

1.0 INTRODUCTION

Weavertown Transport Leasing, Inc. (WTL) proposes to re-develop a portion of their property located in Grandview Township, Washington County, Ohio for use as a transfer station that will be used to provide solidification of non-hazardous industrial wastes (liquids, sludges and semi-solids) and solid waste transfer services. The waste streams will be primarily generated by oil and gas exploration/production companies and industrial manufacturing companies located in eastern Ohio, western West Virginia and western Pennsylvania. This Solid Waste Permit to Install (PTI) application includes an Exemption Request for the acceptance of non-hazardous, industrial wastes (liquids and sludges) in accordance with the Ohio Revised Code (ORC) 3734.02(G). The Exemption Request is included in Appendix A of this PTI application.

WTL owns and operates a similar solidification and transfer station located in Cecil, Pennsylvania which operates under a Residual Waste Permit issued by the Pennsylvania Department of Environmental Regulation (PADER). The WTL Cecil facility received approximately 40,000 tons of residual material at the Cecil facility in 2011. WTL has never received a violation notice from PADER associated with the operation of the Cecil Pennsylvania facility.

This PTI Application presents information and data pertaining to the siting, design, construction and operation of the proposed solid waste transfer facility. WTL is the permit applicant and will be the operator of the proposed WTL Transfer Facility. This PTI Application presents a concise, yet comprehensive discussion of the proposed WTL Transfer Facility.

1.1 PTI CERTIFICATIONS

WTL is an emergency response and waste transport company who has managed and operated the previously mentioned residual waste solidification and transfer facility located in Cecil, Pennsylvania and are in substantial compliance with applicable provisions of the Transfer Facility Permit – I.D. No. 101532 and APS No. 317628 issued by PADEP.

The proposed WTL Transfer Station has been designed to ensure the construction, operation, and closure of the facility will meet and/or exceed the requirements and criteria specified in the Ohio Administrative Code (OAC):

- OAC 3745-27-21 Solid Waste Transfer Facility Permit to Install Application;
- OAC 3745-27-22 Additional Criteria for Approval of Solid Waste Transfer Facility Permit to Install Applications;
- OAC 3745-27-23 Operation of Solid Waste Transfer Facilities; and,
- OAC 3745-27-24 Final Closure of Solid Waste Transfer Facilities.

The facility design will also ensure the operational compliance with ORC Chapters 3734 – Solid and Hazardous Wastes, 3704 – Air Pollution Control, and 6111 – Water Pollution Control, where these chapters specifically pertain to solid waste transfer facilities.

1.1.1 Disclosure Statement

WTL meets the requirements of ORC Sections 3734.42 to 3734.44 and rules adopted thereafter. A Disclosure Statement will be submitted in August 2012 to the Environmental Background Investigation Unit (EBIU) of the State of Ohio Attorney General's office in accordance with OAC 3745-27-22 (G).

1.2 PTI NOTIFICATIONS

Letters of Intent which describe the facility including a description of the property location were sent via certified mail to the following entities:

- Washington County Health Department
- Washington County Board of Commissioners
- Washington County Regional Planning Commission
- Grandview Township Trustees
- Grandview Township Volunteer Fire Department
- Southeastern Ohio Joint Solid Waste Management District
- Southeastern Ohio Port Authority
- The Village of New Matamoras, Mayor's Office
- American Electric Power
- Wayne National Forest – Public Affairs
- Ohio EPA, Southeast District Office, Division of Air Pollution Control
- Ohio EPA, Southeast District Office, Division of Water Pollution Control

Copies of the Letters of Intent and the certified mail receipts are provided in Appendix B. – Letters of Intent.

1.3 PTI APPLICATION ORGANIZATION

The organization of the PTI Application is intended to provide a description of the transfer station facility and proposed operations, confirmation of compliance with siting criteria, and to follow a logical progression of activities required to present how the WTL Transfer Station will be designed, constructed, and operated. This PTI Application includes the following sections with tables, figures, and drawings provided to summarize and graphically present information and data where appropriate.

Section 1.0 – Introduction

Presented as Section 1.0, the Introduction provides certifications and notifications and the organization of the PTI Application.

Section 2.0 - Facility Description

The Facility Description is provided in Section 2.0 of the PTI Application. This section provides a description of the current site conditions, the proposed facility including physical layout and operations; ownership and surrounding land use information; and an overview of the waste management practices that will be employed at the facility.

Section 3.0 – Siting Criteria

The Siting Criteria, presented as Section 3.0, provides discussions related to how the proposed facility complies with the requirements and restrictions for permitting, constructing, and operating a solid waste transfer facility.

Section 4.0 – Facility Design

The facility design aspects will be presented in Section 4.0 to provide descriptions related to, but not limited to, the facility layout, facility access, storm water management and control, and leachate management.

Section 5.0 - Facility Operation

How the facility will be operated to comply with the regulations governing the operation of a solid waste transfer station and material recycling facility are presented in Section 5.0 – Facility Operation.

Section 6.0 – Closure Plan

Methods incorporated to close the WTL Transfer Station including a discussion of the financial assurance for the final closure and required notifications, scheduling, and monitoring are presented in Section 6.0 – Closure Plan.

