



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

FEB 28 2019

Mr. Richard Timm, Jr  
General Counsel  
Ohio Reclamation and Waste Services, LLC  
7013 Krick Road  
Bedford, Ohio 44146

REPLY TO THE ATTENTION OF:

Re: Draft Federal RCRA Permit, Ohio Reclamation and Waste Services, LLC  
Bedford, Ohio, OHD 001 926 740

Dear Mr. Timm:

Enclosed is a copy of the draft federal portion of the Resource Conservation and Recovery Act Hazardous Waste Permit ("draft Federal RCRA permit") to be issued by the U.S. Environmental Protection Agency, Region 5, for Ohio Reclamation and Waste Services, LLC, Bedford, Ohio.

The draft federal RCRA permit will be publicly noticed in The Plain Dealer and iHeart Media, Cleveland, Ohio, on or about February 28, 2019. A copy of the draft federal RCRA permit is available for review at the Southeast Branch of Cuyahoga County Public Library, 70 Columbus St, Cleveland, Ohio 44146. The public comment period extends from February 28, 2019 to April 16, 2019.

During the public comment period, you or any interested party may submit comments to the U.S. Environmental Protection Agency on the draft Federal RCRA permit set forth above. At the close of the comment period, EPA will prepare a response to all significant comments. Comments on the draft Federal RCRA permit may be submitted to:

U.S. Environmental Protection Agency, Region 5  
RCRA Branch (LR-17J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604

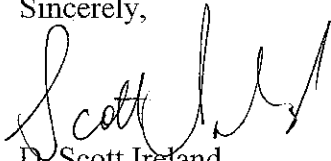
Attention: Jae B. Lee



Following review of any comments received on the draft Federal RCRA permit, EPA will issue a final permit decision in accordance with the requirements of 40 Code of Federal Regulations (C.F.R.) § 124.15. The procedures of permit appeals are found in 40 C.F.R. § 124.19.

If you have any questions, please feel free to contact me at (312) 886-8121, or your staff may contact Jae Lee at (312) 886-3781.

Sincerely,

A handwritten signature in black ink, appearing to read "Scott Ireland", with a stylized flourish at the end.

D. Scott Ireland  
Acting Chief, RCRA Branch  
Land and Chemicals Division

Enclosures

cc: Bradley Mitchell, OEPA



**DRAFT**  
**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
**REGION 5**

**RESOURCE CONSERVATION AND RECOVERY ACT PERMIT**

**Facility Name and Location:** Ohio Reclamation and Waste Services, LLC  
7013 Krick Road  
Bedford, Ohio 44146

**Owner:** Krick Road Holdings, LLC  
1100 Superior Avenue, Suite 1725  
Cleveland, Ohio 44114

**Operator:** Bedford Environmental Services, LLC  
d/b/a Ohio Reclamation and Waste Services, LLC  
7013 Krick Road  
Bedford, Ohio 44146

**U.S. EPA Identification Number:** OHD 001 926 740

**Effective Date:** 30 Days from Issuance Date of the Final Permit

**Expiration Date:** 10 Years from the Effective Date

**Authorized Activities:**

The U.S. Environmental Protection Agency, Region 5 hereby issues a Resource Conservation and Recovery Act permit (hereinafter referred to as the "permit") to Ohio Reclamation and Waste Services, LLC (addressed in the second person as "you" or "Permittee") in connection with the hazardous waste management operations at the Ohio Reclamation and Waste Services, LLC facility located in Bedford, 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 United States Code (U.S.C.) § 6901 *et seq.*) (collectively referred to as "RCRA") and EPA's regulations promulgated thereunder (codified, and to be codified, in Title 40 of the Code of Federal Regulations (40 C.F.R.)).

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

According to Ohio Reclamation and Waste Services, LLC's RCRA permit application, this facility currently does not operate process vents as defined in 40 C.F.R. Part 264, Subpart AA,

Air Emission Standards for Process Vents. Therefore, the requirements under Subpart AA are not set forth in this permit.

The RCRA permit consists of both this permit, which contains the effective Federal RCRA permit conditions, and the effective State RCRA permit conditions under an Ohio Hazardous Waste Permit issued by the State of Ohio's RCRA program authorized under 40 C.F.R. Part 271 (hereinafter the "State RCRA permit"). Any hazardous waste activity which requires a RCRA permit and is not included in the RCRA permit is prohibited.

The State previously issued a RCRA permit on December 28, 2006. (The effective and expiration dates of that earlier State RCRA permit were December 28, 2006 and December 28, 2016, respectively.) That permit has been administratively continued.

### **Permit Approval:**

On June 30, 1989, the State of Ohio received final authorization according to Section 3006 of RCRA, 42 USC § 6926, and 40 C.F.R. 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 EPA has not yet authorized the State of Ohio to administer certain HSWA regulations, including the air emission standards for equipment leaks (40 C.F.R. Part 264, Subpart BB) and tanks and containers (40 C.F.R. Part 264, Subpart CC), EPA is issuing the RCRA permit requirements for operations at your facility which fall under this regulation.

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 C.F.R. Parts 124, 260, 261, 262, 264, 268, 270, and applicable provisions of RCRA. You must also comply with the State RCRA permit.

This permit is based on the assumption that (1) the information submitted in your RCRA Part A and B Permit Renewal Application dated June 8, 2018 and all other revisions and addendums to that application (hereinafter referred to as the "Application") is complete and accurate and (2) the facility is configured, operated and maintained as specified in the 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 C.F.R. §§ 270.41, 270.42 and 270.43; and for enforcement action. You must promptly inform EPA of any deviation from, or changes in, the information in the 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 C.F.R. § 124.19.

**Effective Date:**

This permit is effective as of **(30 Days from Issuance Date of the Final Permit)** and will remain in effect until **(10 Years from the Effective Date)**, unless revoked and reissued under 40 C.F.R. § 270.41, terminated under 40 C.F.R. § 270.43, or continued in accordance with 40 C.F.R. § 270.51(a).

By:

\_\_\_\_\_  
Tinka G. Hyde  
Division Director  
Land and Chemicals Division

Date: \_\_\_\_\_

**OHD 001 926 740****Ohio Reclamation and Waste Services, LLC****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 .....	3
I.E.1    Duty to Comply .....	3
I.E.2    Duty to Reapply .....	3
I.E.3    Permit Expiration .....	3
I.E.4    Need to Halt or Reduce Activity Not a Defense .....	3
I.E.5    Duty to Mitigate .....	3
I.E.6    Proper Operation and Maintenance .....	4
I.E.7    Duty to Provide Information .....	4
I.E.8    Inspection and Entry .....	4
I.E.9    Monitoring and Records .....	5
I.E.10    Reporting Planned Changes .....	5
I.E.11    Reporting Anticipated Noncompliance .....	5
I.E.12    Certification of Construction .....	6
I.E.13    Transfer of Permits .....	6
I.E.14    Twenty-Four Hour Reporting .....	6
I.E.15    Other Noncompliance .....	8
I.E.16    Other Information .....	8
I.F    SIGNATORY REQUIREMENT .....	9
I.G    REPORTS, NOTIFICATIONS AND SUBMITTALS TO THE DIRECTOR .....	9
I.H    CONFIDENTIAL INFORMATION .....	9
I.I    DOCUMENTS TO BE MAINTAINED AT THE FACILITY .....	9
I.I.1    Operating Record .....	10
I.I.2    Notifications .....	10
I.I.3    Copy of Permit .....	10
I.J    ATTACHMENTS AND DOCUMENTS INCORPORATED BY REFERENCE .....	10
I.K    COORDINATION WITH THE CLEAN AIR ACT .....	11



## SECTION II-- AIR EMISSIONS STANDARDS FOR EQUIPMENT LEAKS

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

## SECTION III-- AIR EMISSION STANDARDS FOR TANKS AND CONTAINERS

(40 C.F.R. PART 264 SUBPART CC) .....	15
III.A LEVEL 1 CONTAINER REQUIREMENTS .....	16
III.B LEVEL 2 CONTAINER REQUIREMENTS .....	17
III.C LEVEL 1 TANK REQUIREMENTS .....	18
III.D RECORDKEEPING AND REPORTING REQUIREMENTS .....	20



## SECTION I—STANDARD PERMIT CONDITIONS

### I.A EFFECT OF PERMIT

This permit contains the federal RCRA permit conditions. You also have an effective State of Ohio RCRA permit. You are hereby allowed to manage hazardous waste at the Ohio Reclamation and Waste Services, LLC facility ("facility") in accordance with this permit and the effective State RCRA 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 in containers and tanks are subject to the conditions in the State 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 C.F.R. § 270.4, compliance with the RCRA permit during its term constitutes compliance, for purposes of enforcement, with Subtitle C of RCRA except for those requirements not included in the permit which: (1) become effective by statute; (2) are promulgated under 40 C.F.R. Part 268 restricting the placement of hazardous waste in or on the land; (3) are promulgated under 40 C.F.R. Part 264 regarding leak detection systems; or (4) are promulgated under Subparts BB or CC of 40 C.F.R. Part 265 limiting air emissions. (40 C.F.R. § 270.4).

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

### I.B PERMIT ACTIONS

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

EPA may review, modify, or revoke and reissue this permit, or terminate it for cause, as specified in 40 C.F.R. §§ 270.41, 270.42, and 270.43. EPA may also review and modify this permit, consistent with 40 C.F.R. § 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 C.F.R. § 270.30(f)).

You may request a modification of this permit under the procedures specified in 40 C.F.R. § 270.42. A Class 1 modification is generally allowed without prior approval by EPA except under certain conditions as described in 40 C.F.R. § 270.42(a)(2). A Class 2 modification requires prior approval by EPA as described in 40 C.F.R. § 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 calendar days after submission of the request, unless the Director establishes a later date. (40 C.F.R. § 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 C.F.R. § 270.42(b)(8) has been delegated to the Director of the Land and Chemicals Division of EPA, Region 5. Thus, for the purposes of this permit, the term "Director" must refer to the Division Director of EPA Region 5's Land and Chemicals Division.) Procedures for a Class 3 modification are specified in 40 C.F.R. § 270.42(c).

#### **I.B.2 Permit Renewal**

This permit may be renewed as specified in 40 C.F.R. § 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 C.F.R. § 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 C.F.R. § 124.16(a)).

#### **I.D DEFINITIONS**

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

## **I.E DUTIES AND REQUIREMENTS**

### **I.E.1 Duty to Comply**

You must comply with all conditions of this permit, except to the extent and for the duration for which an emergency permit authorizes such noncompliance (40 C.F.R. § 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 C.F.R. § 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 calendar 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 C.F.R. §§ 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 until 10 years from the effective date of this permit. 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 C.F.R. § 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 C.F.R. §§ 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 C.F.R. § 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 C.F.R. § 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 C.F.R. § 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 a 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, 44 U.S.C. §§ 3501 *et seq.* (40 C.F.R. §§ 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 C.F.R. § 270.30(i)).

#### **I.E.9 Monitoring and Records**

**I.E.9.a** Samples and measurements you take for monitoring purposes must be representative of the monitored activity. The methods you use 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 C.F.R. Part 261, or the methods specified in the "Waste Characteristics" section of your facility RCRA Part B permit application ("Application") (Section C of the Application), or an equivalent method approved by the Director. Laboratory methods you employ or use 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 C.F.R. § 270.30(j)(1)).

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

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

**I.E.9.d** You must retain all reports, records, or other documents, required by this permit, and records of all data used to complete the application for this permit, for a period of at least 3 years from the date of the reports, records, or other documents, unless a different period is specified in this permit. The 3-year period may be extended by request of the Director at any time and is automatically extended during the course of any unresolved enforcement action regarding this facility. (40 C.F.R. §§ 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 C.F.R. § 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 C.F.R. § 270.30(l)(2)).

### **I.E.12 Certification of Construction**

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, in accordance with 40 C.F.R. § 270.30(l)(2)(i). 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:

**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 calendar days of the date of submission of the Certification of Construction letter in I.E.12 of this permit, 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 in accordance with 40 C.F.R. § 270.30(l)(2)(ii)(B).

### **I.E.13 Transfer of Permits**

This permit is not transferable to any person, except after notice to and approval of the Director. You must inform the Director in writing and obtain prior written approval of the Director before transferring ownership or operational control of the facility (40 C.F.R. § 270.42, Appendix I). Under 40 C.F.R. § 270.40, the Director may require permit modification, or revocation and reissuance to change the name of the Permittee 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 C.F.R. Parts 264, 268, and 270, and you must provide a copy of the RCRA permit to the new owner or operator. (40 C.F.R. §§ 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: (1) information concerning the release of any hazardous waste that may endanger public drinking water supplies; (2) information of a release or discharge of hazardous waste; or (3) information of



a fire or explosion from the hazardous waste management facility which 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 of the facility;
- (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.

(40 C.F.R. § 270.30(I)(6)).

**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 C.F.R. §§ 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 C.F.R. § 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 Application or other submittal, or submitted incorrect information in the 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 C.F.R. §§ 270.30(l)(11) and 270.30(h)).

**I.E.16.b** All other requirements contained in 40 C.F.R. § 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 C.F.R. § 270.11. (40 C.F.R. § 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-17J  
Land and Chemicals Division  
U.S. EPA Region 5  
77 West Jackson Boulevard  
Chicago, Illinois 60604

**I.H CONFIDENTIAL INFORMATION**

In accordance with 40 C.F.R. 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 C.F.R. Part 2 (40 C.F.R. § 270.12). You have the burden of substantiating that the claimed information is confidential, and U.S. EPA may request further information from you regarding such claim, and may reasonably determine which such information to treat as confidential.

**I.I DOCUMENTS TO BE MAINTAINED AT THE FACILITY**

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

### **I.I.1 Operating Record**

You must maintain in the facility's operating record the documents required by this permit and by the applicable portions of 40 C.F.R. §§ 264.13, 264.73, 264.1035, 264.1064, 264.1065, 264.1084, 264.1088, and 264.1089.

### **I.I.2 Notifications**

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

### **I.I.3 Copy of Permit**

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

## **I.J ATTACHMENTS AND DOCUMENTS INCORPORATED BY REFERENCE**

**I.J.1** All attachments and documents that this permit requires to be submitted, if any, including all plans and schedules are, upon the Director's approval, incorporated into this permit by reference and become an enforceable part of this permit. Since required items are essential elements of this permit, failure to submit any of the required items or submission of inadequate or insufficient information may subject you to 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 C.F.R. Parts 124, 260, 261, 262, 264, 268, and 270, and applicable provisions of RCRA, all of which are incorporated herein by reference.

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

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

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

## **I.K COORDINATION WITH THE CLEAN AIR ACT**

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

You must not operate at the facility process vents as defined in 40 C.F.R. § 264.1031.

## **SECTION II -- AIR EMISSION STANDARDS FOR EQUIPMENT LEAKS (40 C.F.R. PART 264 SUBPART BB)**

### **II.A EQUIPMENT LEAKS**

#### **II.A.1 Applicable Equipment**

You must comply with all applicable requirements of 40 C.F.R. Part 264 Subpart BB, at 40 C.F.R. § 264.1050 through 40 C.F.R. § 264.1065, (Subpart BB), regarding air emission standards for equipment leaks. These requirements apply 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 C.F.R. § 264.1050(b). You must 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 C.F.R. § 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; and (5) open-ended valves or lines.

#### **II.A.2 Pumps in Light Liquid Service (40 C.F.R. § 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 C.F.R. § 264.1063(b), except: when each pump is (1) equipped with a dual mechanical seal system satisfying the requirements of 40 C.F.R. § 264.1052(d); (2) designated, as described in 40 C.F.R. § 264.1064(g)(2), for no detectable emissions, as indicated by an instrument reading of less than 500 parts per million (ppm) above background, and meeting the requirements of 40 C.F.R. § 264.1052(e); or (3) equipped with a closed vent system complying with the requirements of 40 C.F.R. § 264.1052(f).

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

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

**II.A.2.d** When a leak is detected, it must be repaired as soon as practicable, but not later than 15 calendar days after it is detected, except as provided in 40 C.F.R. § 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.

### **II.A.3 Pressure Relief Devices in Gas/Vapor Service (40 C.F.R. § 264.1054)**

**II.A.3.a** Each pressure relief device in gas/vapor service must 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 C.F.R. § 264.1063(c)), except during pressure releases.

**II.A.3.b** After each pressure release, the pressure release device must 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 C.F.R. § 264.1059 – Standards; Delay of repair.

**II.A.3.c** No later than 5 calendar days after each pressure release, the pressure relief device must 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 C.F.R. § 264.1063(c).

### **II.A.4 Open-Ended Valves or Lines (40 C.F.R. § 264.1056)**

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

**II.A.4.b** Each open-ended valve or line equipped with a second valve must be operated in a manner such that the valve on the hazardous waste stream end is closed before the second valve is closed.

**II.A.4.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 must seal the open end at all other times.

**II.A.5 Valves in Gas/Vapor Service or in Light Liquid Service  
(40 C.F.R. § 264.1057)**

**II.A.5.a** Each valve in gas/vapor or light liquid service must be monitored monthly to detect leaks in accordance with 40 C.F.R. § 264.1057(a) and (c), except as provided in 40 C.F.R. § 264.1057(f), (g), and (h), and 40 C.F.R. §§ 264.1061 and 264.1062.

**II.A.5.b** If an instrument reading of 10,000 ppm or greater is measured, a leak is detected.

**II.A.5.c** When a leak is detected, it must be repaired as soon as practicable, but no later than 15 calendar days after the leak is detected, except as provided in 40 C.F.R. § 264.1059 – Standards; Delay of repair. When a leak is detected, it must be repaired as specified in 40 C.F.R. § 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 C.F.R. § 264.1057(e).

**II.A.6 Pumps and Valves in Heavy Liquid Service, Pressure Relief Devices in Light Liquid or Heavy Liquid Service, and Flanges and Other Connectors  
(40 C.F.R. § 264.1058)**

**II.A.6.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 C.F.R. § 264.1063(b) if evidence of a potential leak is found by visual, audible, olfactory, or any other detection method. If an instrument reading of 10,000 ppm or greater is measured, a leak is detected.

**II.A.6.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 C.F.R. § 264.1059. The first attempt at repair must be made no later than 5 calendar days after each leak is detected.

**II.A.6.c** First attempts at repair include, but are not limited to, the best practices described under 40 C.F.R. § 264.1057(e).

