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

APR 27 2015

REPLY TO THE ATTENTION OF:

Mr. Ronald Guenther
President
Chemtron Corporation
35850 Schneider Court
Avon, Ohio 44011

Re: Final Federal RCRA Permit, Chemtron Corporation
Avon, Ohio, OHD 066 060 609

Dear Mr. Guenther:

Enclosed is a copy of the federal portion of a Resource Conservation and Recovery Act (RCRA) Hazardous Waste permit for the above-referenced facility. The complete RCRA Hazardous Waste permit contains both federal permit conditions (contained herein) and state permit conditions, which were issued separately by the State of Ohio RCRA program authorized under Title 40 of the Code of Federal Regulations (40 CFR) Part 271. Any hazardous waste activity not included in the federal portion of the RCRA permit or in the state portion of the RCRA permit is prohibited when such activity requires a RCRA Hazardous Waste permit.

The draft federal RCRA permit was publicly noticed in The Chronicle Telegram newspaper on September 11, 2014. A copy of the draft federal RCRA permit was available for review at the Lorain Public Library System, Avon Public Library, 37485 Harvest Avenue, Avon, Ohio 44011. The public comment period extended from September 11, 2014 to October 27, 2014.

The only comments received by U.S. Environmental Protection Agency on the draft federal RCRA permit during the public comment period were submitted by Chemtron Corporation. No comments from any concerned citizens were received. EPA's Response Summary to the comments is enclosed with this letter.

This federal permit is effective on May 11, 2015 and valid until January 14, 2025, unless the federal permit is revoked and reissued, or terminated pursuant to 40 CFR § 270.41 and § 270.43. Failure to comply with any conditions of the federal permit may result in civil and/or criminal Penalties.

You may appeal the issuance of this permit by filing a petition for review with the Environmental Appeals Board.

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A petition for review of any condition of a RCRA permit decision must be filed with the Environmental Appeals Board within 30 days after EPA serves notice of the issuance of the final permit decision. 40 CFR § 124.19(a)(3). When EPA serves the notice by mail, service is deemed to be completed when the notice is placed in the mail, not when it is received. However, to compensate for the delay caused by mailing, the 30-day deadline for filing a petition is extended by three days if the final permit decision being appealed was served on the petitioner by mail. 40 CFR § 124.20(d). Petitions are deemed filed when they are received by the Clerk of the Board at the address specified for the appropriate method of delivery. 40 CFR § 124.19(a)(3) and 40 CFR § 124.19(i). Additional information regarding petitions for review may be found in the Environmental Appeals Board Practice Manual (January 2013) and A Citizen's Guide to EPA's Environmental Appeals Board, both of which are available at http://yosemite.epa.gov/oa/EAB_Web_Docket.nsf/General+Information/Environmental+Appeals+Board+Guidance+Documents?OpenDocument.

Eligibility to appeal the federal permit is discussed further in 40 CFR §124.19. General filing requirements are contained in the Practice Manual, The Environmental Appeals Board and A Citizens' Guide to EPA's Environmental Appeals Board.

All documents that are sent through the U.S. Postal Service (except by Express Mail) must be addressed as follows:

Clerk of the Board
U.S. Environmental Protection Agency
Environmental Appeals Board
1200 Pennsylvania Avenue, NW
Mail Code 1103M
Washington, DC 20460-0001

Documents that are hand-carried in person, delivered via courier, mailed by Express Mail, or delivered by a non-U.S. Postal Service carrier (e.g., Federal Express or UPS) must be delivered to:

Clerk of the Board
U.S. Environmental Protection Agency
Environmental Appeals Board
1201 Constitution Avenue, NW
U.S. EPA East Building, Room 3334
Washington, DC 20004

A copy of the petition should also be sent to:

RCRA Branch (LR-8J)
U.S. Environmental Protection Agency, Region 5
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

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

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

Sincerely,

Margaret M. Guerriero
Director
Land and Chemicals Division

Enclosure

cc: Jeremy Carroll, OEPA

FINAL

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5

RESOURCE CONSERVATION AND RECOVERY ACT PERMIT

Facility Name and Location: **Chemtron Corporation**
35850 Schneider Court
Avon, Ohio 44011

Owner: **RJG Enterprises DBA Chemtron**
35850 Schneider Court
Avon, Ohio 44011

Operator: **RJG Enterprises DBA Chemtron**
35850 Schneider Court
Avon, Ohio 44011

EPA Identification Number: **OHD 066 060 609**

Effective Date: **May 29, 2015**

Expiration Date: **January 14, 2025**

Authorized Activities:

The U. S. Environmental Protection Agency hereby issues a Resource Conservation and Recovery Act permit (hereinafter referred to as the "permit") to Chemtron Corporation (addressed in the second person as "you") in connection with the hazardous waste management operations at Chemtron Corporation located in Avon, 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 USC § 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, tanks, containers, and miscellaneous units.

