therefore, no secondary containment is required. This pad stores bulk shipments in dump trailers or roll-off boxes, containerized shipments in enclosed van trailers, or palletized containers. These containers may include one to two cubic yard sacks (super sacks), gaylord boxes or drummed wastes. The permittee may store a maximum of 90,000 gallons or a maximum of 18 bulk transportation vehicles (roll-off boxes, dump trailers) of hazardous waste in this area. The waste is stored in bulk containers or is stored in other types of acceptable containers that would equal the equivalent volume (90,000 gallons). A nominal capacity of 5,000 gallons (twenty-five cubic yards) for bulk transportation vehicles is assumed.

The Permittee is authorized to construct and operate **a Container Management Unit (CMU).** This unit is permitted, but not yet constructed. The CMU will incorporate a container storage area and production line which will convey

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containers through various processing stations, finally decanting the container's contents into one of the CMU's tanks in the tank storage area. The Permittee may store a maximum of 28,600 gallons in containers in this unit. The CMU will consist of the following storage areas and processing stations. A Drum Racking System constructed of prefabricated steel will be designed to accommodate nine storage modules for a total container storage capacity of 432, fifty-five (55) gallon drum equivalents. The secondary containment volume will be 3,024 gallons.

An Auxiliary/Hold Storage area (19 feet 6 inches by 14 feet) will be for the temporary storage of containers. It will store 34, fifty-five (55) gallon drum equivalents and have a secondary containment volume of 225 gallons. An area on the main processing floor, designated as the Staging/Sampling Area (38 feet by 36 feet), will allow for the accumulation and sampling of similar or compatible materials before starting the decanting process. Fifty-four (54), fifty-five (55) gallon drum equivalents will be the maximum capacity of this area with a secondary containment capacity of 404 gallons.

The Permittee is authorized to construct and operate a unit known as (Hazardous) Container Storage Pads #9 and #10. This unit is permitted, but not yet constructed. The two pads will share the same base and be able to store a maximum of 22 over-the-road vehicles, dump trailers or tankers, or their equivalent. A nominal capacity of 5000 gallons (25 cubic yards) is assumed for liquid tanker trucks, solid dump trailers and roll-off boxes. Pad #9 (120 feet by 28 feet) will contain twelve spaces which will be designated for storage of hazardous wastes which contain no free liquids. Therefore, secondary containment is not required. This pad will store bulk shipments in dump trailers or boxes, containerized shipments in enclosed van trailers, or palletized containers. The containers may include one or two cubic yard sacks, gaylord boxes or drummed waste. Pad #10 (110 feet by 40 feet) will have ten parking spaces and be a roofed structure enclosed on three sides. It will have a secondary containment system and be able to store wastes with free liquids. The secondary containment sump is to be capable of containing a final volume of 7,398 gallons. The equivalent maximum waste storage capacity for both pads is to be 110,000 gallons.

C.1 Container Storage/Quantity Limitation

(a) The Permittee is authorized to store 284,430 gallons of hazardous waste at any given time in the permitted container storage areas. The Permittee must not store more than: 35 one ton bags or their equivalent in SPU #1; 50,000 gallons on the Liquids Unloading Hazardous Waste Container Storage Pad; 90,000 gallons on the (Hazardous) Container Storage Pad #2; 28,600 gallons in the CMU; and 110,000 gallons on the (Hazardous) Container Storage Pads #9 and #10. The Permittee must store hazardous waste in the types of containers (size and type) described in Section 3 of the permit application.

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(b) For the purpose of compliance with the capacity limitation of this permit, each container will be considered to be storing an amount of hazardous waste equal to its capacity, regardless of the actual quantity stored in the container. For transportation vehicles, a nominal capacity of 5,000 gallons (25 cubic yards) for liquid tanker trucks, solids dump trailers and roll-off boxes is assumed.

(c) Permit Conditions C.1(a) and C.2 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.

However, when accumulating waste within the permitted container storage area, in accordance with OAC Rule 3745-52-34 and 40 CFR Part 265, subparts AA, BB, and CC, the Permittee must not, for the total amount of hazardous waste stored and accumulated, exceed the maximum container storage inventory established under this permit condition.

C.2 Reserved

C.3 Waste Identification

The Permittee must store in containers only the hazardous waste codes specified below:

Hazardous Waste Codes Permitted for Container Storage:

D001*, D002, D003, D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D023, D024, D025, D026, D027, D028, D029, D030, D034, D035, D036, D038, D039, D040, F006, F007, F008, F009, F011, F012, F019, F039, K002, K003, K004, K005, K006, K007, K008, K061, K062, K069, K100, K171, K174, K175, K176, K177, K178
*(Oxidizer category of D001 only)

C.4 Condition of Containers
OAC Rule 3745-55-71

If a container holding hazardous waste is not in good condition (e.g., severe rusting, apparent structural defects) or if it begins to leak, the Permittee must transfer the hazardous waste from such container to a container that is in good condition or otherwise manage the waste in compliance with the conditions of this permit and the hazardous waste facility chapters of the OAC.

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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) 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.

(b) In the event lab-pack wastes are generated they must be handled in compliance with applicable storage requirements.

(c) In the event lab-pack wastes are generated they must be packaged in drums containing absorbent material that is compatible with the waste.

C.7 Containment Systems
OAC Rule 3745-55-75

(a) The Permittee must construct and maintain the containment systems in accordance with the plans and specifications contained in Section 3 of the permit application for the Container Management Unit (CMU), Liquids Unloading Hazardous Waste Container Storage Pad, and the (Hazardous) Container Storage Pad #10.

(b) The Permittee must maintain the containment system as described in the permit application, designed with sufficient capacity to contain ten percent of the total volume of the containers or the volume of the largest container, whichever is greater. The containment system must be free of cracks and gaps and sufficiently impervious to contain leaks and spills and accumulated precipitation until the collected material is detected and removed. The Permittee must ensure that the coating(s) utilized in lining the secondary containment system(s) is compatible with each waste stored in containers situated at the permitted Container Storage (Pad) Area(s). For those hazardous wastes that are deemed incompatible with the liner material, the Permittee must install a separate secondary containment structure located within the existing structure, possessing the appropriate liner in order to withstand any degrading effects imposed through initial and/or prolonged contact (e.g., 24 hours) with released waste materials.

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(c) The base of the containment system must be sloped or the containment system must be otherwise designed and operated to drain and remove liquids resulting from leaks, spills, or precipitation, unless the containers are elevated or are otherwise protected from contact with accumulated liquids.