#### **II.A.7 Delay of Repair (40 C.F.R. § 264.1059)**

**II.A.7.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 must 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.

**II.A.7.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 C.F.R. § 264.1060.

**II.A.7.c** Delay of repair for pumps will be allowed if: (1) repair requires the use of a dual mechanical seal system that includes a barrier fluid system; and (2) repair is completed as soon as practicable, but not later than six months after the leak was detected.

**II.A.7.d** Delay of repair beyond a hazardous waste management unit shutdown will be allowed for a valve only if the provisions of 40 C.F.R. § 264.1059(e) are met.

#### **II.A.8 Alternative Standards for Valves in Gas/Vapor Service or in Light Liquid Service: Percentage of Valves Allowed to Leak (40 C.F.R. § 264.1061)**

You may elect to have all valves subject to 40 C.F.R. § 264.1057 and Section II.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 C.F.R. §§ 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 C.F.R. § 264.1057 and Section II.A.6, and you must notify the Director in writing that you will comply with the standards described in 40 C.F.R. §§ 264.1057(a) through (e).

#### **II.A.9 Alternative Standards for Valves in Gas/Vapor Service or in Light Liquid Service: Skip Period Leak Detection and Repair (40 C.F.R. § 264.1062)**

You may elect for all valves subject to the requirements of 40 C.F.R. § 264.1057 and Section II.A.6 of this permit within a hazardous waste management unit to comply with



one of the alternative work practices specified below.

**II.A.9.a** After 2 consecutive quarterly leak detection periods with the percentage of valves leaking equal to or less than 2 percent, you may begin to skip one of the quarterly leak detection periods for the valves.

**II.A.9.b** After 5 consecutive quarterly leak detection periods with the percentage of valves leaking equal to or less than 2 percent, you may begin to skip 3 of the quarterly leak detection periods for the valves.

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

## **II.B TEST METHODS AND PROCEDURES (40 C.F.R. § 264.1063)**

You must comply with the test methods and procedures of 40 C.F.R. § 264.1063.

## **II.C RECORDKEEPING AND REPORTING REQUIREMENTS (40 C.F.R. §§ 264.1064 and 264.1065)**

You must comply with the recordkeeping and reporting requirements of 40 C.F.R. §§ 264.1064 and 264.1065.

## **SECTION III – AIR EMISSION STANDARDS FOR TANKS AND CONTAINERS (40 C.F.R. PART 264 SUBPART CC)**

You are permitted by the State portion of the permit to store hazardous wastes in 16 tanks with the following design capacities: Tanks #8 through #11 are 3,000 gallons each; Tank #13 is 15,000 gallons; Tank #14 is 10,000 gallons; Tank #15 is 9,500 gallons; Tanks #16, #52, and #53 are 6,000 gallons each; Tank #55 is 16,000 gallons; and Tanks #56, #58, and #60 through #62 are 14,000 gallons each. The total tank capacity is 150,500 gallons.

You are also permitted by the State portion of the permit to store hazardous waste in containers in three permitted storage areas. The maximum capacity of the container storage areas is 68,695 gallons.

You must comply with all applicable requirements of 40 C.F.R. Part 264, Subpart CC, at 40 C.F.R. § 264.1080 through 40 C.F.R. § 264.1090, regarding air emission standards for containers and tanks handling hazardous waste. All containers and tanks not exempt from

40 C.F.R. Part 264 Subpart CC must be managed using the applicable standards at 40 C.F.R. § 264.1084 and 40 C.F.R. § 264.1086. The tanks and containers permitted in the State RCRA permit, described above, are Level 1 tanks and Level 1 and Level 2 containers and must comply with the standards at 40 C.F.R. § 264.1084(c) (Tank Level 1 standards), 40 C.F.R. § 264.1086(c) (Container Level 1 standards), and 40 C.F.R. § 264.1086(d) (Container Level 2 standards), respectively.

You must not conduct a waste stabilization process, as defined in 40 C.F.R. § 265.1081, in containers and tanks which contain hazardous waste.

You must not operate any units considered to be miscellaneous units that are subject to 40 C.F.R. Part 264 Subpart X.

### III.A LEVEL 1 CONTAINER REQUIREMENTS

You must manage the containers with a design capacity greater than 0.1 m<sup>3</sup> (26.4 gallons) and less than or equal to 0.46 m<sup>3</sup> (121 gallons), and the containers with a design capacity greater than 0.46 m<sup>3</sup> (121 gallons) that are not in light material service, as defined in 40 C.F.R. § 265.1081, with Container Level 1 standards as described at 40 C.F.R. § 264.1086(c). When storing hazardous waste in Level 1 containers you must comply with the following requirements:

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

- (a) meet the applicable Department of Transportation (DOT) regulations as specified in 40 C.F.R. § 264.1086(f),
- (b) be equipped with a cover and closure devices as specified in 40 C.F.R. § 264.1086(c)(1)(ii), or
- (c) be an open-top container with an organic vapor suppressing barrier as specified in 40 C.F.R. § 264.1086(c)(1)(iii).

Containers, which do not meet DOT regulations specified in 40 C.F.R. § 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 must 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 C.F.R. § 264.1086(c)(2))

**III.A.2** Whenever hazardous waste is in a container, you must install all covers and closure devices and secure and maintain each closure device in the closed position as specified in 40 C.F.R. § 264.1086(c)(3). Opening of a closure device or cover is allowed if it meets the purposes and respective requirements specified in 40 C.F.R. § 264.1086(c)(3)(i) through (v).

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

**III.A.4** As specified in 40 C.F.R. § 264.1086(c)(5), you must maintain at the facility a copy of the procedure used to determine that containers with a capacity of 0.46 m<sup>3</sup> or greater which do not meet applicable DOT regulations are not managing hazardous waste in light material service.

### **III.B LEVEL 2 CONTAINER REQUIREMENTS**

You must manage the containers with a design capacity greater than 0.46 m<sup>3</sup> (121 gallons) that are in light material service, as defined in 40 C.F.R. § 265.1081, with Container Level 2 standards as described at 40 C.F.R. § 264.1086(d). When storing hazardous waste in Level 2 containers you must comply with the following requirements:

**III.B.1** You must receive and handle a container complying with one of the following requirements as specified in 40 C.F.R. § 264.1086(d)(1):

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

**III.B.1.b** A container that operates with no detectable organic emissions as defined in 40 C.F.R. § 265.1081 and determined in accordance with the procedure specified in 40 C.F.R. § 264.1086(g); or

**III.B.1.c** A container that has been demonstrated within the preceding 12 months to be vapor-tight by using 40 C.F.R. Part 60, appendix A, Method 27 in accordance with the procedure specified in 40 C.F.R. § 264.1086(h).

**III.B.2** You must transfer hazardous waste into or out of a container in such a manner as to minimize exposure of the hazardous waste to the atmosphere, to the extent practical, as specified in 40 C.F.R. § 264.1086(d)(2). When transferring hazardous waste into or out of a container, you must conduct such transferring activity by opening only the bung portion of the container. You must not open the entire top portion of a container to transfer hazardous waste into or out of a container at any time.

**III.B.3** You must not conduct any treatment activities of the hazardous waste in containers.

**III.B.4** Whenever a hazardous waste is in a container using level 2 controls, you must install all covers and closure devices for the container and secure and maintain each closure device in the closed position as specified in 40 C.F.R. § 264.1086(d)(3), except as specified at 40 C.F.R. § 264.1086(d)(3)(i) through (v).

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

### **III.C LEVEL 1 TANK REQUIREMENTS**

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

**III.C.1** The maximum vapor pressure, as determined by 40 C.F.R. § 264.1083(c)(2), must be less than 76.6 kilo-Pascal (kPa) for all 16 tanks identified above.

**III.C.2** The hazardous waste in the tank must not be heated to a temperature that is greater than the temperature at which the maximum organic vapor pressure is determined under Section III.C.1, above. (40 C.F.R. § 264.1084(b)(1)(ii)).

**III.C.3** You must not conduct a waste stabilization process, as defined at 40 C.F.R. § 265.1081, in tanks (40 C.F.R. § 264.1084(b)(1)(iii))

**III.C.4** You must determine the maximum organic vapor pressure for each hazardous waste placed in a tank in accordance with standards specified in Section III.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 III.C.1, you must perform a new determination of the maximum organic vapor pressure in the tank in accordance with 40 C.F.R. § 264.1083(c)(2).

(40 C.F.R. § 264.1084(c)(1)).

**III.C.5** Each tank must be equipped with a fixed roof design complying with the following specifications (40 C.F.R. § 264.1084(c)(2)):

- (a) The fixed roof and its 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 must be of suitable materials compatible with the hazardous wastes and must be in accordance with good engineering practices.
- (b) The fixed roof must be installed in such a manner such that there are no visible cracks, holes, gaps or other open spaces between roof section joints or between the interface of the roof edge and the tank wall.
- (c) Each opening in the fixed roof and any manifold system associated with the fixed roof must 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.
- (d) The fixed roof and its closure devices must be made of suitable materials that will minimize exposure of the hazardous waste to the atmosphere, to the extent practical, and will maintain the integrity of the fixed roof and closure devices throughout their intended service life.

**III.C.6** Whenever a hazardous waste is in the tank, the fixed roof must be installed with each closure device secured in the closed position except that 1) opening of closure devices or removal of the fixed roof is allowed to provide access to the tank for performing routine inspection, maintenance, or other activities needed for normal operations as specified at 40 C.F.R. § 264.1084(c)(3)(i)(A); 2) opening of closure devices or removal of the fixed roof is allowed to remove accumulated sludge or other residues from the bottom of tank as set forth at 40 C.F.R. § 264.1084(c)(3)(i)(B); and 3) opening of a spring-loaded pressure-vacuum relief valve, conservation vent, or similar type of pressure relief device which vents to the atmosphere is allowed during normal operations for the purpose of maintaining the tank internal pressure in accordance with the tank design specifications as specified at 40 C.F.R. § 264.1084(c)(3)(ii).

**III.C.7** You must inspect the tanks, repair defects, and maintain records of inspection as specified in 40 C.F.R. § 264.1084(c)(4).

**III.C.8** 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.

### **III.D RECORDKEEPING AND REPORTING REQUIREMENTS**

**III.D.1** For containers and tanks, you must comply with all applicable recordkeeping requirements described in 40 C.F.R. §§ 264.1089.

**III.D.2** You must comply with all reporting requirements for the tanks and containers under 40 C.F.R. § 264.1090.



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

FEB 28 2019

REPLY TO THE ATTENTION OF:

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

Re: Draft Federal RCRA Permit, Ohio Reclamation and Waste Services, LLC  
Bedford, Ohio, OHD 001 926 740

Dear Mr. Mitchell:

Enclosed please find a copy of the draft 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,

A handwritten signature in cursive script, reading "Mary S. Setnicar".

Mary S. Setnicar, Chief  
RCRA/TSCA Programs Section

Enclosure







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

FEB 28 2019

REPLY TO THE ATTENTION OF:

Reference Desk Librarian  
Southeast Branch of Cuyahoga County Public Library  
70 Columbus St.,  
Cleveland, Ohio 44146

Re: Draft Federal RCRA Permit, Ohio Reclamation and Waste Services, LLC  
Bedford, Ohio, OHD 001 926 740

Dear Madam or Sir:

The U.S. Environmental Protection Agency intends to issue a final Hazardous Waste Management permit to Ohio Reclamation and Waste Services, LLC, Bedford, Ohio. In accordance with the public involvement procedures in 40 Code of Federal Regulations Part 124, the draft federal RCRA permit will be publicly noticed in The Plain Dealer and iHeart Media, Cleveland, Ohio, on or about February 28, 2019. A copy of the draft federal RCRA permit is available for review at the Southeast Branch of Cuyahoga County Public Library, 70 Columbus St, Cleveland, Ohio 44146. The public comment period extends from February 28, 2019 to April 16, 2019.

Please make available for public examination this letter and the enclosed documents for at least seventy-five (75) days under "Reference Materials – Ohio Reclamation and Waste Services, LLC". The following items are enclosed.

- Draft Permit
- Fact Sheet

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

Sincerely,

Jae B. Lee  
Permit Writer  
Land and Chemicals Division



# EPA Proposes to OK Permit For Ohio Reclamation

Ohio Reclamation and Waste Services, LLC

Bedford, Ohio

February 2019

## Comments welcomed

Comments on the Ohio Reclamation and Waste Services, LLC proposed permit action can be submitted to EPA Environmental Engineer Jae Lee at the address below no later than April 16, 2019. You may also request EPA to hold a public hearing about this permit. At a hearing you will have an opportunity to submit oral and written comments, ask questions, make statements and discuss any concerns about the permit with EPA staff.

Here is Jae's contact information:

### Jae Lee

EPA Region 5, Land and Chemicals  
Division (LR-17J)  
77 W. Jackson Blvd.  
Chicago, Illinois 60604-3590  
Voice: 312-886-3781  
E-mail: [lee.jae@epa.gov](mailto:lee.jae@epa.gov)

Region 5 toll-free:

800-621-8431, Ext 6-3781,  
8:30 a.m. – 4:30 p.m., weekdays

## For more information

The draft permit and this fact sheet may also be viewed online:

<https://www.epa.gov/oh/draft-federal-rcra-permit-ohio-reclamation-and-waste-services-llc>

*(See box back page for locations of the administrative record, which can be reviewed by the public.)*

The U.S. Environmental Protection Agency Region 5 is proposing to issue a federal hazardous waste management permit to Ohio Reclamation and Waste Services, LLC but will review public comments before making a final decision. The permit would set air emission standards for equipment leaks, tanks and containers at the Ohio Reclamation and Waste Services, LLC site.<sup>1</sup> EPA is acting on the hazardous waste permit application under its responsibilities set out in the federal Resource Conservation and Recovery Act (RCRA).

## Background

Ohio Reclamation and Waste Services, LLC operates a hazardous waste storage and treatment facility located at 7013 Krick Road, Bedford, Ohio. The facility receives aqueous hazardous waste for treatment and storage in a series of storage and treatment tanks and containers.

## State permit

On December 28, 2006, the Ohio Environmental Protection Agency issued the State-portion of the RCRA permit. That portion contains rules for tank and container storage and treatment, corrective actions, post closure care, and groundwater monitoring. The Ohio permit expired on December 28, 2016. That permit has been administratively continued. If issued, the proposed federal portion of the RCRA permit will expire in February 2029.

## Tentative decision

EPA has concluded that the company has fulfilled all application requirements and proposes to issue a RCRA permit to Ohio Reclamation. Currently, the State of Ohio is not authorized by EPA to issue a permit for organic air emissions (40 C.F.R. Part 264, Subparts BB and CC) from hazardous waste units. Therefore, EPA has drafted a federal RCRA permit to address organic air emissions from hazardous waste units at Ohio Reclamation.

After the close of the public comment period, EPA will review all comments received and decide whether to issue the federal RCRA permit. The final decision will include notification to those who submitted written comments during the official comment period. EPA will also prepare and send to all responders a document answering significant comments. Within 30 days of a final decision, any person who submitted written comments or made a statement at the hearing if one is held may petition U.S. EPA's Environmental Appeals Board to review the decision.

<sup>1</sup> EPA is proposing to issue the Ohio Reclamation permit under the authority of the federal Resource Conservation and Recovery Act (RCRA) as amended by the Hazardous and Solid Waste Amendments of 1984 and subject to public notice and comment under the provisions of 40 Code of Federal Regulations (C.F.R.) Section 124.10. See <http://www.epa.gov/lawsregs/index.html> to read RCRA and RCRA regulations

# **EPA Tentatively Approves Ohio Reclamation Permit Bedford, Ohio**

**Comment Period:  
Until April 16, 2019  
(details front page)**

## **Review the documents**

The administrative record consists of the permit application and other relevant materials that EPA used to make a decision in this case. The file is available for public review at the following locations:

Southeast Branch of Cuyahoga County  
Public Library, 70 Columbus St.,  
Cleveland, Ohio 44146  
(440) 439-4997

## **EPA Region 5 Offices**

RCRA Branch

77 W. Jackson Blvd.

Chicago

Call Jae Lee at 312- 886-3781, or toll-free 800-621-8431, Ext. 6-3781, for an appointment.