2.0 FACILITY DESCRIPTION

The WTL Transfer Station will process/solidify and transfer non-hazardous liquid and solid waste streams. The WTL Transfer Station will be owned and operated by:

Weavertown Transport Leasing, Inc.
2 Dorrington Road
Carnegie, Pennsylvania 15106

The WTL Transfer Station is located on property owned by WTL since the mid-1980's and includes two parcels located in Grandview Township, Washington County, Ohio. An ALTA/ACSM survey drawing and property deeds are provided in Appendix C – Property Ownership. Section 2.2 below provides additional information regarding the WTL property.

The facility has been designed to include the following waste processing services:

- Solidification of industrial wastes consisting of liquids and sludges prior to transport to licensed municipal solid waste landfill;
- Combining non-hazardous solid wastes for disposal in a licensed municipal solid waste landfill;
- Oily liquids processing to recover waste oils which will be sold to a secondary fuels market;
- Used oil collection and transportation to a secondary fuels market;
- Non-hazardous, drummed waste management; and,
- Temporary, in-transit storage of hazardous waste materials.

All incoming waste streams will be properly characterized and evaluated for compatibility. Solid compatible materials will be placed in a roll-off container for transport to a licensed municipal solid waste landfill. Liquid and semi-solid materials which do not pass the paint filter test will be off-loaded into a solidification basin for drying and bulking, then transported to a licensed municipal solid waste landfill. Oily waste waters will be processed to recovered oils which will be sold to a secondary fuels market. Used drums will be either cleaned for re-use or crushed and disposed a licensed municipal solid waste landfill.

Drying, bulking and solidification agents include, but are not limited to, the following types of solid wastes and soils from remediation projects:

- Paper mill by-products;
- Saw dust and scrap from milling operations;
- Combustion by-products (dust, ash and slag);
- Flue gas desulfurization by-products;
- Spent filtration media;
- Foundry sand;
- Lime/cement kiln by-products;
- Lime-solidified by-products;
- Agricultural by-products;
- Petroleum contaminated soils (PCSs) and oily soils from spill clean ups, other than from underground storage tank remediation projects; and,
- Other absorbent, non-hazardous solid wastes.

Categories of liquid and semi-solid wastes to be processed at the facility include:

- Combustion Residues;
- Metallurgical Process Residues;
- Sludges and Scales;
- Chemical Wastes (wastes containing non-hazardous chemicals, cleaning agents, detergents, etc.);
- Generic Manufacturing Wastes;
- Special Handling Wastes;
- Industrial Equipment, Maintenance Waste/Scrap;
- Non-Coal Mining Oil and Gas, and Other Well Drilling Wastes; and,
- Miscellaneous.

Table 1 provides a more detailed list of waste materials under the general categories above.

2.1 FACILITY LOCATION

The WTL Transfer Station will be located in Grandview Township, Washington County approximately 1 mile south of the Village of New Matamoras, Ohio (please refer to Drawing 1A

– Title Sheet). The facility property address is 50810 State Route (S.R.) 7, New Matamoras, Ohio 45767. The facility property is bound by SR 7 to the northeast, 1st Avenue to the northwest, the Ohio River to the southwest, and an American Electric Power (AEP) substation and residential property to the southeast. Access to the site will be from three existing driveways off S.R. 7.

2.2 SITE DESCRIPTION

Site features including the topography of the property are presented on Drawing No. 2A - Site Environs. The facility property is elevated approximately 25 feet above the Ohio River and is otherwise relatively flat lying. The WTL property is approximately 10.47 acres and was formerly used as a Shell Oil Tank Farm and is currently used by WTL for environmental emergency response for spills on the Ohio River. There is an approximate 5,600 square foot brick commercial building on the property that is currently used by WTL to house their emergency response personnel and equipment. The existing tank farm contains three above ground storage tanks that are approximately 1.2 to 1.7 million gallons each in volume. The tanks are encompassed by an earthen spill containment berm. Appurtenances associated with the tank farm include a pump island for tanker truck loading and a barge unloading station consisting of piping and a catwalk that is approximately 170 feet long. WTL has recently leased the tank farm and pump island to Green Hunter who will operate a brine transfer facility on the WTL property.

The proposed WTL Transfer Station building and staging areas are also shown on Drawing No. 2A – Site Environs. All waste handling area, with the exception of the bulk liquids unload pad, will be enclosed and under roof. The transfer station building is approximately 11,825 square feet and includes a 30-foot wide by 36-foot long by 8-foot deep steel solidification basin with secondary containment, 1,400 square foot drum storage area, a 1,300 square foot oily water processing area and a 600 square foot on-site laboratory and office area. Eight (8), six hundred (600) barrel above ground storage tanks (total capacity of approximately 200,000 gallons) will be used to temporarily store incoming oily waste water that will be processed in the oily water processing area. Recovered oils will be sold to used oil recycling vendors.

2.3 ADJACENT PROPERTY USES

The land adjacent to the property along S.R. 7 is used mainly for residential and retail business purposes. 1st Avenue to the northeast is residential. As stated previously, AEP operates a

substation which is contiguous to the WTL property at the southwest boundary. The Ohio River to the southeast is a major shipping waterway for commercial and industrial material transportation.

2.4 FACILITY LAYOUT

The WTL Transfer Station can be segregated into waste handling areas, truck scale, office and laboratory, staging areas and the bulk liquid tank farm. Drawing 3A – Site Layout shows the facility boundary and site access from S.R. 7, the transfer station building, tank farm, truck scale, roll-off container staging areas and tanker trailer staging area.