(d) Run-on into the containment system must be prevented unless the collection system has sufficient excess capacity in addition to that required in Permit Condition C.7(b) above.

(e) Spilled or leaked waste and accumulated precipitation must be removed from the sump or collection area in a timely manner. This time period is not to exceed twenty-four (24) hours from the time spilled and/or leaked waste is discovered to have reached the hazardous waste pad sump.

C.8 Reserved

C.9 Inspection Schedules and Procedures
OAC Rules 3745-54-15 and 3745-54-73

The Permittee must inspect the container storage area in accordance with the inspection schedule contained in Section 4 of the permit application and in accordance with OAC Rule 3745-54-15. The inspection schedule must be designed to detect for leaking containers, deteriorating containers, and/or containment systems. The Permittee must note the results of these inspections in the inspection log along with any remedial action taken.

Areas subject to spills, such as loading or unloading areas, shall be inspected daily when in use pursuant to the inspection procedure described in Section 4 of the permit application. The Permittee must maintain these inspection results in the facility operating record.

C.10 Recordkeeping
OAC Rule 3745-54-73

The Permittee must comply with all recordkeeping requirements of OAC Rule 3745-54-73 as part of the facility operating record.

C.11 Special Container Provisions for Ignitable or Reactive Waste
OAC Rules 3745-54-17 and 3745-55-76

(a) The Permittee must not store ignitable or reactive waste except in accordance with OAC Rules 3745-54-17 and 3745-55-76.

(b) The Permittee must not locate containers holding ignitable or reactive waste within 15 meters (50 feet) of the facility's property line.

(c) The Permittee must take precautions to prevent accidental ignition or reaction of ignitable or reactive waste and shall follow the storage procedures specified in Section 4 the permit application.

C.12 Special Container Provisions for Incompatible Waste
OAC Rules 3745-54-17(B) and 3745-55-77

(a) The Permittee must not store incompatible waste except in accordance with OAC Rules 3745-54-17(B) and 3745-55-77.

(b) The Permittee must not place hazardous waste in an unwashed container that previously held an incompatible waste or material.

(c) The Permittee must separate or protect (by means of a dike, berm, wall, or other device) a storage container holding a hazardous waste that is incompatible with any waste or other materials stored nearby in other containers or open tanks.

C.13 Reserved

C.14 Closure and Post-Closure
OAC Rules 3745-55-10 through 3745-55-20, and 3745-55-78

(a) At closure of the container area, the Permittee shall remove all hazardous waste and hazardous waste residues from the containment system, in accordance with the procedures in the closure plan set forth in Section 7 of the permit application.

(b) If the Permittee demonstrates that not all contaminated soils can be practically removed or decontaminated in accordance with the Closure Plan, Section 7 of the permit application, the Permittee must close the unit and perform post-closure care following a plan approved by the Director of Ohio EPA.

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MODULE D - TANK STORAGE, TREATMENT AND MANAGEMENT

D. MODULE HIGHLIGHTS

The Permittee is authorized to construct and/or operate four (4) tank storage areas for the storage and/or treatment of hazardous waste. The tank storage areas are located in: **Solids Processing Unit #1 (SPU #1) (existing); Solids Processing Unit #2 (SPU #2) (permitted, but not constructed); Dry Solids Handling System (permitted, but not constructed); and the Container Management Unit (CMU) (permitted, but not constructed).** Hazardous waste managed in these units will include solid and semi-solid sludges (neutralized filter cakes and metal bearing sludges), hazardous debris including cleanup soils, baghouse dusts and blasting sands. Liquid hazardous waste will be managed in the CMU.

The area designated as SPU #1 has ten storage/treatment tanks identified as T30 through T35 and R30 through R33. Each of the T30 through T35 tanks has a storage capacity of 16,800 gallons (83.3 cubic yards). Each tank measures 12 feet 6 inches by 18 feet by 10 feet deep. Each tank is stationary and constructed as a double-walled steel tank incorporating a "drop in" polyethylene protective liner system. Tanks used to treat characteristic wastes are also provided with a prefabricated steel "drop in" liner. All six tanks are set into the floor of the building with reinforced concrete bins. Only the open tops of each tank are exposed. Secondary containment for the SPU #1 T30 through T35 tanks is provided through the use of double walled steel tanks. Electronic leak detection devices located in the interstitial space between each tank's two steel walls are inspected daily for leaks or malfunction.

The SPU #1 tanks (blenders) R30 and R31, consist of a vat and agitator fabricated of stainless steel. These blenders measure 15 feet by 6 feet in diameter, and have a volume capacity of approximately 15 cubic yards (3200 gallons) each. Blenders R32 and R33 (not installed) are to be constructed in the same manner as R30 and R31 except they will measure 15 feet by 7 feet in diameter and have a volume capacity of approximately 20 cubic yards or 4,400 gallons each. The blenders are provided with a secondary containment system.

The wastes accepted for treatment in the SPU #1 unit consist of inorganic wastes which arrive as viscous, semi-solid, solid and/or non-pumpable. They are processed through the SPU #1 system by batch treatment where a series of chemical reactions are carried out to produce a residue suitable for hazardous or non-hazardous land disposal. Hazardous waste debris will be accepted for treatment in the SPU #1 tanks T30 - T35.

The Permittee may treat characteristically hazardous waste in SPU #1 tanks T30-T35 and R30-R33. In tanks T30-T35, chemical reagents and water are added to the waste and mixed together with an excavator bucket. The Permittee

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may only render waste containing the following characteristic codes non-hazardous:

D002, D003, D004, D005, D006, D007, D008, D009, D010, and D011

The Permittee must demonstrate and prove the efficiency of the mixing process for each waste code treated in the SPU #1 tanks T30 to T35. As of January 1, 2013, the following characteristic waste codes have received final approval:

D002, D004, D005, D006, D007, and D008

As of January 1, 2013, the following characteristic waste codes **have not** gone through the approval process:

D003, D009, D010, and D011

U.S. EPA Region V allows the Permittee to delist wastes mixed in the SPU #1 tanks. The Permittee must, however, demonstrate and prove the efficiency of the mixing process for each waste code treated in the SPU #1 tanks T30-T35. As of January 1, 2013, the following listed waste codes have received final approval:

F006, F019

As of January 1, 2013, the following listed waste codes **have not** gone through the approval process:

F007, F008, F009, F011, F012, K002, K003, K004, K005, K006, K007, K008, K062

The Permittee may dedust wastes in SPU #1 tanks T30-T35 to minimize the potential for fugitive emissions from the unloading process.

