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

JUN 2 3 2014

Mr. John Hannah
Environmental, Health & Safety Manager
Veolia ES Technical Solutions, L.L.C.
4301 Infirmary Road
West Carrollton, Ohio 45449

REPLY TO THE ATTENTION OF:

Re: Final Federal RCRA Permit, Veolia ES Technical Solutions, L.L.C.
West Carrollton, Ohio, OHD 093 945 293

Dear Mr. Hannah:

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 "Dayton Daily News" and radio station "WHIO" on or about July 23, 2013. A copy of the draft Federal RCRA permit was available for review at the Dayton Metro – West Carrollton Branch, 300 East Central Avenue, West Carrollton, Ohio 45449. The public comment period extended from July 23 to September 6, 2013. A public hearing was conducted on August 22, 2013, 6:30 p.m. at the West Carrollton Municipal Building Community Room, 300 East Central Avenue, West Carrollton, Ohio 45449.

The comment received by U.S. Environmental Protection Agency on the draft Federal RCRA permit during the public comment period was submitted by Veolia ES Technical Solutions, L.L.C. No comments from any concerned citizens were received. EPA's Response Summary to comments is enclosed with this letter.

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

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.

This Federal permit is effective July 27, 2014 and valid until December 31, 2023, 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.

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: **Veolia ES Technical Solutions, L.L.C.**
4301 Infirmary Road
West Carrollton, Ohio 45449

Owner: **Veolia ES Technical Solutions, L.L.C.**
700 East Butterfield Road, Suite 201
Lombard, Illinois 60148

Operator: **Veolia ES Technical Solutions, L.L.C.**
700 East Butterfield Road, Suite 201
Lombard, Illinois 60148

U.S. EPA Identification Number: **OHD 093 945 293**

Effective Date: **July 27, 2014**

Expiration Date: **December 31, 2023**

Authorized Activities:

The United States Environmental Protection Agency hereby issues a Resource Conservation and Recovery Act permit (hereinafter referred to as "this permit") to Veolia ES Technical Solutions, L.L.C. (Owner and Operator hereinafter referred to as the "Permittee" or addressed in the second person as "you") in connection with the hazardous waste management operations at Veolia ES Technical Solutions, L.L.C., in West Carrollton, Ohio (the "facility").

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 process vents (40 CFR Part 264, Subpart AA); equipment leaks (40 CFR Part 264 Subpart BB); and tanks, containers, and miscellaneous units (40 CFR Part 264 Subpart CC).

This permit contains the applicable federal RCRA permit conditions for the facility. The Permittee also has a state RCRA permit which contains conditions issued by the State of Ohio's RCRA program authorized under 40 CFR Part 271. Any hazardous waste activity which requires a RCRA permit and is not included in either this permit or the state 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 regulations, including the air emission standards for process vents, equipment leaks and containers, EPA is issuing the RCRA permit requirements for operations at the Permittee's facility which fall under these regulations.

You must comply with all terms and conditions contained in this permit. This permit consists of all conditions contained herein; the documents attached hereto; all documents cross-referenced in these documents; approved submittals (including plans, schedules and other documents); applicable regulations in 40 CFR Parts 124, 260, 261, 262, 264, 268 and 270; and applicable provisions of RCRA.

This permit is based on the assumption that the information submitted: (1) in the Permittee's RCRA Part B Permit Application dated May 3, 2013, and all other modifications to that application (hereinafter referred to as the "Part B Permit Application") is accurate; and (2) that the facility is configured, operated and maintained as specified in the permit and as described 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 **July 27, 2014** and will remain in effect until **December 31, 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: 6/20/2014

Margaret M. Guerriero, Director
Land and Chemicals Division

OHD 093 945 293
Veolia ES Technical Solutions, L.L.C.

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SECTION I—STANDARD PERMIT CONDITIONS

I.A EFFECT OF PERMIT

This permit contains the applicable federal permit conditions for the facility. The Permittee also has a state RCRA permit. You are hereby allowed to manage hazardous waste at the facility in accordance with this permit. Under this permit, the storage and treatment of RCRA hazardous waste must comply with all terms and conditions in this permit. Other aspects of the storage and treatment of RCRA hazardous wastes are subject to the conditions in the state-issued 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 generally 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; or (4) are promulgated under 40 CFR Part 264 Subpart AA, BB or CC limiting air emissions. (40 CFR § 270.4)

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. Procedures 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

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, 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 approximately 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 Analysis Plan 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 are 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 of 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 have been constructed in compliance with the applicable conditions of this permit. In addition, you must not operate the permitted control devices until either (40 CFR § 270.30(l)(2)):

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 Within 15 days of the date of submission of the letter in I.E.12, the Permittee has not received notice from the Director of his or her intent to inspect, prior inspection is waived and the Permittee may commence, treatment, storage, or disposal of hazardous waste. (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 from 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 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 information (40 CFR § 270.30(l)(6)): (1) release of any hazardous waste that may endanger public drinking water supplies; (2) a 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. 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(1)(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 U.S. Environmental Protection Agency Region 5, RCRA Branch, at the following address:

RCRA Branch, LR-8J
Land and Chemicals Division
U.S. 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 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 §§ 266.102, 264.13, and 264.73 (as they apply to the equipment used to comply with this permit).

I.I.2 Notifications

If you receive hazardous waste(s) from off-site generator(s), 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 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 comply fully with the requirements contained in this permit. This permit does not include the requirements imposed by the Clean Air Act.

SECTION II -- AIR EMISSION STANDARDS FOR PROCESS VENTS (40 CFR PART 264 SUBPART AA)

II.A PROCESS VENTS

You must comply with all applicable requirements of 40 CFR Part 264 Subpart AA (Subpart AA), regarding air emission standards for process vents. You operate a pot still with a distillation column (Unit 1) and a wiped film evaporator with a distillation column (Unit 2). According to 40 CFR § 264.1030(b), all process vents associated with the operations from these two (2) units are subject to Subpart AA.

The Permittee must process a permit modification and have it approved by the Director prior to the installation and operation of any additional equipment subject to Subpart AA.

II.A.1 Emission Controls

You shall control the organic emissions from Unit 1 and Unit 2 using a closed vent vapor recovery system. The emissions from all process vents associated with these units shall be routed using a closed vent system to the Cryogenic Solvent Recovery System (CSRS) to control emissions of total organic compounds. A CSRS is a high-efficiency condensation system that operates at sub-zero temperatures to achieve high levels of emission reductions from a process gas stream. You shall operate the CSRS to reduce the concentration of total organic emissions from all affected process vents at the facility by 95 weight percent. (40 CFR § 264.1032(a)(2); 40 CFR § 264.1033(b))

II.A.2 CSRS Specifications and Requirements

II.A.2.a The CSRS operates by using ethanol as the condenser coolant that is chilled to an operating set-point as low as -130 degrees Fahrenheit (ºF) using liquid nitrogen. Process gases are pre-cooled in a gas recuperator before entering the primary low-temperature condenser. The low-temperature condenser is designed to achieve an outlet gas temperature of approximately -120 ºF equilibrium with the ethanol coolant outlet.

II.A.2.b The CSRS shall be designed to operate at a pressure below atmospheric pressure, with no detectable emissions.

II.A.2.c Unit 1 and Unit 2 shall not be operated unless the CSRS is in operation.

II.A.2.d A design evaluation of the CSRS concluded that the CSRS would meet a 95 percent removal efficiency if the Low Temperature Condenser outlet temperature is maintained at a temperature of -45 ºF. Therefore, you shall maintain the outlet temperature of the Low Temperature Condenser in production of the CSRS at -45 ºF. If the outlet temperature of the Low Temperature Condenser, monitored in accordance with Section **II.A.3**, is recorded above -45 ºF on a three-hour rolling average basis, you shall suspend the operations of Unit 1 and Unit 2. You shall investigate the cause of the temperature increase and the units shall not be restarted unless the cause of such increase is fully remediated.

II.A.3 Monitoring Procedures for CSRS

You shall monitor the CSRS to ensure proper operation and maintain it by implementing the following requirements. You shall maintain a record of the monitoring in accordance with 40 CFR § 264.1035.

