UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

MAR 2 8 2013

REPLY TO THE ATTENTION OF:

Mr. Stephen Bley
Environmental Compliance Manager
Spring Grove Resource Recovery, Inc.
4879 Spring Grove, Inc.
Cincinnati, Ohio 45232

Re: Final Federal RCRA Permit, Spring Grove Resource Recovery, Inc.
Cincinnati, Ohio, OHD 000 816 629

Dear Mr. Bley:

Enclosed is a copy of the final federal Resource Conservation and Recovery Act (RCRA) permit for Spring Grove Resource Recovery, Inc. (SGRR), of Cincinnati, Ohio. Unless review is requested under 40 CFR § 124.19, the federal permit will become effective on the date which is indicated on the title page of the enclosed federal RCRA permit.

The draft federal RCRA permit was publicly noticed in "The Cincinnati Enquirer" and on the "WAIF (FM) 88.3" radio station on September 28, 2012. A copy of the draft federal RCRA permit was available for review at the Cincinnati/Hamilton County Library, St. Bernard Branch, at 4803 Tower Avenue, Cincinnati, Ohio 45217. The public comment period extended from September 28 to November 15, 2012. A public meeting was held on November 13, 2012, 6:30 p.m. at the Public Library of Cincinnati and Hamilton County-- Northside Branch Meeting Room, 4219 Hamilton Avenue, Cincinnati, Ohio 45223.

SGRR submitted the only comments that the U.S. Environmental Protection Agency received regarding the draft federal permit during the public comment period. EPA's Response Summary to the comments is enclosed with this letter.

Eligibility to appeal the federal permit is discussed further in 40 CFR § 124.19. On any appeal, all original documents are to be signed in blue ink with five copies marked as such. EPA must receive the petition for review in Washington, DC via U.S. Postal Service at the address indicated below within thirty (30) days after service of notice of the final permit decision.

U.S. Environmental Protection Agency
Clerk of the Board
Environmental Appeals Board (1103B)
Ariel Rios Building
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460-0001

Recycled/Recyclable • Printed with Vegetable Oil Based Inks on 100% Recycled Paper (100% Post-Consumer)

Submissions can also be made by hand-delivery or courier, mailed via Federal Express, UPS, or non-U.S. Postal Service at the following address:

U.S. Environmental Protection Agency
Clerk of the Board
Environmental Appeals Board
Colorado Building
1341 G Street, N.W., Suite 600
Washington, DC 20005

A copy of the petition should also be sent to:

U.S. Environmental Protection Agency, Region 5
RCRA Branch (LR-8J)
77 West Jackson Boulevard
Chicago, Illinois 60604

The procedures for filing an appeal are found in 40 CFR § 124.19. The administrative appeal procedure must be completed prior to any action seeking judicial review.

If you have questions concerning the final federal RCRA permit, please contact Jae Lee of my staff at (312) 886-3781.

Sincerely,

Margaret M. Guerriero
Director
Land and Chemicals Division

Enclosures

cc: Jeremy Carroll, OEPA

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

MAR 2 8 2013

REPLY TO THE ATTENTION OF:

Mr. Stephen Bley
Environmental Compliance Manager
Spring Grove Resource Recovery, Inc.
4879 Spring Grove, Inc.
Cincinnati, Ohio 45232

Re: Final Federal RCRA Permit, Spring Grove Resource Recovery, Inc.
Cincinnati, Ohio, OHD 000 816 629

Dear Mr. Bley:

Enclosed is a copy of the final federal Resource Conservation and Recovery Act (RCRA) permit for Spring Grove Resource Recovery, Inc. (SGRR), of Cincinnati, Ohio. Unless review is requested under 40 CFR § 124.19, the federal permit will become effective on the date which is indicated on the title page of the enclosed federal RCRA permit.

The draft federal RCRA permit was publicly noticed in "The Cincinnati Enquirer" and on the "WAIF (FM) 88.3" radio station on September 28, 2012. A copy of the draft federal RCRA permit was available for review at the Cincinnati/Hamilton County Library, St. Bernard Branch, at 4803 Tower Avenue, Cincinnati, Ohio 45217. The public comment period extended from September 28 to November 15, 2012. A public meeting was held on November 13, 2012, 6:30 p.m. at the Public Library of Cincinnati and Hamilton County-- Northside Branch Meeting Room, 4219 Hamilton Avenue, Cincinnati, Ohio 45223.

SGRR submitted the only comments that the U.S. Environmental Protection Agency received regarding the draft federal permit during the public comment period. EPA's Response Summary to the comments is enclosed with this letter.

Eligibility to appeal the federal permit is discussed further in 40 CFR § 124.19. On any appeal, all original documents are to be signed in blue ink with five copies marked as such. EPA must receive the petition for review in Washington, DC via U.S. Postal Service at the address indicated below within thirty (30) days after service of notice of the final permit decision.

U.S. Environmental Protection Agency
Clerk of the Board
Environmental Appeals Board (1103B)
Ariel Rios Building
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460-0001

Recycled/Recyclable • Printed with Vegetable Oil Based Inks on 100% Recycled Paper (100% Post-Consumer)

Submissions can also be made by hand-delivery or courier, mailed via Federal Express, UPS, or non-U.S. Postal Service at the following address:

U.S. Environmental Protection Agency
Clerk of the Board
Environmental Appeals Board
Colorado Building
1341 G Street, N.W., Suite 600
Washington, DC 20005

A copy of the petition should also be sent to:

U.S. Environmental Protection Agency, Region 5
RCRA Branch (LR-8J)
77 West Jackson Boulevard
Chicago, Illinois 60604

The procedures for filing an appeal are found in 40 CFR § 124.19. The administrative appeal procedure must be completed prior to any action seeking judicial review.

If you have questions concerning the final federal RCRA permit, please contact Jae Lee of my staff at (312) 886-3781.

Sincerely,

Margaret M. Guerriero
Director
Land and Chemicals Division

Enclosures

cc: Jeremy Carroll, OEPA

FINAL

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5

RESOURCE CONSERVATION AND RECOVERY ACT PERMIT

Facility Name and Location: **Spring Grove Resource Recovery, Inc.**
4879 Spring Grove Ave.
Cincinnati, Ohio 45232

Owner: **Spring Grove Resource Recovery, Inc.**
4879 Spring Grove Ave.
Cincinnati, Ohio 45232

Operator: **Spring Grove Resource Recovery, Inc.**
4879 Spring Grove Ave.
Cincinnati, Ohio 45232

EPA Identification Number: **OHD 000 816 629**

Effective Date: **April 30, 2013**

Expiration Date: **March 26, 2023**

Authorized Activities:

The U.S. Environmental Protection Agency hereby issues a Resource Conservation and Recovery Act permit (hereinafter referred to as the "permit") to Spring Grove Resource Recovery, Inc. (hereinafter referred to as the "Permittee" or addressed in the second person as "you") in connection with your hazardous waste management operations at your facility in Cincinnati, Ohio.

This permit is issued under the Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act of 1976, and the Hazardous and Solid Waste Amendments (HSWA) of 1984 (42 U.S.C. § 6901 *et seq.*) (collectively referred to as "RCRA") and EPA's regulations promulgated thereunder (codified, and to be codified, in Title 40 of the Code of Federal Regulations (40 CFR)).

Specifically, this permit addresses air emission standards for equipment leaks and tanks and containers. See 40 CFR Part 264, Subparts BB and CC.

The RCRA permit consists of both this permit, which contains the effective federal RCRA permit conditions issued by EPA, and the effective state RCRA permit conditions issued by the State of Ohio's RCRA program authorized under 40 CFR Part 271 (hereinafter called the "State RCRA permit").

The State RCRA permit was issued on March 26, 2013. (The effective and expiration dates of the State RCRA permit are March 26, 2013 and March 26, 2023, respectively.) Any hazardous waste activity which requires a RCRA permit and is not included in the RCRA permit is prohibited.

Permit Approval:

On June 28, 1989, the State of Ohio received final authorization to administer the pre-HSWA RCRA hazardous waste program in accordance with Section 3006 of RCRA, 42 USC § 6926, and 40 CFR Part 271. The State of Ohio has also received final authorization to administer certain additional RCRA requirements on several occasions since that time.

However, because EPA has not yet authorized the State of Ohio to administer certain RCRA regulations promulgated under HSWA, including the air emission standards for equipment leaks (40 CFR Part 264 Subpart BB) and the air emission standards for tanks and containers (40 CFR Part 264 Subpart CC), EPA Region 5 is issuing the RCRA permit requirements for operations at your facility which fall under these regulations.

You must comply with all terms and conditions contained in this permit. This permit consists of all the conditions contained herein, the documents attached hereto, all documents cross-referenced in these documents, approved submittals (including plans, schedules and other documents), the applicable regulations in 40 CFR Parts 124, 260, 261, 262, 264, 270, and applicable provisions of RCRA. You must also comply with the State RCRA permit.

This permit is based on the assumption that 1) the information submitted in your RCRA Part B Permit Application on April 2, 2012, including the Part A Application, and all other modifications to that application (hereinafter referred to as the "Part B Permit Application"), and 2) the information for Subpart BB, and CC, dated July 31, 2006, and the revised Subparts AA, BB, and CC information, dated May 5, 1997, is accurate, and the facility is configured, operated and maintained as specified in the Part B Permit Application and other relevant documents.

Any inaccuracies in the submitted information may be grounds for EPA to terminate, revoke and reissue, or modify this permit in accordance with 40 CFR §§ 270.41, 270.42 and 270.43, and for enforcement action. You must inform EPA of any deviation from, or changes in, the information in the Part B Permit Application and other pertinent documents that might affect your ability to comply with the applicable regulations or conditions of this permit.

Opportunity to Appeal:

Petitions for review must be submitted within 30 days after EPA serves notice of the final permit decision. Any person who files comments on the draft permit or participates in the public hearing may later petition the Environmental Appeals Board to review any condition of the permit decision. Any person who fails to file comments or fails to participate in the public hearing on the draft permit may file a petition for review, but only to contest changes from the draft to the final permit decision. The procedures for permit appeals are found in 40 CFR § 124.19.

Effective Date:

This permit is effective as of **April 30, 2013** and will remain in effect until **March 26, 2023**, unless revoked and reissued under 40 CFR § 270.41, terminated under 40 CFR § 270.43, or continued in accordance with 40 CFR § 270.51(a).

By: _____ Date: 3/27/2013

Margaret M. Guerriero
Director
Land and Chemicals Division

OHD 000 816 629
Spring Grove Resource Recovery Inc.