*Reproduced on Recycled Paper*

**Ohio Reclamation and Waste Services: Tentative Permit Approval**

United States  
Environmental Protection  
Agency  
Region 5  
Office of Public Affairs (P-19J)  
77 W. Jackson Blvd.  
Chicago, IL 60604-3590



**Administrative Record Index (Draft RCRA PERMIT)**  
Ohio Reclamation and Waste Services, LLC, Bedford, Ohio  
OHD 001 926 740

<u>Title</u>	<u>Date</u>	<u>Prepared by</u>
1. Part B Application	June 2016	ORWS
2. Part A/B Application addendum	June 2018	ORWS
3. EJ Information	December 2018	EPA
4. Draft Permit Fact Sheet	February 2019	EPA
5. Draft Federal RCRA Permit	February 2019	EPA

ORWS: Ohio Reclamation and Waste Services, LLC  
EJ: Environmental Justice  
EPA: United States Environmental Protection Agency  
OEPA: Ohio Environmental Protection Agency  
RCRA: Resource Conservation and Recovery Act





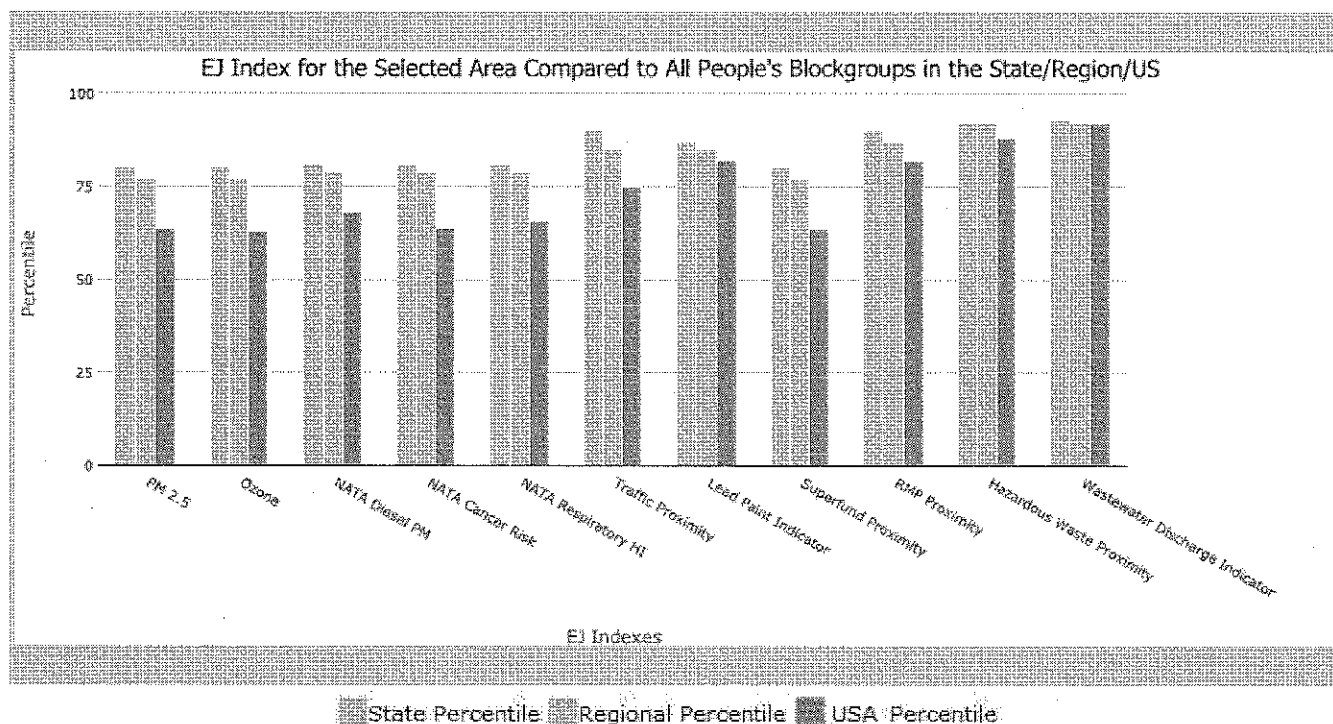
1 mile Ring Centered at 41.372835,-81.530861, OHIO, EPA Region 5

Approximate Population: 2,761

Input Area (sq. miles): 3.14

Ohio Reclamation

Selected Variables	State Percentile	EPA Region Percentile	USA Percentile
<b>EJ Indexes</b>			
EJ Index for PM2.5	80	77	64
EJ Index for Ozone	80	77	63
EJ Index for NATA* Diesel PM	81	79	68
EJ Index for NATA* Air Toxics Cancer Risk	81	79	64
EJ Index for NATA* Respiratory Hazard Index	81	79	66
EJ Index for Traffic Proximity and Volume	90	85	75
EJ Index for Lead Paint Indicator	87	85	82
EJ Index for Superfund Proximity	80	77	64
EJ Index for RMP Proximity	90	87	82
EJ Index for Hazardous Waste Proximity	92	92	88
EJ Index for Wastewater Discharge Indicator	93	92	92



This report shows the values for environmental and demographic indicators and EJSCREEN indexes. It shows environmental and demographic raw data (e.g., the estimated concentration of ozone in the air), and also shows what percentile each raw data value represents. These percentiles provide perspective on how the selected block group or buffer area compares to the entire state, EPA region, or nation. For example, if a given location is at the 95th percentile nationwide, this means that only 5 percent of the US population has a higher block group value than the average person in the location being analyzed. The years for which the data are available, and the methods used, vary across these indicators. Important caveats and uncertainties apply to this screening-level information, so it is essential to understand the limitations on appropriate interpretations and applications of these indicators. Please see EJSCREEN documentation for discussion of these issues before using reports.

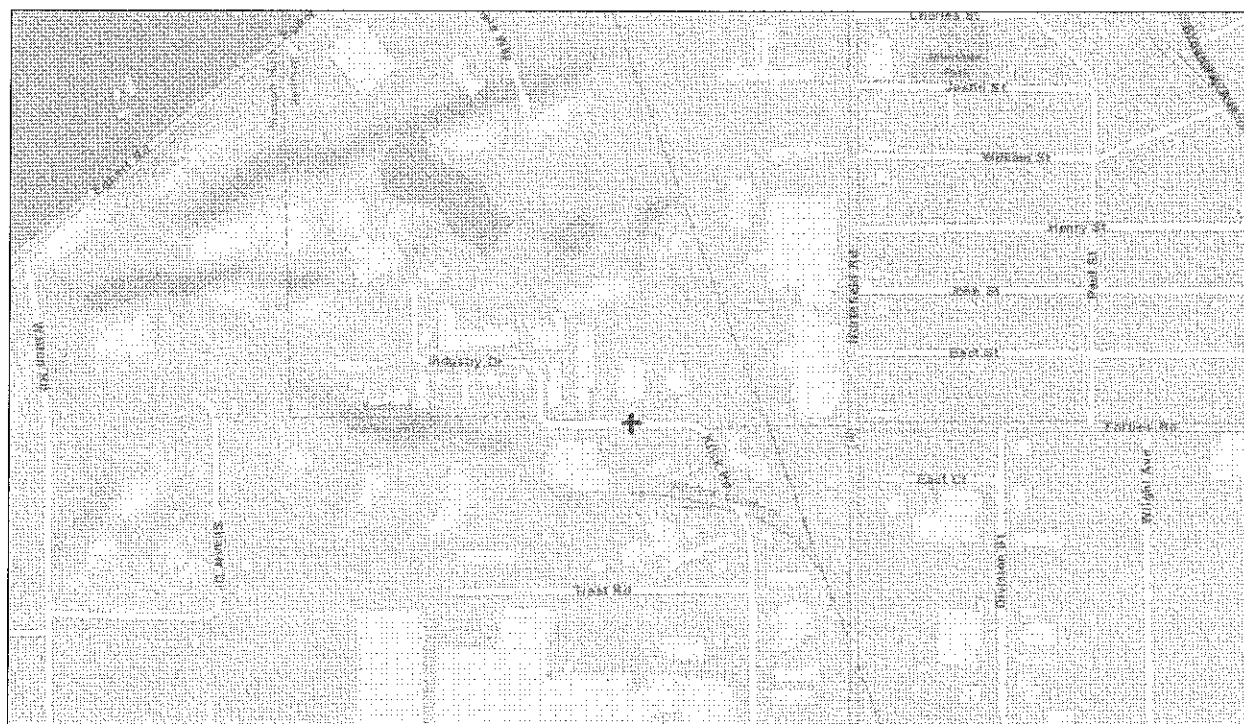


1 mile Ring Centered at 41.372835,-81.530861, OHIO, EPA Region 5

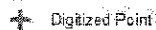
**Approximate Population: 2,761**

**Input Area (sq. miles): 3.14**

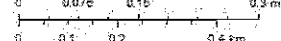
## Ohio Reclamation



November 26, 2018



1-9-028



Source: Est. F.R.E. Group, 1983, Internal, INDEPENDENT P. 10000, East Japan, East Korea, North Korea, East Korea, East (Russia), AG CO, O. Coordinated by the contributors, and the U.S. Navy Community.

Sites reporting to EPA	
Superfund NPL	0
Hazardous Waste Treatment, Storage, and Disposal Facilities (TSDF)	4



## EJSCREEN Report (Version 2018)



1 mile Ring Centered at 41.372835,-81.530861, OHIO, EPA Region 5

Approximate Population: 2,761

Input Area (sq. miles): 3.14

### Ohio Reclamation

Selected Variables	Value	State Avg.	%ile in State	EPA Region Avg.	%ile in EPA Region	USA Avg.	%ile in USA
<b>Environmental Indicators</b>							
Particulate Matter (PM 2.5 in $\mu\text{g}/\text{m}^3$ )	11.7	11.4	73	10.8	70	9.53	89
Ozone (ppb)	40.9	44.4	2	42.6	17	42.5	34
NATA* Diesel PM ( $\mu\text{g}/\text{m}^3$ )	0.939	0.997	50	0.932	50-60th	0.938	60-70th
NATA* Cancer Risk (lifetime risk per million)	37	37	57	34	60-70th	40	<50th
NATA* Respiratory Hazard Index	1.9	1.8	58	1.7	70-80th	1.8	60-70th
Traffic Proximity and Volume (daily traffic count/distance to road)	260	170	83	370	71	600	66
Lead Paint Indicator (% Pre-1960 Housing)	0.61	0.41	73	0.38	75	0.29	82
Superfund Proximity (site count/km distance)	0.03	0.09	39	0.12	31	0.12	34
RMP Proximity (facility count/km distance)	1.5	0.69	86	0.81	83	0.72	86
Hazardous Waste Proximity (facility count/km distance)	7.4	1.6	96	1.5	96	4.3	93
Wastewater Discharge Indicator (toxicity-weighted concentration/m distance)	0.1	17	87	4.2	88	30	90
<b>Demographic Indicators</b>							
Demographic Index	40%	27%	79	28%	77	36%	63
Minority Population	40%	20%	83	25%	78	38%	59
Low Income Population	41%	33%	67	32%	70	34%	66
Linguistically Isolated Population	0%	1%	67	2%	58	4%	44
Population With Less Than High School Education	10%	11%	57	10%	59	13%	50
Population Under 5 years of age	7%	6%	68	6%	68	6%	65
Population over 64 years of age	19%	16%	72	15%	75	14%	76

\* The National-Scale Air Toxics Assessment (NATA) is EPA's ongoing, comprehensive evaluation of air toxics in the United States. EPA developed the NATA to prioritize air toxics, emission sources, and locations of interest for further study. It is important to remember that NATA provides broad estimates of health risks over geographic areas of the country, not definitive risks to specific individuals or locations. More information on the NATA analysis can be found at: <https://www.epa.gov/national-air-toxics-assessment>.

For additional information, see: [www.epa.gov/environmentaljustice](http://www.epa.gov/environmentaljustice)

EJSCREEN is a screening tool for pre-decisional use only. It can help identify areas that may warrant additional consideration, analysis, or outreach. It does not provide a basis for decision-making, but it may help identify potential areas of EJ concern. Users should keep in mind that screening tools are subject to substantial uncertainty in their demographic and environmental data, particularly when looking at small geographic areas. Important caveats and uncertainties apply to this screening-level information, so it is essential to understand the limitations on appropriate interpretations and applications of these indicators. Please see EJSCREEN documentation for discussion of these issues before using reports. This screening tool does not provide data on every environmental impact and demographic factor that may be relevant to a particular location. EJSCREEN outputs should be supplemented with additional information and local knowledge before taking any action to address potential EJ concerns.



## EJSCREEN Report (Version 2018)



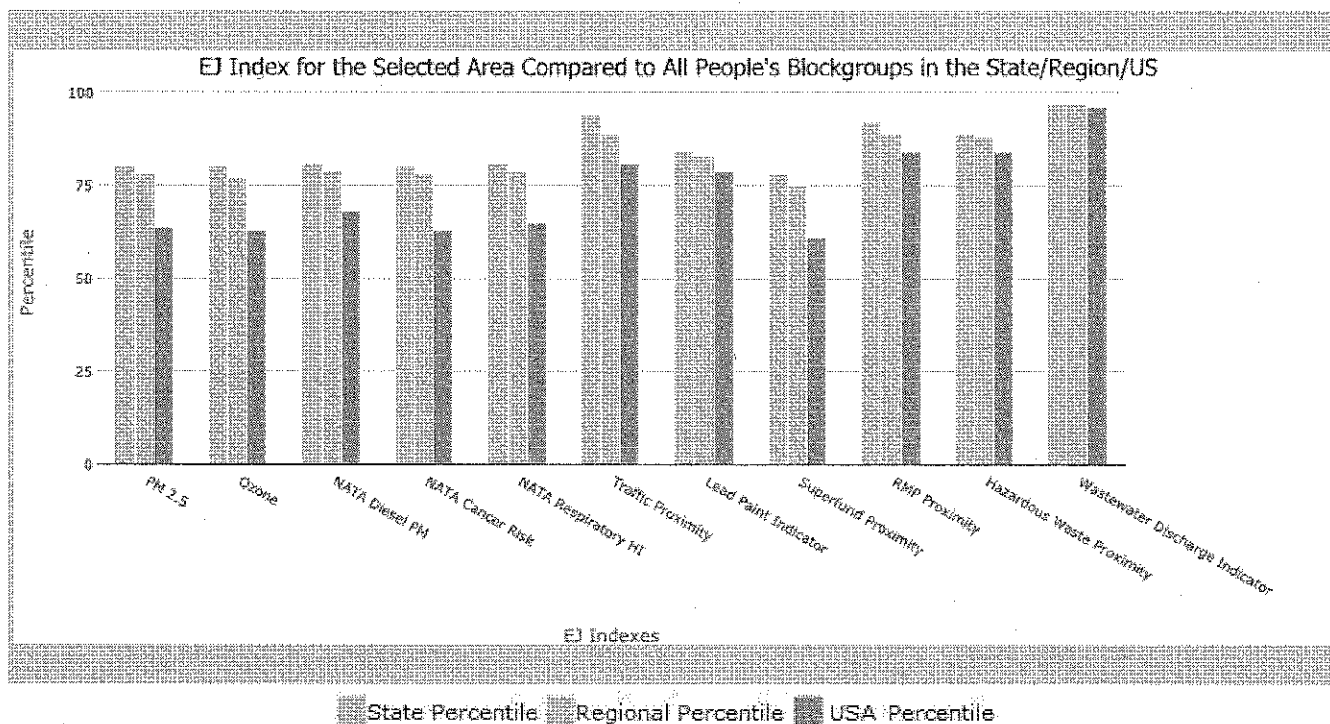
3 mile Ring Centered at 41.372835, -81.530861, OHIO, EPA Region 5

Approximate Population: 45,304

Input Area (sq. miles): 28.27

Ohio Reclamation

Selected Variables	State Percentile	EPA Region Percentile	USA Percentile
<b>EJ Indexes</b>			
EJ Index for PM2.5	80	78	64
EJ Index for Ozone	80	77	63
EJ Index for NATA* Diesel PM	81	79	68
EJ Index for NATA* Air Toxics Cancer Risk	80	78	63
EJ Index for NATA* Respiratory Hazard Index	81	79	65
EJ Index for Traffic Proximity and Volume	94	89	81
EJ Index for Lead Paint Indicator	84	83	79
EJ Index for Superfund Proximity	78	75	61
EJ Index for RMP Proximity	92	89	84
EJ Index for Hazardous Waste Proximity	89	88	84
EJ Index for Wastewater Discharge Indicator	97	97	96



This report shows the values for environmental and demographic indicators and EJSCREEN indexes. It shows environmental and demographic raw data (e.g., the estimated concentration of ozone in the air), and also shows what percentile each raw data value represents. These percentiles provide perspective on how the selected block group or buffer area compares to the entire state, EPA region, or nation. For example, if a given location is at the 95th percentile nationwide, this means that only 5 percent of the US population has a higher block group value than the average person in the location being analyzed. The years for which the data are available, and the methods used, vary across these indicators. Important caveats and uncertainties apply to this screening-level information, so it is essential to understand the limitations on appropriate interpretations and applications of these indicators. Please see EJSCREEN documentation for discussion of these issues before using reports.

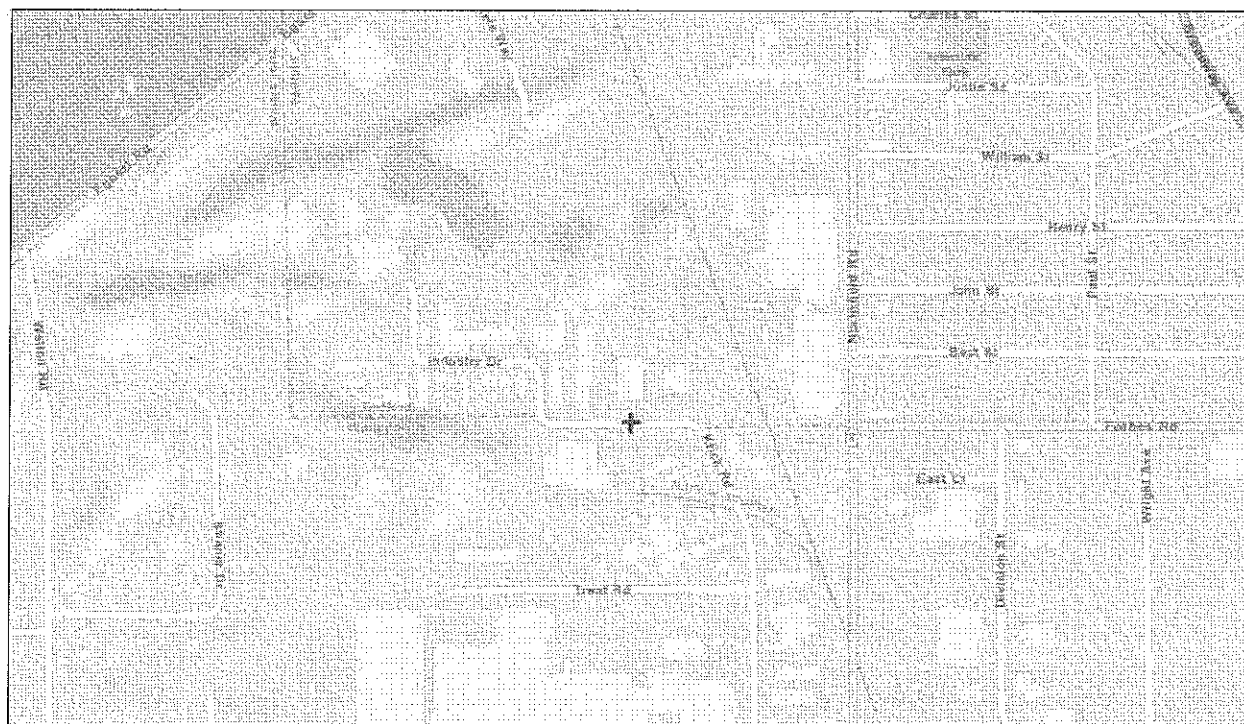


**3 mile Ring Centered at 41.372835,-81.530861, OHIO, EPA Region 5**

**Approximate Population: 45,304**

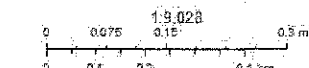
**Input Area (sq. miles): 28.27**

## Ohio Reclamation



November 28, 2018

✚ Digitized Point



Source: ESH, HERN, Garmy, 1995; Internet, AGREEMENT P. NTCN, Est. Japan, MET, Est. China, Hong Kong, Est. Korea, Est. Thailand, AGOCC, 2. Contributors: contributors, and the GIS User Community.