The RCRA permit consists of both this permit, which contains the effective federal RCRA permit conditions, 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 January 14, 2015. (The effective and expiration dates of the state RCRA permit are January 14, 2015 and January 14, 2025, 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 according to Section 3006 of RCRA, 42 USC § 6926, and 40 CFR Part 271, to administer the pre-HSWA RCRA hazardous waste program. The State of Ohio also received final authorization to administer certain additional RCRA requirements on several occasions since then.

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, 268, 270, and applicable provisions of RCRA.

This permit is based on the assumption that the information submitted in your RCRA Part B Permit Application on June 6, 2013, and all other modifications to that application (hereinafter referred to as the "Part B Permit Application"), 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 filed comments on the draft permit or participated in the public hearing may petition the Environmental Appeals Board to review any condition of the permit decision. Any person who failed to file comments or failed to participate in the public hearing on the draft permit may file a petition for review

only to the extent of the 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 **May 29, 2015** and will remain in effect until **January 14, 2025**, 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: 4/27/2015

Margaret M. Guerriero
Director
Land and Chemicals Division

OHD 066 060 609
Chemtron Corporation

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SECTION I—STANDARD PERMIT CONDITIONS

I.A EFFECT OF PERMIT

You are hereby allowed to manage hazardous waste at the Chemtron Corporation facility ("facility") in accordance with this permit. Under this permit, the operation of units storing and treating RCRA hazardous waste must comply with all terms and conditions in this permit. Other aspects of the storage of RCRA hazardous wastes in containers are subject to the conditions in the state RCRA permit.

Subject to 40 CFR § 270.4, compliance with the RCRA permit during its term generally constitutes compliance, for purposes of enforcement, with Subtitle C of RCRA.

This permit does not: (1) convey any property rights or any exclusive privilege; (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 public health or the environment from any imminent and substantial endangerment to human health, welfare, or the environment. (40 CFR §§ 270.4 and 270.30(g))

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 may request a modification of this permit under the procedures specified in 40 CFR § 270.42. A class 1 modification is generally allowed without prior approval by EPA except under certain conditions as described in 40 CFR § 270.42(a)(2). A class 2 modification requires prior approval by EPA as described in 40 CFR §270.42(b).

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.) Procedure for a class 3 modification are specified in 40 CFR § 270.42(c).

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, 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

I.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, or modification; or denial of a permit renewal application. (40 CFR § 270.30(a))

I.E.2 Duty to Reapply

If you wish to continue an activity this permit regulates after its 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 expires, unless the Director grants permission for a later 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 10 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 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 1995, 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:

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 assure 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. (40 CFR § 270.30(i))

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 feed streams, treatment residues, or other hazardous wastes to be analyzed must be the appropriate methods from Appendix I of 40 CFR Part 261, or the methods specified in the Waste Characteristics which

is Section C of the Part B Permit Application, 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 Characteristics. (40 CFR § 270.30(j)(1))

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

I.E.9.c 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 3 years from the date of the reports, records, or other documents, unless a different period is specified in this permit. These periods 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. 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 new owner or operator in writing of the requirements of 40 CFR Parts 264, 266, 268, and 270, and must provide a copy of the RCRA permit to the new owner or operator. (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 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 circumstances.

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

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

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

(3) Facility name, address and telephone number;

(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 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 on 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(*l*)(6) and 270.30(h))

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 of this permit. (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 Part B Permit Application or other submittal, or submitted incorrect information in the Part B 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) and 270.30(h))

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 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 Environmental Protection Agency Region 5, RCRA Branch, at the following address:

RCRA Branch, LR-8J
Land and Chemicals Division
EPA Region 5
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 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)

I.I DOCUMENTS TO BE MAINTAINED AT THE FACILITY

You must maintain at the facility, until closure is completed and certified by a qualified 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 §§ 264.13 and 264.73 (as they apply to the equipment used to comply with this permit).