II.A.3.a Install, calibrate, maintain, and operate according to the manufacturer's specifications a flow indicator that provides a record of vent stream flow from each affected process vent to the CSRS at least once every hour. The flow indicator sensor shall be installed in the vent stream at the nearest feasible point to the CSRS inlet but before the point at which the vent streams are combined. (40 CFR § 264.1033(f)(1))

II.A.3.b Install, calibrate, maintain, and operate according to the manufacturer's specifications a device to continuously monitor CSRS operation by using a temperature monitoring device with a continuous recorder, measuring inlet refrigerant temperature and the CSRS' Low Temperature Condenser outlet exhaust temperature with an accuracy of ±0.5 degrees Celsius (ºC) (±32.9 ºF). The temperature sensor shall be installed at a location in the exhaust vent stream from the CSRS' Low Temperature Condenser exit (i.e., product side). (40 CFR § 264.1033(f)(2)(vi)(B))

II.A.3.c Inspect the readings from each monitoring device required by Section II.A.3 at least once each operating day to check control device operation and, if necessary, immediately implement the corrective measures necessary to ensure the control device operates in compliance with the requirements of Section II.A.3. (40 CFR § 264.1033(f)(3))

II.A.4 Design Requirements for Closed-Vent System

You shall design the closed-vent system to ensure proper operation and maintain it by

implementing the following requirements. You shall maintain a record of the monitoring in accordance with 40 CFR § 264.1035.

II.A.4.a The closed-vent system shall be designed to operate with no detectable emissions, as indicated by an instrument reading of less than 500 parts per million by volume (ppmv) above background as determined by the procedure in 40 CFR § 264.1034(b) and by visual inspections; (40 CFR § 264.1033(k)(1)) or

II.A.4.b The closed-vent system shall be designed to operate at a pressure below atmospheric pressure. The closed-vent 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 when the CSRS is operating. (40 CFR § 264.1033(k)(2)) During regenerations of the molecular sieve, pressure of the closed-vent system may be above atmospheric due to nitrogen purging of the molecular sieve. When the closed-vent system operates above atmospheric pressure, you must comply with permit condition II.A.4.a. and demonstrate that the closed-vent system is operating with no detectable emissions, as indicated by an instrument reading of less than 500 ppmv above background as determined by the procedure in 40 CFR § 264.1034(b) and by visual inspections. (40 CFR § 264.1033(k)(2)). During these time periods, you shall comply with the monitoring and inspection requirements specified permit conditions II.A.5.a through d (40 CFR § 264.1033(l)(1)).

II.A.5 Monitoring and Inspection Requirements for Closed-Vent System

For the closed-vent system that is used to comply with the requirements specified in Section II.A.4.a, you shall inspect each closed-vent system to ensure proper operation and maintain it by implementing the following requirements. You shall maintain a record of the monitoring, inspections, and repair activities in accordance with 40 CFR § 264.1035.

II.A.5.a The Permittee shall conduct an initial leak detection monitoring of the closed-vent system on or before the date the system becomes subject to this section. The Permittee shall monitor the closed-vent system components and connections using the procedures specified in 40 CFR § 264.1034(b) to demonstrate that the closed-vent system operates with no detectable emissions, as indicated by an instrument reading of less than 500 ppmv above background. (40 CFR § 264.1033(l)(1)(i))

II.A.5.b After initial leak detection monitoring required by permit condition II.A.5.a. (40 C.F.R. § 264.1033(l)(i), the permittee shall inspect and monitor the closed-vent system as follows: Closed-vent system joints, seams, or other connections that are permanently or semi-permanently sealed (e.g., a welded joint between two sections of hard piping or a bolted and gasketed ducting flange) shall be visually inspected at least once per year to check for defects that could result in air pollutant emissions. You shall monitor a component or connection using the

procedures specified in 40 CFR § 264.1034(b) to demonstrate that it operates with no detectable emissions following any time the component is repaired or replaced (e.g., a section of damaged hard piping is replaced with new hard piping) or the connection is unsealed (e.g., a flange is unbolted).
(40 CFR § 264.1033(l)(1)(ii)(A))

II.A.5.c After initial leak detection monitoring required by permit condition II.A.5.a. (40 C.F.R. § 264.1033(l)(i), the permittee shall inspect and monitor the closed-vent system as follows: Closed-vent system components or connections other than those specified in Section II.A.5.b shall be monitored annually and at other times as requested by the Director, using the procedures specified in 40 CFR § 264.1034(b) to demonstrate that the components or connections operate with no detectable emissions. (40 CFR § 264.1033(l)(1)(ii)(B))

II.A.5.d In the event that a defect or leak is detected, you shall repair the defect or leak in accordance with the requirements of Section II.A.6. (40 CFR § 264.1033(l)(iii))

For the closed-vent system that is used to comply with the requirements specified in Section II.A.4.b, you shall inspect and monitor the closed-vent system in accordance with requirements specified in 40 CFR § 264.1033(l)(2). In the event that a defect or leak is detected, you shall repair the defect or leak in accordance with the requirements of Section II.A.6.

II.A.6 Repair Requirements for Closed-Vent System and CSRS

You shall repair all detected defects in the closed-vent system and CSRS by implementing the following requirements. You shall maintain a record of the repairs in accordance with 40 CFR § 264.1035.

II.A.6.a Detectable emissions, as indicated by visual inspection, or by an instrument reading greater than 500 ppmv above background, shall be controlled as soon as practicable, but not later than 15 calendar days after the emission is detected, except as provided for in Section II.A.6.c. (40 CFR § 264.1033(l)(3)(i))

II.A.6.b A first attempt at repair shall be made no later than 5 calendar days after the emission is detected. (40 CFR § 264.1033(l)(3)(ii))

II.A.6.c Delay of repair of the closed-vent system for which leaks have been detected is allowed if the repair is technically infeasible without a process unit shutdown, or if the owner or operator determines that emissions resulting from immediate repair would be greater than the fugitive emissions likely to result from delay of repair. Repair of such equipment shall be completed by the end of the next process unit shutdown. (40 CFR § 264.1033(l)(3)(iii))

II.B RECORDKEEPING REQUIREMENTS

In accordance with 40 CFR § 264.1035, you shall maintain up-to-date documentation of compliance with the process vent standards in 40 CFR §§ 264.1032 and 264.1033, including:

II.B.1 Information and data identifying all affected process vents, annual throughput and operating hours of each affected unit, estimated emission rates for each affected vent and for the overall facility (i.e., the total emissions for all affected vents at the facility), and the approximate location within the facility of each affected unit (e.g., identify the hazardous waste management units on a facility plot plan). (40 CFR § 264.1035(b)(2)(i))

II.B.2 Information and data supporting determinations of vent emissions and emission reductions achieved by add-on control devices based on engineering calculations or source tests. For the purpose of determining compliance, determinations of vent emissions and emission reductions must be made using operating parameter values (e.g., temperatures, flow rates, or vent stream organic compounds and concentrations) that represent the conditions that result in maximum organic emissions, such as when Unit 1 and Unit 2 are operating at the highest load or capacity level reasonably expected to occur. If you take any action (e.g., managing a waste of different composition or increasing operating hours of affected waste management units) that would result in an increase in total organic emissions from affected process vents at the facility, then a new determination is required. (40 CFR § 264.1035(b)(2)(ii))

II.B.3 You shall maintain up-to-date design documentation and monitoring, operating, and inspection information recorded for each closed-vent system and the CSRS, including all of the information required by 40 CFR § 264.1035(c). You shall maintain this information in accordance with the time period set forth in 40 C.F.R. § 264.1035(d).

II.C REPORTING REQUIREMENTS

You must comply with the reporting requirements of 40 CFR § 264.1036.

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

III.A EQUIPMENT LEAKS

III.A.1 Applicable Equipment

You must comply with all applicable requirements of 40 CFR Part 264 Subpart BB (Subpart BB), regarding air emission standards for equipment leaks. Subpart BB applies to equipment that contains or contacts hazardous waste with organic concentrations of at least 10 percent by weight that are managed in certain units as provided in 40 CFR § 264.1050(b). You shall clearly mark each piece of equipment to which Subpart BB

applies in such a manner that it can be distinguished readily from other pieces of equipment. (40 CFR § 264.1050(d))

The equipment subject to Subpart BB at your facility 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.