Waste handling areas are under roof with the transfer station building, with the exception of the bulk liquid unload pad and include the following:

- Solidification Basin;
- Truck Unload Floor;
- Transfer Trailer Loading Ramp;
- Unload/Loading Dock;
- Drum Storage Area;
- Oily Water Processing Area; and,
- Bulk Liquid Unload Pad.

Drawing 3B – Transfer Station Plan presents the locations of each of these waste handling areas at the proposed facility. Details of the WTL Transfer Station design are presented on Drawing 3C – Transfer Station Building Section Views and in Section 4.0 – Facility Design. Details of the facility operation are presented in Section 5.0 – Facility Operation.

3.0 SITING CRITERIA

The proposed WTL Transfer Station and waste handling areas (proposed transfer station building and bulk liquid unload pad) are located to adhere to the siting criteria as specifically defined within OAC 3745-27-22 Additional Criteria for Approval of Solid Waste Transfer Facility Permit to Install Applications. The specific criteria are addressed in the following narrative.

OAC 3745-27-22 (C) The waste handling areas of the solid waste transfer facility are not located in a regulatory floodplain. The Federal Emergency Management Agency (FEMA) Firmette Map, Panel 164 of 479 indicated that the WTL property was within the regulatory floodplain. However, inspection of the WTL property elevations compared to the floodplain elevation in the site vicinity indicated that much of the property was mistakenly included in the floodplain by FEMA. Thus, WTL and CEC submitted a request for a Letter of Map Amendment (LOMA) from FEMA, which was approved in a letter dated March 15, 2012. The waste handling areas (transfer station building and bulk liquid unload pad) are no longer in the regulatory floodplain. The FEMA approval letter is included in Appendix D – LOMA & Floodplain Development Permit Application.

OAC 3745-27-22 (D) The waste handling areas of the solid waste transfer facility are not located within two hundred feet of any surface waters of the state, as defined in rule 3745-1-02 of the Administrative Code. WTL has attained agreement from the Ohio EPA, SEDO that the Ordinary High Water Mark (OHWM), that is defined by the U.S. Corp of Engineers, represents the 200 foot offset position from the Ohio River. Appendix E – Ohio River Offset Correspondence provides correspondence between CEC and Ohio EPA SEDO regarding use of the OHWM for the surface water offset criteria. Please refer to Drawing No. 2A – Site Environs to observe the 200 foot surface water offset. The Transfer Station waste handling areas are not located within 200 feet of any surface waters of the state.

OAC 3745-27-22 (I) The solid waste transfer facility is not located in any of the following areas, in existence on the date of receipt of the permit to install application by Ohio EPA:

- (1) **National park or recreation area.** The Transfer Station is not located within a national park or recreation area.

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- (2) **Candidate area for potential inclusion in the national park system.** The Transfer Station is not located within a candidate area for potential inclusion in the national park system.
 - (3) **State park or established state park purchase area.** The Transfer Station is not located within a state park or established state park purchase area.
 - (4) **Any property that lies within the boundaries of a national park or recreation area but that has not been acquired or is not administered by the secretary of the United States Department of the Interior.** The Transfer Station is not located within the boundaries of a national park or recreation area.

OAC 3745-27-22 (J) The waste handling areas of the solid waste transfer facility are not located within five hundred feet of the following, which are in existence on the date of receipt of the permit to install application by Ohio EPA:

- (1) **Areas designated by the Ohio Department of Natural Resources as either a state nature preserve, a state wildlife area, or a state scenic river.** The Transfer Station waste handling areas are not located within a state nature preserve, a state wildlife area, or a state scenic river.
- (2) **Areas designated, owned, and managed by the Ohio Historical Society as a nature preserve.** The Transfer Station waste handling areas are not located within an area designated, owned, and managed by the Ohio Historical Society as a nature preserve.
- (3) **Areas designated by the United States Department of the Interior as either a national wildlife refuge or a national scenic river.** The Transfer Station waste handling areas are not located within either a national wildlife refuge or a national scenic river.
- (4) **Areas designated by the United States Forest Service as either a special interest area or a research natural area in the Wayne National Forest.** The Transfer Station waste handling areas are not located within a special interest area or a research natural area in the Wayne National Forest.

- (5) **Surface waters of the state designated by the Ohio EPA as either a state resource water, a coldwater habitat, or an exceptional warm water habitat, as classified in accordance with Chapter 3745-1 of the Administrative Code.** The Transfer Station waste handling areas are not located within 500 feet of surface waters of the State of Ohio designated as a state resource water, a coldwater habitat, or an exceptional warm water habitat.

OAC 3745-27-22 (K) The waste handling areas of the solid waste transfer facility are not within two hundred fifty feet of a domicile in existence on the date of receipt of the permit to install application by Ohio EPA. The Transfer Station waste handling areas are not located within 250 feet of a domicile. Please refer to Drawing No. 2A – Site Environs for the 250 foot offset position from the closest domiciles.

4.0 FACILITY DESIGN

This section of the PTI Application provides discussions and information pertaining to the following facility design features:

- Transfer Station Building including:
 - Solidification Basin;
 - Truck Unload Floor;
 - Transfer Trailer Loading Ramp;
 - Unload/Loading Dock;
 - Drum Storage Area;
 - Oily Water Processing Area; and,
 - Laboratory and Office Area.
- Bulk Liquid Storage Tanks;
- Bulk Liquid Unload Pad;
- Leachate Management System;
- Erosion Control System; and,
- Facility Access, Roads, and Staging Areas.