I.I.2 Notifications

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

I.I.3 Copy of Permit

You must keep a copy of this permit on site, 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 enforcement

action under Section 3008 of RCRA. This 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, 266, 268, and 270, and applicable provisions of RCRA, all of which are incorporated herein by reference.

I.J.3 Any inconsistency or deviation from the approved designs, plans and schedules is a 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 all applicable Clean Air Act (CAA) and RCRA permit limits. Where two or more operating limitations apply, the most stringent operating limitations take precedence.

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 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 which is subjected to the Subpart BB requirements is considered as "In light liquid service" or "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) flanges and other connectors, 4) pressure release devices, 5) sampling connection systems, 6) open-ended valves or lines, and 7) closed-vent system 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, you must repair it as soon as practicable, but not later than 15 calendar days after it is detected, except as provided in 40 CFR § 264.1059 - Standards: Delay of repair. The first attempt at repair must be made no later than five calendar days after each leak is detected.

II.A.3 Open-ended Valves or Lines (40 CFR § 264.1056)

II.A.3.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.3.b 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.4 Valves in Light Liquid Service (40 CFR § 264.1057)

II.A.4.a Each valve in 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.4.b If an instrument reading of 10,000 ppm or greater is measured, a leak is detected.

II.A.5 Pressure Relief Devices in Light Liquid Service, and Flanges and Other Connectors (40 CFR § 264.1058)

II.A.5.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.5.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 five calendar days after each leak is detected.

II.A.5.c First attempts at repair include, but are limited to, the best practices described under 40 CFR § 264.1057(e).

II.A.6 Delay of Repair (40 CFR § 264.1059)

II.A.6.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.6.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.6.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.6.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.7 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.8 Alternative Standards for Valves 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.

II.A.9 Alternative Standards for Valves 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.7 within a hazardous waste management unit to comply with one of the alternative work practices specified below.

II.A.9.a After two 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.9.b After five consecutive quarterly leak detection periods with the percentage of valves leaking equal to or less than 2 percent, you may begin to skip three 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)

The leak test methods and procedures must be as specified in 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 CONTAINERS AND TANKS (40 CFR PART 264 SUBPART CC)

You are permitted by the state portion of the permit to store a total volume of 135,300 gallons of hazardous wastes in 25 tanks. These tanks include:

Tank Area/Existing or Future	Existing Tanks	Not-Yet-Installed Tanks
Area #1 Total Volume: 46,600 gallons	9 tanks (#1, 2, 3, 6, 7, 8, 13, 14, and 15)	
Area #2 Total Volume: 21,100 gallons	3 tanks (#11, 12, and 24)	1 tank (#10)
Area #4 Total Volume: 45,000 gallons	6 tanks (#18, 19, 20, 22, 23, and 25)	1 tank (#21)
Area #5 Total Volume: 22,600 gallons		5 tanks (#26, 51, 52, 53, and 54)

Some of tanks in all of above areas are also permitted to treat hazardous waste in the tanks.

You are also permitted to operate 5 container storage areas: Area #2 (16,500 gallons), Area #3 (10,450 gallons), Area #4 (56,763 gallons), Area #5 (39,650 gallons), and Area #6 (37,125 gallons). The permitted capacity of the container storage areas is 2,918 drums, not exceeding 160,488 gallons.

The Part B Permit Application specifies that the tanks specified above will be operated in accordance with 40 CFR § 264.1084(c), Level 1 tank requirements. These tanks are covered by a fixed roof and are vented directly to the atmosphere through conservation vent, except 6 tanks currently located in the Area #4. The 6 tanks located in the Area #4 emit its volatile organic emissions to the control device (carbon adsorption system) through the closed-vent system. The containers will be operated either under 40 CFR § 264.1086(c), Level 1 container requirement or 40 CFR § 264.1086(d), Level 2 container requirement, depend on the size of the container.

The hazardous waste entering tanks in Areas 4 and 5 has an average volatile organic (VO) concentration greater than 500 parts per million by weight (ppmw) at the point of waste origination. At any given time, there is only a potential that the tanks in Area 1 and 2 will manage hazardous waste that has an average VO concentration greater than 500 ppmw at the point of waste origin.

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 1 tanks and Level 1 and Level 2 containers and must comply with the standards at 40 CFR § 264.1084(c), Tank Level 1 standards, 40 CFR § 264.1086(c), Container Level 1 standards, and 40 CFR § 264.1086(d), Container Level 2 standards.
You must not conduct a waste stabilization process, as defined at 40 CFR § 265.1081, in containers and tanks.