TABLE OF CONTENTS

SECTION I--STANDARD PERMIT CONDITIONS 1
I.A EFFECT OF PERMIT 1
I.B PERMIT ACTIONS 1
I.B.1 Permit Review, Modification, Revocation and Reissuance, and Termination 1
I.B.2 Permit Renewal 2
I.C SEVERABILITY 2
I.D DEFINITIONS 2
I.E DUTIES AND REQUIREMENTS 2
I.E.1 Duty to Comply 2
I.E.2 Duty to Reapply 3
I.E.3 Permit Expiration 3
I.E.4 Need to Halt or Reduce Activity Not a Defense 3
I.E.5 Duty to Mitigate 3
I.E.6 Proper Operation and Maintenance 3
I.E.7 Duty to Provide Information 4
I.E.8 Inspection and Entry 4
I.E.9 Monitoring and Records 4
I.E.10 Reporting Planned Changes 5
I.E.11 Reporting Anticipated Noncompliance 5
I.E.12 Certification of Construction 5
I.E.13 Transfer of Permits 6
I.E.14 Twenty-Four Hour Reporting 6
I.E.15 Other Noncompliance 8
I.E.16 Other Information 8
I.F SIGNATORY REQUIREMENT 8
I.G REPORTS, NOTIFICATIONS AND SUBMISSIONS TO THE DIRECTOR 8
I.H CONFIDENTIAL INFORMATION 9
I.I DOCUMENTS TO BE MAINTAINED AT THE FACILITY 9
I.I.1 Operating Record 9
I.I.2 Notifications 9
I.I.3 Copy of Permit 9
I.J ATTACHMENTS AND DOCUMENTS INCORPORATED BY REFERENCE 10
I.K COORDINATION WITH THE CLEAN AIR ACT 10

SECTION II-- AIR EMISSIONS STANDARDS FOR EQUIPMENT LEAKS (40 CFR PART 264 SUBPART BB) 10
II.A EQUIPMENT LEAKS 10
II.A.1 Applicable Equipment 10
II.A.2 Pumps in Light Liquid Service (40 CFR § 264.1052) 11
II.A.3 Pressure Relief Devices in Gas/Vapor Services (40 CFR § 264.1054) 11
II.A.4 Sampling Connection Systems (40 CFR § 264.1055) 12
II.A.5 Open-Ended Valves or Lines (40 CFR § 264.1056) 12
II.A.6 Valves in Gas/Vapor Service or in Light Liquid Service (40 CFR § 264.1057) 12
II.A.7 Pressure Relief Devices in Light Liquid Service, and Flanges and Other Connectors (40 CFR § 264.1058) 13
II.A.8 Delay of Repair (40 CFR § 264.1059) 13
II.A.9 Closed-Vent Systems and Control Devices (40 CFR § 264.1060) 14
II.A.10 Alternative Standards for Valves in Gas/Vapor Service or in Light Liquid Service: Percentage of Valves Allowed to Leak (40 CFR § 264.1061) 14
II.A.11 Alternative Standards for Valves in Gas/Vapor Service or in Light Liquid Service: Skip Period Leak Detection and Repair (40 CFR § 264.1062) 14
II.B TEST METHOD AND PROCEDURES (40 CFR § 264.1063) 15
II.C RECORDKEEPING AND REPORTING REQUIREMENTS (40 CFR §§ 264.1064 and 264.1065) 15

SECTION III-- AIR EMISSIONS STANDARDS FOR TANKS AND CONTAINERS (40 CFR PART 264 SUBPART CC) 15
III.A CONTAINER LEVEL 1 STANDARDS 16
III.B CONTAINER LEVEL 2 STANDARDS 17
III.C REQUIREMENTS FOR LEVEL 2 TANKS FOR TANK 5,6,7,8, and 10 18
III.D REQUIREMENTS FOR LEVEL 2 TANKS FOR DISPERSION AND OVERFLOW TANKS 20
III.E RECORDKEEPING AND REPORTING REQUIREMENTS 24

SECTION I—STANDARD PERMIT CONDITIONS

I.A EFFECT OF PERMIT

You are hereby allowed to manage hazardous waste at the Spring Grove Resource Recovery, Inc. (facility) in accordance with this permit. Under this permit, your storage of RCRA hazardous waste must be in compliance with all terms and conditions in this permit. Other aspects of your treatment of RCRA hazardous wastes are subject to the conditions in the state-issued portion of the RCRA permit. Any hazardous waste activity which requires a RCRA permit and is not included either in this permit or the state RCRA permit, is prohibited.

Subject to 40 CFR § 270.4, compliance with the RCRA permit during its term constitutes compliance for purposes of enforcement with Subtitle C of RCRA except for those requirements not included in the permit which: (1) become effective by statute; (2) are promulgated under 40 CFR Part 268 restricting the placement of hazardous waste in or on the land; (3) are promulgated under 40 CFR Part 264 regarding leak detection systems for new and replacement surface impoundment, waste pile, and landfill units, and lateral expansions of the same; or (4) are promulgated under subpart AA of 40 CFR Part 265 limiting air emissions. (40 CFR §§ 270.4)

This permit does not: (1) convey any property rights or any exclusive privilege (40 CFR § 270.30(g)); (2) authorize any injury to persons or property, or invasion of other private rights; or (3) authorize any infringement of state or local law or regulations. Compliance with the terms of this permit does not constitute a defense to any order issued, or any action brought, under: (1) Sections 3008(a), 3008(h), 3013, or 7003 of RCRA; (2) Sections 104, 106(a), or 107 of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, 42 USC §§ 9601 *et seq.* (commonly known as CERCLA); or (3) any other law protecting human health, welfare, or the environment.

I.B PERMIT ACTIONS

I.B.1 Permit Review, Modification, Revocation and Reissuance, and Termination

EPA may review, modify, or revoke and reissue this permit, or terminate it for cause, as specified in 40 CFR §§ 270.41, 270.42, and 270.43. EPA may also review and modify this permit, consistent with 40 CFR § 270.41, to include any terms and conditions it determines are necessary to protect human health and the environment under Section 3005(c)(3) of RCRA. The filing of a request for a permit modification, revocation and reissuance, or termination, or a notification of planned changes or anticipated noncompliance on your part will not stay the applicability or enforceability of any permit condition. (40 CFR § 270.30(f))

You must not perform any construction associated with a Class 3 permit modification request until such modification request is granted and the modification becomes effective. You may perform construction associated with a Class 2 permit modification request beginning 60 days after submission of the request, unless the Director establishes a later date. (40 CFR § 270.42(b)(8)) (Pursuant to Chapter 8-6 of the Region 5 Delegation Manual, the authority assigned to the Regional Administrator as Director under 40 CFR § 270.42(b)(8) has been delegated to the Director of the Land and Chemicals Division of the EPA, Region 5. Thus, for the purposes of this permit, the term Director shall refer to the Division Director of EPA Region 5's Land and Chemicals Division.)

I.B.2 Permit Renewal

This permit may be renewed as specified in 40 CFR § 270.30(b) and Section I.E.2 of this permit. In reviewing any application for a permit renewal, the EPA will consider improvements in the state of control and measurement technology, and changes in applicable regulations. (40 CFR § 270.30(b) and RCRA Section 3005(c)(3))

I.C SEVERABILITY

This permit's provisions are severable; if any permit provision, or the application of any permit provision to any circumstance is held invalid, such provision's application to other circumstances and the remainder of this permit will not be affected. Invalidation of any statutory or regulatory provision on which any condition of this permit is based does not affect the validity of any other statutory or regulatory basis for that condition. (40 CFR § 124.16(a))

I.D DEFINITIONS

The terms used in this permit will have the same meaning as in 40 CFR Parts 124, 260 through 266, 268 and 270, unless this permit specifically provides otherwise. Where neither the regulations nor the permit define a term, the term's definition will be the standard dictionary definition or its generally accepted scientific or industrial meaning.

I.E DUTIES AND REQUIREMENTS

1.E.1 Duty to Comply

You must comply with all conditions of this permit, except to the extent and for the duration for which an emergency permit authorizes such noncompliance (40 CFR

§ 270.61). Any permit noncompliance, except under the terms of an emergency permit, constitutes a violation of RCRA and will be grounds for: enforcement action; permit termination; revocation and reissuance; modification; or denial of a permit renewal application. (40 CFR § 270.30(a))

I.E.2 Duty to Reapply

If you wish to continue the permit regulated activities after the expiration date, you must apply for and obtain a new permit. You must submit a complete application for a new permit at least 180 days before the permit expiration date, unless the Director grants permission for a later submittal date. The Director will not grant permission to submit the complete application for a new permit later than the permit's expiration date. (40 CFR §§ 270.10(h) and 270.30(b))

I.E.3 Permit Expiration

Unless revoked or terminated, this permit and all conditions herein will be effective for Approximately ten years from this permit's effective date. This permit and all conditions herein will remain in effect beyond the permit's expiration date if you have submitted a timely, complete application (40 CFR § 270.10 and §§ 270.13 through 270.29), and, through no fault of your own, the Director has not made a final determination regarding permit reissuance. (40 CFR §§ 270.50 and 270.51)

I.E.4 Need to Halt or Reduce Activity Not a Defense

In an enforcement action, you are not entitled to a defense that it would have been necessary to halt or reduce the permitted activity to maintain compliance with this permit. (40 CFR § 270.30(c))

I.E.5 Duty to Mitigate

In the event of noncompliance with this permit, you must promptly take all reasonable steps to minimize releases to the environment resulting from the noncompliance and must implement all reasonable measures to prevent significant adverse impacts on human health or the environment. (40 CFR § 270.30(d))

I.E.6 Proper Operation and Maintenance

You must always properly operate and maintain all facilities and treatment and control systems (and related appurtenances) that you install or use to comply with this permit. Proper operation and maintenance includes effective performance, adequate funding,

adequate operator staffing and training, and adequate laboratory and process controls, including appropriate quality assurance/quality control procedures. This provision requires you to operate back-up or auxiliary facilities or similar systems only when necessary to comply with this permit. (40 CFR § 270.30(e))

I.E.7 Duty to Provide Information

You must provide the Director, within a reasonable time, any relevant information that the Director requests to determine whether there is cause to modify, revoke and reissue, or terminate this permit, or to determine permit compliance. You must also provide the Director, upon request, with copies of any records this permit requires. The information you must maintain under this permit is not subject to the Paperwork Reduction Act of 1980, 44 USC §§ 3501 *et seq.* (40 CFR §§ 264.74(a) and 270.30(h))

I.E.8 Inspection and Entry

Upon the presentation of credentials and other legally required documents, you must allow the Director or an authorized representative to (40 CFR § 270.30(i)):

I.E.8.a Enter at reasonable times upon your premises where a regulated activity is located or conducted, or where records must be kept under the conditions of this permit;

I.E.8.b Have access to and copy, at reasonable times, any records that you must keep under the conditions of this permit;

I.E.8.c Inspect, at reasonable times, any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under this permit; and

I.E.8.d Sample or monitor any substances at any location at reasonable times, to ensure permit compliance or as RCRA otherwise authorizes.

Notwithstanding any provision of this permit, EPA retains the inspection and access authority which it has under RCRA and other applicable laws.

I.E.9 Monitoring and Records

I.E.9.a Samples and measurements taken for monitoring purposes must be representative of the monitored activity. The methods used to obtain a representative sample of the wastes, contaminated media, treatment residue, or other waste to be analyzed must be the appropriate methods from Appendix I of

40 CFR Part 261, or the methods specified in the State-approved waste analysis plan, or an equivalent method approved by the Director. Laboratory methods must be those specified in *Test Methods for Evaluating Solid Waste: Physical/Chemical Methods* (SW-846, latest edition), *Methods for Chemical Analysis of Water and Wastes* (EPA 600/4-79-020), or an equivalent method, as specified in the referenced waste analysis plan. (40 CFR § 270.30(j)(1))

I.E.9.b You must retain, at the facility, all records as specified in 40 CFR § 264.74.

