HERITAGE
THERMAL SERVICES

HERITAGE THERMAL SERVICES
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OHSAS 18001: 2007
ISO 14001: 2004
ISO 9001: 2008

May 3, 2016
VIA PRIORITY MAIL
RETURN RECEIPT REQUESTED

RECEIVED
MAY 10 2016
AIR ENFORCEMENT BRANCH
U.S. EPA REGION 5

Mr. Jeremy Carroll
OEPA-DHWM-CO
P.O. Box 1049
Columbus, Ohio 43216-1049

Re: Class 1A Permit Modification Request
Compressed Gas 13
Heritage Thermal Service - OHD 980 613 541/ 02-15-0589

Dear Mr. Carroll:

Please consider this letter a request for a Class 1, with prior approval from the Director (1A), permit modification pursuant to Ohio Administrative Code Chapter 3745-50-51 (D) (b). This permit modification is described in paragraph C-2e(5)d of Section C of the facility's approved Part B permit application.

In a letter dated January 30, 2008, the Ohio EPA approved a Class 2 permit modification for Heritage Thermal Services, Inc. (HTS). This Class 2 permit modification allowed HTS to accept and treat two specific types of compressed gases. Section C, Waste Characteristics and Waste Analysis Plan (WAP), of the Part B permit application was modified for this permit modification. Section C-2e(5)d and reads as follows:

> *If the Permittee requests to add additional compressed gases to their permit, the Permittee shall evaluate the specific gas waste stream to ensure it does not pose risks that were not addressed during the 2002 accident analysis. If the new gaseous waste stream does not pose any additional risks, the Permittee may add the compressed gas to the permit following the class 1A permit modification process. If the new gaseous waste stream does pose additional risk(s), the Permittee may add the compressed gas to the permit following the class 2 permit modification process. Examples of the criteria to be used to evaluate a new gas or gas mixture include, but are not limited to: (1) hazardous versus non-hazardous; (2) vapor pressure; (3) vapor density; (4) exposure guidelines; (5) solubility in water; (6) composition; and (7) flammability.*

In accordance with the permit modification approved January 30, 2008, HTS is requesting to add four (4) flammable compressed gases in trace amounts to the currently approved compressed gas list found in Table C-1a(2)(i). After researching these mixtures, HTS found that these waste streams meet the acceptability criteria of the WAP and can be added to permit through the procedure described in C-2e(5) . By themselves, these trace gases would be classified as flammable and be prohibited under the current permit. However when added to a mixture at concentrations below the lower flammability limit (LFL), the trace gases are not classified as flammable gases by the Department of Transportation (DOT) since the mixture is not flammable. The primary hazard of these gases is toxicity, which was addressed with the 2002 accident analysis. Safety Data Sheets (SDS) for each of these gases have been provided for informational purposes only and are not intended to be included as part of the facility's Part B permit application. HTS will process compressed gas mixtures containing these component gases through Direct Organic Tanker East (Bay #1).

In addition to the flammable compressed gases being added to the permit, HTS is also requesting to add one (1) compressed gas that is not flammable but will also only be accepted in trace concentrations. A SDS for this component gas has been included with this permit modification request for your review. This SDS should not be incorporated into the permit. HTS will process compressed gas mixtures containing this component gas through Direct Organic Tanker East (Bay #1).

HTS requests to add the following flammable compressed gases to the approved list as a trace component with the noted concentration:

- Chlorotrifluoroethylene (R-1113) – Up to 2% concentration
- Difluoroethane (R-152a) – Up to 1% concentration
- Isobutane (R-600) – Up to 1% concentration
- Chlorodifluoroethane (R-142b) – Up to 2% concentration

HTS requests to add the following non-flammable compressed gas to the approved list as a trace component with the noted concentration:

- Sulfur Dioxide (R-764) – Up to 1% concentration

The proposed permit modification will affect the following sections of the facility's Part B permit application. Please add/replace the following pages accordingly:

Section C – Waste Characteristics and Waste Analysis Plan
All pages for Section C are Revision 39, dated May 3, 2016.

Replace Cover Page – New revision number and date
Replace Page C-15– Add new gases to waste received at the facility

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 certain penalties for submitting false information including the possibility of fine and imprisonment for knowing violations.

Thank you and if you have any questions or comments, please call me at the above number.

Sincerely,

Carrie L Beringer

Carrie L. Beringer
Environmental, Health, & Safety Manager
Heritage Thermal Services

cc: Natalie Oryshkewych, OEPA-NEDO-DMWM
John Paquelet, OEPA – NEDO – DMWM
Paul Dolensky – OEPA – NEDO – DMWM
John Nyers, OEPA-CO-DMWM
Jae Lee, USEPA – Region V

SECTION C
WASTE CHARACTERISTICS AND WASTE ANALYSIS PLAN

Heritage Thermal Services, Inc.
East Liverpool, Ohio

Revision 39 – May 3, 2016

The generator will certify through chemical analyses, material safety data sheets (MSDS), or other acceptable data that each waste shipment of compressed gas received is accurately characterized by the waste profile for that specific gas mixture.

The annual maximum quantity of gaseous waste treated will be limited by the total volume of waste permitted to be treated by incineration.

TABLE C-1a(2)(i)
APPROVED COMPRESSED GAS AND GAS MIXTURES

Telomer Gas	Chlorotrifluoroethane
Chlorodifluoromethane	Monochloropentafluoroethane)
Trifluoromethane	1,1 Dichlorotetrafluoroethane (CFC-114a)
Dichlorotetrafluoroethane	1,2 Dichlorotetrafluoroethane (Halocarbon R-114)
1,1,1,2–Tetrafluoroethane mixture (HFC-134A)	Difluoromethane(R32)
1,2-Dichloro-1,1,2-Trifluoroethane (HCFC-123a)	Trichlorofluoromethane(HalocarbonR-11)
Dichlorodifluoromethane	1,1,1 Trifluoroethane (Halocarbon 143a)
Pentafluoroethane(Halocarbon-R-125)(1,1,1,2,2 – Pentafluoroethane)	Chlorotetrafluoroethane (R-124)
Perfluoroethane (ZYRON 116)	Dichlorodifluoroethylene (R-1112)
Dichlorofluoromethane (R-21)	Octofluorocyclobutane (R-318)
Chlorotrifluoromethane (R-13)	Chlorotrifluoroethylene (R-1113) – Up to 2% concentration
Difluoroethane (R-152a) – Up to 1% concentration	Isobutane (R-600) – Up to 1% concentration
Chlorodifluoroethane (R-142b) – Up to 2% concentration	Sulfur Dioxide (R-764) – Up to 1% concentration

C-1a(2)(ii) Wastes with Treatment Restrictions

Treatment restrictions are necessary for wastes that cannot be treated by incineration, but can be stored at the facility and later sent to an alternate facility for proper treatment, reclamation, or reuse. Examples include some (not all) inorganic wastes characterized with D004-D011 waste codes, asbestos, asbestos waste, and waste codes which require treatment technologies currently unavailable at the facility. These wastes may be accepted by the facility for storage and re-manifested to other approved treatment facilities.