III.A LEVEL 1 CONTAINER REQUIREMENTS

You must manage the containers with a design capacity greater than 0.1 m^3 (26.4 gallons) and less than or equal to 0.46 m^3 (121 gallons), and the containers with a design capacity greater than 0.46 m^3 (121 gallons) that are not in light material service, as defined in 40 CFR § 265.1081, 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 an 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). For the containers with capacity of 0.46 m^3 or greater, which do not meet applicable DOT regulations, you must maintain at the facility a copy of the procedure used to determine those containers are not managing hazardous waste in light material service, as specified in 40 CFR § 264.1086(c)(5).

III.B LEVEL 2 CONTAINER REQUIREMENTS

You must manage the containers with a design capacity greater than 0.46 m^3 (121 gallons) that are in light material service, as defined in 40 CFR § 265.1081, 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 You shall receive and handle a container complying with one of the following requirements as specified in 40 CFR § 264.1086(d)(1):

III.B.1.a A container that meets the applicable U.S. Department of Transportation regulations on packaging hazardous materials for transportation as specified in 40 CFR § 264.1086(f);

III.B.1.b A container that 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

III.B.1.c A container that has been demonstrated within the preceding 12 months to be vapor-tight 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 You shall transfer hazardous waste into or out of a container in such a manner as to minimize exposure of the hazardous waste to the atmosphere, to the extent practical, as specified in 40 CFR § 264.1086(d)(2). When transferring hazardous waste into or out of a container, you shall conduct such transferring activity by opening only the bung portion of the container. You shall not open entire top portion of the container to transfer hazardous waste into or out of a container at any time.

III.B.3 For the treatment activities in containers other than the prohibited waste stabilization process defined in 40 CFR § 265.1081, you shall comply with the requirements specified in Section IV.B.(2).

III.B.4 You shall install all covers and closure devices for the container whenever a hazardous waste is in a container. You shall secure and maintain each closure device in the closed position except during filling and removal operations as specified in 40 CFR § 264.1086(d)(3).

III.B.5 You shall inspect the containers and their covers and closure devices in accordance with 40 CFR § 264.1086(d)(4)(i) and (ii). When a defect is detected for the container, cover, or closure devices, you shall repair the defect in accordance with 40 CFR § 264.1086(d)(4)(iii).

III.C REQUIREMENTS FOR LEVEL 1 TANKS

All 25 tanks specified above must comply with the Level 1 tank standards of 40 CFR § 264.1084(c) and the following Sections III.C.1 through III.C.5 requirements:

III.C.1 The maximum vapor pressure, as determined by 40 CFR § 264.1083(c)(2), must be less than 76.6 kilo-Pascal (kPa) for all 25 tanks specified above.

III.C.2 The hazardous waste in the tank cannot be heated to a temperature that is greater than the temperature at which the maximum organic vapor pressure is determined under Section III.C.1.

III.C.3 Each tank must be a fixed roof design complying with the following specifications:

(a) The tank closure devices must be designed and constructed to form a continuous barrier over the entire surface area of the hazardous waste in the tank. Gaskets used for closure devices or piping systems shall be of suitable materials compatible with the hazardous wastes and shall be in accordance with good engineering practices.

(b) The fixed roof shall be installed in a manner such that there are no visible cracks, holes, gaps, or other open spaces between roof section joints or between the interface of the roof edge and the tank wall.

(c) 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.

III.C.4 Whenever a hazardous waste is in the tank, all openings (e.g., manholes, instruments connections, pipe nozzles) must be securely closed to prevent releases of vapors into the atmosphere, except for routine inspections, and maintenance. (40 CFR § 264.1084(c)(3))

III.C.5 You must inspect the tanks, at least once per year, or retest the tanks to ascertain that the air emissions from the tank systems comply with the design and with the requirements specified in 40 CFR § 264.1084(c)(4).

III.C. 6 For the 18 tanks located in Areas #1, #2, and #5, you shall comply with the following requirement: Each opening in the fixed roof and any manifold system associated with the fixed roof shall be equipped with a closure device 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 opening and the closure device.

