



April 2014

Draft Hazardous Waste Permit Renewal

Facility Name: Systech Environmental Corporation

U.S. EPA I.D.: OHD 005 048 947

Location:

11397 County Road 176 Paulding, Ohio 45879

Facility Owner:

Systech Environmental Corporation 3085 Woodman Drive, Suite 300 Dayton, Ohio 45420

Facility Operator:

Systech Environmental Corporation 3085 Woodman Drive, Suite 300 Dayton, Ohio 45420

Activity:

Permit renewal for the storage and treatment of organic liquids in tanks and containers and for the completion of corrective actions at the facility.

Comment Period:

April 30, 2014 to June 16, 2014

Submit Comments to:

Ohio EPA
John Nyers
Division of Materials and Waste Management
P.O. Box 1049
Columbus, Ohio 43216-1049
(614) 644-2621
john.nyers@epa.ohio.gov

U.S. EPA, Region 5
Jae Lee
RCRA/TSCA Programs Section, LR-8J
77 West Jackson Boulevard
Chicago, Illinois 60604-3590
lee.jae@epa.gov

Ohio Environmental Protection Agency and U.S. Environmental Protection Agency are issuing a joint (State and Federal portions) Hazardous Waste Permit to Systech Environmental Corporation.

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: to protect human health and the environment from potential hazards of waste disposal, to reduce the amount of waste generated and to ensure that wastes produced are managed in an environmentally sound manner.

When RCRA was written, U.S. Congress' intent was for the states 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 program is 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.

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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?

All persons, including the applicant, may submit written comments relating to this draft action. Written comments or requests for a public meeting may be submitted before the end of the comment period to the address in the box on the front page.

The comment period begins on April 30, 2014, and ends on June 16, 2014. Copies of the permit application and the draft permit are available for review by the public at the following locations:

Ohio EPA, Northwest District Office 347 North Dunbridge Road Bowling Green, Ohio 43402 (419) 352-8461

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

U.S. EPA, Region 5 RCRA Branch, LR-8J 77 West Jackson Boulevard Chicago, Illinois 60604-3590 (312) 886-3781 Copies of the Ohio draft permit and the federal draft permit are available for review by the public at:

Paulding County Carnegie Library 205 S. Main Street Paulding, OH 45879 (419) 399-2032

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/.

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?

Systech Environmental Corporation is a hazardous waste storage and treatment facility. The primary components of the facility are the analytical laboratory, the storage and processing tank systems, and the container storage and processing areas. Waste materials are analyzed, unloaded, temporarily stored, and processed so that they can be safely used as a fuel for cement kilns in the adjacent Lafarge facility. The primary storage components at the facility are large above ground storage tanks (ASTs) and a container storage area.

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

This permit allows Systech Environmental Corporation to accept, store and treat up to 138,150 metric tons of hazardous waste in 1 calendar year. The hazardous waste can be treated and stored in containers and/or tanks. Waste accepted at the facility is analyzed to ensure it contains the characteristics necessary to be used as a fuel. Once accepted, the waste is blended with other compatable wastes to make a target fuel blend. The fuel is then pumped to burn tanks where it is then used as fuel for the adjacent Lafarge facility cement kilns. Additional details regarding more specific waste handling and treatment restrictions, such as daily/location specific limits, can be found in the permit.

Additionally, the permit authorizes Systech to complete corrective measures as outlined in Section E of the permit.

What is the regulatory basis to support this permit renewal?

The Director of Ohio EPA has determined that Systech Environmental Corporation 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 August 8, 2003. 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 Brent Goetz, Ohio EPA, Northwest District Office at (419) 373-4114 or Jae Lee of the U.S. EPA Regional Office in Chicago, Illinois at (800) 621-8431 ext. 63781.

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