I.E.9.c You must submit all monitoring results at the intervals specified in this permit.

I.E.9.d You must retain all reports, records, or other documents, required by this permit, and records of all data used to complete the application for this permit, for a period of at least three years from the date of the reports, records, or other documents, unless a different period is specified in this permit. The 3-year 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 this facility. (40 CFR §§ 270.30(j) and 270.31))

I.E.10 Reporting Planned Changes

You must notify the Director as soon as possible of any planned physical alterations or additions to the permitted facility. (40 CFR § 270.30(l)(1))

I.E.11 Reporting Anticipated Noncompliance

You must notify the Director, in advance, of any planned changes in the permitted facility or activity that may result in permit noncompliance. Advance notice will not constitute a defense for any noncompliance. (40 CFR § 270.30(l)(2))

I.E.12 Certification of Construction

Subject to the requirements of 40 CFR §§ 270.32(b)(2) and 270.42 Appendix I, you must not operate any RCRA air emission control devices completed after the effective date of this permit until you have submitted to the Director, by certified mail or hand-delivery, a letter signed both by your authorized representative and by a registered professional engineer. That letter must state that the portions of the facility covered by this permit (including all air emission control devices required by this permit) have been constructed in compliance with the applicable conditions of this permit. In addition, you must not operate the permitted control devices until either:

I.E.12.a The Director or his/her representative has inspected those portions of the facility and finds them in compliance with the conditions of the permit; or

I.E.12.b The Director waives inspection and you may commence treatment, storage, or disposal of hazardous waste in accordance with 40 CFR § 270.30(l)(2)(ii)(B).

I.E.13 Transfer of Permits

This permit is not transferable to any person, except after notice to the Director. You must inform the Director and obtain prior approval of the Director before transferring ownership or operational control of the facility (40 CFR § 270.42, Appendix I). Under 40 CFR § 270.40, the Director may require permit modification, or revocation and reissuance to change your name and incorporate other RCRA requirements. Before transferring ownership or operation of the facility during its operating life, you must notify the Director and obtain prior approval and notify the new owner or operator in writing of the requirements of this permit and the requirements of 40 CFR Parts 264, 268, and 270. (40 CFR §§ 264.12(c), 270.30(l)(3), and 270.40(a))

I.E.14 Twenty-Four Hour Reporting

I.E.14.a You must report to the Director any noncompliance with this permit and/or other situations that may endanger human health or the environment. Any such information must be promptly reported orally, but no later than 24 hours after you become aware of the noncompliance.

I.E.14.b Your report must include any information (40 CFR §§ 270.30(l)(6) and 270.33) concerning: (1) the release of any hazardous waste that may endanger public drinking water supplies; (2) the release or discharge of hazardous waste; or (3) fire or explosion from the hazardous waste management facility, that could threaten the environment or human health outside the facility. In addition, you must provide a description of the occurrence and its cause that includes the following information:

(1) Name, title and telephone number of the person making the report;

(2) Name, address and telephone number of the facility;

(3) Name, address and telephone number of owner or operator;

(4) Date, time and type of incident;

(5) Location and cause of incident;

(6) Identification and quantity of material(s) involved;

(7) Extent of injuries, if any;

(8) Assessment of actual or potential hazards to the environment and human health outside the facility, where applicable;

(9) Description of any emergency action taken to minimize the threat to human health and the environment; and

(10) Estimated quantity and disposition of recovered material that resulted from the incident.

I.E.14.c In addition to the oral notification required under Sections I.E.14.a and I.E.14.b of this permit, a written report must also be provided within 5-calendar days after you become aware of the relevant circumstances. The written report must include, but is not limited to, the following:

(1) Name, address and telephone number of the person reporting;

(2) Incident description (noncompliance and/or release or discharge of hazardous waste), including cause, location, extent of injuries, if any, and an assessment of actual or potential hazards to the environment and human health outside the facility, where applicable;

(3) Period(s) in which the incident (noncompliance and/or release or discharge of hazardous waste) occurred, including exact dates and times;

(4) Whether the incident's results continue to threaten human health and the environment, which will depend on whether the noncompliance has been corrected and/or the release or discharge of hazardous waste has been adequately cleaned up; and

(5) If the noncompliance has not been corrected, the anticipated period for which it is expected to continue, and the steps taken or planned to reduce, eliminate, and prevent the recurrence of the noncompliance.

The Director may waive the requirement that written notice be provided within 5-calendar days; however, you will then be required to submit a written report within 15-calendar

days of the day which you must provide oral notice, in accordance with Sections I.E.14.a and I.E.14.b of this permit. (40 CFR § 270.30(1)(6))

I.E.15 Other Noncompliance

You must report all instances of noncompliance not reported under Section I.E.14 of this permit, when any other reports this permit requires are submitted. The reports must contain the information listed in Section I.E.14. (40 CFR § 270.30(l)(10))

I.E.16 Other Information

I.E.16.a Whenever you become aware that you failed to submit or otherwise omitted any relevant facts in the permit application or other submittal, or submitted incorrect information in the permit application or other submittal, you must promptly notify the Director of any incorrect information or previously omitted information, submit the correct facts or information, and explain in writing the circumstances of the incomplete or inaccurate submittal. (40 CFR § 270.30(l)(11))

I.E.16.b All other requirements contained in 40 CFR § 270.30 not specifically described in this permit are incorporated into this permit and you must comply with all of those requirements.

I.F SIGNATORY REQUIREMENT

You must sign and certify all applications, reports, or information this permit requires, or which are otherwise submitted to the Director, in accordance with 40 CFR § 270.11. (40 CFR § 270.30(k))

I.G REPORTS, NOTIFICATIONS AND SUBMITTALS TO THE DIRECTOR

Except as otherwise specified in this permit, all reports, notifications, or other submittals that this permit requires to be sent or given to the Director should be sent by certified mail or express mail, or hand-delivered to the following address:

U.S. Environmental Protection Agency
Land and Chemicals Division
RCRA Branch, LR-8J
77 West Jackson Boulevard
Chicago, Illinois 60604

I.H CONFIDENTIAL INFORMATION

In accordance with 40 CFR Part 2, Subpart B, you may claim any information this permit requires, or is otherwise submitted to the Director, as confidential. You must assert any such claim at the time of submittal in the manner prescribed on the application form or instructions, or, in the case of other submittals, by stamping the words "Confidential Business Information" on each page containing such information. If you made no claim at the time of submittal, the Director may make the information available to the public without further notice. If you assert a claim, the information will be treated in accordance with the procedures in 40 CFR Part 2. (40 CFR § 270.12) You have the burden of substantiating that the claimed information is confidential, and EPA may request further information from you regarding such claim, and may determine which such information to treat as confidential.

I.I DOCUMENTS TO BE MAINTAINED AT THE FACILITY

You must maintain at the facility, until closure is completed and certified by an independent registered professional engineer, the following documents and all amendments, revisions, and modifications to them:

I.I.1 Operating Record

You must maintain in the facility's operating record the documents required by this permit, and by the applicable portions of 40 CFR §§ 264.1035, 264.1064, 264.1084, 264.1088, 264.1089 and 40 CFR § 264.73 (as they apply to the equipment used to comply with this permit).

I.I.2 Notifications

You must maintain notifications from generators accompanying initial incoming shipment of wastes subject to 40 CFR Part 268 Subpart C, that specify treatment standards, as required by 40 CFR §§ 264.73, 268.7, and this permit.

I.I.3 Copy of Permit

You must keep a copy of this permit at the facility, including all the documents listed in any attachments, and you must update it as necessary to incorporate any official permit modifications.

I.J ATTACHMENTS AND DOCUMENTS INCORPORATED BY REFERENCE

I.J.1 All attachments and documents that this permit requires to be submitted, if any, including all plans and schedules are, upon the Director's approval, incorporated into this permit by reference and become an enforceable part of this permit. Since required items are essential elements of this permit, failure to submit any of the required items or submission of inadequate or insufficient information may subject you to an enforcement action under Section 3008 of RCRA. This action may include fines, or permit suspension or revocation.

I.J.2 This permit also includes the documents attached hereto, all documents cross-referenced in these documents, and the applicable regulations contained in 40 CFR Parts 124, 260, 261, 262, 264, 268, 270, and the applicable provisions of RCRA, all of which are incorporated herein, by reference.

I.J.3 Any inconsistency or deviation from any approved designs, plans or schedules constitutes permit noncompliance. The Director may grant written requests for extensions of due dates for submittals required in this permit.

I.J.4 If the Director determines that actions beyond those provided for, or changes to what is stated herein, are warranted, the Director may modify this permit according to procedures in Section I.B of this permit.

I.J.5 If any documents attached to this permit are found to conflict with any of the conditions in this permit, the condition will take precedence.

I.K COORDINATION WITH THE CLEAN AIR ACT

You must fully comply with the RCRA requirements contained in this permit. This permit does not include the requirements imposed by the Clean Air Act.

SECTION II -- AIR EMISSION STANDARDS FOR EQUIPMENT LEAKS (40 CFR PART 264 SUBPART BB)

II.A EQUIPMENT LEAKS

II.A.1 Applicable Equipment

You must comply with all applicable requirements of 40 CFR § 264.1050 through 40 CFR § 264.1065, regarding air emission standards for equipment leaks. The applicable equipment contains or contacts hazardous waste with organic concentrations of at least 10

percent by weight. The equipment for managing hazardous waste at this facility is considered as "in light liquid service" as defined in 40 CFR § 264.1031. Some pieces of equipment contact a hazardous waste stream that is considered as "in gas/vapor service" as defined in 40 CFR § 264.1031. The applicable equipment includes, but is not limited to, (1) pumps, (2) valves, (3) pressure relief devices, (4) flanges and other connectors, (5) sampling connection systems, (6) open-ended valves or lines, and (7) closed-vent systems and control devices.

II.A.2 Pumps in Light Liquid Service (40 CFR § 264.1052)

II.A.2.a Each pump in light liquid service must be monitored monthly to detect leaks by the methods specified in 40 CFR § 264.1063(b), except: when each pump is (1) equipped with dual mechanical seal system satisfying the requirements of 40 CFR § 264.1052(d), (2) designated, as described in 40 CFR § 264.1064(g)(2), for no detectable emissions, as indicated by an instrument reading of less than 500 parts per million (ppm) above background, and meeting the requirements of 40 CFR § 264.1052(e), or (3) equipped with a closed vent system complying with the requirements of 40 CFR § 264.1052(f).

II.A.2.b Each pump shall be checked by visual inspection each calendar week for seal leaks.

II.A.2.c A leak is detected if: (1) an instrument reading of 10,000 ppm or greater is measured, or (2) there is an indication of liquid dripping from the pump seal.