Sites reporting to EPA	
Superfund NPL	0
Hazardous Waste Treatment, Storage, and Disposal Facilities (TSDF)	9

## EJSCREEN Report (Version 2018)



3 mile Ring Centered at 41.372835,-81.530861, OHIO, EPA Region 5

Approximate Population: 45,304

Input Area (sq. miles): 28.27

### Ohio Reclamation

Selected Variables	Value	State Avg.	%ile in State	EPA Region Avg.	%ile in EPA Region	USA Avg.	%ile in USA
<b>Environmental Indicators</b>							
Particulate Matter (PM 2.5 in $\mu\text{g}/\text{m}^3$ )	11.7	11.4	73	10.8	71	9.53	89
Ozone (ppb)	40.9	44.4	2	42.6	17	42.5	35
NATA* Diesel PM ( $\mu\text{g}/\text{m}^3$ )	0.989	0.997	54	0.932	50-60th	0.938	60-70th
NATA* Cancer Risk (lifetime risk per million)	35	37	47	34	60-70th	40	<50th
NATA* Respiratory Hazard Index	1.8	1.8	55	1.7	60-70th	1.8	50-60th
Traffic Proximity and Volume (daily traffic count/distance to road)	250	170	83	370	70	600	66
Lead Paint Indicator (% Pre-1960 Housing)	0.38	0.41	53	0.38	56	0.29	68
Superfund Proximity (site count/km distance)	0.029	0.09	38	0.12	29	0.12	33
RMP Proximity (facility count/km distance)	1.5	0.69	85	0.81	83	0.72	85
Hazardous Waste Proximity (facility count/km distance)	4.8	1.6	91	1.5	92	4.3	89
Wastewater Discharge Indicator (toxicity-weighted concentration/m distance)	0.28	17	92	4.2	93	30	93
<b>Demographic Indicators</b>							
Demographic Index	42%	27%	81	28%	78	36%	66
Minority Population	54%	20%	88	25%	84	38%	70
Low Income Population	30%	33%	51	32%	53	34%	49
Linguistically Isolated Population	2%	1%	81	2%	73	4%	58
Population With Less Than High School Education	9%	11%	54	10%	56	13%	48
Population Under 5 years of age	6%	6%	50	6%	49	6%	47
Population over 64 years of age	18%	16%	67	15%	71	14%	72

\* The National-Scale Air Toxics Assessment (NATA) is EPA's ongoing, comprehensive evaluation of air toxics in the United States. EPA developed the NATA to prioritize air toxics, emission sources, and locations of interest for further study. It is important to remember that NATA provides broad estimates of health risks over geographic areas of the country, not definitive risks to specific individuals or locations. More information on the NATA analysis can be found at: <https://www.epa.gov/national-air-toxics-assessment>.

For additional information, see: [www.epa.gov/environmentaljustice](http://www.epa.gov/environmentaljustice)

EJSCREEN is a screening tool for pre-decisional use only. It can help identify areas that may warrant additional consideration, analysis, or outreach. It does not provide a basis for decision-making, but it may help identify potential areas of EJ concern. Users should keep in mind that screening tools are subject to substantial uncertainty in their demographic and environmental data, particularly when looking at small geographic areas. Important caveats and uncertainties apply to this screening-level information, so it is essential to understand the limitations on appropriate interpretations and applications of these indicators. Please see EJSCREEN documentation for discussion of these issues before using reports. This screening tool does not provide data on every environmental impact and demographic factor that may be relevant to a particular location. EJSCREEN outputs should be supplemented with additional information and local knowledge before taking any action to address potential EJ concerns.





June 8, 2018

Mr. Jae Lee  
United States Environmental Protection Agency, Region V  
Land and Chemical Division  
77 West Jackson Blvd.  
Chicago, IL 60604-3590

**RE: RCRA Hazardous Waste Facility Permit Application (Subpart BB/CC)  
Ohio Reclamation & Waste Services, LLC (OHD 001 926 740)  
7013 Krick Road, Bedford, Ohio**

Dear Mr. Lee:

On behalf of our client, Ohio Reclamation & Waste Services, LLC (OR&WS), Partners is pleased to provide you with documentation to support a Federal Hazardous Waste Facility Permit application for the OR&WS site in Bedford, Ohio (the Facility). We appreciate your meeting with us on May 10, 2018 to discuss permit requirements to fully comply with the provisions of the Resource Conservation and Recovery Act (RCRA) air emission standards for Treatment, Storage and Disposal Facilities (TSDFs).

As you are aware, hazardous waste management activities have been conducted at the Facility for approximately 50 years by previous owners / operators. These activities have been conducted under the terms and conditions of a Hazardous Waste Installation and Operation Permit (ID No. 02-18-0315) issued by Ohio Environmental Protection Agency (OEPA). OR&WS is currently negotiating the renewal of this permit with the OEPA. However, because OEPA does not have authority to administer those areas of the Federal hazardous waste regulations dealing with air emission standards (i.e., 40 CFR 264 Subparts AA through CC), OR&WS is providing this application package to EPA Region V.

At the present time, OR&WS is not proposing to re-activate activities associated with process vents subject to 40 CFR 264 Subpart AA. Therefore, the remainder of this submittal consists of a resubmittal of the RCRA Part A permit application as well as supplemental information discussing how OR&WS will comply with the applicable provisions of Subparts BB and CC. Should the facility subsequently decide to commence operation of process equipment subject to Subpart AA, it will submit supplemental compliance demonstration information at that time.

#### **General Facility Description and Basis for Application**

The Facility comprises a single 8.59-acre land parcel, zoned I-1 (industrial), and located within an industrial area of Bedford, OH at 7013 Krick Rd. The Facility was first developed in 1965 on formerly undeveloped land and has operated as a hazardous waste treatment facility since that time. Other industrial operations are located immediately adjacent to the Facility to the east, south and west, and a western-flowing stream and associated wetland area are located on the immediately adjacent land to the north. Maps and site plans are provided as part of the RCRA Part A application package in **Attachment 1**.

The Facility has historically operated as a permitted Resource Conservation and Recovery Act (RCRA) Part B Treatment, Storage, and Disposal Facility (TSDF), with primary operations consisting of the recovery/recycling of hazardous and non-hazardous liquid wastes, including waste organic liquids.

On November 22, 2017, OR&WS acquired the Facility assets from TIER Environmental, LLC and all hazardous waste operations were immediately suspended. On January 5, 2018, a request to temporarily discontinue operations at the Facility was officially submitted through the Ohio Environmental Protection Agency's (EPA's) Cessation of Regulated Operations (CRO) Program.

31100 Solon Road, Suite G, Solon, Ohio 44139  
*An Environmental, Safety, Engineering & Surveying Firm*  
www.partnersenv.com  
phone: (800) 763-1363

June 8, 2018

OR&WS proposes to re-start the Facility as a “drum in – drum out” operation on or about June 15, 2018. In this configuration, hazardous and non-hazardous wastes will be received in bulk tankers or containers (drums / totes). Wastes will be stored in their containers or pumped into one of the permitted hazardous waste bulk storage tanks. The designated storage area provides secondary containment. Tanks are within containment structures that can accommodate the largest container plus (where applicable) accumulated precipitation. Ultimately, the waste may either be loaded into bulk tankers and shipped offsite to appropriately licensed facilities or shipped in containers to appropriately licensed facilities.

#### **RCRA Part A Application**

The Part A application, including the Site Identification Form and supporting documentation for the OR&WS Facility, is provided in **Attachment 1**. These forms reflect our best understanding of operations to be conducted at the Facility when restarted, based on historical processes and material throughput. In particular, the waste throughput data should not be considered additive, as many materials received bear more than one waste code. Individual line items represent expected maximum throughput.

In accordance with 40 CFR 270.13, the Part A application also includes the following.

- A scale drawing of the Facility showing the location of all past, present, and future treatment, storage, and disposal areas.
- Photographs of the Facility showing existing structures and treatment, storage, and disposal areas.
- A topographic map extending one mile beyond the property boundaries of the source.

Note that the Facility does not conduct underground injection and has no injection or withdrawal wells. Monitoring wells have been approved by OEPA for the ongoing post-closure groundwater monitoring. No other known wells are located on site or off-site within 1,000 feet of the Facility property boundary.

As noted previously, a complete RCRA application, including Part A and B elements, forms the basis for the Hazardous Waste Installation and Operation Permit issued by the OEPA. The information provided herein is intended to facilitate review of those elements of the RCRA requirements which must be approved by US EPA.

#### **Air Emission Standards for Equipment Leaks (40 CFR 264 Subpart BB)**

##### **Applicability (40 CFR 264.1050)**

OR&WS proposes to operate equipment in contact with liquid hazardous waste with organic concentrations over 10% by weight. Management of this organic hazardous waste may take place in equipment including tanks, containers, pumps, valves, flanges and other connectors, pressure relief devices, and open-ended valves. As such, this equipment will be subject to the RCRA Air Emission Standards for Equipment Leaks (Subpart BB).

**Attachment 2** contains a summary of equipment subject to the Subpart BB standards. The table includes tag numbers, equipment types, an indication of facility location and associated unit, and the results of the most recent visual and instrument monitoring. None of the applicable components have shown evidence of leakage (visual or exceedances of regulatory trigger levels) since OR&WS assumed ownership of the Facility.

Each piece of equipment subject to this Subpart is marked with a tag that identifies it and distinguishes it from other pieces of equipment.

Equipment in organic liquid service for less than 300 hours per year is exempt from certain requirements of this Subpart. Because the actual operating schedule of the equipment, upon Facility restart, is not known with certainty, OR&WS has not elected to claim this exemption for any equipment at this time.

##### **Pumps in Light Liquid Service (40 CFR 264.1052)**

Monthly monitoring will be conducted on all pumps listed in **Attachment 2**. These pumps will also be visually inspected weekly. A “leak” is detected when: there are indications of liquid dripping from the pump seal; or when an instrument reading of 10,000 ppm or greater is detected.



June 8, 2018

When a leak is detected, a first attempt at repair will be made no later than five (5) days after discovery. Leaks will be repaired as soon as practical, but not later than 15 days after detection.

Compressors (40 CFR 264.1053)

There are no compressors in hazardous waste service at the Facility.

Pressure Relief Devices in Gas/Vapor Service (40 CFR 264.1054)

The hazardous waste tanks are equipped with conservation vents which act as pressure relief devices in gas/vapor service. These units, shown in **Attachment 2**, are tested monthly as part of the Facility's leak detection monitoring program.

Conservation vents will be operated with no detectable emissions, defined as an instrument reading of 500 ppm above background or greater. In addition, after each pressure release, the vent will be returned to a condition of no detectable emissions. This condition will be verified by an instrument reading within five (5) days of the of the pressure release event.

Sampling Connection Systems (40 CFR 264.1055)

There are no sampling connection systems in service at the Facility.

Open-Ended Valves or Lines (40 CFR 264.1056)

Open-ended valves and lines will be equipped with a cap, blind flange, pig, or second valve to seal the open end except during operations that require hazardous waste to flow through the open-ended valve or line.

If 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 valve but shall seal the open end at all times.

Valves in Gas/Vapor Service or in Light Liquid Service (40 CFR 264.1057)

Monthly monitoring will be conducted on all valves in gas or light liquid service as listed in **Attachment 2**. A "leak" is detected when an instrument reading of 10,000 ppm or greater is detected. The Facility may switch to a quarterly monitoring frequency if a leak is not detected for two (2) successive months. If a leak is detected during quarterly monitoring, the valve will be returned to a monthly monitoring status until another two successive months of monitoring does not detect a leak as described above.

When a leak is detected, a first attempt at repair will be made no later than five (5) days after discovery. Leaks will be repaired as soon as practical, but not later than 15 days after detection. At present, the Facility is not designating any components as "unsafe-to-monitor" or "difficult-to-monitor."

Pumps in Heavy Liquid Service, Pressure Relief Devices in Light Liquid or Heavy Liquid Service, and Flanges and Other Connectors (40 CFR 264.1058)

Pressure relief valves, flanges and other connectors in light liquid service will be monitored within five (5) days if evidence of a leak is found (visual, audible, olfactory, or other detection). A "leak" is detected when an instrument reading of 10,000 ppm or greater is detected.

A first attempt at repair for pressure relief valves, flanges, and other connectors in light liquid service will be made no later than five (5) days after discovery. All leaks will be repaired as soon as practical, but not later than 15 days after detection. At present, the Facility is not designating any of these components as "inaccessible" for the purposes of repair.

Delay of Repair (40 CFR 264.1059)

Delay of repair is permitted in cases where it is technically infeasible to conduct repairs without shutdown of a hazardous waste management unit. In such cases, all equipment repairs related to leaking components will be completed before the end of the next hazardous waste management unit shutdown.

Closed-Vent Systems and Control Devices (40 CFR 264.1060)

There are no closed-vent systems or control devices operating at the Facility.

Alternative Leak Detection Standards (40 CFR 264.1061 and 1062)

The RCRA standards allow for alternative standards regarding the percentage of components that are leaking, and for a reduction in the frequency of monitoring should leak detection results indicate that fewer than 2 percent of components are leaking. The Facility may elect to take advantage of this alternative standard for reducing the frequency of leak detection monitoring, should monitoring results suggest a reduced frequency is warranted.

Test Methods and Procedures (40 CFR 264.1063)

Leak detection monitoring will be conducted with EPA Reference Method 21 (40 CFR 60). Monitoring equipment will meet the performance criteria specified in Method 21. Before each day of use, the monitoring device will be calibrated in accordance with Method 21 using a zero (less than 10 ppm) and a span (approximately 10,000 ppm) gas standard.

Sampling will be conducted by traversing the instrument around each subject component, around all potential leak interfaces, as close as possible to the interface. When evaluating against a "no detectable emissions" criterion, a background level will also be established as specified in Method 21, and the arithmetic difference between the instrument reading and the background level will be compared against the leak standard (500 ppm).

For the purposes of compliance with Subpart BB, all of the components in **Attachment 2** are considered to be in contact with hazardous waste with an organic concentration that equals or exceeds 10 percent by weight. Revisions to this determination will require re-sampling and analysis of the waste using applicable ASTM and/or SW-846 test methods.

Recordkeeping Requirements (40 CFR 264.1064)

Records to be kept at the Facility and incorporate into the Operating log specific to Subpart BB include the following.

- Inventory of components subject to Subpart BB.
- Identification (tagging) of equipment determined to be leaking. These tags may be removed upon repair except for valves, for which tags must remain until two successive months of monitoring does not detect a leak.
- Inspection logs documenting leak detection monitoring activities, including leak documentation, dates of discovery/ repair, repair methods, and reasons for delay of repair if applicable.

Reporting Requirements (40 CFR 264.1065)

The Facility is required to submit a semiannual report to the Regional Administrator that documents any equipment (valves, pumps, etc.) for which a leak was not repaired as required in the respective regulation. A semiannual report is not required if, during the semiannual reporting period, there are no leaks, or if any detected leaks are repaired in accordance with the respective regulations.

**Air Emission Standards for Tanks, Surface Impoundments and Containers (40 CFR 264 Subpart CC)**

Applicability (40 CFR 264.1080)

Subpart CC requirements apply to TSDFs that treat, store or dispose of hazardous waste in tanks, surface impoundments or containers. The OR&WS Facility does not include any surface impoundments and as such, the remainder of this submittal addresses only tanks and containers. In addition, the applicable Facility requirements for Containers and Tank Systems (40 CFR 264 Subparts I and J, respectively) are addressed in the Facility's existing permit with OEPA.

The Facility operates a total of 16 hazardous waste tanks. Technical information regarding the tanks, including size, constituents and controls, are provided in **Attachment 3**.

June 8, 2018

Waste Determination (40 CFR 264.1083)

The Facility is not claiming exemptions for volatile organic (VO) concentrations less than 500 ppm or for treated hazardous waste as described in 40 CFR 264.1082(c); therefore, these waste determination provisions do not apply.

Standards: Tanks (40 CFR 264.1084)

As shown in **Attachment 3**, all tanks are less than 75 m<sup>3</sup> (19,813 gallons) design capacity and hold liquid hazardous waste with a vapor pressure less than 76.6 kPa (11.1 psi). Furthermore, the waste in these tanks is not heated, nor are the tanks used for treatment via waste stabilization. These tanks are therefore subject to "Level 1" controls as follows.

- Maximum vapor pressure for hazardous wastes to be managed in the tanks has been set at 11.1 psi. As a practical matter, it is Facility policy not to place any materials with vapor pressures in excess of 10 psi into tanks to ensure compliance with "Level 1" control criteria.
- Each tank holding hazardous waste is equipped with a fixed roof. The fixed roof and closure devices are integral to the tank structural design and form a continuous barrier over the entire surface area of the hazardous waste in the tank.
- The fixed roof is installed such that there are no visible cracks, holes, gaps or other open spaces between roof section joints or between the interface of the roof edge and tank wall.
- Each opening in the fixed roof is equipped with a closure device designed to be operated in the closed position, with no visible cracks, holes, gaps or other open spaces.
- The tanks, roofs and closure devices are constructed of steel, which is compatible with the materials stored in the tanks, will maintain the integrity of the tank system throughout its useful life, and will minimize exposure of the hazardous waste to the atmosphere to the extent practical.
- Each closure device will be maintained in the closed position whenever a hazardous waste is in the tank, unless necessary for maintenance or inspection.
- Conservation vents will be operated with no detectable organic emissions under normal operations. The opening of a conservation vent is permitted during normal operation if necessary to maintain the normal operating pressure of the tank in accordance with its design specifications, or to avoid unsafe conditions.
- The fixed roof and associated closure devices will be inspected prior to being placed into service, and at least annually thereafter. Inspections will be documented, and any defects will be repaired in accordance with regulatory requirements.

There are currently no tanks subject to "Level 2" controls at the Facility. There are no tanks equipped with internal or external floating roofs, nor are any tanks vented to control devices. At this time, the Facility is not claiming any covers as "unsafe to inspect and monitor."

Transfers of hazardous waste from one tank to another, if required, will be conducted using continuous hard-piping or other means of closed-system transfer that does not allow exposure of hazardous waste to the atmosphere.