III.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: any pump that is (1) equipped with dual mechanical seal system and for which the requirements of 40 CFR § 264.1052(d) are satisfied; (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 for which the requirements of 40 CFR § 264.1052(e) are satisfied; or (3) equipped with a closed vent system complying with the requirements of 40 CFR § 264.1052(f). 40 CFR § 264.1052(a)(1).

III.A.2.b Each pump in light liquid service shall be checked by visual inspection each calendar week for seal leaks.

III.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. (40 CFR § 264.1052(b))

III.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 – Standards; Delay of Repair. The first attempt at repair must be made no later than 5 calendar days after each leak is detected. (40 CFR § 264.1052(c))

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

III.A.3.a Each pressure relief device in gas/vapor service shall be operated with no detectable emissions, as defined by 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. (40 CFR § 264.1054(a))

III.A.3.b After each pressure release, the pressure release device shall be returned to a condition of no detectable emissions, as indicated by an instrument reading of less than 500 ppm above background, as soon as practicable, but no later than 5 calendar days after each pressure release, except as provided in 40 CFR § 264.1059 – Standards: Delay of repair. (40 CFR § 264.1054(b)(1))

III.A.3.c No later than 5 calendar days after each pressure release, the pressure relief device shall be monitored to confirm the condition of no detectable emissions, as indicated by an instrument reading of less than 500 ppm above background, as measured by the method specified in 40 CFR § 264.1063(c). 40 CFR § 264.1054(b)(2))

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

Each sampling connection system, except *in-situ* sampling systems and sampling systems without purges, shall collect the sample purge for return to the process or for routing them to the appropriate treatment system, and shall be equipped with a closed-purge, closed-loop, or closed-vent system which meets one of the following requirements:

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

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

III.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.

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

III.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.

III.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.

III.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.

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

III.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), and 40 CFR §§ 264.1061 and 264.1062.

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

III.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, except as provided in 40 CFR § 264.1059 – Standards; Delay of Repair. When a leak is detected, it must be repaired as specified in 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, and must include the best practices specified in 40 CFR § 264.1057(e).

III.A.7 Pumps and Valves in Heavy Liquid Service, Pressure Relief Devices in Light Liquid or Heavy Liquid Service, and Flanges and Other Connectors (40 CFR § 264.1058)

III.A.7.a Pumps and valves in heavy liquid service, pressure relief devices in light liquid or heavy 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.

III.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.

III.A.7.c First attempts at repair include, but are not limited to, the best practices described under 40 CFR § 264.1057(e).

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

III.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 (in such cases, repair of this equipment shall occur before the end of the next 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.

III.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.

III.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.

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

III.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.

III.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 subject to 40 CFR § 264.1057 and Section III.A.6 within a hazardous waste management unit comply with an alternative standard that allows no greater than 2 percent of the valves to leak. If you elect to comply with this alternative standard, you must comply with the provisions of 40 CFR §§ 264.1061(b) and (c). If you decide to discontinue the election of the alternative standards, you must comply with the work practice standards in 40 CFR § 264.1057 and Section III.A.6, and you must notify the Director in writing that you will comply with the standards described in 40 CFR §§ 264.1057(a) through (e).

III.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 III.A.6 of this permit within a hazardous waste management unit to comply with one of the alternative work practices specified below.

III.A.11.a After two (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.

III.A.11.b After five (5) consecutive quarterly leak detection periods with the percentage of valves leaking equal to or less than two (2) percent, you may begin to skip three (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 two (2) percent, but you may elect to use the alternative standards after meeting the requirements of 40 CFR § 264.1057(c)(1).

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

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

III.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 IV – AIR EMISSION STANDARDS FOR TANKS, AND CONTAINERS AND MISCELLANEOUS UNITS (40 CFR PART 264 SUBPART CC))

You must comply with all applicable requirements of 40 CFR Part 264 Subpart CC (Subpart CC), regarding air emission standards for tanks and containers. 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 subject to your state RCRA permit, described below, include Level 1 and 2 containers and Level 1 tanks, and therefore must comply with the standards at 40 CFR § 264.1086(c), Container Level 1 standards, 40 CFR § 264.1086(d), Container Level 2 standards, and 40 CFR § 264.1084(c), Tank Level 1 standards.

The State RCRA permit allows you to store hazardous wastes in forty (40) tanks (East Tank Farm: TK-1001-1023; West Tank Farm: TK-2001 – 2008 and 2011-2016; Solvent Distillation Process Area: D-4214 and D-4217; and Drum Dispersion Unit Area: TK-6002). The total capacity of the hazardous waste tanks is 462,000 gallons. You also store hazardous waste in containers in two permitted storage areas. These areas include Decant Building and Drum Storage Building. The maximum capacity of the container storage areas is 158,400 gallons (or the equivalent of approximately 2,880 55-gallon drums of hazardous waste).

You shall not conduct a waste stabilization process, as defined at 40 CFR § 265.1081, in containers and tanks which contain hazardous waste.

IV.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:

IV.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))

IV.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).

IV.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).

IV.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:

IV.B.1 You shall receive and handle a container that meets one of the following requirements in accordance with Level 2 standards (40 CFR § 264.1086(d)(1):

IV.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);

IV.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

IV.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).

IV.B.2 You shall transfer hazardous waste into or out of a Level 2 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). For the transfer of solid hazardous waste from containers to the roll-off box, you shall prepare a plan how to minimize emissions from such transfer and such plan shall be submitted in accordance with compliance schedule specified in Section V. The plan shall include, but not be limited to, estimated total emissions from solid hazardous waste transfer, proposal of physical or chemical modification of the operation, proposal of the additions of the venting and control mechanisms, and any other proposals to minimize the exposure of the hazardous waste to the atmosphere to the extent practical.

IV.B.3 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).

IV.B.4 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).

IV.C LEVEL 1 TANK REQUIREMENTS

All hazardous waste tanks specified above must comply with the Level 1 tank standards of 40 CFR § 264.1084(c) and the following requirements:

IV.C.1 The maximum vapor pressure, as determined by 40 CFR § 264.1083(c)(2), must be less than 27.6 kilo-Pascal (kPa) for tanks TK-1020, TK-1021, TK-22, and TK-1023. The maximum vapor pressure, as determined by 40 CFR § 264.1083(c)(2), must be less than 76.6 kPa for other thirty-six (36) tanks.

IV.C.2 You shall determine the maximum organic vapor pressure for each hazardous waste placed in a tank in accordance with standards specified in Section **IV.C.1**. Whenever changes to the hazardous waste managed in the tank could potentially cause the maximum organic vapor pressure to increase to a level that is equal or greater than the maximum organic vapor pressure limit for the tank design capacity specified in Section **IV.C.1**, you shall perform a new determination of the maximum organic vapor pressure in the tank in accordance with 40 CFR § 264.1083(c)(2).

IV.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) 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.

(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.

IV.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, maintenance, and other approved activities. (40 CFR § 264.1084(c)(3))

IV.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).

IV.C.6 You must process a Class 1 permit modification and obtain approval from the Director if you plan to operate or to modify the tank systems to comply with Level 2 standards.

IV.C.7 You shall control the air emissions from the tanks located in East and West Tank Farms and Solvent Distillation Process Area in accordance with 40 CFR § 264.1084(c)(2)(iii)(B) by venting the tanks through closed vent systems to CSRS, which is designed and operated to minimize emissions with an efficiency of 95 percent or greater by weight. If the CSRS is offline due to a power outage or maintenance, emissions shall be routed through the closed-vent system to the carbon canister adsorption system.

You shall control the air emissions from TK-6002 (located in Drum Dispersion Unit Area) in accordance with 40 CFR § 264.1084(c)2)(iii)(B) by venting the tank through closed vent systems to the carbon canister adsorption system, which is designed and operated to minimize emissions with an efficiency of 95 percent or greater by weight.

IV.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 requirements specified in 40 CFR §§ 264.1084(g), (j), (k), and (l).

IV.C.7.b You shall comply with the specification, monitoring, inspection, and repair requirement of the CSRS specified in Section II.A.