II.A.2.d When a leak is detected, it shall be repaired as soon as practicable, but not later than 15 calendar days after it is detected, except as provided in 40 CFR § 264.1059. The first attempt at repair must be made no later than 5-calendar days after each leak is detected.

II.A.3 Pressure Relief Devices in Gas/Vapor Services (40 CFR § 264.1054)

II.A.3.a Each pressure relief device in gas/vapor service shall be operated with "no detectable emissions" (defined for purposes of this Section II.A.3 of this permit as an instrument reading of less than 500 ppm above background, as measured by the method specified in 40 CFR § 264.1063(c)), except during pressure releases.

II.A.3.b After each pressure release, the pressure release device shall be returned to a condition of no detectable emissions, as soon as practicable, but no later than 5 calendar days after each pressure release except as provided in 40 CFR § 264.1059.

II.A.3.c No later than 5-calendar days after the pressure release, the pressure relief device shall be monitored to confirm the condition of no detectable emissions.

II.A.4 Sampling Connection Systems (40 CFR § 264.1055)

Each sampling connection system, except *in-situ* sampling systems and sampling systems without purges, shall be equipped with a closed-purge, closed-loop, or closed-vent system which meets one of the following requirements:

II.A.4.a Return the purged process fluid directly to the process line;

II.A.4.b Collect and recycle the purged process fluid; or

II.A.4.c Be designed and operated to capture and transport all the purged process fluid to a waste management unit that complies with applicable sections of 40 CFR § 264.1084 through § 264.1086 or a control device that complies with 40 CFR § 264.1060.

II.A.5 Open-Ended Valves or Lines (40 CFR § 264.1056)

II.A.5.a Each open-ended valve or line must be equipped with a: (1) cap, (2) blind flange, (3) plug, or (4) second valve, which seals the open end at all times except during operations requiring hazardous waste stream flow through the open-ended valve or line.

II.A.5.b Each open-ended valve or line equipped with a second valve shall be operated in a manner such that the valve on the hazardous waste stream end is closed before the second valve is closed.

II.A.5.c When a double block and bleed system is used, the bleed valve or line may remain open during operations that require venting the line between the block valves but shall seal the open end at all other times.

II.A.6 Valves in Gas/Vapor Service or in Light Liquid Service (40 CFR § 264.1057)

II.A.6.a Each valve in gas/vapor or light liquid service shall be monitored monthly to detect leaks in accordance with 40 CFR § 264.1057(a) and (c), except as provided in 40 CFR § 264.1057(f), (g), and (h).

II.A.6.b If an instrument reading of 10,000 ppm or greater is measured, a leak is detected.

II.A.6.c When a leak is detected, it shall be repaired as soon as practicable, but no later than 15-calendar days after the leak is detected in accordance with 40 CFR § 264.1057(d) and (e). The first attempt at repair must be made no later than 5-calendar days after each leak is detected.

II.A.7 Pressure Relief Devices in Light Liquid Service, and Flanges and Other Connectors (40 CFR § 264.1058)

II.A.7.a Pressure relief devices in light liquid service and flanges and other connectors must be monitored within five days by the method specified in 40 CFR § 264.1063(b) if evidence of a potential leak is found by visual, audible, olfactory, or any other detection method. If an instrument reading of 10,000 ppm or greater is measured, a leak is detected.

II.A.7.b When a leak is detected, you must repair the leak as soon as practicable, but not later than 15-calendar days after it is detected, except as provided in 40 CFR § 264.1059. The first attempt at repair shall be made no later than 5-calendar days after each leak is detected.

II.A.7.c First attempts at repair include, but are limited to, the best practices described under 40 CFR § 264.1057(e).

II.A.8 Delay of Repair (40 CFR § 264.1059)

II.A.8.a Delay of repair of equipment for which leaks have been detected will be allowed if: (1) the repair is technically infeasible without a hazardous waste management unit shutdown; or (2) the equipment is isolated from the hazardous waste management unit and does not continue to contain or contact hazardous waste with organic concentrations at least 10 percent by weight.

II.A.8.b Delay of repair for valves will be allowed if: (1) emissions of purged material resulting from immediate repair are greater than the emissions likely to result from delay of repair; and (2) when repair procedures are effected, the purged material is collected and destroyed or recovered in a control device complying with 40 CFR § 264.1060.

II.A.8.c Delay of repair for pumps will be allowed if: (1) repair requires the use of a dual mechanical seal system that includes a barrier fluid system; and (2) repair is completed as soon as practicable, but not later than six months after the leak was detected.

II.A.8.d Delay of repair beyond a hazardous waste management unit shutdown will be allowed for a valve only if it meets the provisions of 40 CFR § 264.1059(e).

II.A.9 Closed-Vent Systems and Control Devices (40 CFR § 264.1060)

Closed-vent systems and control devices shall comply with the provisions of 40 CFR §§ 264.1033 and 264.1060.

II.A.10 Alternative Standards for Valves in Gas/Vapor Service or in Light Liquid Service: Percentage of Valves Allowed to Leak (40 CFR § 264.1061)

You may elect to have all valves within a hazardous waste management unit comply with an alternative standard that allows no greater than 2 percent of the valves to leak if the provisions of 40 CFR §§ 264.1061(b) and (c) are met. You must notify the Director in writing, if you decide to discontinue the election of the alternative standards, that the work practice standards described in 40 CFR §§ 264.1057(a) through (e) will be followed; and comply with them.

II.A.11 Alternative Standards for Valves in Gas/Vapor Service or in Light Liquid Service: Skip Period Leak Detection and Repair (40 CFR § 264.1062)

You may elect for all valves subject to the requirements of 40 CFR § 264.1057 and Section II.A.6 of this permit within a hazardous waste management unit to comply with one of the alternative work practices specified below. You must notify the Director before implementing one of the alternative work practices.

II.A.11.a After 2 consecutive quarterly leak detection periods with the percentage of valves leaking equal to or less than 2 percent, you may begin to skip one of the quarterly leak detection periods for the valves.

II.A.11.b After 5 consecutive quarterly leak detection periods with the percentage of valves leaking equal to or less than 2 percent, you may begin to skip 3 of the quarterly leak detection periods for the valves.

You must monitor valve leaks monthly in accordance with 40 CFR § 264.1057, if the percentage of valves leaking is greater than 2 percent, but you may again elect to use the alternative standards after meeting the requirements of 40 CFR § 264.1057(c)(1).

II.B TEST METHODS AND PROCEDURES (40 CFR § 264.1063)

You must comply with the test methods and procedures of 40 CFR § 264.1063.

II.C RECORDKEEPING AND REPORTING REQUIREMENTS (40 CFR §§ 264.1064 and 264.1065)

You must comply with the recordkeeping and reporting requirements of 40 CFR § 264.1064 and 264.1065.

SECTION III – AIR EMISSION STANDARDS FOR TANKS AND CONTAINERS (40 CFR PART 264 SUBPART CC)

The State RCRA permit permits you to store hazardous wastes in eight (8) tanks (Tank 5, 6, 7, 8, 9, and 10, Dispersion tank, and Overflow tank). The total capacity of the eight tanks is 75,450 gallons (Tanks 5 and 6: 7,000 gallons each, Tanks 7 through 10: 15,000 gallons each, Dispersion tank: 1,200 gallons, and Overflow tank: 250 gallons).

Dispersion Tank and Overflow tank are located in an enclosed room of Building F. In the enclosed room, there is a drum scraping auger unit to scrape the contents of the drums by an auger mechanism. The drum scraping auger includes auger, drum dumping chamber, drum movement chamber, coarse shredder, pump feed chamber, and other ancillary equipment. By the definition of the State RCRA permit, all of these units are considered as a part of the Dispersion tank.

Hazardous waste is also stored in containers in the permitted nine (9) container storage areas. These areas include Building H, Flammables Pad, Building F, Tanker Load/Unload Pad, Building D Pad, Truck Dock Area, High Bay, Container Storage Pad, and Outbound Container Storage Pad. The maximum capacity of the container storage areas is 150,000 gallons (or the equivalent of approximately 2,727 55-gallon drums of hazardous waste).

You must comply with all applicable requirements of 40 CFR § 264.1080 through 40 CFR § 264.1090, regarding air emission standards for containers and tanks handling hazardous waste. All containers and tanks not exempt from 40 CFR Part 264 Subpart CC must be managed using the applicable standards at 40 CFR § 264.1084 and 40 CFR § 264.1086. The tanks and containers permitted in the State RCRA permit, described above, are Level 2 tanks and Level 1 and Level 2 containers and must comply with the standards at 40 CFR § 264.1084(d), Tank Level 2 standards, 40 CFR § 264.1086(c), Container Level 1 standards, and 40 CFR § 264.1086(d), Container Level 2 standards.

The containers for managing hazardous waste at this facility are considered "in light material service" as defined at 40 CFR § 265.1081.

You must not conduct a waste stabilization process, as defined at 40 CFR § 265.1081, in containers and tanks which contain hazardous waste with an average volatile organic concentration at the point of waste origination of more than 500 parts per million by weight (ppmw). For the tank or container unit in which you are conducting waste stabilization process, you must review and update, as necessary, at least once every twelve months following the date of the initial determination that the hazardous waste streams entering the unit have less than an average volatile organic concentration at the point of waste origination of less than 500 ppmw using the procedures specified in 40 CFR § 264.1083(a).

III.A CONTAINER LEVEL 1 STANDARDS

You must manage the containers in the container storage areas specified above with a design capacity greater than 0.1 m^3 (26 gallons) and less than or equal to 0.46 m^3 (119 gallons) with Container Level 1 standards as described at 40 CFR § 264.1086(c). When storing hazardous waste in Level 1 containers you must comply with the following requirements

III.A.1 A Level 1 container must satisfy one of the following requirements (40 CFR § 264.1086(c)(1)):

(a) meet the applicable Department of Transportation (DOT) regulations as specified in 40 CFR § 264.1086(f),

(b) be equipped with a cover and closure devices with an acceptable tightness and construction materials in accordance with 40 CFR § 264.1086(c)(1)(ii), or

(c) be an open-top container with organic vapor suppressing barrier to prevent hazardous waste from being exposed to the atmosphere as specified in 40 CFR § 264.1086(c)(1)(iii).

Containers, which do not meet DOT regulation specified in 40 CFR § 264.1086(f), must be equipped with covers and closure devices, as applicable to the container, that are composed of suitable materials to minimize exposure of the hazardous waste to the atmosphere and to maintain the equipment integrity, for as long as the container is in service. Factors to be considered in selecting the materials of construction and designing the cover and closure devices shall include: Organic vapor permeability, the effects of any contact with the hazardous waste or its vapor managed in the container; the effects of outdoor exposure of the closure device or cover material to wind, moisture, and sunlight;

and the operating practices for which the container is intended to be used. (40 CFR § 264.1086(c)(2))

III.A.2 All covers and closure devices must be in closed position whenever hazardous waste is in a container. Opening of a closure device or cover is allowed if it meets the purpose of and operates as defined in 40 CFR § 264.1086(c)(3)(i) through (v).

III.A.3 You must inspect the containers and their covers and closure devices in accordance with 40 CFR § 264.1086(c)(4)(i) and (ii) and repair defects in accordance with 40 CFR § 264.1086(c)(4)(iii).