The Permittee is authorized to construct and operate a second solids processing unit, Solids Processing Unit #2 (SPU #2). SPU #2 will have six in-ground hazardous waste storage tanks (T36, T37, T38, T39, T40, T41), and four waste blenders (R34, R35, R36, R37). The SPU #2 in-ground tanks will each measure 12 feet 6 inches by 18 feet by 10 feet deep with a maximum capacity of 83.3 cubic yards (16,800 gallons). The open top tanks will be constructed of reinforced concrete and are to be set into the floor of the building and provided with a leak detection system. Each blender will consist of a vat and rotating element and is to be fabricated of stainless steel with abrasion resistant liner plates, and will have a volume capacity of approximately 4,400 gallons (20 cubic yards).

The Permittee is authorized to construct and operate a Dry Solids Handling System (DSHS) for treatment of dry hazardous waste. Dry wastes will arrive and

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be conveyed either directly to the DSHS pugmill or one of the unit's waste storage silos. Wastes within the pugmill are to be thoroughly agitated to assure complete chemical reactions and maximum treatment of the wastes. Treatment in this unit will use the same chemical reactions and stabilization methods used in the solids processing units. Treatment chemicals will be metered into the inlet of the pugmill. A batch will take 30 minutes to an hour to process completely through the pugmill. The pugmill is considered a miscellaneous unit and is covered in permit section G. Three above ground storage silos/tanks will store wastes which do not contain free liquids. Dimensions of the tanks are 35 feet by 12 feet in diameter. Total storage capacity per tank is 24,800 gallons. Secondary containment for wastes that pass the Paint Filter Liquids Test will not be required.

The Permittee is authorized to construct and operate a Container Management Unit (CMU) to store and process containerized waste prior to treating in the RCRA exempt Liquids Processing Unit (LPU). The CMU will incorporate a processing line which will convey containers through processing stations including conveyor loading, decanting, deheading and a drum wash and rinse unit. The rinseates generated are to be processed through the LPU. Waste containers may be either decanted or stored for a short time to accumulate inventory for a production run. If containers are stored, they are palletized and placed in a racking system. The CMU will have nine storage tanks which will be designed to store either acidic or alkaline wastes and are to be constructed of fiberglass reinforced plastic. The total permitted volume of liquid wastes stored in these tanks is 22,000 gallons. Secondary containment will be provided for containerized storage. Secondary containment will be provided for the storage tanks by separate diked areas designed to contain more than the volume of the largest tank.

D.1 Tank Storage Quantity Limitation/Waste Identification

(a) The Permittee may store a total volume of 330,935 gallons of hazardous waste in 32 tanks, and treat a total volume of 200,000 gallons of hazardous waste per day in 14 tanks (eight blending tanks and six SPU #1 tanks T30-T35) subject to the terms of this permit and as detailed in the table below.

Tank No.	Capacity (Gallons)	Dimensions of Tank	Secondary Containment Required	Description of Hazardous Waste	Hazardous Waste No.
Tanks SPU #1 Existing					
T-30, 31, 32, 33, 34, 35	16,800 each	12'6"x18'x10'D	Yes	Waste inorganic solids, semi-	Condition D.1(c)

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Tank No.	Capacity (Gallons)	Dimensions of Tank	Secondary Containment Required	Description of Hazardous Waste	Hazardous Waste No.
				solids	
Blending Tanks SPU #1					
R-30, 31 Existing	3,200 each	15'x 6' in diameter	Yes	Waste inorganic solids, semi-solids	Condition D.1(c)
R-32, 33 Not yet constructed	4,400 each	15'x7' in diameter	Yes	"	"
Tanks SPU #2 Not yet constructed					
T-36, 37, 38, 39, 40, 41	16,800 each	12'6"x18'x10'D	Yes	"	"
Blending Tanks SPU #2 Not yet constructed					
R-34, 35, 36, 37	4,400 each	15'x7' in diameter	Yes	"	"
Tanks Container Management Building Not yet constructed					
T-13	16,000	16'x13' in diameter	Yes	Alkaline/Neutral liquid wastes	Condition D.1(c)
T-15, 16	1000 each	5'x6' in diameter	Yes	"	"
T-17, 18, 19, 20	500 each	5'x4' in diameter	Yes	Acid liquid wastes	"
T-27, 28	1000 each	5'x6' in diameter	Yes	"	"
Tanks Dry Solids Handling System Not yet constructed					
T-50, 51, 52	24,800 each	35'x12' in diameter	No	Waste inorganic solids (no free liquids)	Condition D.1 (c)

(b) During any calendar year, the Permittee must not manage through tank storage hazardous waste in excess of the maximum annual quantity set

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forth in Permit Condition B.1(b).

(c) The Permittee shall store and treat in tanks only the hazardous waste codes specified in the approved Part B permit application and summarized below:

D001*, D002, D003, D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D023, D024, D025, D026, D027, D028, D029, D030, D034, D035, D036, D038, D039, D040, F006, F007, F008, F009, F011, F012, F019, K002, K003, K004, K005, K006, K007, K008, K061, K062, K069, K100, K171, K174, K175, K176, K177, K178, F039
*(D001 is the oxidizer category only)

(d) The Permittee is prohibited from storing or treating hazardous waste that is not identified in this permit condition. Incoming hazardous waste carrying the following waste codes and with concentrations in excess of the Land Disposal Restrictions (LDR) limits may not be subjected to the stabilization/solidification treatment process:

D018, D019, D021, D022, D023, D024, D025, D026, D027, D028, D029, D030, D034, D035, D036, D038, D039, D040, F039

(e) The following 15 categories of listed waste may be rendered non-hazardous when treated in SPU tanks R30-R37 in accordance with the November 7, 1986, (Federal Register, Volume 51, page 41323) delisting as granted by U.S. EPA:

F006, F007, F008, F009, F011, F012, F019, K002, K004, K005, K006, K007, K008, K062, K171

(f) The Permittee may treat characteristic hazardous waste in the following tanks:
SPU #1: T30, T31, T32, T33, T34, and T35 and R30 to R37.