IV.C.7.c You shall comply with the specification, monitoring, inspection, and repair requirement of the carbon canister adsorption system specified in Section IV.C.2.

IV.C.7.d You shall comply with monitoring, inspection, and repair requirements for closed-vent system specified in Sections II.A and IV.C.2.

IV.D MISCELLANEOUS UNIT (40 CFR PART 264 SUBPART X)

The Drum Dispersion Unit (DDU) within the Decant Building has the ability to crush 55-gallon and 85-gallon containers. You shall control emissions from the DDU, which includes air lock and crushing chambers, container staging stations, drum movement conveyer, hydropulper tank, a chute, collection hopper, and other ancillary units. DDU is designated as a miscellaneous unit regulated under 40 CFR Part 264, Subpart X, and is therefore subject to the requirements of 40 CFR Part 264, Subpart CC.

The Part B Permit Application indicates that the crushing activity is operated in a completely enclosed system. All emissions generated from the crushing process are directly routed through the closed-vent system to the carbon canister for treatment.

You shall control air pollutant emissions from the DDU to comply with 40 CFR § 264.601. The emission controls shall consist of: (1) air lock and crushing chambers; (2) a closed vent system, including an induced draft fan with a capacity to maintain a negative pressure inside the ductwork connecting the chambers to a control device; (3) a carbon canister adsorption system functioning as the control device; and (4) a chute that pushes crushed empty drums into a collection hopper."

IV.D.1 The design and operation of the DDU shall comply with the following requirements:

IV.D.1 a DDU shall be designed, operated and maintained in accordance with the operational specifications described in the Part B Permit Application, Section D, Process Description and Section L, Subpart AA, BB, and CC Controls. The gases, vapors, and fumes emitted from hazardous waste in the DDU must be vented by the closed vent system to the carbon canister adsorption system for treatment.

IV.D.2 The closed vent system and carbon canister adsorption system shall comply with the following requirements:

IV.D.2.a The closed vent system shall route the gases, vapors, and fumes emitted from hazardous waste in the DDU to the carbon canister adsorption system.

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

IV.D.2.c The closed vent system and carbon canister adsorption system shall be operated when hazardous waste is present in the chambers, when chambers are being loaded, when crushed drum is being ejected from the chamber, or when vapor from hazardous waste is present in the chambers. Negative pressure shall be maintained within the chambers and closed-vent system at all times when crushing activity is in operation, except when the chambers are undergoing the nitrogen purging process. You shall continue to operate the induced draft fan and closed vent system after waste is no longer present in the chambers and after crushing activity has been turned off until all of vapors in the chambers, including back-flow, from the air lock and crushing chambers have been vented into the vent duct and to the control device. You shall determine the necessary waiting time based on the induced draft fan capacity, volume of the chambers including vent duct for back-flow, and other pertinent data of the vapor. Such determination and end results of any calculation shall be documented in writing and retained at the facility.

IV.D.2.d The carbon canister adsorption system shall have a minimum removal efficiency of 95% in accordance with 40 CFR § 264.1087(c)(1)(i). You shall demonstrate that the carbon canister adsorption system achieves this performance standard as specified in 40 CFR §§ 264.1087(c)(5) and (c)(6).

IV.D.2.e The concentration level of the organic compounds in the exhaust vent stream from the carbon canister 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 canister 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 canister 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 manufacturers 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 canister 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.D.2.f All carbon that is removed from the carbon canister 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.

IV.D.2.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.D.2.h The vent system shall have an exhaust fan with a sufficient capacity to maintain a negative pressure in the closed-vent system. 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 crushing activity 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.D.2.i You shall inspect, monitor, and maintain the closed vent system in accordance with 40 CFR §§ 264.1087(b)(4), 1033(l), and 1087(c)(7). You shall inspect, monitor, and maintain the carbon canister adsorption system in accordance with the requirements in 40 CFR §§ 264.1084(b)(4) and 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.D.3 You shall repair each defect detected during an inspection performed in accordance with Section IV.C.2.i, according to requirements specified in 40 CFR § 264.1084(k) and 40 CFR § 264.1087(c)(7).

IV.E RECORDKEEPING AND REPORTING REQUIREMENTS

IV.E.1 For container storage areas and tanks, you must comply with all applicable recordkeeping and reporting requirements described in 40 CFR §§ 264.1089 and 264.1090.

IV.E.2 You must prepare and maintain records for DDU in the same manner as required for tanks under 40 CFR § 264.1089, including but not limited to 40 CFR § 264.1089(a), (b)(1) and (2)(iv). You must prepare and maintain records for the chamber, the closed vent system, and the carbon canister adsorption system described in Section IV in the manner described in 40 CFR § 264.1089, including 40 CFR §§ 264.1089(a), (b)(2)(iv), and (e).

IV.E.3 You must comply with all reporting requirements for the carbon canister adsorption system under 40 CFR § 264.1090(c) and (d). Such reports shall be sent to EPA (at the address specified in Section I.G). You must also report to EPA (at the address specified in Section I.G) each occurrence when hazardous waste is managed in DDU or in the chamber in noncompliance with the conditions specified in Section IV.D of this permit, in the manner specified in 40 CFR § 264.1090(b).

V. COMPLIANCE SCHEDULE

You must submit to EPA a plan to minimize exposure of the hazardous waste to the atmosphere while transferring solid hazardous waste from containers to the roll-off box, as required in Section IV.B.2, in accordance with the following schedule:

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

RESPONSE SUMMARY

RESPONSE TO COMMENTS ON THE FEDERAL DRAFT PERMIT FOR Veolia ES Technical Solutions, L.L.C. West Carrollton, Ohio OHD 093 945 293

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 July 23, 2013 to September 6, 2013. A public hearing was conducted jointly by U.S. Environmental Protection Agency and Ohio Environmental Protection Agency on August 22, 2013, 6:30 p.m. at the West Carrollton Municipal Building Community Room, 300 East Central Avenue, West Carrollton, Ohio 45449.

II. COMMENTS, RESPONSES, AND CHANGES

Veolia ES Technical Solutions, L.L.C. (Veolia) submitted the following comments during the public comment period. On March 17, 2014, after the close of the public comment period, Veolia provided additional information for and revisions to Comments 1, 2, 4, and 8, as described below. The additional information and revisions correct Veolia's findings of inaccuracies in its Part B Permit Application and led to Veolia's subsequent submittal of a Part B Permit Application Addendum dated March 17, 2014 (Part B Addendum). EPA has reviewed the revised comments and Part B Addendum and finds that they do not change Veolia's current operations or significantly alter the original comments submitted, but rather provide additional information and correct inaccuracies or include omitted information from Veolia's Part B permit application. For these reasons, EPA considers the revised comments and Part B Addendum as part of the administrative record for this permit.

Each comment is taken directly from Veolia's written comments. For Comments 1, 2, 4, and 8, Veolia's comments submitted during the public comment period are provided under "Original Comment" and the revised comments submitted on March 17, 2014 are provided under "Revised Comment."

1. **Comment: Section II.A.2.d**: **Original Comment**: The permit mentions "the outlet temperature". Veolia believes this should say the outlet of the production condenser. The CSRS outlet temperature will vary depending on gas flowrates and ambient conditions. The CSRS uses the gas leaving the condenser to cool the incoming gas and heat up the outgoing gas. So, the outlet gas will not be at or below -45 ◦F, but the production outlet will be below -45 ◦F.