III.A.4 You shall not transfer hazardous waste in or out of the containers.

III.B CONTAINER LEVEL 2 STANDARDS

You must manage the containers in the container storage areas specified above with a design capacity greater than 0.46 m^3 (119 gallons) with Container Level 2 standards as described at 40 CFR § 264.1086(d). When storing hazardous waste in Level 2 containers you must comply with the following requirements:

III.B.1 A Level 2 container must satisfy one of the following requirements (40 CFR § 264.1086(d)(1)):

(a) meet the applicable U.S. DOT regulations as specified in 40 CFR § 264.1086(f);

(b) operates with no detectable organic emissions as defined in 40 CFR § 265.1081 and determined in accordance with the procedure specified in 40 CFR § 264.1086(g); or

(c) be vapor tight within the preceding 12 months by using 40 CFR Part 60, Appendix A, Method 27 in accordance with the procedure specified in 40 CFR § 264.1086 (h).

III.B.2 Transfer of hazardous waste in or out of a Level 2 container must be conducted in such a manner as to minimize exposure of the hazardous waste to the atmosphere, as specified by 40 CFR § 264.1086(d)(2).

III.B.3 Whenever a hazardous waste is in a Level 2 container, you must install all covers and closure devices for the container, and secure and maintain each closure device in the closed position except as specified in 40 CFR § 264.1086(d)(3).

III.B.4 You must inspect the Level 2 containers and their covers and closure devices as specified in 40 CFR § 264.1086(d)(4)(i) and (ii). When a defect is detected for the container, cover, or closure devices, you must repair the defect in accordance with 40 CFR § 264.1086(d)(4)(iii).

III.C REQUIREMENTS FOR LEVEL 2 TANKS FOR TANKS 5, 6, 7, 8, AND 10

You shall control the air emissions from Tanks 5, 6, 7, 8, 9, and 10 in accordance with Level 2 requirements at 40 CFR § 264.1084(d) by venting the tanks through closed vent systems to carbon adsorption units designed and operated to recover the organic vapors vented to them with an efficiency of 95 percent or greater by weight. The tanks shall be covered by a fixed roof and vented directly through the closed vent system to a control device in accordance with the following requirements specified in 40 CFR §§ 264.1084(g), (j), (k), and (l):

III.C.1 The fixed roof and its closure devices shall be designed to form a continuous barrier over the entire surface area of the liquid in the tank.
(40 CFR § 264.1084(g)(1)(i))

III.C.2 Each opening in the fixed roof not vented to the control device shall be equipped with a closure device. If the pressure in the vapor headspace underneath the fixed roof is less than atmospheric pressure when the control device is operating, the closure devices shall be designed to operate such that when the closure device is secured in the closed position there are no visible cracks, holes, gaps, or other open spaces in the closure device or between the perimeter of the cover opening and the closure device. If the pressure in the vapor headspace underneath the fixed roof is equal to or greater than atmospheric pressure when the control device is operating, the closure device shall be designed to operate with no detectable organic emissions. (40 CFR § 264.1084(g)(1)(ii))

III.C.3 The fixed roof and its closure devices shall be made of suitable materials that will minimize exposure of the hazardous waste to the atmosphere, to the extent practical, and will maintain the integrity of the fixed roof and closure devices throughout their intended service life. Factors to be considered when selecting the materials for and designing the fixed roof and closure devices shall include: organic vapor permeability, the effects of any contact with the liquid and its vapor managed in the tank; the effects of outdoor exposure to wind, moisture, and sunlight; and the operating practices used for the tank on which the fixed roof is installed. (40 CFR § 264.1084(g)(1)(iii))

III.C.4 Whenever a hazardous waste is in the tank, the fixed roof shall be installed with each closure device secured in the closed position and the vapor headspace underneath the fixed roof vented to the control device except as provided in 40 CFR § 264.1084(g)(2)(i) and (ii).

III.C.5 You must inspect and monitor the air emission control equipment in accordance with the requirements specified in 40 CFR §§ 264.1084(g)(3) and 264.1084(l). In the event that a defect is detected, you shall repair the defect in accordance with 40 CFR § 264.1084(k).

III.C.6 You shall transfer hazardous waste to a tank in accordance with 40 CFR § 264.1084(j).

III.C.7 The closed vent system shall be designed and operated in accordance with the requirements of 40 CFR § 264.1087(b).

III.C.7.a The closed vent systems shall route the gasses, vapors and fumes emitted from the hazardous waste in the tanks to control devices that meet the requirements specified in 40 CFR §264.1087(c):

III.C.7.b The closed vent systems shall be designed and operated in accordance with the requirements specified in 40 CFR §264.1033(k):

(i) each closed vent system shall be designed to operate with no detectable emissions, as indicated by an instrument reading of less than 500 ppm by volume above background as determined by the procedure in 40 CFR § 264.1034(b) and by visual inspections; or

(ii) each closed vent system shall be designed to operate at a pressure below atmospheric pressure. The system shall be equipped with at least one pressure gauge or other pressure measurement device that can be read from a readily accessible location to verify that negative pressure is being maintained in the closed vent system.

III.C.7.c The closed vent system shall not include any bypass devices that could be used to divert the gas or vapor stream to the atmosphere before entering the control device.

III.C.7.d The closed vent systems shall be inspected and monitored an accordance with 40 CFR § 264.1033(l).

III.C.8 The control device shall be designed and operated in accordance with the requirements of 40 CFR § 264.1087(c).

III.C.8.a You must demonstrate compliance with the minimum 95 percent by weight removal efficiency of the total organic content of the inlet vapor stream vented to the carbon adsorption system. (40 CFR § 264.1087(c)(1)(i))

III.C.8.b The planned routine maintenance of the carbon adsorption system, during which the 95 percent removal efficiency cannot be met, shall not exceed 240 hours per year. (40 CFR § 264.1087(c)(2)(i))

III.C.8.c You must comply with 40 CFR § 264.1087(c)(2)(ii) through (c)(2)(vi) concerning the planned routine maintenance, control system device malfunction, record keeping, remedial of the malfunctioned device, and other operating requirements.

III.C.8.d You shall replace the existing carbon in the control device with fresh carbon on a regular basis by using one of the following procedures:

(i) The concentration level of the organic compounds in the exhaust vent stream from the carbon adsorption system shall be monitored on a regular schedule. The monitoring frequency shall be daily or at an interval no greater than 20 percent of the time required to consume the total carbon working capacity established as a requirement of 40 CFR § 264.1035(b)(4)(iii)(G), whichever is longer. You shall replace the existing carbon in the control device with fresh carbon immediately when carbon breakthrough is indicated. (40 CFR §§ 264.1087(c)(3)(i) and 264.1033(h)(1))

(ii) The existing carbon shall be replaced with fresh carbon at a regular, predetermined time interval that is less than the design carbon replacement interval established as a requirement of 40 CFR § 264.1035(b)(4)(iii)(G). (40 CFR §§ 264.1087(c)(3)(i) and 264.1033(h)(2))

III.C.8.e All carbon that is removed from the carbon adsorption system after use shall be managed in accordance with the requirements of 40 CFR §§ 264.1087(c)(3)(ii) and 264.1033(n). You shall prepare and maintain records sufficient to demonstrate that the requirements of this provision are satisfied as part of the facility operating record.

III.D REQUIREMENTS FOR LEVEL 2 TANKS FOR DISPERSION AND OVERFLOW TANKS

You shall control air pollutant emissions from the Dispersion tank which includes the drum scraping auger, drum dumping chamber, drum movement chamber, coarse shredder, pump feed chamber, and other ancillary equipment, and the Overflow tank located in Building F, through complying with 40 CFR §§ 264.1084(g) and (i). The emission control shall consist of: (1) an enclosure housing the Dispersion tank, including a drum scraping auger unit, and its attached doors and openings, (2) a closed vent system,

including an exhaust fan with a capacity to maintain a negative pressure inside the enclosure and ductwork connecting the enclosure to a control device, and (3) a carbon adsorption system functioning as the control device.

III.D.1 The design and operation of drum scraping, the conveyors, and drum dumping and movement chambers shall comply with the following requirements:

III.D.1 a The drum scraping auger shall be designed, operated and maintained in accordance with the operational specifications described in the Part B Permit Application, Sections B and D. The gases, vapors, and fumes emitted from hazardous waste in the enclosure room must be vented by the closed vent system to the carbon adsorption system to be treated.

III.D.2 The enclosure consists of a room (enclosure room) with four walls, a ceiling, a floor, doors, openings, and an empty drum outlet door. The enclosure room shall comply with the following requirements:

III.D.2.a You shall design and operate the enclosure room in accordance with the criteria for a permanent total enclosure as specified in "Procedure T – Criteria for and Verification of a Permanent or Temporary Total Enclosure" under 40 CFR § 52.741 (Procedure T). You shall perform the verification procedure for the enclosure room as specified in Section 5.0 of such Procedure T annually. The first such test shall be performed within 30 days after the issuance date of this permit. Before you conduct the annual Procedure T test, you shall notify the EPA including a brief description and date of the test, monitoring equipment to be used, calibration and design specification of the monitoring devices, and other related information.

III.D.2.b All access doors or other openings whose areas are not included in determining the total area of natural draft openings (NDOs) under paragraphs 4.1 (with reference to paragraph 3.3) and/or 5.2 of Procedure T shall be kept closed during routine operation of the process. Routine operation of the process includes those times when hazardous waste is present in the enclosure room, when gases, vapors, or fumes from hazardous waste are present in the enclosure room, and/or when the drum scraping auger is in operation. In cases of emergency or malfunction, the doors may be open in such conditions, but only as long as necessary to allow authorized personnel equipped with all necessary safety devices and other equipment, to enter and exit the enclosure room to safely address the emergency or malfunction.

III.D.2.c Each time you perform the verification procedure in Section 5 of Procedure T, you shall prepare written documentation accurately recording all

results of the procedure. All such documentation shall be maintained as part of the facility operating record for at least three years.

III.D.3 The closed vent system and carbon adsorption system shall comply with the following requirements:

III.D.3.a The closed vent system shall route the gases, vapors, and fumes emitted from hazardous waste in the enclosure room to the carbon adsorption system.

III.D.3.b The closed vent system and carbon adsorption system (used as a control device) shall comply with the requirements in 40 CFR § 264.1087. The closed vent system shall comply with the requirements of 40 CFR § 264.1033(k)(2).

III.D.3.c The closed vent system and carbon adsorption system shall be operated and negative pressure shall be maintained within the enclosure room at all times when the drum scraping auger is in operation, when hazardous waste is present in the enclosure room, when the drum scraping auger is being loaded, or when vapor from hazardous waste is present in the enclosure room. You shall continue to operate the exhaust fan and closed vent system after waste is no longer present in the enclosure room and after the drum scraping auger has been turned off until all vapors in the enclosure room including back-flow from the compactor have been vented into the vent duct and to the control device. You shall determine the necessary waiting time based on the exhaust fan capacity; the volume of the enclosure room, including the vent duct and auger for back-flow; and other pertinent data of the vapor. You shall document in writing and retain at the facility such determination and the end results of any associated calculations.