Only the following characteristic waste codes may be rendered nonhazardous when treated in the aforementioned tanks:

D002, D003, D004, D005, D006, D007, D008, D009, D010, D011

The Permittee must demonstrate and prove the efficiency of the mixing process for each waste code treated in SPU #1 tanks, T30 to T35. As of January 1, 2013, the following characteristic waste codes have received final approval:

D002, D004, D005, D006, D007, and D008

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As of January 1, 2013, the following characteristic waste codes **have not** gone through the approval process:

D003, D009, D010, and D011

U.S. EPA Region V allows the Permittee to delist waste mixed in the SPU #1 tanks. As of January 1, 2013, the following listed waste codes have received final approval for delisting when treated in the SPU #1 tanks, T30 to T35:

F006, F019

As of January 1, 2013, the following listed waste codes have not gone through the approval process:

F007, F008, F009, F011, F012, K002, K003, K004, K005, K006, K007, K008, K062

D.2 Limitations on Treatment of Hazardous Waste in Tanks

(a) The Permittee is authorized to treat hazardous waste in the tanks specified in the table below. The Permittee shall treat in tanks only the hazardous waste codes specified in the permit application and summarized below:

(b) The provision of Condition D.2(a) shall not apply to the Permittee's activities as a generator treating hazardous waste in tanks on-site in compliance with the provisions of OAC Rule 3745-52-34.

Tank No.	Capacity (Gallons)	Dimensions of Tank	Secondary Containment Required	Description of Hazardous Waste	Hazardous Waste No.
Tanks SPU #1					
T-30, 31, 32, 33, 34, 35 Existing	16,800 each	12'6"x18'x10'D	Yes	Waste inorganic solids, semi-solids	Condition D.1(c) through (f)
Blending Tanks SPU #1					
R-30, 31 Existing	3,200 each	15'x6' in diameter	Yes	Waste inorganic solids, semi-solid	Condition D.1(c) through (f)
R-32, 33 Not yet	4,400 each	15'x7' in diameter	Yes	"	"

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Tank No.	Capacity (Gallons)	Dimensions of Tank	Secondary Containment Required	Description of Hazardous Waste	Hazardous Waste No.
constructed					
Blending Tanks SPU #2 Not yet constructed	[redacted]				
R-34, 35, 36, 37	4,400 each	"	"	"	"

D.3 Design and Installation of New Tank Systems or Components
OAC Rule 3745-55-92

(a) The Permittee must construct the tank system in accordance with Section 3 of the permit application.

(b) Prior to operation of the newly constructed tank system, the Permittee must submit the certification of installation of the tank system in accordance with OAC Rule 3745-55-92(B) to ensure that proper handling procedures were adhered to in order to prevent damage to the system during installation.

D.4 Containment and Detection of Releases
OAC Rule 3745-55-93

The Permittee must construct and operate the secondary containment system in accordance with requirements of OAC Rule 3745-55-93(B) through (F), and Section 3 of the permit application.

D.5 Operating Requirements
OAC Rule 3745-55-94

(a) The Permittee must not place hazardous wastes or treatment reagents in the tank system if they could cause the tank, its ancillary equipment, or a containment system to rupture, leak, corrode, or otherwise fail.

(b) The Permittee must prevent spills and overflows from the tank or containment systems using the methods described in the permit application. The Permittee must comply with the requirements of OAC Rule 3745-55-96 if a leak or spill occurs in the tank system.

(c) The Permittee must manage waste within the SPU area so as to minimize and control the wind dispersal of waste. The SPU areas must be designed and operated to control fugitive dust to minimize visible emissions. Visible emissions must be minimized at all times during

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routine operating and maintenance conditions.

(d) The Permittee is authorized to install and operate a dedusting system to allow the unloading of materials that have a potential for fugitive emissions. This system must consist of a system of water sprays to control emissions and may include tarps for additional control. The Permittee may also add water to the wastes in SPU tanks T30-T35 to control potential fugitive emissions throughout the materials handling and treatment process.

D.6 Inspection Schedules and Procedures
OAC Rule 3745-55-95

(a) The Permittee must inspect the tank systems, in accordance with the Inspection Schedule found in Section 4 of the permit application and must complete the items in Permit Conditions D.6(b) and D.6(c) as part of those inspections.

(b) The Permittee must inspect the overfill controls, in accordance with the procedure and schedule in the permit application.

(c) The Permittee must inspect the following components of the tank system once each operating day:

(i) Aboveground portions of the tank system, if any, to detect corrosion or releases of waste;

(ii) Data gathered from monitoring and leak detection equipment (e.g., pressure or temperature gauges, monitoring wells) to ensure that the tank system is being operated according to its design; and

(iii) Construction materials and the area immediately surrounding the externally accessible portion of the tank system, including the secondary containment system, to detect erosion or signs of releases of hazardous waste (e.g., wet spots, dead vegetation).

(d) Reserved.

(e) The Permittee must document compliance with Permit Condition D.6 in the operating record of the facility.

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D.7 Response to Leaks or Spills
OAC Rule 3745-55-96

(a) In the event of a leak or a spill from the tank system, from a secondary containment system, or if a system becomes unfit for continued use, the Permittee must remove the system from service immediately and complete the following actions:

(i) Immediately stop the flow of hazardous waste into the tank system or secondary containment system and inspect the system to determine the cause of the release.

(ii) If the release was from the tank system, the Permittee must, within twenty-four hours after detection of the leak, or, if the Permittee demonstrates that it is not possible, at the earliest practicable time, remove as much of the waste as is necessary to prevent further release of hazardous waste to the environment and to allow inspection and repair of the tank system to be performed.
If the material released was to a secondary containment system, all released materials must be removed within twenty-four hours or in as timely a manner as possible to prevent harm to human health and the environment.

(iii) The Permittee must immediately conduct a visual inspection of all releases to the environment and, based on that inspection: (1) prevent further migration of the leak or spill to soils or surface water and (2) remove and properly dispose of any visible contamination of the soil or surface water.

(b) Unless the requirements of Permit Conditions D.7(b)(i) through D.7(b)(vi) are satisfied, the Permittee must close its tank system in accordance with OAC Rule 3745-55-97 and its closure plan if there has been a leak or spill from the tank system, from a secondary containment system, or if a system becomes unfit for continual use.

(i) For a release caused by a spill that has not damaged the integrity of the system, the Permittee must remove the released waste and make any necessary repairs to fully restore the integrity of the system before returning the tank system to service.

(ii) For a release caused by a leak from the primary tank system to the secondary containment system, the Permittee must repair the primary system prior to returning it to service.