Drawing 3B – Transfer Station Plan identifies the plan location of each of the features of the Transfer Station Facility. Details of the WTL Transfer Station design are presented on Drawing 3C – Transfer Station Building Section Views. A narrative description of each area is provided in the following sections.

4.1 TRANSFER STATION BUILDING

The Transfer Station Building will be a four-sided, steel frame structure with metal siding built on reinforced concrete foundation/footers and floor slabs. The structure is approximately 11,825 square feet and includes a Solidification Basin that consists of a water-tight, welded steel structure that is contained within a reinforced concrete secondary basin. The Solidification Basin will also have a sand-filled leak detection zone between the steel structure and the secondary concrete containment. The Truck Unload Floor, Transfer Trailer Loading Ramp, Unload/Loading Dock, Drum Storage Area and Oily Water Processing Area will be reinforced concrete that is 8 inches thick which will provide adequate capability to withstand the forces and weights

of the equipment and containers during normal facility operations. The building layout is presented as Drawing No. 3B - Transfer Station Plan.

Ramps and aprons surrounding the structure will be constructed of reinforced concrete, as will the Tanker Trailer Staging Area. Aggregate surfaces will be used for the remainder of the approaches to the building apron and ramps, internal access areas, staging areas and site access roads.

4.2 SOLIDIFICATION BASIN

The Solidification Basin is an approximate 30 feet by 36 feet by 8 feet deep water-tight, ½ inch thick, welded steel mixing structure, surrounded by secondary containment and leak detection zone. Secondary containment is provided by 12 inch thick, reinforced concrete structure which is separated from the steel mixing structure by a nominal 2 ½ inch thick, sand-filled, leak detection zone. The sand-filled leak detection zone will be installed on the bottom and all four sides between the steel mixing basin and the secondary concrete containment structure. A ½ inch thick steel flange will be anchored into the concrete floor and welded to the top of the steel mixing structure to stabilize the steel structure and to prevent fluids or waste from entering the sand-filled leak detection zone from the surrounding concrete floor. The leak detection system has been design to identify any leakage due to damage to the steel mixing structure and will provide adequate monitoring of the mixing structure integrity.

The reinforced concrete secondary containment will be 12 inches thick on all sides and will be sloped to a low point where a 1 inch I.D. PVC slotted standpipe will serve as a witness tube to allow any fluids that may collect in the leak detection zone to be detected using an electronic water level indicator. If liquids collect in the leak detection zone, they can be drained to the leachate collection sump following repair of the leak in the steel basin. This will be accomplished using a dual contained pipe and valve system that will extend from the low area in the secondary concrete containment, through the wall of the concrete containment and into the leachate collection sump. Drawing 3B – Transfer Station Plan provides the plan view of these features and Drawing 3D – Waste Handling Area Plan and Profiles provides details of each of these features.

4.3 TRUCK UNLOAD FLOOR

The Truck Unload Floor will have approximate dimensions of 53 feet by 47 feet and will be constructed of 8 inch thick reinforced concrete. The truck unload area floor will be sloped to force spills during truck unloading or from wet cleanup to drain into the Solidification Basin. Overhead doors will allow the Truck Unload Floor to be secured and will minimize noise. A 6 inch diameter steel wheel stop will be positioned approximately 18 inches above the concrete floor and adjacent to the Solidification Basin to prevent trucks from backing into the basin.

4.4 TRANSFER TRAILER LOADING RAMP

The Transfer Trailer Loading Ramp will be an 8-inch thick, reinforced concrete structure that will slope downward 6 feet below the Truck Unload Floor. This will allow a hydraulic excavator to easily load the trailers with solidified material from the Solidification Basin. Empty transfer trailers will be backed into the sloped ramp and pulled forward after loading.

4.5 UNLOAD/LOADING DOCK

The Unload/Loading Dock will be used primarily for delivery of drummed, non-hazardous waste materials and other miscellaneous supply deliveries. The Unload/Loading Dock will be constructed of 8 inch thick, reinforced concrete that will slope downward to 4 feet below the Truck Unload Floor. The dock will be 25 feet wide to allow for both truck access and a roll-off container that will be used for off-site transport of compatible solids, crushed drums and other drummed debris. The Unload/Loading Dock will be partially covered by an overhanging roof.

4.6 DRUM STORAGE AREA

The Drum Storage Area is an approximate 25 foot by 56 foot area constructed with an 8 inch thick, reinforced concrete floor that is adjacent to the Unload/Loading Dock and the Solidification Basin. Waste delivered to the facility in drums will be documented and evaluated (including appropriate laboratory testing) and either temporarily stored or combined with other compatible drummed material for off-site shipping following receipt of laboratory testing and compatibility evaluation. Emptied drums will be cleaned for reuse or crushed prior to off-site disposal.

The Drum Storage Area may also be used for temporary hazardous waste storage (10 day exemption) in accordance with OAC 3745-53-12. Temporary hazardous waste storage will occur only in a designated and secure area of the Drum Storage Area.