III.D.3.d The carbon adsorption system shall have a minimum removal efficiency of 95 percent by weight in accordance with 40 CFR § 264.1087(c)(1)(i). You shall demonstrate that the carbon adsorption system achieves this performance standard as specified in 40 CFR § 264.1087(c)(5) and (c)(6).

III.D.3.e The concentration level of the organic compounds in the exhaust vent stream from the carbon adsorption system shall be accurately monitored with one of the following frequencies: (a) daily, or (b) an interval that is no greater than 20 percent of the time required to consume the total carbon working capacity established as a requirement of 40 CFR § 264.1035(b)(4)(iii)(G), whichever is longer. The carbon adsorption system shall be monitored by a photoionization detector or other suitable instrument that can detect carbon breakthrough. You shall calibrate, inspect

and maintain the monitoring device as necessary to assure proper function and in accordance with the manufacturer's specifications. You shall replace the existing carbon in the control device with fresh carbon immediately when carbon breakthrough is indicated. (40 CFR §§ 264.1087(c)(3)(i) and 264.1033(h)(1)) You shall maintain a carbon adsorption maintenance log at the site. Such maintenance log shall include, but shall not be limited to, (i) a description of the method of monitoring the concentration level of organic compounds in the exhaust vent stream; (ii) a description of the method of determining carbon breakthrough; (iii) results of the daily monitoring activities; (iv) description of the monitoring device and procedures, along with the manufacturer's specifications; (v) results of calibration, inspection, and maintenance of the monitoring detector; (vi) written documentation of each determination that carbon breakthrough had been achieved and the data on which such determination relied; (vii) the date of each carbon bed replacement, the amount of carbon removed and the amount of carbon added; (viii) for each time carbon is removed from the carbon adsorption system, an adequate description of the method of disposal and/or regeneration of the spent carbons; and (ix) any other inspection and maintenance records. The log shall be maintained as part of the facility operating record.

III.D.3.f All carbon that is removed from the carbon adsorption system after use shall be managed in accordance with the requirements of 40 CFR §§ 264.1087(c)(3)(ii) and 264.1033(n). As part of the facility operating record, you shall prepare and maintain records sufficient to demonstrate that the requirements of this provision are satisfied.

III.D.3.g The closed vent system shall not include any bypass devices that could be used to divert the gas or vapor stream to the atmosphere before entering the control device, unless equipped with either a flow indicator or a seal or locking device specified in 40 CFR § 264.1087(b)(3).

III.D.3.h The vent system shall have an exhaust fan with a sufficient capacity to maintain a negative pressure inside the enclosure room. You shall determine an appropriate minimum fan capacity determined from a written design analysis or from a performance test. You shall maintain such a minimum fan capacity while the drum scraping auger is in operation. In addition, you shall maintain as part of the facility operating records either the written design analysis, or a written performance test plan and all test results.

III.D.3.i You shall inspect, monitor, and maintain the closed vent system in accordance with 40 CFR §§ 264.1087(b)(4), 264.1033(l), and 264.1087(c)(7). You shall inspect, monitor, and maintain the carbon adsorption system in accordance with the requirements in 40 CFR § 1087(c)(7). You shall develop and

implement a written plan and schedule to perform the inspections and monitoring required by this paragraph. You shall incorporate this plan and schedule into any inspection plan required by the State RCRA permit.
(40 CFR § 264.1088).

III.D.4 You shall repair each defect detected during an inspection performed in accordance with Section III.D.3.i, according to requirements specified in 40 CFR § 264.1084(k) and 40 CFR § 264.1087(c)(7).

III.E RECORDKEEPING AND REPORTING REQUIREMENTS

III.E.1 You must prepare and maintain records for the drum scraping auger and its ancillary equipment in the same manner as required for tanks under 40 CFR § 264.1089, including but not limited to 40 CFR § 264.1089(a), 264.1089(b)(1) and 264.1089(b)(2)(iv). You must prepare and maintain records for the enclosure room (functioning as an enclosure as described in 40 CFR § 264.1084(i)), the closed vent system, and the carbon adsorption system in the manner described in 40 CFR § 264.1089, including 40 CFR §§ 264.1089(a), 264.1089(b)(2)(iv), and 264.1089(e).

III.E.2 You must comply with all reporting requirements for the carbon adsorption system under 40 CFR § 264.1090(c) and (d). Such reports shall be sent to the EPA (at the address specified in Section I.G). You must also report to the EPA (at the address specified in Section I.G) each occurrence when hazardous waste is managed in the drum scraping auger and its ancillary equipment or in the enclosure room in noncompliance with the conditions specified in Section III.D of this permit, in the manner specified in 40 CFR § 264.1090(b).

III.E.3 For container storage areas, tanks 5, 6, 7, 8, 9, 10, and Overflow, you must comply with all applicable recordkeeping and reporting requirements described in 40 CFR §§ 264.1089 and 264.1090.

RESPONSE SUMMARY

RESPONSE TO COMMENTS ON THE DRAFT PERMIT FOR
Spring Grove Resource Recovery, Inc.
Federal RCRA Permit
Cincinnati, Ohio
OHD 000 816 629

I. INTRODUCTION

This summary is issued in response to all of the significant comments raised during the public comment period. The public comment period for the draft permit extended from September 28 to November 15, 2012. A public meeting will be held on November 13, 2012, 6:30 p.m., at The Public Library of Cincinnati and Hamilton County -- Northside Branch Meeting Room, 4219 Hamilton Avenue, Cincinnati, Ohio 45223.

II. COMMENTS, RESPONSES, AND CHANGES

The following comments were submitted by Spring Grove Resource Recovery, Inc. during public comment period.

1. **Comment**: Spring Grove Resource Recovery Inc. would like to comment about section III.D of the Draft Federal RCRA Permit. We believe that there is a misunderstanding about the dispersion tank system. Section III.D inappropriately requires additional compliance requirements (i.e. Procedure T requirement) for the Pegasus enclosure, Dispersion tank, and the overflow tank that are not required by regulation. This system was permitted and is required by OEPA as a series of tanks. All components of the system including the chamber where drums are emptied, contents shredded and conveyed to the dispersion tank are operated under a negative vacuum that is vented to activated carbon for organic control. This tank system was designed, permitted and should be regulated under level 2 tank requirements as described in section III.C of the draft permit. These units have been identified and permitted as tanks by both state and federal regulators and should be regulated as such. These tanks meet the requirements for compliance listed under 40 CFR 264.1084 and would require no further action to obtain compliance with the level 2 tank requirements. The building that houses these tanks is not designed nor required to operate as a T enclosure.

   Response: The State draft RCRA permit issued by the Ohio Environmental Protection Agency (OEPA) on September 26, 2012 permits Spring Grove Resource Recovery, Inc. (SGRR) to store hazardous waste in the Tank #11, Dispersion Unit, among others. The State permit further defines the Tank #11, Dispersion Unit, as including the 1) Dispersion tank; 2) over flow tank; 3) drum scraping auger; 4) drum dumping chamber; 5) coarse shredder; 6) pump feed chamber; 7) drum movement chamber; and 8) any other ancillary

equipment. The RCRA Part B Permit Application, dated April 2, 2012, indicates that the Tank #11, Dispersion unit, is located in Building F. The Part B Permit Application describes Building F as a completely enclosed roofed building of 15,000 square feet, ventilated with an equipped control device.

Since SGRR's Dispersion tank unit is located inside an enclosed room with a ventilation and control unit, the most analogous provisions of the Subpart CC regulations are 40 CFR §§ 264.1084(g) and (i). 40 CFR § 264.1084(g) regulates an owner or operator who controls air pollutant emissions from a tank by venting the tank through a closed vent system to a control device. 40 CFR § 264.1084(i) regulates an owner or operator who controls air pollutant emissions by using an enclosure vented through a closed vent system to an enclosed control device.

Therefore, EPA has determined that SGRR's Dispersion tank unit must comply with air emission standards applicable to an owner or operator who controls air pollutant emissions from a tank by using an enclosure vented through a closed vent system to an enclosed control device. A combination of the requirements specified under 40 CFR §§ 264.1084(g) and (i) is the most appropriate set of requirements for SGRR's shredder unit.

To make the permit requirements more clear, EPA will insert the relevant regulatory citations into the permit.

Change: Section III.D: "You shall control air pollutant emissions from Dispersion tank which includes drum scrapping auger, drum dumping chamber, drum movement chamber, coarse shredder, pump feed chamber, and other ancillary equipment, and Overflow tank located in the Building F" shall be changed to "You shall control air pollutant emissions from the Dispersion tank which includes the drum scraping auger, drum dumping chamber, drum movement chamber, coarse shredder, pump feed chamber, and other ancillary equipment, and the Overflow tank located in Building F, through complying with 40 CFR §§ 264.1084(g) and (i)."

Administrative Record Index ***(Final RCRA PERMIT)***

Spring Grove Resource Recovery, Inc.
Cincinnati, Ohio
OHD 000 816 629

	Title	Date	Prepared by
1.	Revised Subparts AA/ BB/ CC Information	May 5, 1997	SGRR
2.	Subparts AA, BB, and CC Information	July 31, 2006	SGRR
3.	Part B Application	April 2, 2012	SGRR
4.	EJ Report	August 2012	EPA
5.	State RCRA Draft Permit	September 2012	OEPA
6.	Federal Draft RCRA Permit	September 2012	EPA
7.	Comments for draft permit	November 14, 2012	SGRR
8.	Responsive Summary	April 2013	EPA
8.	Federal Final RCRA Permit	April 2013	EPA

EPA: United States Environmental Protection Agency
OEPA: Ohio Environmental Protection Agency
RCRA: Resource Conservation Recovery Act
EJ: Environmental Justice
SGRR: Spring Grove Resource Recovery, Inc.
Subpart AA: Air Emission Standards for Process Vents
Subpart BB: Air Emission Standards for Equipment Leaks
Subpart CC: Air Emission Standards for Tanks, Surface Impoundments and Containers

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

MAR 28 2013

REPLY TO THE ATTENTION OF

Mr. Jeremy Carroll
Ohio Environmental Protection Agency
Division of Hazardous Waste Management
Post Office Box 1049
Columbus, Ohio 43266-0149

Re: Final Federal RCRA Permit, Spring Grove Resource Recovery, Inc.
Cincinnati, Ohio, OHD 000 816 629

Dear Mr. Carroll:

Enclosed please find a copy of the final federal Resource Conservation and Recovery Act permit and cover letter to the above-referenced facility.

If you have any questions, please contact Jae Lee of my staff at (312) 886-3781.