   Revised Comment: The Cryogenic Solvent Recovery System (CSRS) is a dual phase unit that operates one side while the other side is in regeneration. As required in Veolia's Synthetic Minor air permit, the outlet temperature of the Low Temperature Condenser in operation must be continuously monitored. The outlet temperature of the Low Temperature Condenser in regeneration is not required to be monitored as no vapors are

passing through the unit. The monitoring point for Low Temperature Condenser E-5101 is temperature transmitter TT-5102 and the monitoring point for Low Temperature Condenser E-5201 is temperature transmitter TT-5202. Veolia respectfully requests the following revision to section II.A.2.d:

II.A.2.d *A design evaluation of the CSRS concluded that the CSRS would meet a 95 percent removal efficiency if the Low Temperature Condenser outlet temperature is maintained at a temperature of -45◦F. Therefore, you shall maintain the outlet temperature of the Low Temperature Condenser in production of the CSRS at -45◦F. If the outlet temperature of the Low Temperature Condenser, monitored in accordance with Section II.A.3, is recorded above -45◦F on a three-hour rolling average basis, you shall suspend the operations of Unit 1 and Unit 2. You shall investigate the cause of the temperature increase and the units shall not be restarted unless the cause of such increase is fully remediated.*

Response: The permit condition specified in Section II.A.2.d was based on the description of the CSRS in Veolia's Part B Permit Application. Section L of Veolia's Part B permit application, dated July 19, 2013, states that "Veolia conducts continuous monitoring on the outlet temperature of the cryogenic condenser." It further states that "the cryogenic condenser would meet a 95 percent efficiency if the outlet temperature was maintained at temperature of -45 ºF." However, Veolia submitted additional information about the CSRS in the Part B Addendum. The Addendum describes the CSRS as "a dual phase unit that operates one side while the other side is in regeneration." The Addendum further provides that a design evaluation conducted on the CSRS found that "the cryogenic condenser would meet a 95% efficiency if the outlet temperature of the Low Temperature Condenser (E-5101 or E-5201) in production is maintained at temperature of -45 ºF." Based on the information included in Veolia's Part B Addendum, Veolia would not be able to comply with the CSRS temperature limits in the permit as originally written. Therefore, to address the corrected information submitted by Veolia, EPA will modify the permit condition accordingly.

Change: II.A.2.d: "A design evaluation of the CSRS concluded that the CSRS would meet a 95 percent removal efficiency if the outlet temperature is maintained at a temperature of -45 ºF. Therefore, you shall maintain the outlet temperature of the CSRS at -45 ºF. If the outlet temperature of the CSRS, monitored in accordance with Section II.A.3, is recorded above -45 ºF on a three-hour rolling average basis, you shall suspend the operations of Unit 1 and Unit 2. You shall investigate the cause of the temperature increase and the units shall not be restarted unless the cause of such increase is fully remediated."

will be changed to:

"A design evaluation of the CSRS concluded that the CSRS would meet a 95 percent removal efficiency if the Low Temperature Condenser outlet temperature is maintained at a temperature of -45 ºF. Therefore, you shall maintain the outlet temperature of the Low Temperature Condenser in production of the CSRS at -45 ºF. If the outlet

temperature of the Low Temperature Condenser, monitored in accordance with Section II.A.3, is recorded above -45 ºF on a three-hour rolling average basis, you shall suspend the operations of Unit 1 and Unit 2. You shall investigate the cause of the temperature increase and the units shall not be restarted unless the cause of such increase is fully remediated."

2. **Comment: Section II.A.3.b: Original Comment:** Install, calibrate, maintain, and operate according to the manufacturer's specifications a device to continuously monitor CSRS operation by using a temperature monitoring device with a continuous recorder, measuring inlet refrigerant temperature and the CSRS outlet exhaust temperature with an accuracy of ±0.5 degrees Celsius (◦C). The temperature sensor shall be installed at a location in the exhaust vent stream from the CSRS exit (i.e., product side).

   Veolia maintains a Synthetic Minor air permit, permit# P0106686, issued by the Ohio EPA for the operations at the West Carrollton facility. The permit requires that Veolia comply with the monitoring and recording requirements of §63.1258(b)(iii) for the CSRS unit. Veolia respectfully requests that the same monitoring and recording keeping requirements be identified in the RCRA permit or defer to the Synthetic Minor air permit.

   In addition to the above comments, it is not clear what USEPA is requesting to be measured with the exhaust temperature. As mentioned in Comment 1, Veolia believes USEPA is requesting the outlet temperature of the production condenser as the CSRS outlet temperature will vary depending on gas flowrates and ambient conditions. The CSRS uses the gas leaving the condenser to cool the incoming gas and heat up the outgoing gas.

   Revised Comment: Section II.A.3.b: The CSRS outlet exhausts temperature of the Low Temperature Condenser in production is monitored in accordance with the manufacture's specifications. Veolia respectfully requests the condition II.A.3.b be amended to reflect the exhaust outlet monitoring after the Low Temperature Condenser. Veolia has provided a proposed revision to section II.A.3.b below:

   II.A.3.b *Install, calibrate, maintain, and operate according to the manufacturer's specifications a device to continuously monitor CSRS operation by using a temperature monitoring device with a continuous recorder, measuring inlet refrigerant temperature and the CSRS' Low Temperature Condenser outlet exhaust temperature with an accuracy of ±0.5 degrees Celsius (◦C). The temperature sensor shall be installed at a location in the exhaust vent stream from the CSRS' Low Temperature Condenser exit (i.e., product side).*

   Response: Permit Condition II.A.3.b was based on the description of the CSRS in Veolia's Part B Permit Application. Section L of Veolia's Part B permit application, dated July 19, 2013, states that "Veolia conducts continuous monitoring on the outlet temperature of the cryogenic condenser." However, Veolia submitted additional information about the CSRS in the Part B Addendum. The Addendum describes the CSRS as "a dual phase unit that operates one side while the other side is in regeneration."

The Addendum further provides that the outlet temperature of the Low temperature Condenser in operation must be continuously monitored. Based on the information included in Veolia's Part B Addendum, Veolia would not be able to comply with the CSRS monitoring requirements in the permit as originally written. Therefore, to address the corrected information submitted by Veolia, EPA will modify the permit condition accordingly.

Change: Section II.A.3.b: "Install, calibrate, maintain, and operate according to the manufacturer's specifications a device to continuously monitor CSRS operation by using a temperature monitoring device with a continuous recorder, measuring inlet refrigerant temperature and the CSRS outlet exhaust temperature with an accuracy of ±0.5 degrees Celsius (ºC). The temperature sensor shall be installed at a location in the exhaust vent stream from the CSRS exit (i.e., product side). (40 CFR § 264.1033(f)(2)(vi)(B))"

will be changed to:

"Install, calibrate, maintain, and operate according to the manufacturer's specifications a device to continuously monitor CSRS operation by using a temperature monitoring device with a continuous recorder, measuring inlet refrigerant temperature and the CSRS' Low Temperature Condenser outlet exhaust temperature with an accuracy of ±0.5 degrees Celsius (ºC). The temperature sensor shall be installed at a location in the exhaust vent stream from the CSRS' Low Temperature Condenser exit (i.e., product side). (40 CFR § 264.1033(f)(2)(vi)(B))"

In response to Veolia's comment that it should only be subject to the monitoring and recordkeeping requirements for the CSRS unit under Veolia's synthetic minor air permit, 40 CFR § 264.1030(e) provides that 40 CFR Part 264, Subpart AA does not apply to the process vents where the facility owner or operator certifies that all of the process vents that would otherwise be subject to Subpart AA are equipped with and operating air emission controls in accordance with the process vent requirements of an applicable CAA regulation codified under 40 CFR Part 60, Part 61, or Part 63. To request Subpart AA monitoring and recordkeeping requirements be removed from the RCRA permit, Veolia must submit a certification to EPA to demonstrate that the process vents meet the requirements under 40 CFR § 264.1030(e).

3. **Comment: Section II.A.4.b** states that "The closed-vent system shall be designed to operate at a pressure below atmospheric pressure."

   The CSRS has been designed to operate at a pressure below atmospheric pressure. Veolia does operate a Molecular Sieve that is not subject to the RCRA regulations, but it is subject to other air emission requirements. Due to this, the molecular sieve is connected to the CSRS to control any volatile organics. The molecular sieve is used to dry solvents. During the solvent drying process, the sieve beads in the molecular sieve unit will become saturated with water. When this occurs, the molecular sieve will start an automated regeneration process to dry the sieve beads. The regeneration process will use heat and nitrogen to drive off the water. During this regeneration process the

nitrogen is vented to the CSRS which can result in an above atmospheric pressure. Veolia respectfully requests this term be amended to read:

The closed-vent system shall be designed to operate at a pressure below atmospheric pressure. During regenerations of the molecular sieve, pressure may be above atmospheric due to nitrogen purging of the molecular sieve."