III.C.7 You shall control the air emissions from the tanks located in Area #4 in accordance with 40 CFR § 264.1084(c)(2)(iii)(B) by venting the tanks through closed vent systems to carbon adsorption system designed and operated to recover the organic vapors vented to them with an efficiency of 95 percent or greater by weight. If the carbon system is offline due to a power outage or maintenance, the vapor emission shall be routed through closed-vent system to the stand-by carbon adsorption unit to be controlled.

III.C.7.a 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.7.b You shall comply with the specification, monitoring, inspection, and repair requirement of the Carbon Adsorption units specified in Section IV.A.3.

III.C.7.c You shall comply with monitoring, inspection, and repair requirements for closed-vent system specified in Section IV.A.3.

SECTION IV – AIR EMISSION STANDARDS FOR FUEL BLENDING SYSTEM (MISCELLANEOUS UNIT) (40 CFR PART 264 SUBPART CC)

You shall control air pollutant emissions from the Fuel Blending system which includes the de-heading chamber, auger scrapping chamber, drum movement conveyers, container staging stations, hydropulper tank, and other ancillary areas and units located in Area #4. The station which holds containers with remained residues is also included in the Fuel Blending system. (The containers with remained residues may not be considered as RCRA-empty drums and should be regulated under the RCRA regulations for further

treatment.)

You are required to control emissions from the Fuel Blending system by complying either Section IV.A or IV.B(1), below.

IV.A CLOSED-VENT AND ENCLOSURE SYSTEM

The emissions shall be controlled through complying with 40 CFR §§ 264.1084(g) and (i). The emission control shall consist of: (1) an enclosure housing the Fuel Blending units 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.

IV.A.1 The design and operation of de-heading chamber, auger scraping chamber, and the conveyors shall be designed, operated and maintained in accordance with the operational specifications described in the Part B Permit Application, Sections 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.

IV.A.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:

IV.A.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.

IV.A.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 fuel blending system 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.

IV.A.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.

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

IV.A.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.

IV.A.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).

IV.A.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 Fuel Blending system is in operation, when hazardous waste is present in the enclosure room, when the de-heading chamber and/or auger scrapping chamber 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 de-heading chamber and/or auger scrapping chamber has been turned off until all vapors in the enclosure room including back-flow from the de-heading and/or scrapping has 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 chamber(s) 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.

IV.A.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).

IV.A.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.

IV.A.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.

IV.A.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).

IV.A.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 Fuel Blending system 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.

IV.A.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).

IV.A.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).

IV.B EMISSION CONTROL PLAN

You shall prepare an Emission Control Plan to describe the following information, as applicable, and such plan shall be submitted to EPA in accordance with the compliance scheduled specified in Section VII.

(1) You shall prepare a plan how to control emissions from the operation of the Fuel Blending system. The plan should address, but not be limited to, the following subjects:

(a) Control of emissions from any full or partly opened containers at the staging area before entering de-heading chamber;

(b) Control of emissions from de-heading chamber;

(c) Control of emissions from the temporarily covered containers in the conveyer in between de-heading and auger scraping chambers;

(d) Control of emissions from the containers completed the auger scrapping process but not determined as RCRA empty containers located in the staging or conveyer, which includes procedures how to determine RCRA-empty containers from the auger completed containers;

(e) Control of emissions from the auger scrapping chamber and hydropulper tank;

(f) Control of vapors in the enclosed room generated from the Fuel Blending system; and

(g) Control of any other emissions from the operation of the Fuel Blending system, including ancillary units and areas and other conveyers and staging areas.

If you choose to control emissions from the Fuel Blending system by complying Section IV.B(1), you shall inform EPA of your decision before the effective date of the permit and such plan shall be submitted in accordance with compliance schedule specified in Section VII.

(2) For the treatment process conducted in containers located in Areas #4 and #5 to prepare hazardous waste to be pumped into the tank, you shall include the following information in the Emission Control Plan:

(a) Types of treatment activities conducted in the containers, information of the containers (i.e., size and volume), and hazardous waste data (i.e., viscosity);

(b) An assessment whether the types of treatment activities would be categorized as "waste stabilization process" defined in 40 CFR § 265.1081;

(c) Amount of organic vapors generated from the treatment process and control efficiency of the existing venting and control unit; and

(d) Proposal of procedural or/and mechanical modifications and/or addition of venting and control unit(s) to minimize the generation and control of the generated organic vapors; and

(e) Any need of conducting "Procedure T – Criteria for and Verification of a Permanent or Temporary Total Enclosure" under 40 CFR § 52.741 to determine an adequacy of the venting of the vapors in the enclosure room to the closed vent and vapor control system, and any other proposals to minimize the exposure of the hazardous waste to the atmosphere to the extent practical.