4.7 OILY WATER PROCESSING AREA

The Oily Water Processing Area will house processing equipment which will recover oils suitable for re-sale and generate clean wastewater which will be discharged to the New Matamoros sanitary sewer system. The equipment is expected to have the capacity to process up to 20,000 gallons of oily water per day. Clean water discharge is expected to be approximately 5,000 gallons per day average. An industrial waste discharge permit application will be submitted to the Village of Matamoros Water & Sewer Department for the clean water discharge. Additional details regarding permitting for the oil recovery process are provided in Section 5.1.3.

4.8 LABORATORY AND OFFICE AREA

The Laboratory and Office Area is approximately 15 feet by 40 feet and is constructed with a reinforced concrete floor that is adjacent to the Drum Storage Area. The laboratory will be equipped with a hood area, appropriate analytical devices, including a hand held radiation detector, and a refrigerator for temporary sample storage. Routine waste screening analyses will be performed in the on-site laboratory; however, more detailed waste characterization testing will be routinely shipped to an accredited off-site laboratory. All documents associated with waste testing and operation of the transfer station facility will be filed in the Laboratory and Office Area.

4.9 BULK LIQUID STORAGE TANKS

The WTL Transfer Station Facility will include storage of oily water in the Bulk Liquid Storage Tanks. The above ground tank farm will consist of eight (8), 600 barrel steel tanks with the combined capacity to hold approximately 200,000 gallons of liquids. The tanks will meet American Petroleum Institute (API) specification 12F (API 12F). A water-tight, concrete secondary containment structure will surround the tanks and is sized to retain the volume of one 600 barrel tank plus a 6-inch rainfall event. The base of the concrete containment structure will slope to a sump which will be used to pump out precipitation that falls into the structure. Access

to the tanks will consist of a steel stair and catwalk platform. Oily water stored in the tank farm will be processed in the Oily Water Processing Area.

4.10 BULK LIQUID UNLOAD PAD

An approximate 17 foot by 20 foot reinforced concrete Bulk Liquid Unload pad will be positioned adjacent to the tank farm and the incoming truck scale. Incoming trucks containing oily water will back over the concrete portion of the pad where they will connect to the piping system that pumps to one of eight (8) 600 barrel steel tanks. There will be a separate supply pipe for each steel tank. The Bulk Liquid Unload will include a catch basin which will drain to the leachate manhole and then will be pumped to Solidification Basin.

4.11 LEACHATE MANAGEMENT SYSTEM

There will be six (6) areas within the Transfer Station Building (enclosed structure) and one (1) area outside the building where management of liquids and solids (i.e. waste handling areas) will occur, including the:

- 1) Solidification Basin;
- 2) Truck Unload Floor;
- 3) Transfer Trailer Loading Ramp;
- 4) Unload/Loading Dock;
- 5) Drum Storage Area;
- 6) Oily Water Processing Area; and,
- 7) Bulk Liquid Unload Pad.

The facility Leachate Management System is designed to collect water that has contacted waste and re-circulate that contact water back to the Solidification Basin. Thus, the Leachate Management System is designed as a closed-loop system which does not discharge treated or untreated water to local sewers or surface waters. The Leachate Management System is designed to collect any leaks through the steel mixing structure and potential leaks and spillage in each of the other waste handling areas listed above.

There is expected to be spillage as the solidified material is transported from the Solidification Basin to the transfer trailers. Otherwise, there is potential for minor spillage of liquids and solids

from incoming trucks and tankers, perhaps from minor drips during unloading of truck, splashing of liquids in the Solidification Basin, unloading drummed solids or from unloading of oily water. The Leachate Management System described below was designed with these considerations in mind.

Drawing 3D – Waste Handling Area Plan and Profiles and Drawing 3E – Leachate Management System Plan and Profiles present plan view and section details of the Leachate Management System. The reinforced concrete floor and Solidification Basin will prevent leachate infiltration and allow for either dry or wet cleanup of these areas. The concrete floors and ramps will be regularly inspected for cracks or other degradation and repaired, if required. Catch basins will be dual-contained including PolyDrain channels that will be set in reinforced concrete structures with a waterproof coating. Double-walled HDPE piping will be used to transfer liquids from the catch basins to the central manhole sump and ultimately to the Solidification Basin. Adequately spaced piping clean outs are included which will promote good pipe maintenance practices. Descriptions of each of the waste handling areas included in the Leachate Management System area provided below:

Solidification Basin: As stated above, the Solidification Basin is designed with concrete secondary containment, which will capture liquids and solids if there is a breach in the steel mixing structure. Liquid flowing into the secondary containment can be piped to the central manhole sump and pumped back to the Solidification Basin, following repair of the steel mixing structure.

Truck Unload Floor: The Truck Unload Floor will be graded from the overhead door entrances toward the Solidification Basin, which will promote drainage or clean-up of spilled liquids or solids. Wet clean-up of spilled liquids and solids will consist of spraying and/or sweeping the spilled materials directly into the Solidification Basin.

Transfer Trailer Loading Ramp: The Transfer Trailer Ramp is designed to slope to a catch basin that will be piped to the central manhole sump, then pumped back to the Solidification Basin. The central manhole sump will have a grinder pump that is capable of pumping liquids and solids that may collect in the Transfer Trailer Loading Ramp's catch basin. Spillage that occurs during transfer trailer loading will undergo dry or wet clean-up by pushing or washing the material into the trench-style catch basin positioned at the lowest area of the ramp. The catch

basin design allows liquids to drain back to the central manhole sump while sediments remain in the structure and can be removed with a vacuum truck periodically.