Response: Permit Condition II.A.4 and 40 CFR § 264.1033(k) require that Veolia's closed-vent system shall meet either of the following design requirements: (1) operate with no detectable emissions, as indicated by an instrument reading of less than 500 parts per million by volume (ppmv) above background determined by the procedure in 40 CFR § 264.1034(b) and by visual inspections; or (2) operate at a pressure below atmospheric pressure. Therefore, during any time when Veolia operates the closed-vent system above atmospheric pressure, including during the molecular sieve's regeneration period, Veolia must comply with 40 CFR § 264.1033(k)(1) (Permit Condition II.A.4.a). Veolia shall also comply with the monitoring and inspection requirements specified in 40 CFR § 264.1033(l)(1) (Permit Conditions II.A.5.a through II.A.5.d). After effective date of the permit and on or before the date that the closed-vent system is being operated above atmospheric pressure, Veolia shall conduct an initial leak detection motioning of the closed-vent system in accordance with 40 C.F.R. § 264.1033(l)(1)(i) (Permit Condition II.A.5.a). Thereafter, Veolia shall monitor the closed-vent system annually when the closed-vent system is operated above atmospheric pressure to demonstrate the closed-vent system operates with no detectable emissions in accordance with 40 C.F.R.§ 264.1033(l)(ii) (Permit Condition II.A.5.b-d). During all other periods of operation, Veolia shall comply with the monitoring requirements under 40 CFR § 264.1033(l)(2). EPA will modify the permit to clarify the compliance requirements for time periods when the CSRS may operate above atmospheric pressure.

Change: Section II.A.4.b: "The closed-vent system shall be designed to operate at a pressure below atmospheric pressure. The closed-vent 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 when the CSRS is operating. (40 CFR § 264.1033(k)(2))"

will be changed to:

"The closed-vent system shall be designed to operate at a pressure below atmospheric pressure. The closed-vent 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 when the CSRS is operating. (40 CFR § 264.1033(k)(2)) During regenerations of the molecular sieve, pressure of the closed-vent system may be above atmospheric due to nitrogen purging of the molecular sieve. When the closed-vent system operates above atmospheric pressure, you must comply with permit condition II.A.4.a. and demonstrate that the closed-vent system is operating with no detectable emissions, as indicated by an instrument reading of less than 500 ppmv above background as determined by the

procedure in 40 CFR § 264.1034(b) and by visual inspections. (40 CFR § 264.1033(k)(2)). During these time periods, you shall comply with the monitoring and inspection requirements specified permit conditions II.A.5.a through d (40 CFR § 264.1033(l)(1)).”

4. **Comment: Section II.B.2**: **Original Comment:** Veolia has two flow meters installed in the vent system. The flow meters are after the vacuum pumps for each process unit. The exhaust gas from the vacuum pumps will likely make it look like non-condensables are being sent to the CSRS unit, which would not be the case. Since the CSRS unit is final emissions control unit after each process unit’s final condenser, the use of the flow meters is not relevant. The point of monitoring compliance should be the CSRS unit.

   Revised Comment: Veolia misread section II.B.2. At this time, Veolia respectfully withdraws Comment 4. As required under this permit condition, Veolia will monitor the vent exhaust temperature of the Low Temperature Condenser instead of monitoring the flow rates or vent stream organic compounds.

   Response: No response is necessary for this comment.

5. **Comment: Section III.C** states that “You must comply with the recordkeeping and reporting requirements of 40 CFR §§ 264.1064 and 264.1065”

   Veolia maintains a Synthetic Minor air permit, permit# P0106686, issued by the Ohio EPA for the operations at the West Carrollton facility. The permit requires that Veolia comply with the monitoring and recording requirements of §61.246 and 247 for all applicable equipment. As the monitoring and recordkeeping rules are duplicative, Veolia respectfully requests that this condition be modified to allow for compliance under § 61.246 and 247.

   Response: 40 CFR § 264.1064(m) provides that the owner or operator of a facility with equipment that is subject to 40 CFR Part 264, Subpart BB and to regulations at 40 CFR Part 60, Part 61, or Part 63 may elect to determine compliance with Subpart BB either by documentation pursuant to 40 CFR § 264.1064 or by documentation of compliance with the regulations at 40 CFR Part 60, Part 61, or Part 63 pursuant to the regulations at 40 CFR Part 60, Part 61, or Part 63. If Veolia elects to comply with Subpart BB regulations by documenting compliance with the applicable CAA regulations, Veolia should submit such a request with relevant and adequate documentation for EPA review and approval.

6. **Comment: Section IV.B.2** states that “For the transfer of solid hazardous waste from containers to the roll-off box, you shall prepare a plan how to minimize emissions from such transfer and such plan shall be submitted in accordance with compliance schedule specified in Section V. The plan shall include, but not be limited to, estimated total emissions from solid hazardous waste transfer, proposal of physical or chemical modification of the operation, proposal of additions of the venting and control mechanisms, and any other proposals to minimize exposure of the hazardous waste to the atmosphere to the extent practical.”

Veolia consolidates solid hazardous waste material in a consistent manner as other Treatment Storage and Disposal Facilities (TSDF) around the country. Veolia will only open the Level 1 containers in accordance with §264.1086(c)(3)(ii). Once the Level 1 container is empty, it is no longer subject to the closure requirements of §264.1086(c)(3). The contents of the containers will be consolidated into a roll-off (e.g. Level 2 container). Once the roll-off is full or no further processing will occur within 15 minutes, the roll-off is covered as required in §264.1086(d)(3). Veolia does not agree with the need for a compliance schedule for the solid hazardous waste consolidations.

Response: 40 CFR § 264.1086(d)(2) requires Veolia to conduct transfer activity in Level 2 containers in such a manner as to minimize exposure of the hazardous waste to the atmosphere to the extent practical and provides specific container loading procedures that would meet this requirement. Veolia's Part B Permit Application provides that portions of containers received at the facility contain some solid hazardous waste that cannot be processed in the drum dispersion unit (DDU). These containers may be mechanically tipped to facilitate transfer of solid hazardous waste to other containers. This repacking of solid hazardous waste is conducted in a designated area of the containerized waste storage building. During a site visit conducted on June 27, 2013, a representative of EPA observed the repacking activities described above. Veolia consolidates solid hazardous waste by removing the entire top portion of a container, lifting the container into the hopper, manually scraping the content of the container and hopper, and dumping the solid hazardous waste into a 40-yard roll-off box. Veolia then covers the roll-off box with a plastic sheet. These activities occur in a room with one side open and without any emission collection or control. Emissions are generated from the opened containers and hopper during the lifting and scraping process and from the roll-off box which contains solid hazardous waste and is covered only with a plastic sheet. Veolia must modify its current practice operationally and structurally to control emissions generated from these units in accordance with 40 CFR § 1086(d)(2) through the development and implementation of a plan approved by EPA under the permit.

7. **Comment: Section IV.C.2** states that "You shall determine the maximum organic vapor pressure for each hazardous waste placed in a tank in accordance with standards specified in Section IV.B.1."

   Section IV.B.1 appears to be a misprint. Section IV.B.1 is for the handling of Level 2 containers and not calculating vapor pressure. Should "Section IV.B.1" be "Section IV.C.1"?

   Response: The reference to Section IV.B.1. is a misprint and EPA will modify the permit to reference the correct permit condition.

   Change: Section IV.C.2: "You shall determine the maximum organic ……specified in Section **IV.B.1**. Whenever changes to the hazardous ……in Section **IV.B.1**, you shall perform ……."

will be changed to:

"You shall determine the maximum organic ……specified in Section IV.C.1. Whenever changes to the hazardous ……in Section IV.C.1, you shall perform ……."

8. **Comment: Section IV.D: Original Comment:** The current design and operation as described in the Part B application is not represented with the terms and conditions that USEPA has described in this section.

   The current unit is operated with a nitrogen purge to drop the oxygen level in the chambers to less than 5%. All the vapors displaced by this process are routed to the carbon absorption unit. The entry chamber door only opens when the crushing chamber door is closed and the oxygen level drops to less than 5%. The process of purging the various chambers pushes the organic vapors to the carbon adsorption canister. The unit is not operated with an exhaust fan.