If a defect is detected during an inspection, an initial attempt at repair will be made no later than five (5) days after detection. Repairs will be completed as soon as practical but no later than 45 days after detection. Repair may be delayed beyond the 45-day limit only if it is necessary to empty the tank or remove it from service, and there is no alternative tank capacity available at the Facility in which to manage the hazardous waste. In this case the repair will be conducted as soon as process or unit stops operation, and the repair will be completed before the process is resumed.

Standards: Containers (40 CFR 264.1085)

Liquid wastes are managed in containers (drums and totes) at the Facility.

Containers between 0.1 m<sup>3</sup> (26.4 gallons) and 0.46 m<sup>3</sup> (121 gallons) are subject to "Container Level 1" controls, which include the following.

June 8, 2018

- Use of a container that meets US Department of Transportation (DOT) regulations on packaging hazardous materials for transportation.
- Alternatively, use of a container equipped with a cover and closure device that forms a continuous barrier over the container openings, such that when secured in the closed position there are no visible holes, gaps, or other open spaces into the interior of the container. The regulations provide that this cover may be a separate cover installed on the container (e.g., a lid on a drum or a suitably secured tarp on a roll-off box) or may be an integral part of the container structural design (e.g., a "portable tank" or bulk cargo container equipped with a screw-type cap).

All containers required to meet Container Level 1 controls will be operated in accordance with the following requirements.

- Containers will be equipped with covers and closure devices 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 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.
- Whenever a hazardous waste is in a container using Container Level 1 controls, all covers and closure devices for the container, as applicable to the container will be installed, secured and maintained in the closed position except for the addition or removal of waste (described in further detail below).
- Opening of a closure device or cover is allowed for the purpose of adding hazardous waste or other material to the container. In the case when the container is filled to the intended final level in one continuous operation, the closure devices will be secured in the closed position promptly upon conclusion of the filling operation. In the case when discrete quantities or batches of material intermittently are added to the container over a period of time, the owner or operator shall promptly secure the closure devices will be secured in the closed position and covers installed, as applicable to the container, upon either: the container being filled to the intended final level; the completion of a batch loading after which no additional material will be added to the container within 15 minutes; the person performing the loading operation leaving the immediate vicinity of the container; or the shutdown of the process generating the material being added to the container, whichever condition occurs first.
- Opening of a closure device or cover is allowed for the purpose of removing hazardous waste from the container. A container meeting the RCRA definition of "empty" as defined in 40 CFR 261.7(b) may be open to the atmosphere at any time (i.e., covers and closure devices are not required to be secured in the closed position on an empty container). In the case when discrete quantities or batches of material are removed from the container but the container does not meet the "RCRA empty" criteria, the Facility will promptly secure the closure devices in the closed position and install covers, as applicable to the container, upon the completion of a batch removal after which no additional material will be removed from the container within 15 minutes or the person performing the unloading operation leaves the immediate vicinity of the container, whichever condition occurs first.
- Opening of a closure device or cover is allowed when access inside the container is needed to perform routine activities other than transfer of hazardous waste. Examples of such activities include those times when a worker needs to open a port to measure the depth of or sample the material in the container, or when a worker needs to open a manhole hatch to access equipment inside the container. Following completion of the activity, the Facility will promptly secure the closure device in the closed position or reinstall the cover, as applicable to the container.
- If present, opening of a spring-loaded pressure-vacuum relief valve, conservation vent, or similar type of pressure relief device which vents to the atmosphere is allowed during normal operations for the purpose of maintaining the internal pressure of the container in accordance with the container design specifications. The device shall be designed to operate with no detectable

June 8, 2018

organic emissions when the device is secured in the closed position. The settings at which the device opens shall be established such that the device remains in the closed position whenever the internal pressure of the container is within the internal pressure operating range determined by the owner or operator based on container manufacturer recommendations, applicable regulations, fire protection and prevention codes, standard engineering codes and practices, or other requirements for the safe handling of flammable, ignitable, explosive, reactive, or hazardous materials. Examples of normal operating conditions that may require these devices to open are during those times when the internal pressure of the container exceeds the internal pressure operating range for the container as a result of loading operations or diurnal ambient temperature fluctuations.

- Opening of a safety device, as defined in 40 CFR 265.1081, is allowed at any time conditions require doing so to avoid an unsafe condition.

All containers required to meet Container Level 1 controls will be inspected in accordance with the following requirements.

- For Level 1 containers and upon receipt, the Facility will visually inspect the container, cover and closure devices to check for visible cracks, holes, gaps, or other open spaces into the interior of the container when the cover and closure devices are secured in the closed position. The container visual inspection shall be conducted on or before the date that the container is accepted at the Facility (i.e., the date the container becomes subject to the Subpart CC container standards). For purposes of this requirement, the date of acceptance is the date of the Facility's signature on the Uniform Hazardous Waste Manifest showing receipt.
- When a defect is detected during an inspection of for the container, cover, or closure devices, a first effort at repair will be made no later than 24 hours after detection. Repair shall be completed as soon as possible but no later than five (5) calendar days after detection. If repair of a defect cannot be completed within five (5) calendar days, then the hazardous waste shall be removed from the container and the container shall not be used to manage hazardous waste until the defect is repaired.

Containers greater than between 0.46 m<sup>3</sup> (121 gallons) in light material service are subject to "Container Level 2" controls, which include the following.

- Use of a container that meets the applicable U.S. DOT regulations on packaging hazardous materials for transportation.
- Alternatively, use of 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 paragraph (g) of this section.

All containers required to meet Container Level 2 controls will be operated in accordance with the following requirements.

- Transfer of hazardous waste in or out of a container using Container Level 2 controls shall be conducted in such a manner as to minimize exposure of the hazardous waste to the atmosphere, to the extent practical, considering the physical properties of the hazardous waste and good engineering and safety practices for handling flammable, ignitable, explosive, reactive, or other hazardous materials. Examples of container loading procedures that the EPA considers to meet the requirements of this paragraph include using any one of the following: A submerged-fill pipe or other submerged-fill method to load liquids into the container; a vapor-balancing system or a vapor-recovery system to collect and control the vapors displaced from the container during filling operations; or a fitted opening in the top of a container through which the hazardous waste is filled and subsequently purging the transfer line before removing it from the container opening.
- Whenever a hazardous waste is in a container using Container Level 2 controls, all covers and closure devices for the container, as applicable to the container will be installed, secured and maintained in the closed position except for the addition or removal of waste (described in further detail below).

June 8, 2018

- Opening of a closure device or cover is allowed for the purpose of adding hazardous waste or other material to the container. In the case when the container is filled to the intended final level in one continuous operation, the closure devices will be secured in the closed position promptly upon conclusion of the filling operation. In the case when discrete quantities or batches of material intermittently are added to the container over a period of time, the owner or operator shall promptly secure the closure devices will be secured in the closed position and covers installed, as applicable to the container, upon either: the container being filled to the intended final level; the completion of a batch loading after which no additional material will be added to the container within 15 minutes; the person performing the loading operation leaving the immediate vicinity of the container; or the shutdown of the process generating the material being added to the container, whichever condition occurs first.
- Opening of a closure device or cover is allowed for the purpose of removing hazardous waste from the container. A container meeting the RCRA definition of "empty" as defined in 40 CFR 261.7(b) may be open to the atmosphere at any time (i.e., covers and closure devices are not required to be secured in the closed position on an empty container). In the case when discrete quantities or batches of material are removed from the container but the container does not meet the "RCRA empty" criteria, the Facility will promptly secure the closure devices in the closed position and install covers, as applicable to the container, upon the completion of a batch removal after which no additional material will be removed from the container within 15 minutes or the person performing the unloading operation leaves the immediate vicinity of the container, whichever condition occurs first.
- Opening of a closure device or cover is allowed when access inside the container is needed to perform routine activities other than transfer of hazardous waste. Examples of such activities include those times when a worker needs to open a port to measure the depth of or sample the material in the container, or when a worker needs to open a manhole hatch to access equipment inside the container. Following completion of the activity, the Facility will promptly secure the closure device in the closed position or reinstall the cover, as applicable to the container.
- If present, opening of a spring-loaded pressure-vacuum relief valve, conservation vent, or similar type of pressure relief device which vents to the atmosphere is allowed during normal operations for the purpose of maintaining the internal pressure of the container in accordance with the container design specifications. The device shall be designed to operate with no detectable organic emissions when the device is secured in the closed position. The settings at which the device opens shall be established such that the device remains in the closed position whenever the internal pressure of the container is within the internal pressure operating range determined by the owner or operator based on container manufacturer recommendations, applicable regulations, fire protection and prevention codes, standard engineering codes and practices, or other requirements for the safe handling of flammable, ignitable, explosive, reactive, or hazardous materials. Examples of normal operating conditions that may require these devices to open are during those times when the internal pressure of the container exceeds the internal pressure operating range for the container as a result of loading operations or diurnal ambient temperature fluctuations.
- Opening of a safety device, as defined in 40 CFR 265.1081, is allowed at any time conditions require doing so to avoid an unsafe condition.

All containers required to meet Container Level 2 controls will be inspected in accordance with the following requirements.

- For Level 2 containers and upon receipt, the Facility will visually inspect the container and its cover and closure devices will be inspected to check for visible cracks, holes, gaps, or other open spaces into the interior of the container when the cover and closure devices are secured in the closed position. The container visual inspection shall be conducted on or before the date that the container is accepted at the facility (i.e., the date the container becomes subject to the subpart CC container standards). For purposes of this requirement, the date of acceptance is the date of signature on Item 20 of the Uniform Hazardous Waste Manifest.

June 8, 2018

- When a defect is detected during an inspection of for the container, cover, or closure devices, a first effort at repair will be made no later than 24 hours after detection. Repair shall be completed as soon as possible but no later than 5 calendar days after detection. If repair of a defect cannot be completed within 5 calendar days, then the hazardous waste shall be removed from the container and the container shall not be used to manage hazardous waste until the defect is repaired.

The Facility does not treat hazardous waste in containers using a stabilization process and as such, there are no containers subject to "Level 3" standards at the facility.

Standards: Closed-Vent Systems and Control Devices (40 CFR 264.1087)

The Facility does not operate any closed-vent systems or control devices associated with its tank systems and containers. This section is not applicable.

Inspection and Monitoring Requirements (40 CFR 264.1088)

The Facility does not operate any air emission control equipment associated with tank systems and containers. This section is not applicable.

Recordkeeping Requirements (40 CFR 264.1089)

The specific recordkeeping provisions in this section are not applicable to the Facility. The Facility will maintain records as required as part of the facility operating record.

Reporting Requirements (40 CFR 264.1090)

The specific reporting provisions in this section are not applicable to the Facility.

**CLOSING**

We trust that the information provided herein will assist you in finalizing a permit for those RCRA Subparts not covered under the Facility's existing permit with OEPA. As previously discussed, the Facility is eager to re-start operations and as such, anything your office can do to expedite permit approval would be greatly appreciated.

Should you have any questions or require additional information, please do not hesitate to contact the undersigned at 800-763-1363 or at [rwalters@partnersenv.com](mailto:rwalters@partnersenv.com). You may also contact Mr. Richard Timm, General Counsel, directly at 440-937-6348 or at [rtimm@chemtron-corp.com](mailto:rtimm@chemtron-corp.com).

Sincerely,  
Partners



Robert A. Walters, PE  
Associate Director, Environmental Compliance



Sarah B. Green, PE  
Associate Director


Attachments (3)

cc: R. Timm, OR&WS

June 8, 2018

**CERTIFICATION**

*I certify under penalty of law that this document and all attachments were prepared under my direction or supervision according to a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.*

  
Signature


RICHARD M. TIMM, JR.  
Name

GENERAL COUNSEL / OR & WS  
Title

JUNE 11, 2018  
Date



**ATTACHMENT 1**  
**PART A APPLICATION AND SUPPORTING DOCUMENTATION**

<b>SEND COMPLETED FORM TO:</b> The Appropriate State or Regional Office.	<b>United States Environmental Protection Agency</b> <b>RCRA SUBTITLE C SITE IDENTIFICATION FORM</b>		
<b>1. Reason for Submittal</b>  MARK ALL BOX(ES) THAT APPLY	<b>Reason for Submittal:</b> <input type="checkbox"/> To provide an Initial Notification (first time submitting site identification information / to obtain an EPA ID number for this location) <input checked="" type="checkbox"/> To provide a Subsequent Notification (to update site identification information for this location) <input type="checkbox"/> As a component of a First RCRA Hazardous Waste Part A Permit Application <input checked="" type="checkbox"/> As a component of a Revised RCRA Hazardous Waste Part A Permit Application (Amendment # 001) <input type="checkbox"/> As a component of the Hazardous Waste Report (If marked, see sub-bullet below)  <input type="checkbox"/> Site was a TSD facility and/or generator of >1,000 kg of hazardous waste, >1 kg of acute hazardous waste, or >100 kg of acute hazardous waste spill cleanup in one or more months of the report year (or State equivalent LQG regulations)		
<b>2. Site EPA ID Number</b>	EPA ID Number <u>0</u> <u>0</u> <u>H</u> <u>D</u> <u>0</u> <u>0</u> <u>1</u> <u>9</u> <u>2</u> <u>6</u> <u>7</u> <u>4</u> <u>0</u>		
<b>3. Site Name</b>	Name: OHIO RECLAMATION AND WASTE SERVICES, LLC		
<b>4. Site Location Information</b>	Street Address: 7013 KRICK ROAD		
	City, Town, or Village: BEDFORD		County: CUYAHOGA
	State: OHIO	Country: USA	Zip Code: 44146
<b>5. Site Land Type</b>	<input type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Tribal <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other		
<b>6. NAICS Code(s) for the Site (at least 5-digit codes)</b>	A. <u>5</u> <u>6</u> <u>2</u> <u>9</u> <u>9</u> <u>8</u>	C. <u> </u> <u> </u> <u> </u> <u> </u> <u> </u> <u> </u>	
	B. <u> </u> <u> </u> <u> </u> <u> </u> <u> </u> <u> </u>	D. <u> </u> <u> </u> <u> </u> <u> </u> <u> </u> <u> </u>	
<b>7. Site Mailing Address</b>	Street or P.O. Box: 7013 KRICK ROAD		
	City, Town, or Village: BEDFORD		
	State: OHIO	Country: USA	Zip Code: 44146
<b>8. Site Contact Person</b>	First Name: RICHARD		MI: M. Last: TIMM, JR.
	Title: GENERAL COUNSEL		
	Street or P.O. Box: 7013 KRICK ROAD		
	City, Town or Village: BEDFORD		
	State: OHIO	Country: USA	Zip Code: 44146
	Email: RTIMM@CHEMTRON-CORP.COM		
<b>9. Legal Owner and Operator of the Site</b>	A. Name of Site's Legal Owner: KRICK ROAD HOLDINGS, LLC		Date Became Owner: 11/22/2017
	Owner Type: <input checked="" type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Tribal <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other		
	Street or P.O. Box: 1100 SUPERIOR AVE, SUITE 1725		
	City, Town, or Village: CLEVELAND		Phone: 216-781-3233
	State: OHIO	Country: USA	Zip Code: 44114
	B. Name of Site's Operator: BEDFORD ENVIRONMENTAL SERVICES, LLC D/B/A OHIO RECLAMATION AND WASTE SERVICES, LLC		Date Became Operator: 11/22/2017
	Operator Type: <input checked="" type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Tribal <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other		

**10. Type of Regulated Waste Activity (at your site)**

Mark "Yes" or "No" for all current activities (as of the date submitting the form); complete any additional boxes as instructed.

**A. Hazardous Waste Activities; Complete all parts 1-10.**Y ☒ N ☐**1. Generator of Hazardous Waste**

If "Yes," mark only one of the following – a, b, or c.

- ☒ a. LQG: Generates, in any calendar month, 1,000 kg/mo (2,200 lbs/mo.) or more of hazardous waste; or Generates, in any calendar month, or accumulates at any time, more than 1 kg/mo (2.2 lbs/mo) of acute hazardous waste; or Generates, in any calendar month, or accumulates at any time, more than 100 kg/mo (220 lbs/mo) of acute hazardous spill cleanup material.

- ☐ b. SQG: 100 to 1,000 kg/mo (220 – 2,200 lbs/mo) of non-acute hazardous waste.

- ☐ c. CESQG: Less than 100 kg/mo (220 lbs/mo) of non-acute hazardous waste.

If "Yes" above, indicate other generator activities in 2-10.

Y ☐ N ☐

- 2. Short-Term Generator** (generate from a short-term or one-time event and not from on-going processes). If "Yes," provide an explanation in the Comments section.

Y ☒ N ☐

- 3. United States Importer of Hazardous Waste**

Y ☐ N ☐

- 4. Mixed Waste** (hazardous and radioactive) Generator

Y ☒ N ☐**5. Transporter of Hazardous Waste**

If "Yes," mark all that apply.

- ☒ a. Transporter  
☒ b. Transfer Facility (at your site)

Y ☒ N ☐

- 6. Treater, Storer, or Disposer of Hazardous Waste** Note: A hazardous waste Part B permit is required for these activities.

Y ☒ N ☐

- 7. Recycler of Hazardous Waste**

Y ☐ N ☐

- 8. Exempt Boiler and/or Industrial Furnace** If "Yes," mark all that apply.

- ☐ a. Small Quantity On-site Burner Exemption  
☐ b. Smelting, Melting, and Refining Furnace Exemption

Y ☐ N ☐

- 9. Underground Injection Control**

Y ☒ N ☐

- 10. Receives Hazardous Waste from Off-site**

**B. Universal Waste Activities; Complete all parts 1-2.**Y ☒ N ☐

- 1. Large Quantity Handler of Universal Waste** (you accumulate 5,000 kg or more) [refer to your State regulations to determine what is regulated]. Indicate types of universal waste managed at your site. If "Yes," mark all that apply.

- a. Batteries ☒  
b. Pesticides ☒  
c. Mercury containing equipment ☒  
d. Lamps ☒  
e. Other (specify) \_\_\_\_\_ ☐  
f. Other (specify) \_\_\_\_\_ ☐  
g. Other (specify) \_\_\_\_\_ ☐

Y ☒ N ☐

- 2. Destination Facility for Universal Waste**

Note: A hazardous waste permit may be required for this activity.

**C. Used Oil Activities; Complete all parts 1-4.**Y ☒ N ☐**1. Used Oil Transporter**

If "Yes," mark all that apply.

