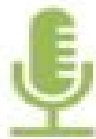




Heritage Thermal Services, LLC Draft Federal RCRA Permit

U.S. EPA, Region 5
January 12 and 14, 2021



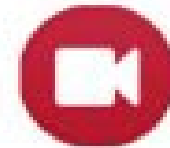
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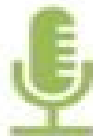
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Introductions

- Francisco Arcaute, Community Involvement Coordinator
- Jae Lee, US EPA Project Manager, Environmental Engineer
- Susan Mooney, Chief, RCRA C&D Section
- Mary Setnicar, Acting Chief, Land and Chemicals Branch



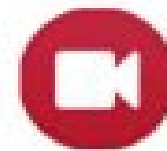
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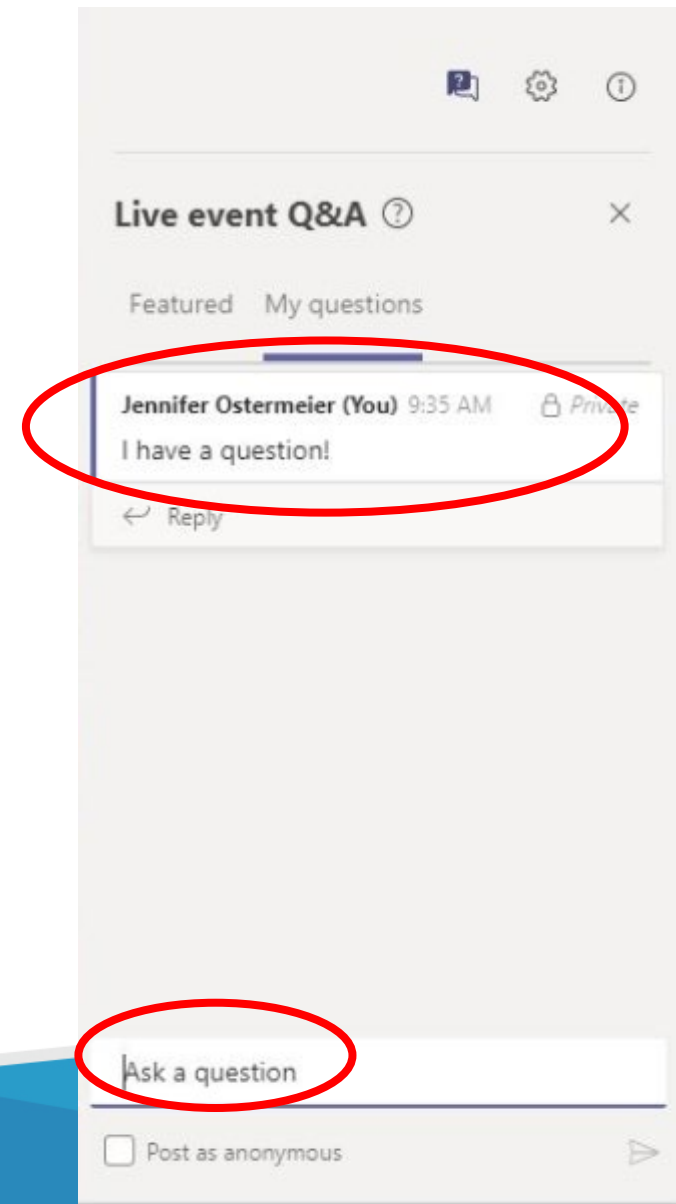
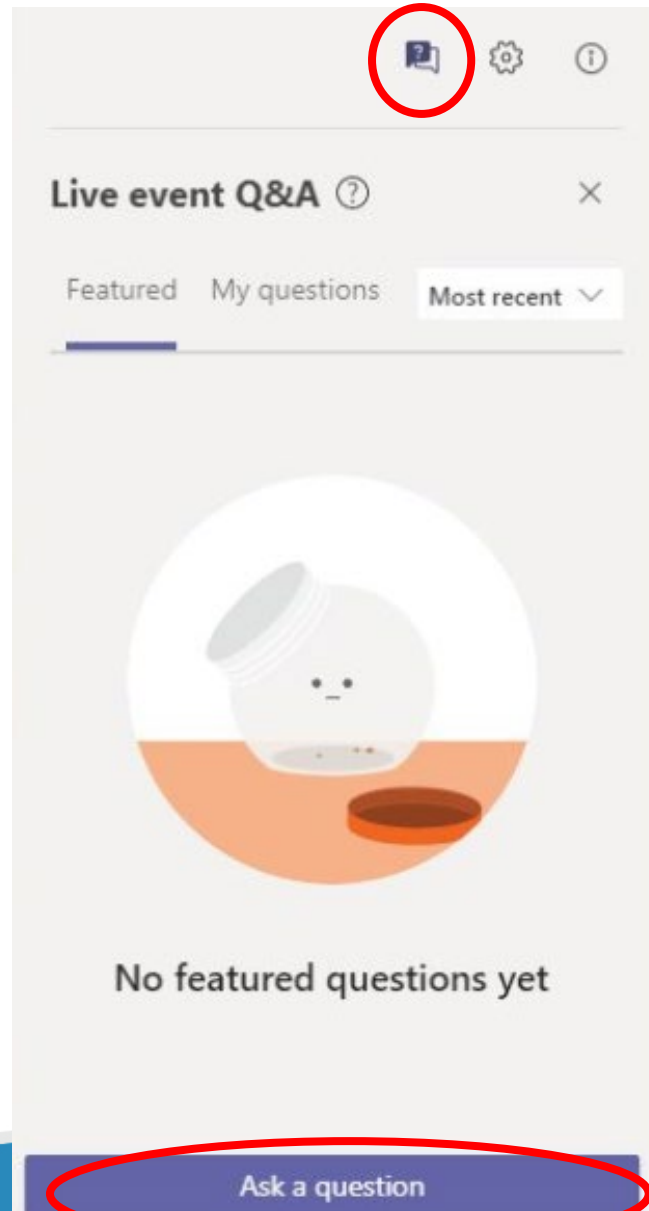


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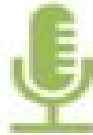
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The chat function will be used for questions and comments.