Sincerely,

Mary S. Setnicar, Chief
RCRA/TSCA Programs Section
Land and Chemicals Division

Enclosure

Recycled/Recyclable • Printed with Vegetable Oil Based Inks on 100% Recycled Paper (50% Postconsumer)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

MAR 28 2013

Cincinnati/Hamilton County Library
St. Bernard Branch
4803 Tower Avenue
Cincinnati, Ohio 45217

REPLY TO THE ATTENTION OF:

Re: Final Federal RCRA Permit, Spring Grove Resource Recovery, Inc.
Cincinnati, Ohio, OHD 000 816 629

Dear Librarian:

The U.S. Environmental Protection Agency issued a final Hazardous Waste Management permit to Spring Grove Resource Recovery, Inc., of Cincinnati, Ohio. In accordance with the public involvement procedures in Title 40 Code of Federal Regulations Part 124, the draft federal RCRA permit was publicly noticed in "The Cincinnati Enquirer" and on the "WAIF (FM) 88.3" radio station on September 28, 2012.

The public comment period extended from September 28 to November 15, 2012. A public meeting was held on November 13, 2012, 6:30 p.m., at The Public Library of Cincinnati and Hamilton County – Northside Branch Meeting Room, 4219 Hamilton Avenue, Cincinnati, Ohio 45223.

Please make this letter and the enclosed documents available for public examination for at least 75 days from the date of this letter, under "Reference Materials – Spring Grove Resource Recovery, Inc." The following items are enclosed.

-- Final Permit
-- Fact Sheet
-- Response Summary

Thank you for your assistance. If you have any questions, please call me at 312-886-3781.

Sincerely,

Jae B. Lee, Permit Writer
RCRA/TSCA Programs Section
Land and Chemicals Division

Enclosures

Recycled/Recyclable • Printed with Vegetable Oil Based Inks on 100% Recycled Paper (100% Post-Consumer)

State of Ohio Environmental Protection Agency

Fact Sheet

[September / 2012]

Draft Hazardous Waste Permit Renewal

Public Participation Procedures and Comment Period Ohio Administrative Code (OAC) Rule 3745-50-22 (B)(5)(a)&(b)

A public meeting will be held on Tuesday, November 13, 2012 at 6:30 p.m. at the Cincinnati Libraries – Northside Branch Meeting Room, 4219 Hamilton Avenue, Cincinnati, OH 45223 to receive public comments. Oral comments will be received during the public meeting. All persons, including the applicant, may submit written comments relating to this draft action. Written comments may be submitted before the end of the comment period to the address in the box on the right.

The comment period begins on September 27, 2012 and ends on November 15, 2012. A copy of the draft permit is available for review by the public at the following locations:

Cincinnati/Hamilton County Library
St. Bernard Branch
4803 Tower Avenue
Cincinnati, Ohio 45217
(513) 369-4462

Ohio EPA, Southwest District
401 E. Fifth Street
Dayton, Ohio 45402
(937) 285-6357

Ohio EPA, Central Office
Division of Materials and Waste Management
Lazarus Government Center
50 West Town St., Suite 700
Columbus, Ohio 43215
(614) 644-2917

Facility Name: Spring Grove Resource Recovery, Inc

U.S. EPA I.D.: OHD 000 816 629

Location: 4879 Spring Grove Avenue
Cincinnati, Ohio 45232

Facility Owner: Spring Grove Resource Recovery, Inc
4879 Spring Grove Avenue
Cincinnati, Ohio 45232

Facility Operator: Spring Grove Resource Recovery, Inc
4879 Spring Grove Avenue
Cincinnati, Ohio 45232

Activity: Permitted Container and Tank Treatment and Storage, and corrective action

Comment Period: September 27, 2012 – November 15, 2012

Submit Comments to:

Ohio EPA	U.S. EPA, Region 5
Mr. Shawn Sellers, P.E.	Mr. Jae Lee
Div. of Materials & Waste Mgmt.	RCRA Branch (LR-8J)
P.O. Box 1049	77 West Jackson Boulevard
Columbus, Ohio 43216-1049	Chicago, Illinois 60604-3590
Shawn.Sellers@epa.state.oh.us	Lee.Jae@epa.gov

The State of Ohio is authorized by United States Environmental Protection Agency (U.S. EPA) to administer its hazardous waste management program in lieu of the federal hazardous waste management program, except for portions of the federal standards for organic air emissions (40 CFR Part 264, Subparts BB and CC) from hazardous waste storage units. As an authorized program, Ohio has the responsibility for issuing the RCRA permit for hazardous waste treatment, storage, and disposal facilities. U.S. EPA has drafted a federal RCRA permit to address organic air emissions from hazardous waste storage units for which Ohio is not yet authorized.

The draft state permit is available for review by the public online at: http://www.epa.ohio.gov/dmwm

The draft federal permit is available for review by the public online at: http://www.epa.gov/region5/waste/permits/actions.htm#2012

Within sixty (60) days the close of the public comment period, Ohio EPA will, without prior hearing, issue the permit (or deny the request) in accordance with Chapter 3734 of the Revised Code (ORC). If Ohio EPA approves the

application, a renewal permit will be issued with terms and conditions as are necessary to ensure compliance with hazardous waste rules.

Description of Facility OAC Rule 3745-50-22 (B)(1)

Spring Grove Resource Recovery, Inc, located at 4879 Spring Grove Avenue, Cincinnati, is an Ohio EPA permitted treatment, storage, disposal facility for hazardous waste. The Facility provides commercial hazardous waste management services to a complete range of industrial clients.

Description of Requested Permit Renewal OAC Rule 3745-50-22 (B)(2)

This permit allows Spring Grove Recourse Recovery to store up to 150,000 gallons of hazardous waste in containers, treat up to 80,800 gallons per day in containers using methods like stabilization, neutralization, and carbon absorption, treat and store up to 75,450 gallons of hazardous waste in tanks, and treat up to 2 short tons per hour using compaction.

In addition, this permit allows Spring Grove Resource Recovery to complete corrective action at the facility.

Regulatory Basis to Support the Decision to Renew the Permit Application OAC Rule 3745-50-22 (B)(3)

The director has determined that Spring Grove Resource Recovery has submitted an application for renewal one hundred eighty (180) days prior to the expiration date of its present permit which was issued by the Ohio EPA on September 30, 2002. The director has considered the application, inspection reports, a report regarding the facility's compliance with the present permit, and the rules adopted under Chapter 3734.05 of the Ohio Revised Code. The director has found that the Part B permit application meets the director's performance standards and that the facility has a history of compliance with this chapter, rules adopted under it, the existing permit, and orders entered into, which demonstrates reliability, expertise, and competency to subsequently operate the facility under this chapter, the rules, and the permit.

Contact Person OAC Rule 3745-50-22 (B)(6)

For additional information, please contact Cathy Altman, Ohio EPA, Southwest District Office at (937) 285-6093 or Jae Lee of the U.S. EPA Regional Office in Chicago, Illinois at (800) 621-8431 ext. 6-3781 or by email at: Lee.Jae@epa.gov.

Environmental Justice Profile for 3-mile radius around
Spring Grove Resource Recovery in Cincinnati, OH

	Demographics								
Census Tract	*Tract Population (2000)*	*2011 EJ Rank*	*2011 EJ Score*	*Percent Minority*	*Percent in poverty*	*Percent under 5 years old*	*Percent over 64 years old*	*Percent 25 years and older without a high school diploma*	*Percent linguistically isolated households*
39061002100	950	1	87.6	94.5	37.3	7.7	11.5	51.6	3.8
39061002200	2715	1	74.2	88.1	21.7	4.9	9.9	36.6	10.4
39061002300	1816	1	74.8	83.9	39.7	9.9	6.2	27.7	7.6
39061002500	2317	1	65	30.0	43.3	2.8	3.7	20.8	20.1
39061002600	3364	2	62.3	26.3	40.5	3.2	3.9	13.6	8.7
39061002700	1685	2	60.5	28.4	23.2	4.0	6.9	14.3	12.3
39061002800	1506	1	79.1	29.4	35.3	6.1	7.9	59.7	8.4
39061002900	4775	1	66.3	31.5	30.4	2.4	9.9	20.3	27.1
39061003000	3978	1	68.9	39.6	41.5	2.1	1.7	10.0	40.8
39061003200	1589	1	73.9	63.3	35.8	4.5	8.1	34.3	17.4
39061003300	2241	1	67.5	54.8	33.4	3.3	6.9	17.2	12.5
39061003400	1049	1	86.4	94.4	53.0	5.6	20.0	53.3	3.1
39061003500	1389	1	81.6	93.9	39.3	8.6	9.9	52.9	6.1
39061003600	1638	1	81.1	98.8	38.8	8.3	24.8	53.1	3.2
39061003700	2059	1	77.5	92.5	37.8	7.2	17.2	39.5	5.9
39061003800	2943	1	79.6	96.6	39.0	6.9	14.8	42.8	4.2
39061003900	2553	1	76.8	96.2	32.0	8.1	11.0	42.3	4.3
39061004000	2432	1	69.7	78.2	9.3	5.1	21.5	26.0	10.6
39061004100	1805	1	64.6	59.2	13.2	5.4	17.4	23.8	8.9
39061006000	5526	2	65.7	26.6	13.3	6.6	19.5	19.0	8.6
39061006100	2412	1	72.7	13.8	15.9	9.0	14.0	35.6	5.5
39061006201	3985	1	76.5	79.7	14.5	5.0	20.6	24.5	16.3
39061006202	269	1	64.2	50.9	0.0	0.0	4.5	40.2	0.0
39061006300	5993	1	78.3	97.0	22.0	8.1	12.7	27.2	9.0
39061006400	3689	1	79	94.4	19.1	5.1	15.7	26.3	5.5
39061006500	6326	1	64.6	55.4	12.1	3.8	11.6	14.5	10.3
39061006600	2913	1	74.5	81.8	38.0	6.4	11.8	31.5	9.2
39061006700	3357	1	83.1	97.9	45.4	8.3	12.8	33.1	9.4
39061006800	5072	1	78	93.7	33.0	7.8	16.6	34.0	8.5

Environmental Justice Profile for 3-mile radius around
Spring Grove Resource Recovery in Cincinnati, OH