(3) For the rotary vacuum process used as a means of separation/consolidation in Area #3 to collect solids by drawing liquids through a media filter, you shall describe in the Emission Control Plan how the organic vapors generated from the rotary vacuum process will be routed and controlled in the control device.

SECTION V – AIR EMISSION STANDARDS FOR COMPACTOR (MISCELLANEOUS UNIT) (40 CFR PART 264 SUBPART CC)

You are permitted by the state RCRA permit to operate a compactor unit. The compactor is located in the Area #5.

The Part B Permit Application indicates that the compactor unit is operated in a totally closed system not to emit any emissions to the outside. All of emissions generated from the compaction process of the containers containing hazardous waste are directly routed through the closed vent system to the carbon adsorption system to be treated.

You shall comply with the requirements specified in Section IV.A.3 for the closed vent system and carbon adsorption system of the compactor.

For any additional future installations and operations of the compactor, shredder unit(s), and/or any other miscellaneous unit(s), you shall submit an appropriate permit modification to this permit.

SECTION VI – RECORDKEEPING AND REPORTING REQUIREMENTS (40 CFR PART 264 SUBPART CC)

You shall comply with the following recordkeeping and reporting requirements for the containers, tanks, Fuel Blending system and compactor unit.

VI.A You must comply with the recordkeeping and reporting requirements in 40 CFR §§ 264.1089 and 264.1090 for the containers and tanks.

VI.B You must prepare and maintain records for the Fuel Blending system 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), as applicable. 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), as applicable.

VI.C You must prepare and maintain records for the compactor unit in the same manner as required for tanks under 40 CFR § 264.1089, including but not limited to 40 CFR §§ 264.1089(a) and 264.1089(e).

VI.D 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 Fuel Blending system and its ancillary equipment or in the enclosure room or compactor unit in noncompliance with the conditions specified in Sections IV and V of this permit, in the manner specified in 40 CFR § 264.1090(b).

SECTION VII – COMPLIANCE SCHEDULE

You shall submit a plan to control emissions from the operation of the Fuel Blending system, as required in Section IV.B, in accordance with the following schedule:

Submittal of Emission Control Plan:	Within 45 days of Effective Date of Final Permit
Submittal of Revised Emission Control Plan:	Within 45 days of your receipt of EPA's Review and Comment
Implementation of the Approved Emission Control Plan:	Within 45 days of your receipt of EPA's Approval of the Emission Control Plan

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

Chemtron Corporation
Avon, Ohio
OHD 066 060 609

	Title	Date	Prepared by
1.	Part B Renewal Application	June 6, 2013	Chemtron
2.	EJ Analysis	September 2013	U.S. EPA
3.	Part B Application (Revised)	April 11, 2014	Chemtron
4.	State RCRA Draft Permit	September 2014	OEPA
5.	Federal RCRA Draft Permit	September 2014	U.S. EPA
6.	email correspondences	2012-2014	Chemtron and U.S. EPA
7.	Final State Permit	January 2015	OEPA
8.	Response Summary	April 2015	U.S. EPA
9.	Final Federal Permit	April 2015	U.S. EPA

U.S. EPA: United States Environmental Protection Agency
EJ: Environmental Justice
OEPA: Ohio Environmental Protection Agency
RCRA: Resource Conservation Recovery Act

RESPONSE TO COMMENTS ON THE FEDERAL DRAFT PERMIT FOR
Chemtron Corporation
Avon, Ohio EPA ID# OHD 066 060 609

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 lasted from September 11 to October 27, 2014.

II. COMMENTS, RESPONSES, AND CHANGES

Chemtron Corporation (Chemtron) submitted the following comments during the public comment period. No comments from any other concerned citizens were received.

Each comment is taken directly from Chemtron's written comments.

1. **Comment**: The fifth paragraph of Section III of the permit states that "You indicated in the Part B Permit Application that all hazardous waste entering these tanks has an average volatile organic (VO) concentration greater than 500 parts per million by weight (ppmw) at the point of waste origination." Chemtron clarifies this statement by stating that these tanks have the potential to manage hazardous waste that has an VO concentration greater than 500 ppmw at the point of waste origin. Chemtron manages organic waste primarily in the Area 4 tanks (18, 19, 20, 22, 23 and 25). The tanks in Area 1 (1, 2, 3, 6, 7, 8, 13, 14, and 15) and the tanks in Area 2 (11, 12 and 24) are typically utilized for inorganic acid wastes, inorganic alkaline wastes, inorganic aqueous metal-bearing wastes, and lean waters. At any given time, there is only a potential that the tanks in Area 1 and 2 will manage hazardous waste that has an average VO concentration greater than 500 ppmw at the point of waste origin.