- ☒ a. Transporter  
☒ b. Transfer Facility (at your site)

Y ☐ N ☒

- 2. Used Oil Processor and/or Re-refiner** If "Yes," mark all that apply.

- ☐ a. Processor  
☐ b. Re-refiner

Y ☐ N ☒

- 3. Off-Specification Used Oil Burner**

Y ☒ N ☐**4. Used Oil Fuel Marketer**

If "Yes," mark all that apply.

- ☒ a. Marketer Who Directs Shipment of Off-Specification Used Oil to Off-Specification Used Oil Burner  
☐ b. Marketer Who First Claims the Used Oil Meets the Specifications

**D. Eligible Academic Entities with Laboratories—Notification for opting into or withdrawing from managing laboratory hazardous wastes pursuant to 40 CFR Part 262 Subpart K**

❖ You can ONLY Opt into Subpart K if:

- you are at least one of the following: a college or university; a teaching hospital that is owned by or has a formal affiliation agreement with a college or university; or a non-profit research institute that is owned by or has a formal affiliation agreement with a college or university; AND
- you have checked with your State to determine if 40 CFR Part 262 Subpart K is effective in your state

Y ☐ N ☐ 1. Opting into or currently operating under 40 CFR Part 262 Subpart K for the management of hazardous wastes in laboratories  
See the item-by-item instructions for definitions of types of eligible academic entities. Mark all that apply:

- ☐ a. College or University
- ☐ b. Teaching Hospital that is owned by or has a formal written affiliation agreement with a college or university
- ☐ c. Non-profit Institute that is owned by or has a formal written affiliation agreement with a college or university

Y ☐ N ☐ 2. Withdrawing from 40 CFR Part 262 Subpart K for the management of hazardous wastes in laboratories**11. Description of Hazardous Waste****A. Waste Codes for Federally Regulated Hazardous Wastes.** Please list the waste codes of the Federal hazardous wastes handled at your site. List them in the order they are presented in the regulations (e.g., D001, D003, F007, U112). Use an additional page if more spaces are needed.

D001	D002	D003	D004	D005	D006	D007
D008	D009	D010	D011	D012	D013	D014
D015	D016	D017	D018	D019	D020	D021
D022	D023	D024	D025	D026	D027	D028
D029	D030	D031	D032	D033	D034	D035
D036	D037	D038	D039	D040	D041	D042
D043	F001	F002	F003	F004	F005	F006
F019	F024	F025	F037	F038	F039	K009
K010	K014	K015	K016	SEE	ADDITIONAL	PAGES

**B. Waste Codes for State-Regulated (i.e., non-Federal) Hazardous Wastes.** Please list the waste codes of the State-Regulated hazardous wastes handled at your site. List them in the order they are presented in the regulations. Use an additional page if more spaces are needed.


**12. Notification of Hazardous Secondary Material (HSM) Activity**

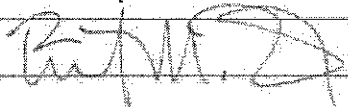
Y ☐ N ☒ Are you notifying under 40 CFR 260.42 that you will begin managing, are managing, or will stop managing hazardous secondary material under 40 CFR 261.2(a)(2)(ii), 40 CFR 261.4(a)(23), (24), or (25)?

If "Yes," you must fill out the Addendum to the Site Identification Form: Notification for Managing Hazardous Secondary Material.

**13. Comments**

THIS 05-07-2018 SUBMITTAL IS INTENDED TO MODERNIZE PREVIOUS SUBMITTALS AND SERVE AS NOTICE THAT THE FACILITY NAME, OPERATOR, AND OWNER SHOULD ALL BE UPDATED TO REFLECT "CHEMTRON CORPORATION". ALL REFERENCES TO RJG ENTERPRISES SHOULD BE DELETED.

**14. Certification.** I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations. For the RCRA Hazardous Waste Part A Permit Application, all owner(s) and operator(s) must sign (see 40 CFR 270.10(b) and 270.11).

Signature of legal owner, operator, or an authorized representative	Name and Official Title (type or print)	Date Signed (mm/dd/yyyy)
	RICHARD M. TIMM, JR.	05/07/2018
	GENERAL COUNSEL	

# Ohio Reclamation and Waste Services, LLC

## Permitted EPA Waste Numbers (continued)

K016	K017	K018	K019	K020	K021	K022	K023	K024	K025
K026	K028	K029	K030	K048	K049	K050	K051	K052	K060
K061	K062	K083	K085	K086	K087	K093	K094	K095	K096
K103	K104	K105	K136	K141	K142				
U002	U003	U004	U007	U008	U017	U019	U021	U023	U024
U025	U027	U028	U029	U031	U032	U037	U039	U043	U044
U045	U046	U047	U048	U051	U052	U055	U056	U057	U066
U067	U068	U069	U070	U071	U072	U075	U076	U077	U079
U080	U081	U082	U083	U088	U089	U092	U101	U102	U107
U112	U113	U117	U118	U121	U122	U123	U127	U131	U132
U134	U140	U144	U145	U146	U147	U153	U154	U159	U161
U162	U165	U166	U167	U168	U169	U171	U182	U183	U184
U188	U190	U191	U196	U201	U207	U208	U209	U210	U211
U213	U220	U221	U225	U226	U227	U228	U235	U238	U239
U328	U353	U359							

## United States Environmental Protection Agency

## HAZARDOUS WASTE PERMIT PART A FORM



## 1. Facility Permit Contact

First Name	<b>Richard</b>	MI	<b>M</b>	Last Name	<b>Timm</b>
Title	<b>General Counsel</b>				
Email	<b>rtimm@chemtron-corp.com</b>				
Phone	<b>440-937-6348</b>	Ext		Fax	

## 2. Facility Permit Contact Mailing Address

Street Address	<b>7013 Krick Road</b>	
City, Town, or Village	<b>Bedford</b>	
State	<b>OHIO</b>	Country <b>USA</b> Zip Code <b>44146</b>

## 3. Facility Existence Date (mm/dd/yyyy)

7/14/1965

## 4. Other Environmental Permits

A. Permit Type	B. Permit Number												C. Description
E	P	0	1	0	8	7	2	3					State Air Permit - P007, P008, P009, P010, P011, P018, and P019
E	P	0	0	9	5	0	8	4					State Air Permit - P012, P013, and P015
E	P	0	1	0	9	9	3	2					State Air Permit - P016
E	2	2	8	S	S	I	U	1	3				Sewer Permit - Northeast Ohio Regional Sewer District
R	0	2	1	8	0	3	1	5					OH Hazardous Waste Permit

## 5. Nature of Business

<b>Hazardous Waste Treatment, Storage, and Disposal Facility</b>

## 6. Process Codes and Design Capacities

Line Number		A. Process Code			B. Process Design Capacity		C. Process Total Number of Units	D. Unit Name
					(1) Amount	(2) Unit of Measure		
x	1	S	0	1	68,695	G	003	Container
x	2	S	0	2	150,150	G	016	Tank
x	3	T	0	1	19,800	U	003	Tank Treatment

## 7. Description of Hazardous Wastes (Enter codes for Items 7.A, 7.C and 7.D(1) )

Line No.		A. EPA Hazardous Waste No.				B. Estimated Annual Qty of Waste	C. Unit of Measure	D. Processes									
								(1) Process Codes									
x	1	D	0	0	1	10,566,800	G	S	0	1	S	0	2	T	0	1	
x	2	D	0	0	2	264,170	G	S	0	1	S	0	2	T	0	1	
x	3	D	0	0	3	264,170	G	S	0	1	S	0	2	T	0	1	
x	4	D	0	0	4	264,170	G	S	0	1	S	0	2	T	0	1	
x	5	D	0	0	5	264,170	G	S	0	1	S	0	2	T	0	1	
x	6	D	0	0	6	264,170	G	S	0	1	S	0	2	T	0	1	
x	7	D	0	0	7	264,170	G	S	0	1	S	0	2	T	0	1	
x	8	D	0	0	8	264,170	G	S	0	1	S	0	2	T	0	1	
x	9	D	0	0	9	264,170	G	S	0	1	S	0	2	T	0	1	
1	0	D	0	1	0	264,170	G	S	0	1	S	0	2	T	0	1	
1	1	D	0	1	1	264,170	G	S	0	1	S	0	2	T	0	1	

## 8. Map

Attach to this application a topographical map, or other equivalent map, of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all spring, rivers, and other surface water bodies in this map area. See instructions for precise requirements.

## 9. Facility Drawing

All existing facilities must include a scale drawing of the facility. See instructions for more detail.

## 10. Photographs

All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment, and disposal areas; and sites of future storage, treatment, or disposal areas. See instructions for more detail.

## 11. Comments

The annual waste quantities in Section 7 are not additive because several waste codes may be assigned to one waste stream. These are estimated maxima.



## 7. Description of Hazardous Wastes (Enter Codes for Items 7.A, 7.C, and 7.D(1)) Additional Page 1

Line No.		A. EPA Hazardous Waste No.					B. Estimated Annual Qty of Waste	C. Unit of Measure	D. Processes									
									(1) Process Codes								(2) Process Description (If code is not entered in 7.D(1))	
1	2	D	0	1	2	264,170	G	S	0	1	S	0	2	T	0	1		
1	3	D	0	1	3	264,170	G	S	0	1	S	0	2	T	0	1		
1	4	D	0	1	4	264,170	G	S	0	1	S	0	2	T	0	1		
1	5	D	0	1	5	264,170	G	S	0	1	S	0	2	T	0	1		
1	6	D	0	1	6	264,170	G	S	0	1	S	0	2	T	0	1		
1	7	D	0	1	7	264,170	G	S	0	1	S	0	2	T	0	1		
1	8	D	0	1	8	264,170	G	S	0	1	S	0	2	T	0	1		
1	9	D	0	1	9	264,170	G	S	0	1	S	0	2	T	0	1		
2	0	D	0	2	0	264,170	G	S	0	1	S	0	2	T	0	1		
2	1	D	0	2	1	264,170	G	S	0	1	S	0	2	T	0	1		
2	2	D	0	2	2	264,170	G	S	0	1	S	0	2	T	0	1		
2	3	D	0	2	3	264,170	G	S	0	1	S	0	2	T	0	1		
2	4	D	0	2	4	264,170	G	S	0	1	S	0	2	T	0	1		
2	5	D	0	2	5	264,170	G	S	0	1	S	0	2	T	0	1		
2	6	D	0	2	6	264,170	G	S	0	1	S	0	2	T	0	1		
2	7	D	0	2	7	264,170	G	S	0	1	S	0	2	T	0	1		
2	8	D	0	2	8	264,170	G	S	0	1	S	0	2	T	0	1		
2	9	D	0	2	9	264,170	G	S	0	1	S	0	2	T	0	1		
3	0	D	0	3	0	264,170	G	S	0	1	S	0	2	T	0	1		
3	1	D	0	3	1	264,170	G	S	0	1	S	0	2	T	0	1		
3	2	D	0	3	2	264,170	G	S	0	1	S	0	2	T	0	1		
3	3	D	0	3	3	264,170	G	S	0	1	S	0	2	T	0	1		
3	4	D	0	3	4	264,170	G	S	0	1	S	0	2	T	0	1		
3	5	D	0	3	5	264,170	G	S	0	1	S	0	2	T	0	1		
3	6	D	0	3	6	264,170	G	S	0	1	S	0	2	T	0	1		
3	7	D	0	3	7	264,170	G	S	0	1	S	0	2	T	0	1		
3	8	D	0	3	8	264,170	G	S	0	1	S	0	2	T	0	1		
3	9	D	0	3	9	264,170	G	S	0	1	S	0	2	T	0	1		
4	0	D	0	4	0	264,170	G	S	0	1	S	0	2	T	0	1		
4	1	D	0	4	1	264,170	G	S	0	1	S	0	2	T	0	1		
4	2	D	0	4	2	264,170	G	S	0	1	S	0	2	T	0	1		
4	3	D	0	4	3	264,170	G	S	0	1	S	0	2	T	0	1		
4	4	F	0	0	1	792,510	G	S	0	1	S	0	2	T	0	1		
4	5	F	0	0	2	792,510	G	S	0	1	S	0	2	T	0	1		
4	6	F	0	0	3	792,510	G	S	0	1	S	0	2	T	0	1		
4	7	F	0	0	4	792,510	G	S	0	1	S	0	2	T	0	1		
4	8	F	0	0	5	792,510	G	S	0	1	S	0	2	T	0	1		
4	9	F	0	0	6	264,170	G	S	0	1	S	0	2	T	0	1		
5	0	F	0	1	9	264,170	G	S	0	1	S	0	2	T	0	1		

## 7. Description of Hazardous Wastes (Enter Codes for Items 7.A, 7.C, and 7.D(1)) Additional Page 2

[illegible]

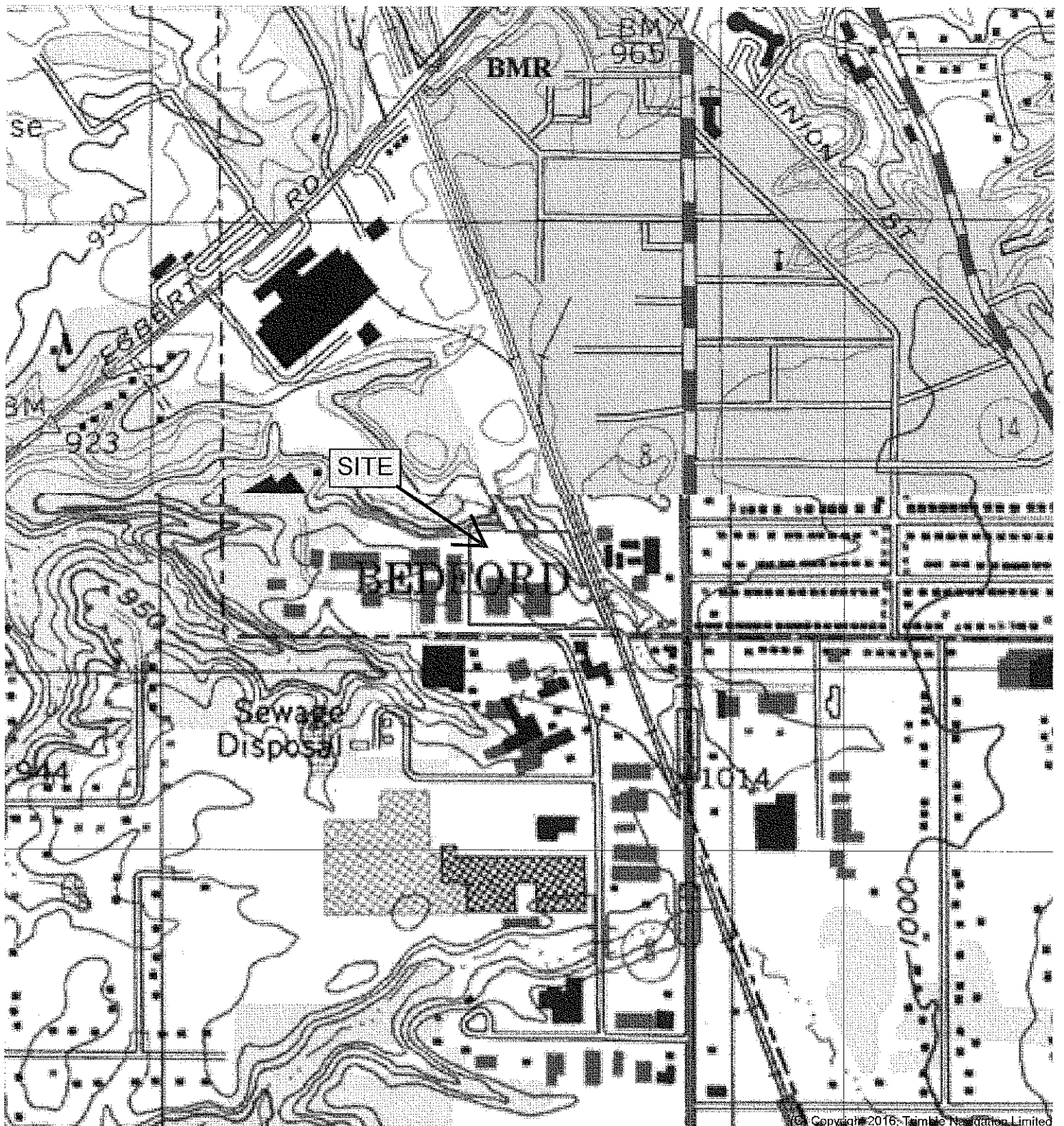
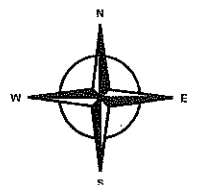
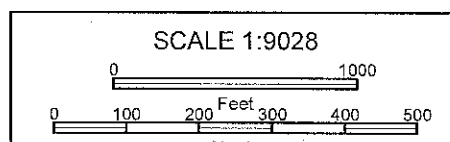