Unload/Loading Dock: The Unload/Loading Dock is also designed to slope to a catch basin that will be piped to the central manhole sump, then pumped back to the Solidification Basin. The central manhole sump will have a grinder pump that is capable of pumping liquids and solids that may collect in the Unload/Loading Dock's catch basin. Spillage that occurs at the Unload/Loading Dock will undergo dry or wet clean-up by pushing or washing the material into the trench-style catch basin positioned at the lowest area of the dock. The catch basin design allows liquids to drain to the central manhole sump while sediments remain in the structure and can be removed with a vacuum truck periodically.

Drum Storage Area: The Drum Storage Area floor will slope to a catch basin drain that will be piped to the central manhole sump, then pumped back to the Solidification Basin. The central manhole sump will have a grinder pump that is capable of pumping liquids and solids that may collect in the Drum Storage Area floor drain. Spillage that occurs at the Drum Storage Area will undergo dry or wet clean-up by pushing or washing the material into the catch basin drain. The catch basin drain design and pipe clean outs allows liquids to drain to the central manhole sump while sediments remain in the structure which can be cleaned periodically.

Oily Water Processing Area: The Oily Water Processing Area floor will slope to a catch basin drain that will be piped to the central manhole sump, then pumped back to the Solidification Basin. The central manhole sump will have a grinder pump that is capable of pumping liquids and solids that may collect in the Oily Water Processing Area catch basin drain. Spillage that occurs at the Oily Water Processing Area will undergo dry or wet clean-up by pushing or washing the material into the catch basin drain. The catch basin drain design and pipe clean outs allows liquids to drain to the central manhole sump while sediments remain in the structure which can be cleaned out periodically.

Bulk Liquid Unload Pad: The Bulk Liquid Unload Pad will consist of a reinforced concrete pad that will be sloped to a catch basin drain that will be piped to the central manhole sump, then pumped back to the Solidification Basin. The central manhole sump will have a grinder pump that is capable of pumping liquids and solids that may collect in the Bulk Liquid Unload pad catch basin. Spillage that occurs at the Bulk Liquid Unload will undergo dry or wet clean-up by pushing or washing the material into the catch basin drain. The catch basin design and pipe

clean outs allows liquids to drain to the central manhole sump while sediments remain in the structure which can be cleaned out periodically.

4.12 EROSION CONTROL SYSTEM

The existing stormwater conveyance system at the WTL facility is currently located in the southern portion of the transfer station facility, in the vicinity of the existing office building and pump island. This system currently discharges to the Ohio River. The existing surface conditions are asphalt paving at the three (3) existing entrances to the facility, around the existing office building and also around the existing pump island. Remaining areas of the site are grass covered.

The proposed stormwater conveyance system will direct runoff from the transfer station building area, staging areas and access areas and roads to the detention basin located in the northeastern site area. Runoff will be routed into the stormwater catch basins and then piped through the conveyance system into the detention basin. The detention basin will detain the 25 year, 24 hour storm event and will slowly release stormwater using the primary outlet structure and will also include a forebay. The detention basin will also include an emergency spillway for larger storm events. The location of the existing and proposed stormwater conveyance systems are presented on Drawing No. 3A – Site Layout.

Proposed catch basins in the vicinity of the transfer station staging and access areas will be constructed with FloGard® (or approved equivalent) filtration devices, which consist of a multi-model, flexible-body, catch basin insert designed to collect silt, debris and petroleum hydrocarbons from stormwater runoff.

A combination of silt fence, erosion control blankets and dandy bags will be incorporated to aid in managing and controlling sediment during the construction of the facility. Silt fence will be placed at the perimeter of the proposed grading areas. Erosion control blankets will be placed where the grading is greater than 3:1 (detention basin area) and dandy bags will be placed as inlet control protection at any existing or proposed stormwater catch basins. Details and notes describing the construction erosion controls are provided on Drawing 3F – Erosion Control Plan and Drawings 3G and 3H – Erosion Control Notes and Details.

4.13 FACILITY ACCESS, ROADS AND STAGING AREAS

There are three (3) existing entrances to the WTL facility. The primary entrance to the Transfer Station will be from the southern-most existing entrance. Alternate truck ingress will be from the northern-most entrance. If needed, improvements will be made to widen the approach apron at each of these two entrances prior to operation of the facility. The existing middle entrance will be used for employees and visitors to the existing WTL office building.

The main access road, bulk storage staging areas and the surface surrounding the Transfer Station building will be covered with compacted aggregate. Reinforced concrete pavement will be used for approach aprons at the Transfer Station Building, the Bulk Liquid Unload Pad and for the Bulk Liquid Staging Area. Surface water runoff and control will be provided as necessary through the proper grading and catch basins as described in Section 4.12 - Erosion Control System. Drawing No. 3A – Site Layout, identifies these road and staging area surfaces.

Each site entrance will have appropriate sized gates which will remain locked when the facility is not in operation. A sign will be posted at the gate which will provide the following information:

- Facility name
- Facility address
- Operator name and address
- Facility contact name and telephone number
- Facility license number
- Hours of operation
- List of unacceptable waste
- Directions of how and where to proceed through the facility
- Grandview Township Volunteer Fire Department telephone number
- Washington County Health Department telephone number
- SouthEastern Ohio Joint Solid Waste Management District telephone number
- The Ohio EPA, Southeast District Office telephone number

A sign will also be posted at the Transfer Station scale which provides the same information as previously listed.