   Revised Comment: The DDU operates under a positive pressure while nitrogen purging is occurring. The vapors from the air lock chamber, crushing chamber, drum chute and drum hopper are routed to a carbon canister. The carbon canister is operated with an induced draft fan to pull vapors through the carbon canister. Veolia will provide an addendum to Section L of the Part B application that will better describe the operation of the DDU.

   Response: The chambers of the DDU operate under positive pressure while nitrogen purging is occurring. Nitrogen is used to lower the oxygen level in the chambers to prevent a potential fire hazard. However, as stated in Veolia's Part B Addendum, the closed-vent system operates under negative pressure when the induced draft fan located in the carbon canister is operational. EPA will modify this condition to include the additional information contained in the Part B Addendum.

   Change: Section IV.D, third paragraph: "You shall control air pollutant emissions from the DDU to comply with 40 CFR § 264.601. The emission controls shall consist of: (1) a chamber housing the DDU and crushing chamber; (2) a closed vent system, including an exhaust fan with a capacity to maintain a negative pressure inside the enclosure and ductwork connecting the chamber to a control device; (3) a carbon canister adsorption system functioning as the control device; and (4) a chute that pushes crushed empty drums into a collection hopper."

   will be changed to:

   "You shall control air pollutant emissions from the DDU to comply with 40 CFR § 264.601. The emission controls shall consist of: (1) air lock and crushing chambers; (2) a closed vent system, including an induced draft fan with a capacity to maintain a negative pressure inside the ductwork connecting the chambers to a control device; (3) a carbon canister adsorption system functioning as the control device; and (4) a chute that pushes crushed empty drums into a collection hopper."

9. **Comment: Section IV.D:** It is not clear what USEPA is referring to with "The emission controls shall consist of: (1) a chamber housing the DDU and crushing chamber"

   Veolia believes that USEPA is stating that the "Chamber Housing" would be the metal chamber that encloses the crushing chamber and DDU as being Item 1 of the emission controls and not the entire room that encompasses the Subpart X unit.

   Response: EPA acknowledges that the term "a chamber housing DDU and crushing chamber" is misleading because the DDU includes air lock and crushing chambers. Because the crushing activity occurs in a closed chamber and the emissions are routed through the closed-vent system to a control unit, the room which contains the DDU is not considered part of the unit in which the emissions are to be controlled. EPA will modify the permit to clarify the description of the DDU.

   Change: Section IV.D "The Drum Dispersion Unit (DDU) within the Decant Building has the ability to crush 55-gallon and 85-gallon containers. DDU is designated as a miscellaneous unit regulated under 40 CFR Part 264, Subpart X, and is therefore subject to the requirements of 40 CFR Part 264, Subpart CC.

   You shall control air pollutant emissions from the DDU to comply with 40 CFR § 264.601. The emission controls shall consist of: (1) a chamber housing the DDU and crushing chamber; (2) a closed vent system and a duct connecting the chamber to a control device; (3) a carbon canister adsorption system functioning as the control device; and (4) a chute that pushes crushed empty drums into a collection hopper."

   will be changed to:

   "The Drum Dispersion Unit (DDU) within the Decant Building has the ability to crush 55-gallon and 85-gallon containers. You shall control emissions from the DDU, which includes air lock and crushing chambers, container staging stations, drum movement conveyer, hydropulper tank, a chute, collection hopper, and other ancillary units. DDU is designated as a miscellaneous unit regulated under 40 CFR Part 264, Subpart X, and is therefore subject to the requirements of 40 CFR Part 264, Subpart CC.

   The Part B Permit Application indicates that the crushing activity is operated in a completely enclosed system. All emissions generated from the crushing process are directly routed through the closed-vent system to the carbon canister for treatment.

   You shall control air pollutant emissions from the DDU to comply with 40 CFR § 264.601. The emission controls shall consist of: (1) air lock and crushing chambers; (2) a closed vent system, including an induced draft fan with a capacity to maintain a negative pressure inside the ductwork connecting the chambers to a control device; (3) a carbon canister adsorption system functioning as the control device; and (4) a chute that pushes crushed empty drums into a collection hopper."

10. Comment: Section IV.D states that **"**(4) a chute that pushes crushed empty drums into a collection hopper."

Veolia views the emission control for item 4 to end where the drum exits the chute. If USEPA looks at the emission control going beyond the point where the drum exits the chute, Veolia will need to install additional duct work, exhaust fan, and carbon adsorption units.

Response: Containers from which hazardous waste has been removed are not subject to regulation under RCRA Subtitle C, provided they meet certain standards in order to be considered legally "empty," often called "RCRA empty". 40 CFR § 261.7(b)(1) contains the requirements for a container to be considered "RCRA-empty." Because Veolia's Part B Permit Application specifies that the drums in the hopper are "RCRA empty" drums, the hopper is not subject to regulation as part of the DDU. However, because the chute is connected to the drum crushing chamber, the chute is subject to Subpart CC regulations and any emissions in the chute must be routed to the control device through the closed vent system.

11. Comment: Section IV.D.1 states that "The design and operation of DDU, the duck conveyors, and the compactor shall comply with the following requirements;"

Should the word "duck conveyors" be "duct conveyors"? Veolia is unsure what USEPA is referring to with design and operation of the "duct conveyors".

Response: The reference to "duck conveyors" is a misprint of "duct conveyors." As explained in the response to Comment 9, the permit will be modified to include a more accurate description of the DDU. DDU is defined in the beginning of **Section IV.D** as a unit which includes air lock and crushing chambers, container staging stations, drum movement conveyer, hydropulper tank, a chute, collection hopper, and other ancillary units. Therefore, the term "DDU, the duct conveyers, and compactor" will be replaced with "DDU". The term "DDU chamber" also will be replaced with "DDU".

Change: Section IV.D.1: "The design and operation of DDU, the duck conveyors, and the compactor shall comply with the following requirements:"

will be changed to:

"The design and operation of the DDU shall comply with the following requirements:"

12. Comment: Section IVD.2.c: As discussed in Comment 8, the Part B Application describes the operation of this Subpart X Unit. The unit does not operate under a negative pressure. It however uses a nitrogen purge to move the vapors to the carbon adsorption unit. The unit is not equipped with an exhaust fan.

Response: The revised comments and Part B Permit Application Addendum indicate that the carbon canister system has an induced draft fan that pulls vapors present in the

chambers through the system for treatment. When the draft fan is in operation, the closed-vent system and chambers operate under negative pressure. However, the chambers operate under positive pressure when the nitrogen purging process is activated. Therefore, Veolia must maintain negative pressure in the chambers and closed-vent system in order to vent vapors to the carbon canister system. During the nitrogen purging process, Veolia may operate the chambers under positive pressure. EPA will modify the permit condition to address this issue.

Change: Section IV.D.2.c: " . . . Negative pressure shall be maintained within the chamber at all times when DDU is in operation. You shall continue to operate the exhaust fan and closed vent system after waste is no longer present in the chamber and after DDU has been turned off until all of vapors in the chamber, including back-flow, from the crushing chamber 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, volume of the enclosure room including vent duct and compactor for back-flow, and other pertinent data of the vapor. Such determination and end results of any calculation shall be documented in writing and retained at the facility."

will be changed to:

"**. . .** Negative pressure shall be maintained within the chambers and closed-vent system at all times when crushing activity is in operation, except when the chambers are undergoing the nitrogen purging process. You shall continue to operate the induced draft fan and closed vent system after waste is no longer present in the chambers and after crushing activity has been turned off until all of vapors in the chambers, including back-flow, from the air lock and crushing chambers have been vented into the vent duct and to the control device. You shall determine the necessary waiting time based on the induced draft fan capacity, volume of the chambers including vent duct for back-flow, and other pertinent data of the vapor. Such determination and end results of any calculation shall be documented in writing and retained at the facility."

13. **Comment: Section IV.D.2.h** states that "The vent system shall have an exhaust fan with a sufficient capacity to maintain a negative pressure inside enclosure room."

Veolia believes USEPA may be referring to the "Chamber Housing" instead of the "Enclosure Room". As discussed in Comment 9, the Veolia views the chamber housing as the metal chamber that encloses the crushing chamber and DDU.