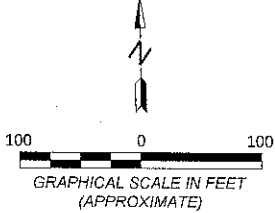
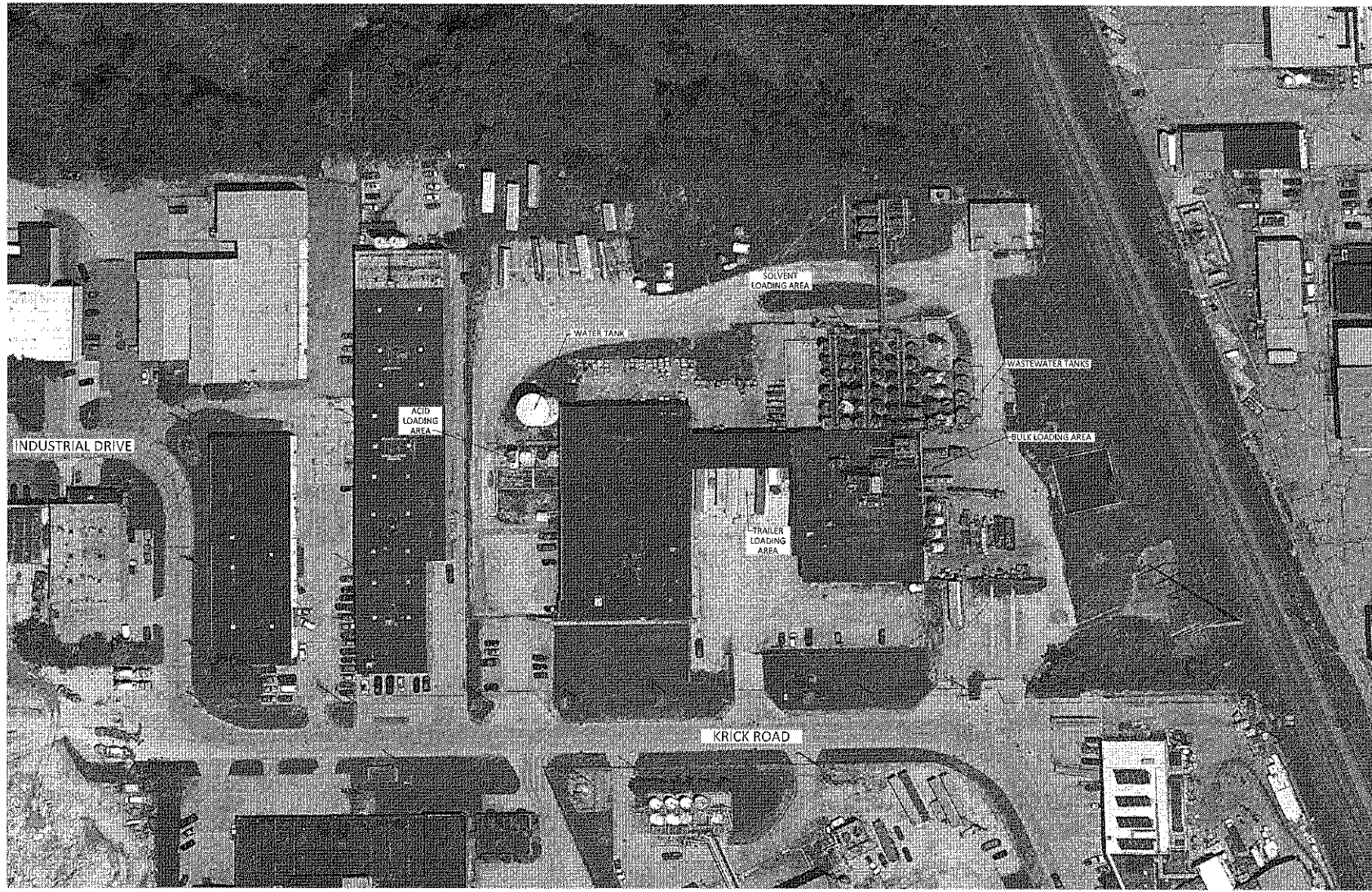
Figure 1: Property Location Map  
Ohio Reclamation & Waste Services, LLC  
7013 Krick Road  
Bedford, Cuyahoga County, Ohio

——— Property Boundary




Map Name: NORTHFIELD  
Print Date: 05/21/18  
Map Center: 041° 22' 25.7059" N, 081° 31' 49.1513" W

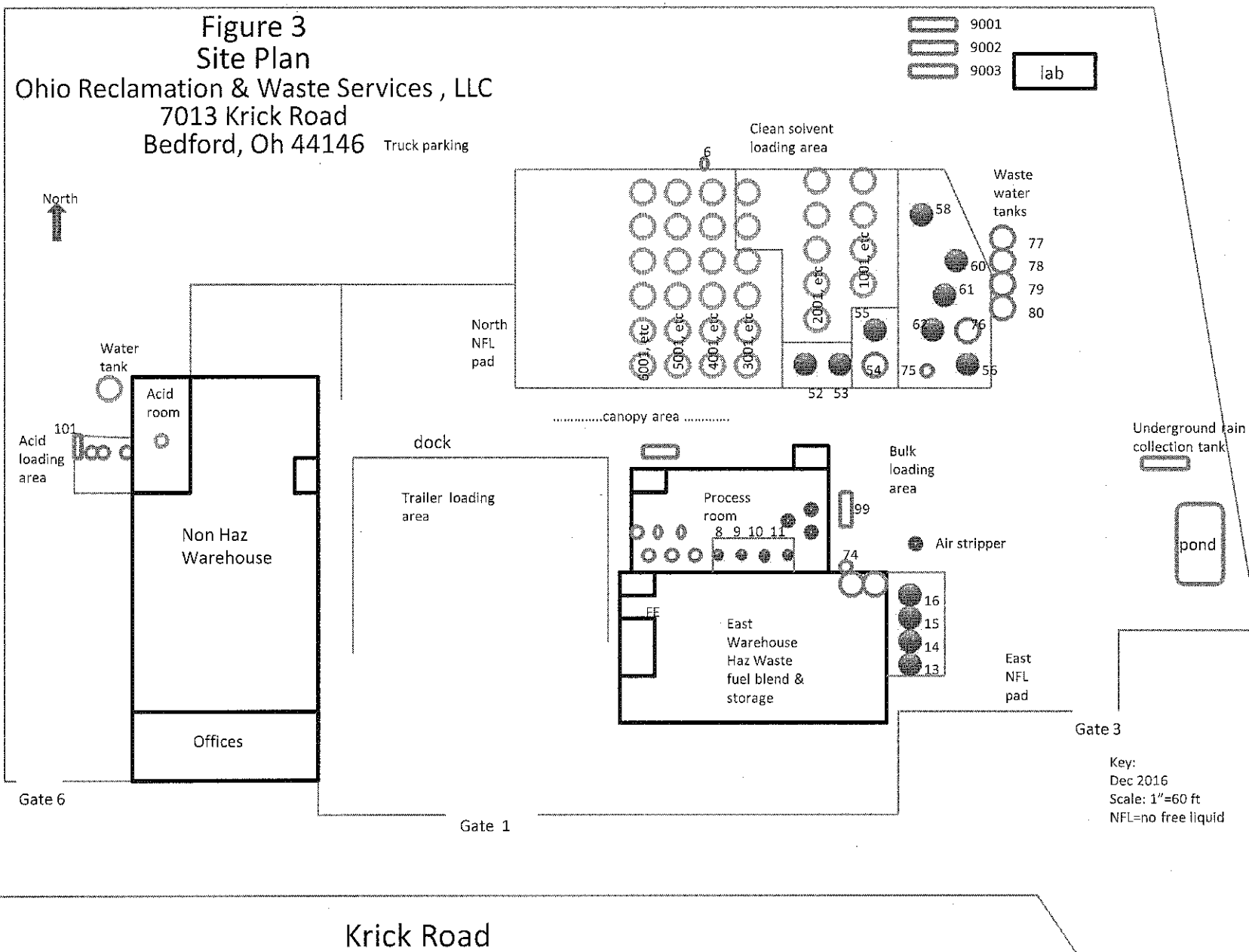




LEGEND  
- - - - - APPROXIMATE FACILITY LINE

 <b>PARTNERS</b> ENVIRONMENTAL	Date 5/21/2018	FACILITY DIAGRAM	FIGURE  2
	Project No. 1843.01	OHIO RECLAMATION & WASTE SERVICES, LLC 7013 KRICK ROAD BEDFORD, CUYAHOGA COUNTY, OHIO	

**Figure 3**  
**Site Plan**  
 Ohio Reclamation & Waste Services, LLC  
 7013 Krick Road  
 Bedford, Oh 44146





## TRANSFER AND RECEIVING DOCK AREAS



East Pad Area - Bulk Fuels



24 Hr Staging Area - Containerized Dock

## HAZARDOUS WASTE SOLIDS ONLY AREA



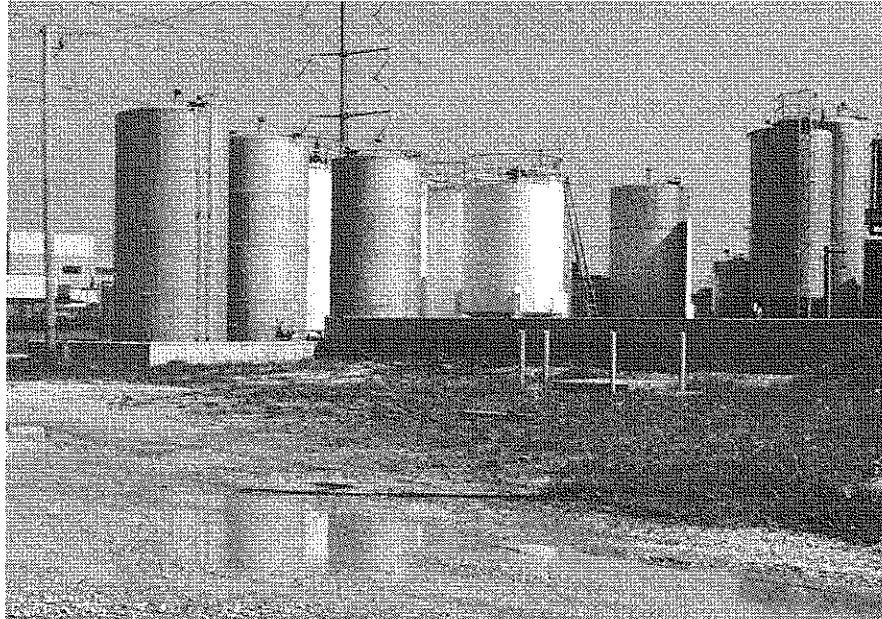
East Pad Area – H.W. Solids Only

## HAZARDOUS WASTE STORAGE TANKS

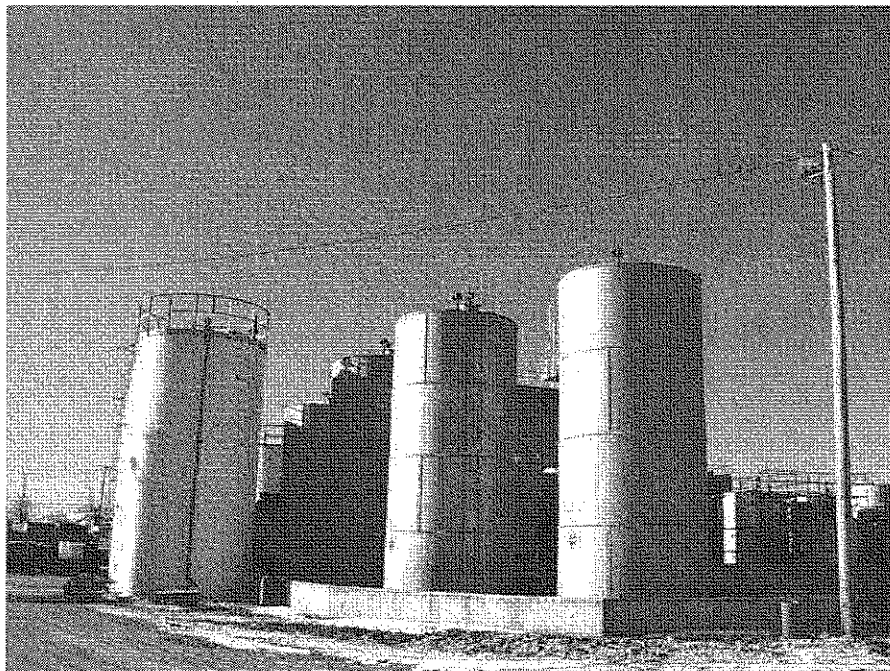


F-1 Tank Dike Area – “Chemfuel” Tanks

## EAST PAD HAZARDOUS WASTE STORAGE TANK DIKE AREA



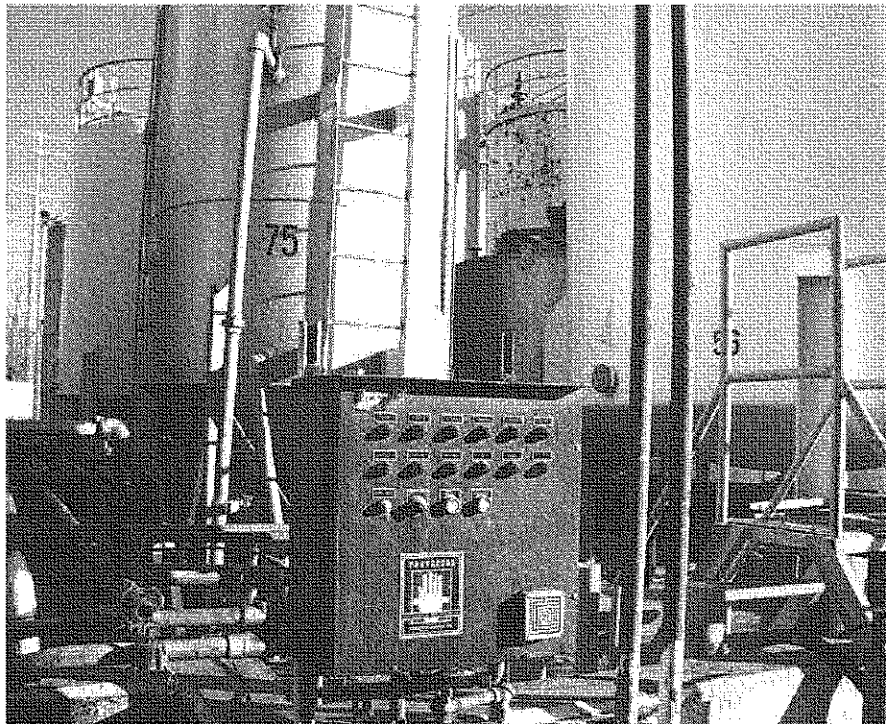
View from NW of Dike Area



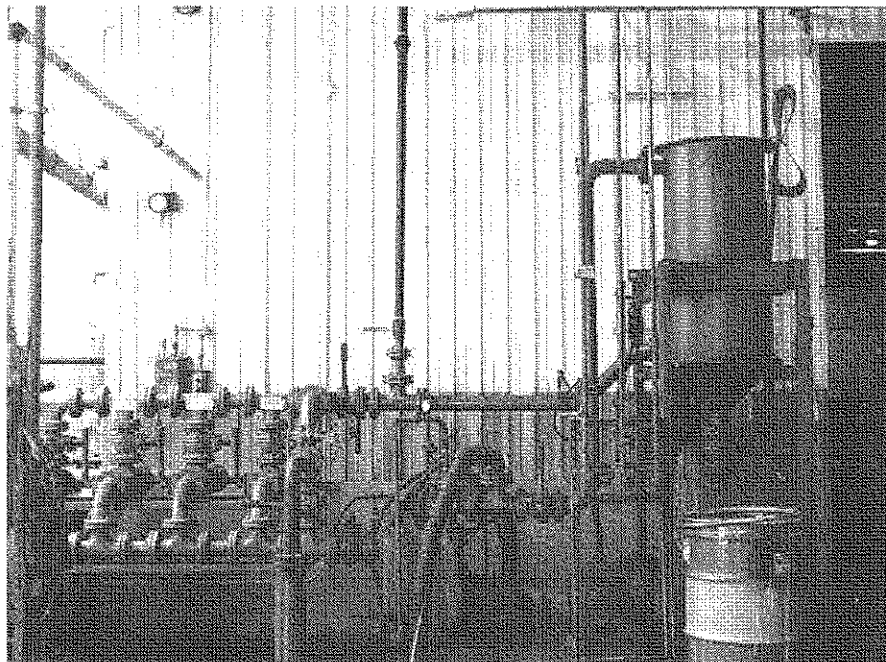
View from NE of H.W. Dike Area



## STORAGE TANKS

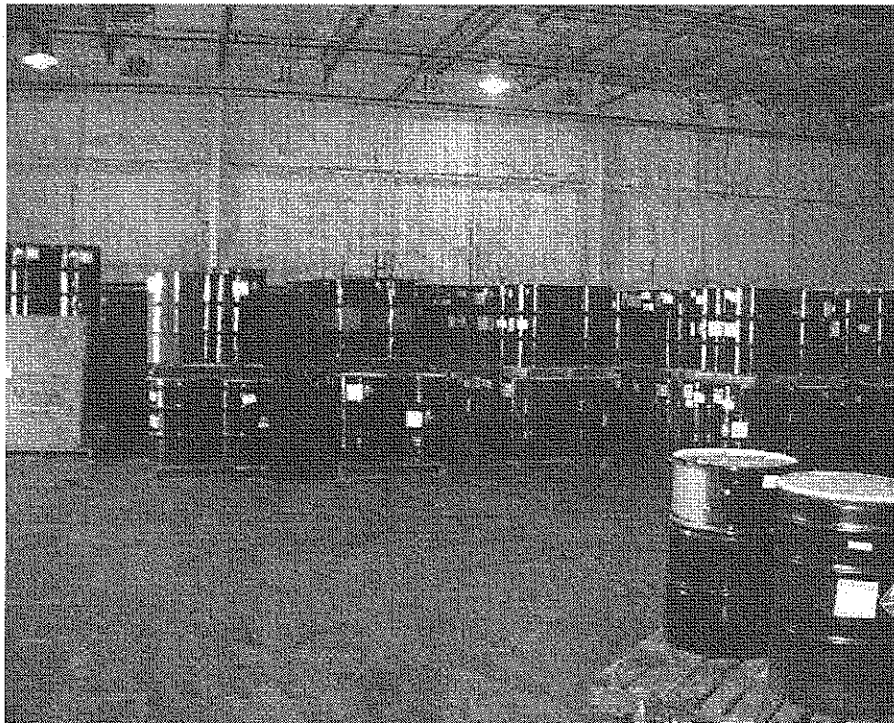
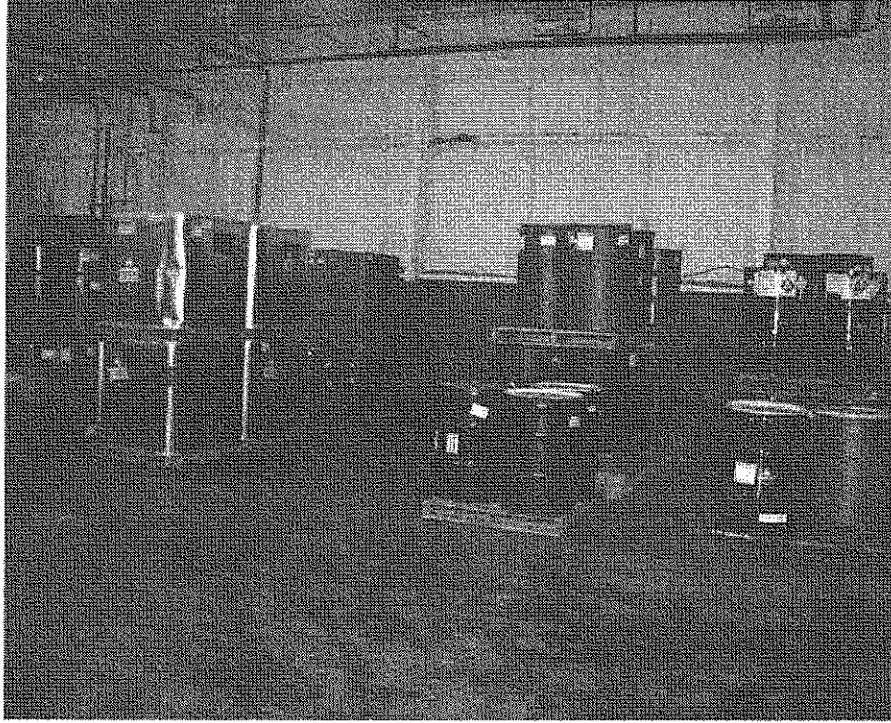