Agenda

- Permit Overview
- Questions and Answers Session on Presentation or Permitting Process
 - submit questions via chat
- Public Comment on Draft Federal RCRA Permit
 - submit name and comment via chat to be read into the record



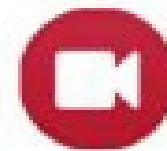
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Terms Used in this Presentation

- US EPA: Federal EPA
- Federal Permit: Permit issued by US EPA
- Ohio EPA: State of Ohio EPA
- State Permit: Permit issued by Ohio EPA
- RCRA: Resource Conservation and Recovery Act
- CAA: Clean Air Act



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RCRA Draft Federal Permit Process

- On August 28, 2020: EPA issued a public notice announcing a draft permit
- Public comment period: August 28 to October 16, 2020
- Public comment period extended to January 20, 2021



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State RCRA and CAA Permits

- Ohio EPA RCRA permit (1/17/2019):
 - Storage, treatment requirements for tank and containers
 - Corrective actions, incinerator, and groundwater monitoring
- Ohio EPA CAA permit (12/26/2018):
 - Operating conditions for incinerator, emissions from equipment, tanks, containers

Authorization of State RCRA Program

- Ohio is authorized to administer most RCRA programs
- Ohio has not yet been authorized to implement the Air Emission Standards found in 40 CFR Part 264 Subparts AA, BB, and CC



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Hazardous Waste Equipment and Unit

Heritage processes hazardous wastes

- Equipment
- Thirty (30) permitted tanks (370,500 gallons and 1,500 cubic yards)
- Eight (8) permitted container storage areas (maximum: 855,475 gallons)
- Extruder unit



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The Draft Federal RCRA Permit Includes:

Air emission standards (40 CFR Part 264, Subparts BB and CC)

- Subpart BB: emissions from equipment (such as pump or valve)
- Subpart CC: emissions from tanks and containers



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RCRA vs. CAA (Overlapping)

- Heritage Thermal can choose regulatory compliance either with Resource Conservation and Recovery Act (RCRA) or Clean Air Act (CAA)
- Both regulations have similar requirements for air emission standards

Federal RCRA Permit: Air Emissions from equipment (Subpart BB)

- Equipment - pumps, valves, flanges, and connectors
- Heritage will comply with RCRA regulations by documenting compliance with CAA

40 C.F.R. Part 61 – National Emission Standards for Hazardous Air Pollutants, Subpart V and Subpart J

Federal RCRA Permit: Air Emissions from Tank/Container (Subpart CC):

- Tanks and Containers: Heritage will comply with Clean Air Act - 40 C.F.R. Part 60, Subpart Kb, Part 61, Subpart FF, and Part 63, Subpart DD
- Except Tank #T-1
 - Tank T-1 will comply with RCRA



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Federal RCRA Permit: Air Emissions from Tank/Container (Subpart CC):

Tank #T-1: Heritage will comply with RCRA subpart CC standards:

- Volatile organic emissions from Tank T-1 should be reduced by 95 percent
- Control device: incinerator and carbon to control organic emissions
- Other requirements



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Tank T-1



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Federal RCRA Permit: Air Emissions from Extruder (Subpart CC)

Extruder: Heritage will comply with RCRA Subpart CC standard:

- Volatile organic emissions from Extruder should be reduced by 95 percent
- Control device: incinerator and carbon to control organic emissions
- Other Requirements



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Extruder Unit



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Question and Answer Session

- The Q &A session is to provide an opportunity for any questions on the presentation or the permitting process.
- This is not the official public comment portion of the meeting.
- You will be able to submit comments for the record after this Q & A session. Please hold your public comments until then.
- All participants are muted. You must use the chat function and type in your questions. Questions will be read aloud by our moderator.



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Public Comment Session

- To submit a public comment, type into the chat: your name, email address and comment.
- We will read the comment into the record. Your contact information will only be seen by EPA officials.
- After consideration of all comments received by January 20, 2021, EPA will make a determination on the issuance of a final permit.
- Everyone who submits a public comment will receive a copy the responsiveness summary and the final permit decision.

Additional Public Comment Opportunities

- If you prefer, you can submit your comments by January 20, 2021 by mail or email to:
Jae Lee, lee.jae@epa.gov
U.S. EPA Region 5 (mail code LL-17J)
77 W. Jackson Blvd., Chicago, IL 60604
- If you prefer to submit oral public comments, please attend our public meeting conference call on January 14, 2021 at 6 PM EST. 312-667-5632, conference code 1344648.



Thank you for participating.

Attending a public hearing is not required to make a comment on the proposed permit for the record. Comments can be submitted until Jan. 20, 2021 by mail or email to:
Jae Lee, lee.jae@epa.gov
U.S. EPA Region 5 (mail code LL-17J)
77 W. Jackson Blvd., Chicago, IL 60604