(iii) Reserved.

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(iv) Reserved.

(v) Reserved.

(vi) If the Permittee replaces a component of the tank system to eliminate the leak, that component must satisfy the requirements for new tank systems or components in OAC Rules 3745-55-92 and 3745-55-93.

(c) For all major repairs (e.g., installation of an internal liner, repair of a ruptured tank, or repair or replacement of a secondary containment vault) to eliminate leaks or restore the integrity of the tank system, the Permittee must obtain a certification by an independent, qualified, registered professional engineer in accordance with OAC Rule 3745-50-42(D)(1) that the repaired system is capable of handling hazardous wastes without release for the intended life of the system before returning the system to service. This certification must be submitted to the Director within seven days after returning the tank system to use.

D.8 Recordkeeping and Reporting
OAC Rules 3745-55-96, 3745-55-91(A), and 3745-55-92(G)

(a) The Permittee must report to the Director, within 24 hours of detection, when a leak or spill occurs from the tank system or secondary containment system to the environment. A leak or spill of one pound or less of hazardous waste, that is immediately contained and cleaned-up, need not be reported. Releases that are contained within a secondary containment system need not be reported.

(b) Within 30 days of detecting a release to the environment from the tank system or secondary containment system, the Permittee must report the following information to the Director:

(i) Likely route of migration of the release;

(ii) Characteristics of the surrounding soil (including soil composition, geology, hydrogeology, and climate);

(iii) Results of any monitoring or sampling conducted in connection with the release. If the Permittee finds it will be impossible to meet this time period, the Permittee should provide the Director with a schedule of when the results will be available. This schedule must be provided before the required 30-day submittal period expires;

(iv) Proximity of downgradient drinking water, surface water, and

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populated areas; and

(v) Description of response actions taken or planned.

(c) The Permittee must obtain, and keep on file at the facility, the written statements by those persons required to certify the design and installation of the tank system.

(d) The Permittee must keep on file at the facility the written assessment of the tank system's integrity.

(e) The Permittee must submit to the Director all certifications of major repairs to correct leaks within seven days from returning the tank system to use.

D.9 Closure and Post-Closure Care
OAC Rule 3745-55-97

(a) At closure of the tank system(s), the Permittee must follow the procedures in the closure plan in Section 7 of the permit application.

(b) If the Permittee demonstrates that not all contaminated soils can be practically removed or decontaminated, in accordance with the closure plan, then the Permittee must close the tank system(s) and perform post-closure care.

D.10 Special Tank Provisions for Ignitable or Reactive Wastes
OAC Rule 3745-55-98

(a) The Permittee must not place ignitable or reactive waste in the tank system or in the secondary containment system, unless the procedures specified in the permit application are followed. The Permittee must document compliance with this condition and place it in the operating record.

(b) The Permittee must comply with the requirements for the maintenance of protective distances between the waste management area and any public ways, streets, alleys, or an adjoining property line that can be built upon, as required in Tables 2-1 to 2-6 of the National Fire Protection Association's "Flammable and Combustible Liquids Code" (1996 or most recent edition) incorporated by reference in OAC Rule 3745-50-11.

D.11 Special Tank Provisions for Incompatible Wastes
OAC Rule 3745-55-99

(a) The Permittee must not place incompatible wastes, or incompatible wastes and materials, in the same tank system or the same secondary

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containment system, unless the procedures specified in the permit application are followed. The Permittee must document compliance with this condition and place that documentation into the operating record.

(b) The Permittee must not place hazardous waste in a tank system that has not been decontaminated and that previously held an incompatible waste or material, unless the requirements of Permit Condition D.11(a) are met.

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MODULE E - CORRECTIVE ACTION REQUIREMENTS

E. CORRECTIVE ACTION SUMMARY

The Preliminary Review (PR)/Visual Site Inspection (VSI) phases of a RCRA Facility Assessment (RFA) were completed for the facility. The PR/VSI report dated September 30, 1991 was prepared by Ohio EPA for the U.S. Environmental Protection Agency. This report summarized information acquired during the PR and VSI concerning Waste Management Units (WMUs) present at the facility. The report identified nine (9) WMUs. The WMUs included storage areas, process areas, and loading/unloading areas. Based on review of the information acquired, the PR/VSI report recommended and U.S. EPA determined that no corrective action investigation or implementation is required at this time.

Transition of corrective action authority from U.S EPA to Ohio EPA occurred on January 15, 2003.

E.1 Corrective Action at the Facility
OAC Rules 3745-50-10 and 3745-54-101

In accordance with OAC Rule 3745-50-10, waste management unit means any discernible unit at which solid waste, hazardous waste, infectious waste (as those terms are defined in ORC Chapter 3734), construction and demolition debris (as defined in ORC Chapter 3714), industrial waste, or other waste (as those terms are defined in ORC Chapter 6111), has been placed at any time, irrespective of whether the unit was intended for the management of waste or hazardous waste. Such units include any area at a facility at which wastes have been routinely and systematically released. For the purpose of Corrective Action, facility is defined as all contiguous property under the control of the owner or operator seeking a permit under Subtitle C of RCRA. The terms Interim Measure (IM), RCRA Facility Investigation (RFI), Corrective Measures Study (CMS) and Corrective Measure Implementation (CMI) are defined in U.S. EPA's Corrective Action Plan (CAP) (OSWER Directive 9902.3-2A, May 1994).

The Permittee must institute Corrective Action as necessary to protect human health and the environment for all releases of hazardous wastes or hazardous constituents from any waste management units (WMUs) at the Facility, regardless of the time at which waste was placed in such units.

E.2 Corrective Action Beyond the Facility Boundary
OAC Rule 3745-54-101

The Permittee must implement Corrective Action beyond the Facility property boundary, where necessary to protect human health and the environment, unless the Permittee demonstrates to the satisfaction of Ohio EPA that, despite the Permittee's best efforts, the Permittee was unable to obtain the necessary

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permission to undertake such actions. The Permittee is not relieved of all responsibility to clean up a release that has migrated beyond the Facility boundary where off-site access is denied. On-site measures to address such releases will be addressed under the RFI, CMS, and CMI phases, as determined to be necessary on a case-by-case basis.