H.W. Bottoms Storage Tank Dike Area  
& High Level Alarm Panel



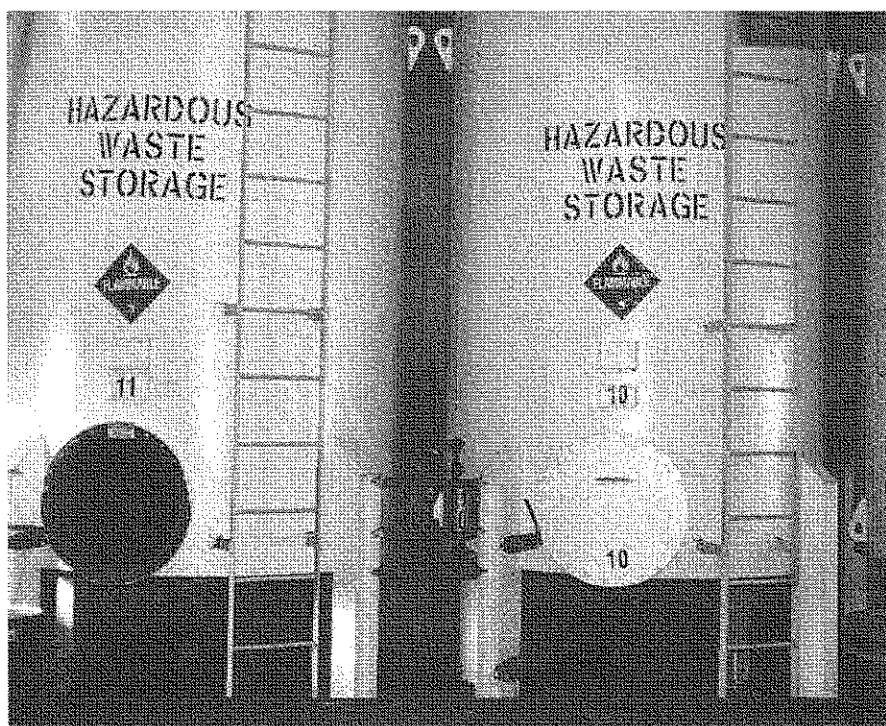
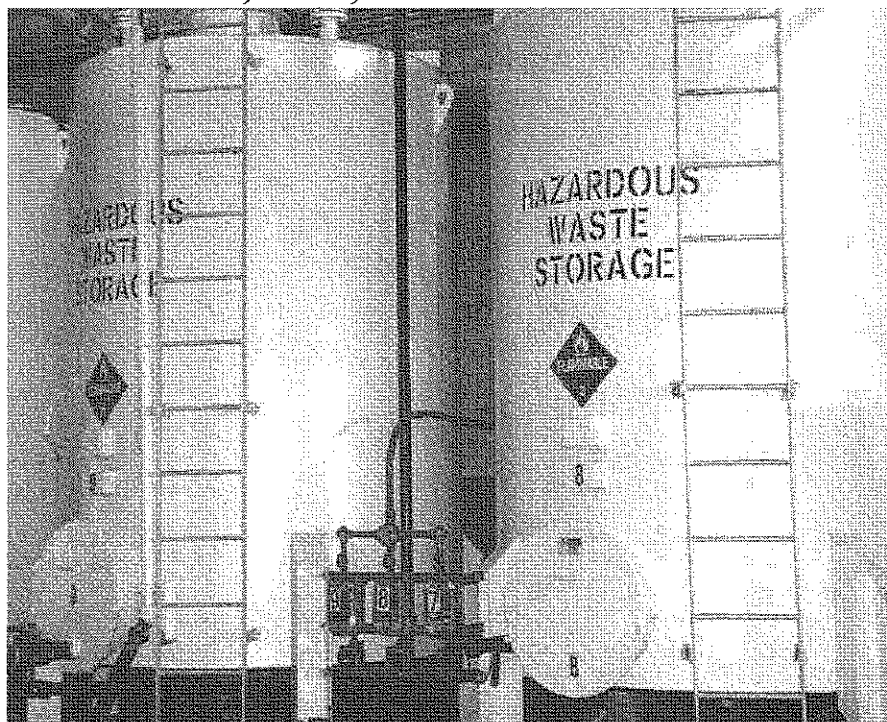
Manifold and Strainer (located under East Pad Canopy)

# EAST WAREHOUSE HAZARDOUS WASTE STORAGE AREA



# HAZARDOUS WASTE STORAGE TANKS

## T-8, T-9, T-10 AND T-11



**ATTACHMENT 2**  
**LEAK DETECTION COMPONENT DOCUMENTATION**



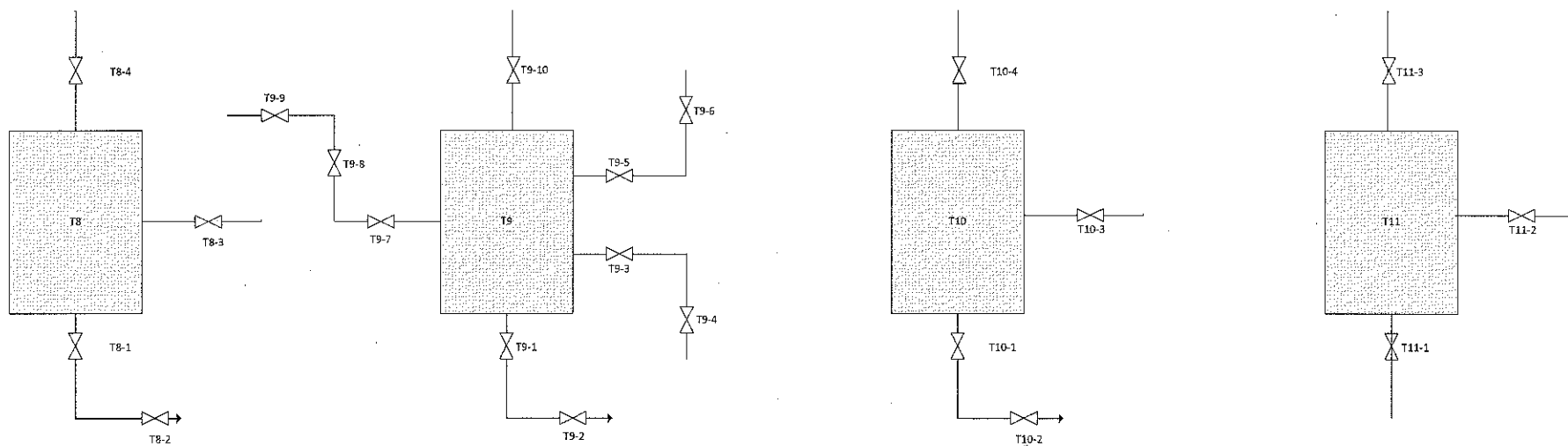


**ATTACHMENT 3**  
**TANK DOCUMENTATION**



FAIR IDENTIFIER	SUBPARTS CONTENTS	ALTERNATE TANK NUMBER	IS TANK READY	MAXIMUM OPERATING TEMPERATURE	MAXIMUM VAPOR PRESSURE	PRESSURE RELIEF	ROD TYPE	BOTTOM TYPE	VOLUME (GALLONS)	DIAMETER (FEET)	HEIGHT (FEET)	THICKNESS	MINIMUM STRESS (PSI/FEET)	MATERIAL	LOCATION
8	LEVEL 1	8-3-F	NO	AMBIENT	11.1 PSI	CONSERVATION VENT	FIXED	CONE	3,000	7	10.00	7 GA	0.095	Steel	RECLAMATION ROOM
9	LEVEL 1	9-3-F	NO	AMBIENT	11.1 PSI	CONSERVATION VENT	FIXED	CONE	3,000	7	10.00	7 GA	0.095	Steel	RECLAMATION ROOM
10	LEVEL 1	10-3-F	NO	AMBIENT	11.1 PSI	CONSERVATION VENT	FIXED	CONE	3,000	7.0	10.00	7 GA	0.095	Steel	RECLAMATION ROOM
11	LEVEL 1	11-3-F	NO	AMBIENT	11.1 PSI	CONSERVATION VENT	FIXED	CONE	3,000	7.0	10.00	7 GA	0.095	Steel	RECLAMATION ROOM
13	LEVEL 1	13-15M	NO	AMBIENT	11.1 PSI	CONSERVATION VENT	FIXED	CONE	15,000	10.0	27.00	3/8"	0.1033	Carbon Steel	FUEL BLEND
14	LEVEL 1	V210M	NO	AMBIENT	11.1 PSI	CONSERVATION VENT	FIXED	CONE	10,000	10.0	15.00	1/4"	0.0328	Carbon Steel	FUEL BLEND
15	LEVEL 1	V100M	NO	AMBIENT	11.1 PSI	CONSERVATION VENT	FIXED	DISH	9,500	9.5	27.00	1/4"	0.0328	Carbon Steel	FUEL BLEND
16	LEVEL 1	V600C	NO	AMBIENT	11.1 PSI	CONSERVATION VENT	FIXED	CONE	6,000	10.5	8.17	1/4"	0.0328	Carbon Steel	FUEL BLEND
52	LEVEL 1	6000V	NO	AMBIENT	11.1 PSI	CONSERVATION VENT	FIXED	CONE	6,000	8.0	15.17	1/4"	0.0464	Carbon Steel	NORTH TANK FARM
53	LEVEL 1	6000E	NO	AMBIENT	11.1 PSI	CONSERVATION VENT	FIXED	CONE	6,000	8.0	15.17	1/4"	0.0464	Carbon Steel	NORTH TANK FARM
55	LEVEL 1	V117	NO	AMBIENT	11.1 PSI	CONSERVATION VENT	FIXED	CONE	16,000	10.5	23.08	1/4"	0.1391	Carbon Steel	NORTH TANK FARM
56	LEVEL 1	V120	NO	AMBIENT	11.1 PSI	CONSERVATION VENT	FIXED	DISH	14,000	12.0	15.58	3/16"	0.071	Carbon Steel	NORTH TANK FARM
58	LEVEL 1	V214	NO	AMBIENT	11.1 PSI	CONSERVATION VENT	FIXED	FLAT	14,000	10.5	24.00	3/8"	0.0233	Carbon Steel	NORTH TANK FARM
60	LEVEL 1	V414	NO	AMBIENT	11.1 PSI	CONSERVATION VENT	FIXED	DISH	14,000	10.5	15.58	3/8"	0.0233	Carbon Steel	NORTH TANK FARM
61	LEVEL 1	V514	NO	AMBIENT	11.1 PSI	CONSERVATION VENT	FIXED	FLAT	14,000	10.5	24.00	3/8"	0.0233	Carbon Steel	NORTH TANK FARM
62	LEVEL 1	V614	NO	AMBIENT	11.1 PSI	CONSERVATION VENT	FIXED	FLAT	14,000	10.5	24.00	3/8"	0.0233	Carbon Steel	NORTH TANK FARM

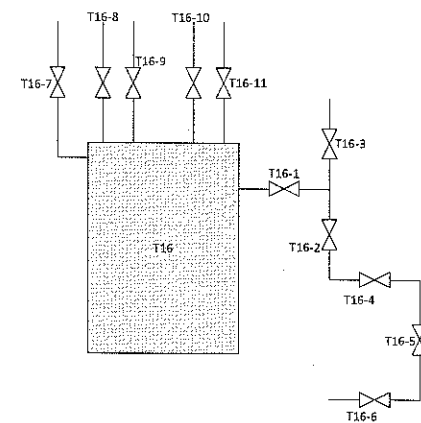
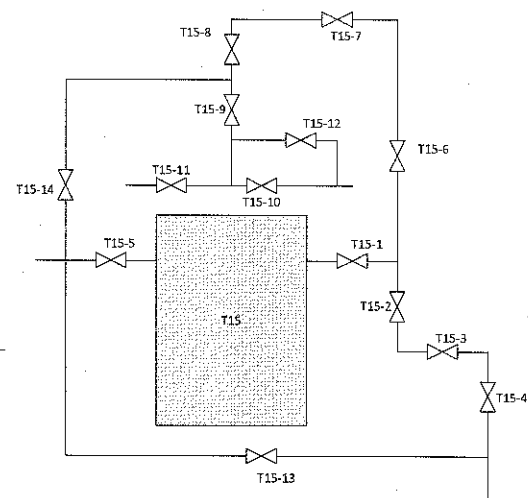
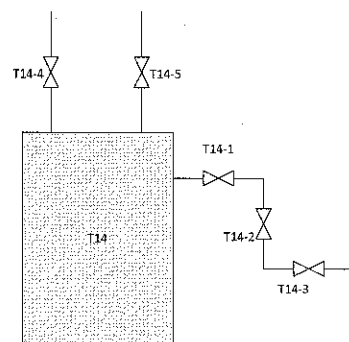
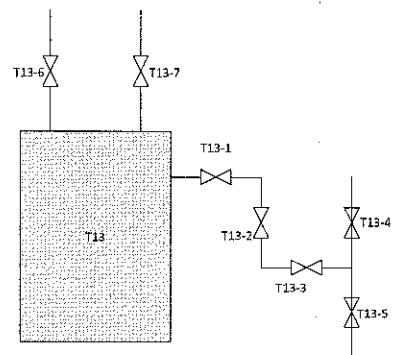




Bedford Environmental Services, LLC d/b/a  
Ohio Reclamation and Waste Services, LLC  
7013 Krick Road  
Bedford, Ohio 44146

Date	January 26, 2018
------	------------------

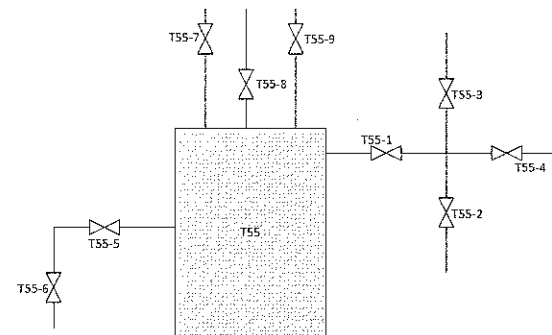
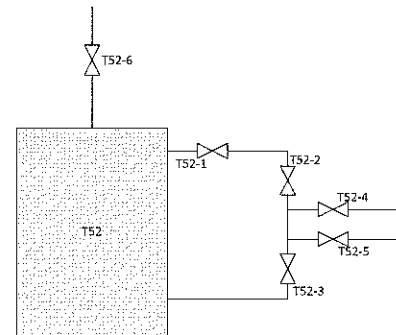
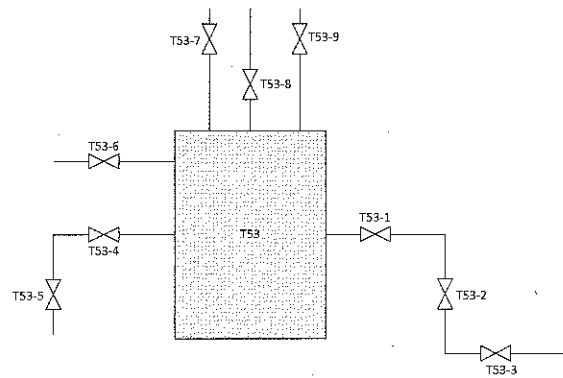
Tanks 8-11



Bedford Environmental Services, LLC d/b/a  
Ohio Reclamation and Waste Services, LLC  
7013 Krick Road  
Bedford, Ohio 44146

Date January 26, 2018

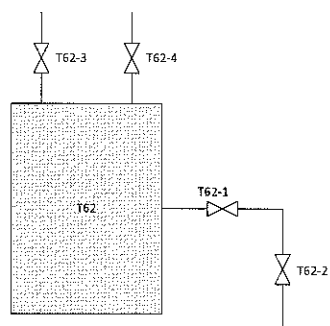
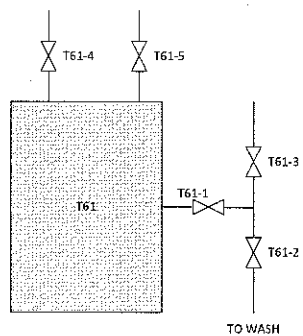
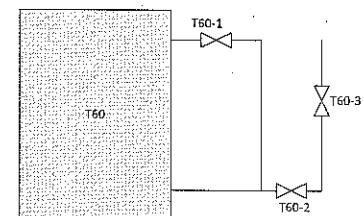
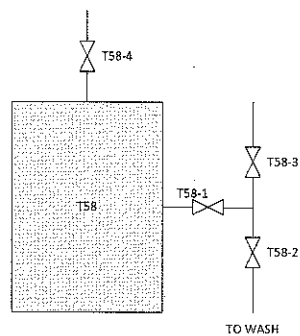
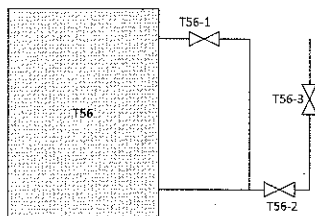
Tanks 13-16



Bedford Environmental Services, LLC d/b/a  
Ohio Reclamation and Waste Services, LLC  
7013 Krick Road  
Bedford, Ohio 44146

Date	January 26, 2018
------	------------------

Tanks 52, 53, 55



Bedford Environmental Services, LLC d/b/a  
Ohio Reclamation and Waste Services, LLC  
7013 Krick Road  
Bedford, Ohio 44146

Date	January 26, 2018
------	------------------

Tanks 56, 58, 60, 61, 62