5.0 FACILITY OPERATION

The WTL Transfer Station will be operated following standard WTL operating procedures and in accordance with the provisions specified in OAC 3745-27-23 Operation of Solid Waste Transfer Facilities. Operations will be in compliance with the approved plans and specifications developed for the facility and the terms and conditions of the approved PTI Application and the Solid Waste Facility License. The day-to-day operations and maintenance will be under the responsible charge of a certified operator who has completed the operator training as required by rules adopted pursuant to Chapter 3734 of the ORC. The certified operator will be on site throughout the normal operating hours for the facility and will be thoroughly knowledgeable of the operations and the facility Contingency Plans (refer to Section 5.10 – Contingency Plans).

5.1 ADDITIONAL PERMITS AND AUTHORIZATIONS

WTL, as part of the PTI Application process, has submitted inquiries to the Division of Air Pollution Control and the Division of Surface Water within the Ohio EPA in order to determine if and what additional permit(s) and authorization(s) may be required for the WTL Transfer Station to operate in accordance with all applicable rules and regulations. If required, WTL will apply for any and all permits and authorizations of Chapters 3704 and 6111 of the ORC and will abide by any and all terms and conditions of those permit(s) and authorizations(s). The Ohio EPA, SEDO, Division of Materials and Waste Management (DMWM) will be copied on all correspondence with the Division of Air Pollution Control and the Division of Surface Water regarding any and all additional permit(s) and authorization(s).

5.1.1 Sanitary Sewer and Water Services

The Village of Matamoras Water & Sewer Department currently provides water and sanitary sewer service for the existing office building on the WTL property. WTL will request water and sanitary sewer taps for the proposed Transfer Station Building. Waste waters described as “leachate” in this Solid Waste Transfer Station PTI Application will be contained within the closed-loop leachate management system and will not be discharged to the local sanitary sewer. Wastewater derived from the proposed oil recovery process to be located in the Oily Water Processing Area will be discharged to the local sanitary sewer as described in Section 5.1.3 – Oil Recovery Permitting.

5.1.2 Floodplain Development Permit Application

WTL has submitted a Floodplain Development Permit Application to the Washington County Building Department to obtain permission to place fill material within the 100 year floodplain of the Ohio River in two small area areas (combined area is approximately ½ acre) along the northeast border of the site. A copy of the Floodplain Development Permit Application is provided in Appendix D – LOMA & Floodplain Development Permit Application.

5.1.3 Oil Recovery Process Permitting

The oil recovery process proposed for the Oily Water Processing Area at the WTL Transfer Station will generate non-hazardous wastewater that will be discharged to the local sanitary sewer. Details of the oil recovery process proposed for the WTL Transfer Station are not currently finalized. Upon finalization of these details, WTL will prepare additional required permit applications to state and, if required, federal regulatory agencies. The applicable regulations will be dependent on the oil recovery process system, the types of oils or wastewaters processed, the source(s) of these liquids and the wastewater effluent and air discharges generated by the oil recovery process. WTL will request assistance from Ohio EPA, SEDO, Division of Surface Water (DSW) and Division of Air Pollution Control (DAPC) in regard to permitting applicability for the proposed oil recovery process. Possible state regulations that may apply to wastewater discharges include OAC 3745-3, OAC 3745-36 and/or OAC 3745-279. Federal regulations for wastewater discharges may include Title 40 of the Federal Code of Regulation (CFR), Part 437 and other applicable rules. Air permitting may be required under OAC 3745-31 and other applicable rules.

Ohio EPA, SEDO, DSW has provided a preliminary indication that an Indirect Discharge PTI may be required for the oil recovery process proposed for the WTL Transfer Station. In accordance with OAC 3745-36, an Indirect Discharge PTI is required because the Village of Matamoras Water & Sewer Department does not have an Ohio EPA-approved pretreatment program. The Village of Matamoras Water & Sewer Department must also approve the Indirect Discharge PTI through correspondence with WTL and the Ohio EPA, SEDO, DSW. It is anticipated that Ohio EPA PTI Application Forms A, B6 and B8 will be included in the Indirect Discharge PTI Application. Holding tanks in the Bulk Liquid Storage Area will be included in the Indirect Discharge PTI application using Form B8. Additional holding tank permitting requirements are discussed in Section 5.1.4 below.

WTL will continue to seek assistance from Ohio EPA, SEDO with evaluation of state and federal rule requirements associated with permitting of the oil recovery process proposed for the Oily Water Processing Area of the WTL Transfer Station. All required permit applications will be prepared based on applicability of these state and federal regulations.

5.1.4 Bulk Liquid Storage Tanks Permitting

Above-ground storage tanks in the Bulk Liquids Storage Area will be used to temporarily hold oily wastewaters that will be processed to recovery oils in the Oily Water Processing Area, to be located in the Transfer Station Building. The Indirect Discharge PTI Application discussed above will include completion of Form B8 for proposed holding tanks in the Bulk Liquids Storage Area. Other state and federal regulations may require additional permits for these above ground tanks. A Spill Prevention, Control and Countermeasures (SPCC) Plan may be required for the Bulk Liquid Storage Tank Area. Ohio has not promulgated its own oil pollution prevention regulations, thus, federal SPCC regulations in 40 CFR 112 may be applicable to these tanks. An air permit from Ohio EPA will likely be required for the holding tanks, unless they are specifically exempt under the applicable rules. Depending on the characteristics of the oily waters processed for oil recovery, the Ohio State Fire Marshall may have regulatory authority and permitting requirements for the proposed holding tanks.