E.3 Identification of WMUs
OAC Rules 3745-50-44(D) and 3745-54-101

The PR/VSI report identified the following nine WMUs:

(1) Alkaline unloading pad
(2) Acid unloading pad
(3) Alkaline/neutral waste storage tanks and reactor area
(4) Acidic waste storage area
(5) Neutralization tank area
(6) Filter room
(7) SPU unloading and storage bins area
(8) SPU blenders and dump trailer area
(9) Container storage areas

E.4 No Corrective Action Required at this Time
OAC Rule 3745-54-101

Based on the available information for the Facility, no known or potential releases of hazardous wastes or hazardous constituents have been associated with identified WMUs. No Corrective Action investigation or implementation is required at this time.

E.5 RCRA Facility Investigation (RFI)
OAC Rule 3745-54-101

The Permittee must conduct an RFI to thoroughly evaluate the nature and extent of the release of hazardous wastes and hazardous constituents from all applicable WMUs identified in Permit Condition E.10. The major tasks and required submittal dates are shown below. The scope of work for each of the tasks is found in U.S. EPA's CAP.

(a) RFI Workplan

The Permittee must submit a written RFI Workplan to Ohio EPA in case of a newly discovered waste management unit, on a time frame established by Ohio EPA.

(i) Within 60 days of receipt of any Ohio EPA comments on the RFI Workplan, the Permittee must submit either an amended or new

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RFI Workplan that incorporates Ohio EPA's comments.

(ii) Ohio EPA will approve or modify and approve, in writing, the amended or new RFI Workplan. The RFI Workplan, as approved or as modified and approved, shall be incorporated into this permit and become an enforceable condition of this permit. Subsequent changes to the approved RFI Workplan must be authorized by Ohio EPA.

(b) RFI Implementation

The Permittee must implement the RFI Workplan according to the terms and schedule in the approved RFI Workplan.

(c) RFI Final Report

Within 60 days after the completion of the RFI, the Permittee must submit an RFI Final Report to Ohio EPA. The RFI Final Report must describe the procedures, methods, and results of the RFI. The Final Report must contain adequate information to support further decisions concerning Corrective Action at the Facility.

(i) Within 60 days of receipt of any Ohio EPA comments on the RFI Final Report, the Permittee must submit either an amended or new RFI Final Report that incorporates Ohio EPA's comments.

(ii) Ohio EPA will approve or modify and approve, in writing, the amended or new RFI Final Report. The RFI Final Report, as approved or as modified and approved, shall be incorporated into this permit and become an enforceable condition of this permit. Subsequent changes to the approved RFI Final Report must be authorized by Ohio EPA.

E.6 Interim Measure (IM)

Based on the RFI Final Report or other information documenting a release of hazardous waste or constituents to the environment, Ohio EPA may require (or the Permittee may propose) the development and implementation of an IM (this may include an IM Workplan) at any time during the life of the permit to mitigate or eliminate a threat to human health or the environment. The Permittee must implement the IM upon a time frame established by Ohio EPA.

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E.7 Determination of No Further Action

(a) Permit Modification

Based on the results of the completed RFI and other relevant information, the Permittee may submit an application to Ohio EPA for a permit modification under OAC Rule 3745-50-51 to terminate the Corrective Action tasks of the Schedule of Compliance. Other tasks identified in the Schedule of Compliance shall remain in effect. This permit modification application must conclusively demonstrate that there are no releases of hazardous waste or constituents from WMUs at the Facility that pose an unacceptable risk to human health and the environment.

If, based upon review of the Permittee's request for a permit modification, the results of the completed RFI, and other information, Ohio EPA determines that releases or suspected releases which were investigated either are nonexistent or do not pose an unacceptable risk to human health and the environment, Ohio EPA will approve the requested modification. Decisions regarding the completion of RCRA Corrective Action and no further action may be made for the entire Facility, for a portion of the Facility, or for a specific unit or release.

(b) Periodic Monitoring

A determination of no further action shall not preclude Ohio EPA from requiring continued or periodic monitoring of air, soil, ground water, or surface water, if necessary to protect human health and the environment, when site-specific circumstances indicate that a potential or an actual release of hazardous waste or constituents exists.

(c) Further Investigations

A determination of no further action shall not preclude Ohio EPA from requiring further investigations, studies, or remediation at a later date, if new information or subsequent analysis indicates that a release or potential release from a WMU at the Facility may pose an unacceptable risk to human health or the environment. In such a case, Ohio EPA shall initiate a modification to the terms of the permit to rescind the determination made in accordance with Permit Condition E.7(a). Additionally, in the event Ohio EPA determines that there is insufficient information on which to base a determination, the Permittee, upon notification, is required to develop a Work Plan and upon Ohio EPA approval of that Work Plan, perform additional investigations as needed.

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E.8 Corrective Measures Study (CMS)

If Ohio EPA determines, based on the results of the RFI and any other relevant information, that corrective measures are necessary, Ohio EPA will notify the Permittee in writing that the Permittee must conduct a CMS either as described below or as described in Ohio EPA's notification to the Permittee. The purpose of the CMS will be to develop and evaluate the corrective action alternative(s) and to outline one or more alternative corrective measure(s) that will satisfy the performance objectives specified in Permit Condition E.9.

(a) CMS Workplan

The Permittee must submit a written CMS Workplan to Ohio EPA within 90 days from the notification by Ohio EPA of the requirement to conduct a CMS.

(i) Within 60 days of receipt of any Ohio EPA comments, the Permittee must submit either an amended or new CMS Workplan that incorporates Ohio EPA's comments.

(ii) Ohio EPA will approve or modify and approve, in writing, the amended or new CMS Workplan. The CMS Workplan, as approved or as modified and approved, must be incorporated into this permit and become an enforceable condition of this permit. Subsequent changes to the approved CMS Workplan must be authorized by Ohio EPA.

(b) CMS Workplan Implementation

The Permittee must implement the CMS Workplan according to the terms and schedule in the approved CMS Workplan.

(c) CMS Final Report

Within 60 days after the completion of the CMS, the Permittee must submit a CMS Final Report to Ohio EPA. The CMS Final Report must summarize the results of the investigations for each remedy studied and must include an evaluation of each remedial alternative.

(i) Within 60 days of receipt of any Ohio EPA comments, the Permittee must submit either an amended or new CMS Final Report that incorporates Ohio EPA's comments.

(ii) Ohio EPA will approve or modify and approve, in writing, the amended or new CMS Final Report. The CMS Final Report, as

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approved or as modified and approved, must be incorporated into this permit and become an enforceable condition of this permit. Subsequent changes to the approved CMS Final Report must be authorized by Ohio EPA.