Response: As discussed in response to Comment 9, EPA will modify the permit accordingly.

Change: Section **IV.D.2.h "**The vent system shall have an exhaust fan with a sufficient capacity to maintain a negative pressure inside 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 DDU 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."

will be changed to:

"The vent system shall have an exhaust fan with a sufficient capacity to maintain a negative pressure in the closed-vent system. 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 crushing activity 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."

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

Veolia ES Technical Solutions, L.L.C.
West Carrollton, Ohio
OHD 093 945 293

	Title	Date	Prepared by
1.	Part A Application	May 3, 2013	Veolia
2.	Part B Permit Application	May 3, 2013	Veolia
3.	EJ Information	May 2013	EPA
4.	Subparts AA/BB/CC Information (Section L of Part B Application)	June 12, 2013	Veolia
5.	Site Visit Observation Notes	June 27, 2013	EPA
6.	Revised Section A, B, and D of Part B Application	July 18, 2013	Veolia
7.	Subparts AA/BB/CC Information (Updated Section L of Part B Application)	July 19, 2013	Veolia
8.	Fact Sheet	July 22, 2013	OEPA/EPA
9	Draft RCRA Permit (EPA)	July 22, 2013	EPA
10.	Comments on Draft Permit	September 5, 2013	Veolia
11.	RCRA Final Permit (State)	December 31, 2013	OEPA
12.	Part B Application Addendum	March 17, 2014	Veolia
13.	Revised Draft Federal Permit Comments	March 17, 2014	Veolia
14.	Response Summary	June 2014	EPA
15.	Final RCRA Permit	June 2014	EPA

EPA: United States Environmental Protection Agency
OEPA: Ohio Environmental Protection Agency
RCRA: Resource Conservation Recovery Act
EJ: Environmental Justice
Subpart AA: Air Emission Standards for Process Vents
Subpart BB: Air Emission Standards for Equipment Leaks
Subpart CC: Air Emission Standards for Tanks and Containers

July 2013

Draft Hazardous Waste Permit Renewal

Facility Name: Veolia ES Technical Solutions, L.L.C.

U.S. EPA I.D.: OHD093945293

Location:
4301 Infirmary Road
West Carrollton, OH 45449

Facility Owner:
Veolia ES Technical Solutions, L.L.C.
700 East Butterfield Road, Suite 201
Lombard, IL 60148

Facility Operator:
Veolia ES Technical Solutions, L.L.C.
P.O. Box 453
West Carrollton, OH 45449

Activity:
Permit renewal for storage and treatment of hazardous waste.

Comment Period:
[Beginning Date – Ending Date]

Submit Comments to:
Ohio EPA
Shawn Sellers
Division of Materials and Waste Management

P.O. Box 1049
Columbus, Ohio 43216-1049
(614) 644-2621
shawn.sellers@epa.ohio.gov

U.S. EPA, Region 5
Jae Lee
RCRA Branch (LR-8J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590
1-800-621-8431 ext. 63781
lee.jae@epa.gov

What is the history of the hazardous waste program?

The Resource Conservation and Recovery Act (RCRA), an amendment to the Solid Waste Disposal Act, was passed in 1976. The main reason for the amendment was to address the growing volume of municipal and industrial solid waste generated across the United States. A few goals established by RCRA include the protection of human health and the environment from potential hazards of waste disposal, to reduce the amount of waste generated and to ensure that waste produced are managed in an environmentally sound manner.

When RCRA was written, U.S. Congress' intent for the states was to assume primary responsibility for implementing the hazardous waste regulations with oversight from the United States Environmental Protection Agency (U.S. EPA). U.S. EPA must approve each state as an authorized state. To become an authorized state, each must demonstrate that the state programs are at least equivalent to and consistent with federal laws, provides adequate enforcement authority and provides availability of information similar to the federal program. Since 1989, the State of Ohio has been an authorized state by U.S. EPA for the majority of the hazardous waste program.

Currently, the State of Ohio is not authorized by U.S. EPA to issue a permit for organic air emissions (40 CFR Part 264, Subparts BB and CC) from hazardous waste storage units. U.S. EPA has drafted a RCRA permit to address organic air emissions from hazardous waste storage units. U.S. EPA's draft permit and the State of Ohio's draft permit have been issued concurrently and both share the same comment period.

How can I become more involved?

Public meeting has been pre-scheduled.

A public meeting will be held to receive comments on August 22, 2013 at 6:30 p.m. at the West Carrollton Municipal Building Community Room, 300 E. Central Ave., West Carrollton, OH. 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 left.

The comment period begins on [date begins], and ends on [date ends]. A copy of the permit application and the draft permit is available for review by the public at the following locations:

Ohio EPA, Southwest District Office
401 East 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) 644-2621

A copy of the draft permit is available for review by the public online at the following locations:

The Ohio draft permit is available for review by the public online under the "Stakeholder Input" tab at: ***epa.ohio.gov/dmwm/***.

Dayton Metro Library
West Carrolton Branch
300 E. Central Ave.
West Carrollton, OH 45449

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

Within sixty (60) days of 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 Ohio Revised Code (ORC). If Ohio EPA approves the application, taking into account public comments, a renewal permit will be issued with terms and conditions as are necessary to ensure compliance with hazardous waste rules.

What does the facility do?

Veolia ES Technical Solutions, L.L.C. is a permitted hazardous waste storage and treatment facility located in West Carrollton, Ohio. No hazardous waste disposal takes place on site. All waste that comes into the facility is either treated or repackaged and sent off-site to a final disposal or recycling destination.

What would this hazardous waste permit allow the facility to do?

This permit allows Veolia ES Technical Solutions, L.L.C. to store up to 158,400 gallons of containerized hazardous waste in two container storage areas – the Drum Storage Building and the Decant Building.

Additionally, the facility is authorized to store and treat a total volume of 462,000 gallons of hazardous waste in 40 tanks. Treatment activities allowed would be decanting, distillation and fuel blending. Tanks are located in four areas at the facility: the East Tank Farm, the West Tank Farm, the Solvent Distillation Process Area and the Decant Building.

What is the regulatory basis to support this permit renewal?

The Director has determined that Veolia ES Technical Solutions, L.L.C. has submitted an application for renewal one hundred eighty (180) days prior to the expiration date of its present permit which was issued by Ohio EPA on September 30, 2013. The Director has considered the application, inspection reports, a report regarding the facility's compliance with the present permit, and the rules adopted under ORC Section 3734. 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.

Who can I contact for more information?

For additional information, please contact Thomas Koch at (937) 285-6594 or Jae Lee of the U.S. EPA Regional Office in Chicago, Illinois at (312) 886-3781.

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

JUN 23 2014

REPLY TO THE ATTENTION OF:

Reference Desk Librarian
West Carrollton-Dayton Metro Library
300 East Central Avenue
West Carrollton, Ohio 45449

Re: Final Federal RCRA, Veolia ES Technical Solutions, L.L.C.
West Carrollton, Ohio, OHD 093 945 293

Dear Madam or Sir:

The U.S. Environmental Protection Agency intends to issue a final Hazardous Waste Management permit to Veolia ES Technical Solutions, L.L.C., West Carrollton, Ohio.

The draft federal RCRA permit was publicly noticed in the Dayton Daily News and radio station WHIO (am) on July 25, 2013. A copy of the draft federal RCRA permit was available for review at the West Carrollton-Dayton Metro Library, 300 East Central Avenue, West Carrollton, Ohio 45449. The public comment period extended from July 25 to September 6, 2013. A public hearing was conducted on August 22, 2013, 6:30 p.m. at the West Carrollton Municipal Building Community Room, 300 East Central Avenue, West Carrollton, Ohio 45449.

Please make available for public examination this letter and the enclosed documents for at least seventy-five (75) days under "Reference Materials – Veolia ES Technical Solutions, L.L.C.". The following items are enclosed.

-- Final Permit
-- Responsive 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 Branch
Land and Chemicals Division

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

JUN 2 3 2014

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, Veolia ES Technical Solutions, L.L.C.
West Carrollton, Ohio, OHD 093 945 293

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,

for James Blanchard

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

Enclosure