	Demographics								
Census Tract	*Tract Population (2000)*	*2011 EJ Rank*	*2011 EJ Score*	*Percent Minority*	*Percent in poverty*	*Percent under 5 years old*	*Percent over 64 years old*	*Percent 25 years and older without a high school diploma*	*Percent linguistically isolated households*
39061006900	3907	1	75.9	96.7	32.5	6.7	14.1	36.0	4.4
39061007000	2525	2	63.3	37.0	19.9	4.5	10.3	12.2	19.4
39061007100	3579	2	58.6	16.4	10.9	3.9	18.1	7.5	15.7
39061007200	2442	2	62.5	29.3	20.8	4.3	6.9	8.6	18.9
39061007300	**2337**	**1**	**71.2**	**51.5**	**9.7**	**6.5**	**8.5**	**24.3**	**10.6**
39061007400	2210	1	73	46.5	34.4	7.0	7.4	42.0	4.7
39061007500	2227	2	62.2	32.9	15.4	5.9	16.6	19.5	5.8
39061007700	3914	1	86.9	96.5	54.3	14.0	7.7	49.4	14.7
39061007800	3170	1	70.9	43.6	23.2	6.1	9.2	24.0	10.5
39061007900	1782	2	65.7	48.2	14.5	7.6	8.7	19.1	9.3
39061008000	5375	1	92.1	86.8	63.6	18.6	7.6	36.1	6.3
39061008100	2801	2	68.1	81.1	10.2	4.7	13.9	20.9	6.0
39061008201	4388	2	66.3	61.6	9.9	7.6	12.4	17.5	5.2
39061008202	3652	1	67.5	49.8	15.6	6.4	21.1	16.0	8.7
39061008400	2015	2	67.2	45.8	17.9	8.5	34.0	20.1	1.9
39061008501	4136	1	72.1	74.9	24.5	12.6	4.8	21.3	13.5
39061008502	2453	1	91	96.8	60.6	24.8	3.8	44.3	10.6
39061008601	4510	1	80	83.9	52.2	11.7	6.4	49.8	9.0
39061011000	2874	1	74.3	80.1	16.9	5.6	14.6	17.6	9.8
39061011100	3629	2	62.3	41.1	5.6	5.4	19.8	14.2	7.5
39061022200	4409	2	60	18.8	5.1	5.2	18.7	9.6	7.0
39061025200	4885	2	62.9	6.7	9.6	6.1	13.6	31.3	6.7
39061025401	1650	2	64.3	4.9	12.2	5.6	15.3	28.1	7.2
39061025500	4602	1	64.1	7.8	14.4	6.0	14.4	34.5	10.1
39061025600	3696	2	60.8	7.1	18.6	5.7	9.2	24.4	6.9
39061025700	2681	1	67.7	8.9	19.0	7.6	10.2	46.4	2.6
39061025800	4924	1	67.8	8.9	8.7	6.1	15.5	19.5	5.5

Environmental Justice Profile for 3-mile radius around
Spring Grove Resource Recovery in Cincinnati, OH

	Health		Compliance and Enforcement			
Census Tract	*Total low weight births / Total live births*	*Total infant deaths / Total live births*	*# of uninspected facilities*	*# of facilities with violations*	*# of facilities with violations and no formal enforcement actions*	*# of permits / sq. mi.*
39061002100	9.8	11.1	0	0	0	189.54138
39061002200	9.8	11.1	0	0	0	24.9501
39061002300	9.8	11.1	4	0	0	59.145933
39061002500	9.8	11.1	0	0	0	28.20238
39061002600	9.8	11.1	0	0	0	41.105275
39061002700	9.8	11.1	0	0	0	13.887603
39061002800	9.8	11.1	16	16	8	178.21685
39061002900	9.8	11.1	0	0	0	48.676874
39061003000	9.8	11.1	5	5	0	50.434295
39061003200	9.8	11.1	3	3	0	90.768507
39061003300	9.8	11.1	2	4	4	116.55555
39061003400	9.8	11.1	0	0	0	120.23034
39061003500	9.8	11.1	0	0	0	77.700078
39061003600	9.8	11.1	0	0	0	23.293734
39061003700	9.8	11.1	0	0	0	62.053987
39061003800	9.8	11.1	0	0	0	58.153309
39061003900	9.8	11.1	0	0	0	32.959789
39061004000	9.8	11.1	0	0	0	49.627792
39061004100	9.8	11.1	4	4	0	63.390385
39061006000	9.8	11.1	0	0	0	42.69535
39061006100	9.8	11.1	12	15	0	149.63153
39061006201	9.8	11.1	0	0	0	59.686489
39061006202	9.8	11.1	5	3	0	69.146729
39061006300	9.8	11.1	0	0	0	48.247025
39061006400	9.8	11.1	21	0	0	79.606073
39061006500	9.8	11.1	0	0	0	35.939173
39061006600	9.8	11.1	0	0	0	16.268098
39061006700	9.8	11.1	4	0	0	146.32396
39061006800	9.8	11.1	0	0	0	15.123331

Environmental Justice Profile for 3-mile radius around
Spring Grove Resource Recovery in Cincinnati, OH

	Health		Compliance and Enforcement			
Census Tract	*Total low weight births / Total live births*	*Total infant deaths / Total live births*	*# of uninspected facilities*	*# of facilities with violations*	*# of facilities with violations and no formal enforcement actions*	*# of permits / sq. mi.*
39061006900	9.8	11.1	0	0	0	17.452684
39061007000	9.8	11.1	0	0	0	19.189912
39061007100	9.8	11.1	0	0	0	22.910347
39061007200	9.8	11.1	4	0	0	66.910289
39061007300	**9.8**	**11.1**	**43**	**50**	**27**	**95.108281**
39061007400	9.8	11.1	4	0	0	129.52485
39061007500	9.8	11.1	0	0	0	6.439668
39061007700	9.8	11.1	0	0	0	64.200034
39061007800	9.8	11.1	3	0	0	140.44355
39061007900	9.8	11.1	0	0	0	2.702484
39061008000	9.8	11.1	68	51	46	58.073376
39061008100	9.8	11.1	0	0	0	15.839444
39061008201	9.8	11.1	0	0	0	16.960913
39061008202	9.8	11.1	0	0	0	56.150333
39061008400	9.8	11.1	0	0	0	3.54676
39061008501	9.8	11.1	0	0	0	1.689289
39061008502	9.8	11.1	0	0	0	4.986785
39061008601	9.8	11.1	0	0	0	11.594875
39061011000	9.8	11.1	3	0	0	76.038744
39061011100	9.8	11.1	0	0	0	25.363187
39061022200	9.8	11.1	8	8	0	21.843016
39061025200	9.8	11.1	2	0	0	56.254834
39061025401	9.8	11.1	12	20	12	116.62658
39061025500	9.8	11.1	0	0	0	62.590858
39061025600	9.8	11.1	0	0	0	98.237987
39061025700	9.8	11.1	0	0	0	72.134232
39061025800	9.8	11.1	79	54	54	131.42418

Environmental Justice Profile for 3-mile radius around
Spring Grove Resource Recovery in Cincinnati, OH

	Environment					
Census Tract	*Total Cancer Risk*	*Non-Cancer Neurological Hazard Index + Non-Cancer Respiratory Hazard Index*	*Diesel PM concentration (HAPEM Total)*	*PM-2.5 concentration*	*Ozone concentration, 8-hour average*	*Pounds of pollutant, adjusted by fate and transport modeling and subpopulation-specific exposure factors, times toxicity weight. Same as the RSEI risk-related result, but without the population weighting.*
39061002100	0.000095	5.37	4.14	12.86	47.47	2.10145
39061002200	0.000076	4.06	2.48	12.83	47.49	1.024884
39061002300	0.000068	3.42	1.81	12.87	47.42	1.711973
39061002500	0.000065	3.31	1.66	13.08	47.4	1.547182
39061002600	0.000072	3.57	1.79	13.19	47.31	1.354871
39061002700	0.000064	3.15	1.75	13.32	47.23	1.881949
39061002800	0.000081	4.14	2.99	13.67	47.3	8.758386
39061002900	0.00006	3.02	1.53	13.46	47.38	1.954302
39061003000	0.000063	2.97	1.37	13.27	47.51	1.392267
39061003200	0.000071	3.31	1.56	13.19	47.56	1.933413
39061003300	0.000069	3.5	1.68	12.78	47.71	1.254044
39061003400	0.000091	4.53	2.79	12.85	47.55	3.085908
39061003500	0.000073	3.83	2.6	12.87	47.52	1.466107
39061003600	0.000064	3.27	1.78	13.04	47.42	2.55525
39061003700	0.000066	3.4	1.58	12.98	47.41	1.549042
39061003800	0.000069	3.52	2.02	13.26	47.37	3.115471
39061003900	0.000065	3.45	1.69	13.14	47.35	1.645434
39061004000	0.000061	3.01	1.45	13.28	47.34	2.476531
39061004100	0.000058	2.77	1.34	12.83	47.37	2.142298
39061006000	0.000056	2.64	1.27	14.45	48.19	3.071754
39061006100	0.000061	3.05	1.61	15.12	48.14	2.737966
39061006201	0.000059	2.89	1.39	14.51	48.03	3.442597
39061006202	0.000044	2.31	1.24	14.81	48.14	3.086803
39061006300	0.000059	2.87	1.35	14.35	47.97	2.688366
39061006400	0.000066	3.37	1.94	14.36	47.94	3.322625
39061006500	0.000059	2.88	1.39	13.73	47.88	2.910068
39061006600	0.00006	2.96	1.55	13.42	47.85	2.198931
39061006700	0.000068	3.57	2.05	13.29	47.82	1.639184
39061006800	0.000061	3.01	1.51	13.66	47.85	2.393153

Environmental Justice Profile for 3-mile radius around
Spring Grove Resource Recovery in Cincinnati, OH

	Environment					
Census Tract	*Total Cancer Risk*	*Non-Cancer Neurological Hazard Index + Non-Cancer Respiratory Hazard Index*	*Diesel PM concentration (HAPEM Total)*	*PM-2.5 concentration*	*Ozone concentration, 8-hour average*	*Pounds of pollutant, adjusted by fate and transport modeling and subpopulation-specific exposure factors, times toxicity weight. Same as the RSEI risk-related result, but without the population weighting.*
39061006900	0.000057	2.78	1.22	13.54	47.96	1.82025
39061007000	0.000058	2.7	1.26	13.68	47.44	2.620245
39061007100	0.000058	2.71	1.35	13.7	47.41	2.408147
39061007200	0.000061	3.01	1.32	13.6	47.38	5.045054
39061007300	**0.000054**	**2.45**	**0.89**	**14.25**	**47.46**	**3.287233**
39061007400	0.000062	2.9	1.35	14.09	47.41	1.736652
39061007500	0.000052	2.24	1	14.19	47.45	2.075192
39061007700	0.00006	2.76	1.53	13.76	47.34	2.039899
39061007800	0.000066	3.29	1.97	14.08	47.4	1.807564
39061007900	0.000058	2.69	1.35	14.14	47.44	2.106615
39061008000	0.000051	2.23	0.76	14.44	48.16	2.275192
39061008100	0.000048	2	0.69	14.25	48.14	2.217039
39061008201	0.000053	2.34	0.91	14.2	48.15	1.723245
39061008202	0.000056	2.71	1.1	14.17	47.54	1.66302
39061008400	0.00005	2.2	0.83	14.21	47.52	2.894891
39061008501	0.00005	2.16	0.91	14.12	47.48	2.170329
39061008502	0.000061	2.93	1.69	14.06	47.39	1.748366
39061008601	0.000054	2.43	1.12	13.8	46.94	2.107786
39061011000	0.00006	2.9	1.32	14.43	48.23	3.319166
39061011100	0.000049	2.07	0.72	14.24	48.14	2.060701
39061022200	0.000049	2.07	0.76	14.64	48.18	2.483668
39061025200	0.000062	3.14	1.65	14.11	47.97	3.717418
39061025401	0.000067	3.33	1.69	13.69	47.93	6.777611
39061025500	0.000063	3.15	1.58	13.89	47.91	3.245682
39061025600	0.000062	3.09	1.56	13.56	47.88	3.983924
39061025700	0.000059	3.18	1.39	14.61	48.09	1.669178
39061025800	0.000057	2.75	1.29	14.06	48.04	2.178474