   Response: The fifth paragraph of Section III will be modified to read "The hazardous waste entering tanks in Areas 4 and 5 has an average VO concentration greater than 500 ppmw at the point of waste origination. At any given time, there is only a potential that the tanks in Area 1 and 2 will manage hazardous waste that has an average VO concentration greater than 500 ppmw at the point of waste origin." If, however, any of the tanks in Areas 1 and 2 ever contain hazardous waste with an average VO concentration exceeding 500 ppmw, then Subpart CC requirements may apply, according to the terms of the regulation.

2. **Comment**: Section II.A.3 of the permit contains a "Pressure Relief Devices in Gas/Vapor Services (40 CFR § 264.1054)". Chemtron seeks clarification whether this section should be included in the permit. The term "gas services" and "vapor services" are undefined terms. As you know, Chemtron manages liquid wastes in light service in many of its tanks, not gasses. These tanks have Pressure Relief Valves to control vapors from the liquids only. The vapors are suppressed in the Area 4 tanks by a nitrogen

blanket and the tanks are managed utilizing Level 1 controls which include a 76.5kPa cap on the vapor pressure of the wastes placed inside these tanks. Chemtron would appreciate feedback if 40 CFR §264.1054 would be applicable to these vapors. If it is not required, Chemtron requests that Section II.A.3 be stricken in its entirety.

Response: 40 CFR § 264.1031 defines "in gas/vapor service" as a piece of equipment that contains or contacts a hazardous waste stream in the gaseous state under operating conditions. Since you state that Chemtron doesn't store or process a hazardous waste in the gaseous state under operating conditions, the requirements of 40 CFR § 264.1054 do not apply to this facility. Consequently, Section II.A.3 will be deleted from the permit.

3. **Comments**: Section II.A.4 of the permit includes a "Sampling Connection Systems (40 CFR § 264.1055)". Chemtron does not utilize a Sampling Connection System. This section should be stricken in its entirety.

   Response: EPA agrees with this comment and Section II.A.4 (Sampling Connection System (40 CFR § 264.1055) will be deleted from the permit.

4. **Comment**: Section IV.B.(3) of the permit contains a requirement for the rotary vacuum. The proposed rotary vacuum process is to be utilized for the removal of solids from inorganic acid wastes, inorganic alkaline wastes, and inorganic aqueous metal-bearing wastes. It will not be used for wastes that contain an average volatile organic (VO) concentration greater than 500 parts per million by weight (ppmw) at the point of waste origin. Accordingly, Section IV.B.(3) should be stricken in its entirety.

   Response: The Part B application was not clear about whether your rotary vacuum processes solid hazardous waste with less than 500 ppmw at the point of waste origin. As requested by Section IV.B.(3), Chemtron should include rotary vacuum's operation process and its average VO concentration data of the hazardous waste in the Emission Control Plan.

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

APR 27 2015

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, Chemtron Corporation
Avon, Ohio, OHD 066 060 609

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

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

APR 27 2015

REPLY TO THE ATTENTION OF:

Reference Desk Librarian
Avon Public Library
37485 Harvest Avenue
Avon, Ohio 44011

Re: Final Federal RCRA Permit, Chemtron Corporation
Avon, Ohio, OHD 066 060 609

Dear Madam or Sir:

The U.S. Environmental Protection Agency intends to issue a final Hazardous Waste Management Permit to Chemtron Corporation of Avon, 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 Chronicle Telegram newspaper on September 11, 2014. A copy of the draft federal RCRA permit was available for review at the Lorain Public Library System, Avon Public Library, 37485 Harvest Avenue, Avon, Ohio 44011. The public comment period extended from September 11, 2014 to October 27, 2014.

Please make available for public examination this letter and the enclosed documents for at least seventy-five (75) days under "Reference Materials – Chemtron Corporation" The following items are enclosed.

-- Final Permit
-- Response Summary
-- Cover Letter

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

Sincerely,

Jae B. Lee, Permit Writer
RCRA Branch
Land and Chemicals Division

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