E.9 Corrective Measures Implementation (CMI)

Based on the results of the CMS, the Permittee must implement one or more of the Corrective Measures authorized by Ohio EPA. Ohio EPA will authorize one or more of the Corrective Measures in the CMS, and will notify the Permittee in writing of the decision. The Corrective Measure selected for implementation must: (1) be protective of human health and the environment; (2) attain media cleanup standards; (3) control the source(s) of releases so as to reduce or eliminate further releases of hazardous waste(s) (including hazardous constituent[s]); and (4) comply with all applicable standards for management of wastes.

If two or more of the Corrective Measures studied meet the threshold criteria set out above, Ohio EPA will authorize the Corrective Measures Implementation by considering remedy selection factors including: (1) long-term reliability and effectiveness; (2) the degree to which the Corrective Measure will reduce the toxicity, mobility or volume of contamination; (3) the Corrective Measure's short-term effectiveness; (4) the Corrective Measure's implementability; and (5) the relative cost associated with the alternative.

(a) Permit Modification

Ohio EPA will initiate a permit modification, as provided by OAC Rule 3745-50-51 to require implementation of the corrective measure(s) authorized.

The Permittee must not implement the corrective measure until the permit is modified pursuant to OAC Rule 3745-50-51.

(b) Financial Assurance
OAC Rule 3745-54-101

Within 30 days after receiving approval of the CMI, the Permittee must provide financial assurance in the amount necessary to implement the corrective measure(s) as required by OAC Rule 3745-54-101 (B) and (C).

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E.10 Newly Identified WMUs or Releases
OAC Rule 3745-54-101

(a) General Information

The Permittee must submit to Ohio EPA, within 30 days of discovery, the following information regarding any new WMU identified at the Facility by Ohio EPA or the Permittee:

(i) The location of the unit on the site topographic map;

(ii) Designation of the type of unit;

(iii) General dimensions and structural description (supply any available drawings);

(iv) When the unit was operated; and

(v) Specification of all waste(s) that have been managed at the unit.

(b) Release Information

The Permittee must submit to Ohio EPA, within 30 days of discovery, all available information pertaining to any release of hazardous waste(s) or hazardous constituent(s) from any new or existing WMU.

E.11 Corrective Action for Newly Identified WMUs and Releases
OAC Rule 3745-54-101

If Ohio EPA determines that an RFI is required for newly identified WMUs, the Permittee must submit a written RFI Workplan to Ohio EPA upon a time frame established in written notification by Ohio EPA in accordance with Permit Condition E.5. This determination will be made based on the information submitted in accordance with Permit Condition E.10.

Further investigations or corrective measures will be established by Ohio EPA.

The Permittee must make such submittal in accordance with time frames established by Ohio EPA.

E.12 Completion of Corrective Action
OAC Rule 3745-54-101

After completing Corrective Action as necessary to protect human health and the environment for all releases of hazardous wastes or hazardous constituents from any WMUs at the Facility, the Permittee shall submit a Corrective Measures

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Completion of Work (CMCW) Report. The CMCW Report shall document that Corrective Action construction is complete, cleanup objectives and standards have been met, and any releases of hazardous waste or constituents no longer pose an unacceptable risk to human health and the environment. The CMCW Report may be submitted for any part of the Facility for which corrective measures are complete, or for the entire Facility. The CMCW Report must be submitted as a request for permit modification pursuant to OAC Rule 3745-50-51.

E.13 Documents Requiring Professional Engineer Stamp
ORC Section 4733.01

Preparation of the following Corrective Action documents constitutes the "practice of engineering" as defined by ORC Section 4733.01:

Final Interim Measures Report

Corrective Measures Final Design

Corrective Measures Construction Completion Report

Corrective Measures Attainment of Groundwater Performance Standards Report

Corrective Measures Completion of Work Report

As such, the Permittee must ensure that these documents, as submitted to Ohio EPA, are stamped by a Professional Engineer licensed to practice in the State of Ohio.

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MODULE F - POST-CLOSURE CARE

(RESERVED)

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MODULE G - MISCELLANEOUS UNITS

G. MISCELLANEOUS UNITS HIGHLIGHTS

The Permittee is authorized to install and operate two miscellaneous units, a pugmill unit, located within the Dry Solids Handling System (DSHS) and a vibratory screen unit located in SPU #1. Neither has been installed.

The Permittee will operate the DSHS for the treatment of dry, dusty hazardous waste. It will consist of an unloading station with a mechanically assisted vacuum wand for decanting containers and vehicles, a filter/receiver, a vacuum unit, a HEPA air filtering system, and a pugmill. The pugmill is permitted to process 90,000 tons per year or 60,000 gallons per day of hazardous waste. A conversion factor of 90 pounds per cubic foot is assumed.

The pugmill will measure approximately 16 feet in length and will have a liquid equivalent capacity of 135 gallons or 18 cubic feet. The pugmill is to be constructed of carbon steel and lined with abrasion resistant lining plates. The unit will not be designed as a tank, but rather as a continuous flow mixing device. To eliminate dusting, moisture will be added to the pugmill. Chemical treatment of the waste will occur within the pugmill conditioning unit. Thorough agitation will assure complete chemical reactions and maximum treatment of the wastes. If necessary, the wastes can be treated further in the Solids Processing Unit.

Secondary containment is not required because only dry materials are to be processed in the pugmill. However, the Permittee will construct the floor of the DSHS as a secondary containment structure.

The Permittee is authorized to operate a vibratory screen unit in the SPU #1 area. The vibratory screen unit will be utilized as a pretreatment process to remove debris such as plastic, wood, concrete, stones, etc., so that the waste is amenable for treatment in the solids processing unit. Debris which is removed from the vibratory screen will be stored in a collection hopper prior to off-site disposal. The Permittee may treat 50,000 tons of hazardous waste per year at a maximum rate of 20 tons per hour through the vibratory screen.

G.1. Process Capacity/Annual Limitation/Waste Identification

(a) The Permittee shall not treat in excess of 60,000 gallons per day in the pugmill and shall not treat in excess of 50,000 gallons per day through the vibratory screen.

