

FINAL
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5

RESOURCE CONSERVATION AND RECOVERY ACT PERMIT

Facility Name and Location: **Systech Environmental Corporation**
11397 County Road 176
Paulding, Ohio 45879

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

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

U.S. EPA Identification Number: **OHD 005 048 947**

Effective Date: **July 20, 2007**

Expiration Date: **August 8, 2013**

Authorized Activities:

The United States Environmental Protection Agency (U.S. EPA) hereby issues a Resource Conservation and Recovery Act permit (hereinafter referred to as the “permit”) to Systech Environmental Corporation (addressed in the second person as “you”) in connection with the hazardous waste management operations at the Systech Environmental Corporation, located in Paulding, Ohio.

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

The RCRA permit consists of both this permit, which contains the effective Federal RCRA permit conditions, and the effective State RCRA permit conditions issued by the State of Ohio’s RCRA program authorized under 40 CFR Part 271 (hereinafter called the “State RCRA permit”). The State RCRA permit was issued on August 8, 2003. (The effective and expiration dates of the State RCRA permit are August 8, 2003 and August 8, 2013, respectively.) Any hazardous waste activity which requires a RCRA permit and is not included in the RCRA permit is prohibited.

Permit Approval:

On June 28, 1989, the State of Ohio received final authorization according to Section 3006 of RCRA, 42 USC § 6926, and 40 CFR Part 271, to administer the pre-HSWA RCRA hazardous waste program. The State of Ohio has also received final authorization to administer certain additional RCRA requirements on several occasions since then. However, because the U.S. EPA has not yet authorized the State of Ohio to administer certain regulations, including the air emission standards for equipment leaks and changes to other sections of applicable regulations, the U.S. EPA Region 5 is issuing the RCRA permit requirements for operations at your facility which fall under these regulations.

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

This permit is based on the assumption that the information submitted in your (1) RCRA Part B Permit Renewal Application dated September 2004, and all other modifications to that application (hereinafter referred to as the “Part B Permit Application”) and (2) Leak Detection and Repair Program, revised in May 2005, is accurate, and the facility is configured, operated and maintained as specified in the Part B Permit Application and other relevant documents.

Any inaccuracies in the submitted information may be grounds for the U.S. 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 the U.S. 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 the U.S. 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.

Final June 2007

Systech Environmental Corporation

OHD 005 048 947

Effective Date:

This permit is effective as of **July 20, 2007** and will remain in effect until **August 8, 2013**, 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:

Margaret M. Guerriero, Director
Land and Chemical Division

Date:_____

OHD 005 048 947
Systech Environmental Corporation, Paulding, Ohio

TABLE OF CONTENTS

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

I.K	COORDINATION WITH THE CLEAN AIR ACT	10
SECTION II -- LAND DISPOSAL RESTRICTIONS		10
II.A	GENERAL CONDITIONS	10
II.B	TESTING AND RELATED REQUIREMENTS	11
II.C	STORAGE PROHIBITIONS.....	11
II.D	BLENDING OF METAL WASTES	12
SECTION III – HAZARDOUS WASTE CODES		12
SECTION IV-- AIR EMISSIONS STANDARDS FOR EQUIPMENT LEAKS (40 CFR PART 264 SUBPART BB)		13
IV.A	EQUIPMENT LEAKS	13
IV.A.1	Applicable Equipment	13
IV.A.2	Pumps in Light Liquid Service (40 CFR § 264.1052)	13
IV.A.3	Sampling Connection System (40 CFR § 264.1055)	14
IV.A.4	Open-ended Valves or Lines (40 CFR § 264.1056)	14
IV.A.5	Valves in Light Liquid Service (40 CFR § 264.1057)	14
IV.A.6	Pressure Relief Devices in Light Liquid Service, and Flanges and Other Connectors (40 CFR § 264.1058)	15
IV.A.7	Delay of Repair (40 CFR § 264.1059)	15
IV.A.8	Closed-Vent Systems and Control Devices (40 CFR § 264.1060)	16
IV.A.9	Alternative Standards for Valves in Light Liquid Service: Skip Period Leak Detection and Repair (40 CFR § 264.1062)	16
IV.B	TEST METHODS AND PROCEDURES (40 CFR § 264.1063)	16
IV.C	RECORDKEEPING AND REPORTING REQUIREMENTS (40 CFR §§ 264.1064 and 264.1065)	16
SECTION V-- AIR EMISSIONS STANDARDS FOR TANKS AND CONTAINERS (40 CFR PART 264 SUBPART CC)		17