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(b) The Permittee shall process through the pugmill and the vibratory screen only the hazardous waste codes specified in the approved Part B permit application and summarized below:

D001*, D002, D003, D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D023, D024, D025, D026, D027, D028, D029, D030, D034, D035, D036, D038, D039, D040, F006, F007, F008, F009, F011, F012, F019, K002, K003, K004, K005, K006, K007, K008, K061, K062, K069, K100, K174, K175, K176, K177, K178, F039

*(D001 is the oxidizer category only)

(c) The Permittee may render only the following waste streams non-Hazardous after treatment through the pugmill:

D001*, D002, D003, D004, D005, D006, D007, D008, D009, D010, D011
*(oxidizer category only)

(d) The Permittee is prohibited from storing or treating hazardous waste that is not identified in this permit condition.

G.2. Secondary Containment and Integrity Assessments
OAC Rules 3745-55-90 through 3745-55-93

(a) Pugmill and Vibratory Screen. The Permittee is not required to provide a secondary containment system for these units. Only hazardous waste which has no free liquids is permitted to be treated in the pugmill and vibratory screen. The Permittee must demonstrate the absence or presence of free liquids in the stored/treated waste by using Method 9095, Paint Filter Liquids Test. The Permittee shall maintain the miscellaneous units inside a building that has an impermeable floor. [OAC Rule 3745-55-90(A)].

G.3. Certification of Pugmill and Vibratory Screen
OAC Rules 3745-55-92, 3745-55-93 and 37 45-50-42

(a) The Permittee shall keep on file a written statement(s) by those persons required to certify the design of the pugmill and supervise the installation of the pugmill in accordance with the tank requirements of OAC Rule 3745-55-92, which will be used to attest that the pugmill was properly designed and installed. These written statements shall include the certification as required by OAC Rule 3745-50-42(D).

(b) The Permittee shall keep on file a written statement(s) by those persons required to certify the design of the vibratory screen and supervise the installation of the vibratory screen in accordance with the installation and

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certification requirements specified in OAC Rule 3745-55-92, which will be used to attest that the vibratory screen was properly designed and installed. These written statements shall include the certification as required by OAC Rule 3745-50-42(D).

G.4. Operating Requirements
OAC Rule 3745-55-94

(a) The Permittee shall not place hazardous wastes or treatment reagents in the pugmill if they could cause the pugmill, its ancillary equipment, or a containment system to rupture, leak, corrode, or otherwise fail. The Permittee shall not place hazardous waste or treatment reagents in the vibratory screen if they could cause the vibratory screen to rupture, leak, corrode, or otherwise fail.

(b) The Permittee shall prevent spills and overflows from the pugmill or containment systems and the vibratory screen using the methods described in the approved Part B permit application. The Permittee shall comply with the requirements of OAC Rule 3745-55-96 if a leak or spill occurs in the pugmill.

G.5. Response to Leaks or Spills
OAC Rule 3745-55-96

(a) In the event of a leak or spill from the pugmill and/or the vibratory screen, or if a system becomes unfit for continued use, the Permittee shall remove the system from service immediately and complete the following action:

Stop the flow of hazardous waste into the pugmill and/or vibratory screen and inspect the system to determine the cause of the release.

(b) For a release caused by a spill that has not damaged the integrity of the system, the Permittee shall remove the released waste and make any necessary repairs to fully restore the integrity of the system before returning the pugmill and/or vibratory screen to service.

(c) For a release caused by a leak from the pugmill, or from a leak from the vibratory screen, the Permittee shall repair the primary system prior to returning it to service.

(d) If the Permittee replaces a component of the pugmill or vibratory screen to eliminate a leak, that component must satisfy the requirements for new systems or components, as specified in the tank requirements in OAC Rules 3745-55-92 and 3745-55-93.

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G.6. Inspection Schedules and Procedures
OAC Rule 3745-55-95

(a) The Permittee shall inspect the pugmill and vibratory screen, in accordance with the Inspection Schedule in the approved Part B application and shall complete the items in Permit Condition G.6(b) and G.6(c) as part of those inspections;

(b) The Permittee shall inspect the overfill controls, if any, in accordance with the procedure and schedule in the approved Part B permit application;

(c) The Permittee shall inspect the following components of the pugmill and vibratory screen once each operating day;

Aboveground portions of the pugmill and vibratory screen, to detect corrosion or releases of wastes;

(d) The Permittee shall document compliance of permit condition G.6 in the operating record of the facility.

G.7. Recordkeeping and reporting
OAC Rule 3745-55-96

(a) The Permittee shall report to the Director of Ohio EPA, within 24 hours of detection, when a leak or spill occurs from the pugmill or vibratory screen. (A leak or spill of one pound or less of hazardous waste, that is immediately contained and cleaned-up, need not be reported.) (Releases that are contained within a secondary containment system need not be reported.)

(b) Within 30 days of detecting a release to the environment from the pugmill, and/or vibratory screen, the Permittee shall report the following information to the Director of Ohio EPA:

(i) Likely route of migration of the release;

(ii) Characteristics of the surrounding soil (including soil composition, geology, hydrogeology, and climate);

(iii) Results of any monitoring or sampling conducted in connection with the release. If the Permittee finds it will be impossible to meet this time period, the Permittee shall provide the Director with a schedule of when the results will be available. This schedule must be provided before the required 30-day submittal period expires;

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(iv) Proximity of downgradient drinking water, surface water and populated areas; and

(v) Description of response actions taken or planned.

(c) The Permittee shall submit to the Director all certifications of major repairs to correct leaks within seven days from returning the pugmill and/or vibratory screen to use.

(d) The Permittee shall obtain, and keep on file at the facility, the written statements by those persons required to certify the design and installation of the pugmill and vibratory screen.

G.8. Closure and Post-Closure Care
OAC Rule 3745-55-97

At closure of the Pugmill and/or vibratory screen, the Permittee shall follow the procedures in the Closure Plan.

G.9. Special Provisions for Ignitable or Reactive Wastes
OAC Rule 3745-55-98

(a) The Permittee shall not place reactive waste in the pugmill or vibratory screen, unless the procedures specified in Part 8 of the approved permit application are followed. The Permittee shall document compliance with this condition and place that documentation into the operating record.

G.10. Special Provisions for Incompatible Wastes
OAC Rule 3745-55-99

(a) The Permittee shall not place incompatible wastes, or incompatible wastes and materials, in the pugmill and/or vibratory screen, unless the procedures specified in Part 8 of the approved permit application are followed. The Permittee shall document compliance with this condition and place that documentation into the operating record.

(b) The Permittee shall not place hazardous waste in the pugmill or vibratory screen if they have not been decontaminated and if they previously held an incompatible waste or material, unless the requirements of Permit Condition G.10(a) are met.

End of Permit Conditions