WTL will continue to seek assistance from Ohio EPA, SEDO with evaluation of state and federal rule requirements associated with permitting of these holding tanks.

5.2 FACILITY CONSTRUCTION

Construction of the facility will be in accordance with the plans and specifications approved as part of the PTI Application. Alterations or modifications to the approved facility design and construction will not be incorporated without first obtaining the approval of the Ohio EPA. This not only addresses alterations or modifications related to the leachate management system and/or the waste handling areas specifically addressed in the rules and regulations, but will include alterations or modifications to the approved transfer building footprint. For any substantial expansion or relocation of the transfer building from the approved design, WTL understands that approval of a new PTI may be required.

Upon completion of the facility construction, WTL will submit to Ohio EPA SEDO certification that the Transfer Station was constructed in accordance with all terms and conditions of the approved PTI Application which includes the approved design plans and specifications. The certification will include a discussion and project record drawings of any and all alteration(s) and modification(s) made during the construction activities. Operations at the WTL Transfer Station will not begin until the Washington County Health Department has performed an inspection of the facility to ensure that the facility was constructed in accordance with the approved PTI Application including the design plans and specifications, all necessary equipment to operate the facility is present, the financial assurance instrument has been completed and funded, and the construction certification report has been submitted.

5.3 ACCEPTABLE WASTE MATERIALS

WTL will accept industrial wastes (liquids and sludges) for solidification and solid wastes for transfer to a permitted municipal solid waste landfill (MSW). An Exemption Request to accept industrial wastes (liquids and sludges) is included in Appendix A of this PTI application. Waste streams to be accepted at the WTL Transfer Station are identified in Table 1 – Acceptable Non-Hazardous Waste Streams. The general categories of acceptable waste streams have been segregated into the following generalized categories:

- Combustion Residues
- Metallurgical Process Residues
- Sludges, Scales
- Chemical Wastes
- Generic Manufacturing Wastes
- Special Handling Wastes
- Non-Coal Mining, Oil and Gas, and Other Well Drilling Wastes
- Miscellaneous

WTL will not accept for processing and transfer any of the following listed materials:

- Hazardous wastes
- Municipal solid wastes
- Asbestos or asbestos-containing waste material that is subject to the provisions of NESHAP, 40 CFR Part 61, Subpart M, July 1, 2003
- Low-level radioactive wastes as specified in Section 3734.027 of the Revised Code

- Any untreated infectious wastes, other than those subject to Division (A)(1)(c) of Section 3734.021 of the Revised Code
- Lead-acid batteries
- Whole or shredded scrap tires
- Yard waste, source-separated yard waste, or commingled yard waste

WTL will post signs at the scale entrance which will indicate the items that will not be accepted for processing and transfer. Transporters of the unacceptable materials listed above will be turned away and directed to the nearest facility that is licensed to accept these materials.

5.4 WASTE ACCEPTANCE PROCEDURE

5.4.1 Waste Profiles

WTL will require that waste generators prepare waste profiles for all incoming waste streams. The waste profile sheet will provide generator certification that the waste material is not a hazardous waste as defined in OAC 3745-51-03 and will include waste generator identification and location, waste generation description, MSDS sheets, available laboratory analyses and the RCRA status of the material (i.e. exempt, delisted, etc.). A blank waste profile form is included in Appendix F – Waste Profile Form of this PTI Application. WTL will evaluate each waste profile submittal to determine if the waste material can be accepted at the WTL Transfer Station.

5.4.2 Hauler Registration and Required Documents

Upon arrival at the site, WTL will initially verify that waste hauling vehicles are licensed for waste hauling. All shipments accepted at the WTL Transfer Station will have complete shipping documents, and a waste profile sheet with accompanying analytical results and/or MSDS sheet. Each waste profile will be assigned a unique tracking number that will correlate with the facility's master log sheet.

WTL will conduct additional evaluation of incoming waste shipments as needed to supplement and/or confirm the waste profile information. Additional evaluation may include radiation screening, bench scale testing (describe below) and/or off-site laboratory testing. Results of any additional waste evaluation will be included with the waste profile information and stored in the WTL record files.

Transporters that arrive at the WTL Transfer Station without the proper paperwork will be held in a designated parking area. The transporter and/or generator will be notified of any paperwork or permit discrepancies. If the discrepancy can be resolved by phone, email or fax, then the load will then be directed to the designated unloading or staging area. If the discrepancy cannot be resolved, the load will be rejected and, if needed, directed back to the waste generator. WTL will allow a rejected load to remain in a staging area at the WTL Transfer Station for up to 10 days before being turned away from the facility.

5.4.2.1 Waste Quantity Determination

Trucks will be routed to the on-site scale for gross weight measurement. For incoming loads that will undergo transfer facility processing, the net weight of the shipment will be determined following unloading of the material, then by returning the truck to the scale for the net weight calculation. In-transit loads will be weighed to provide a gross weight record; however, the net weight of the material will be determined following transport to the final destination (i.e. solid waste landfill, liquid processing facility or recycling facility) and recorded in the facility's master log sheet.

5.4.3 Incoming Waste Segregation

Each load that arrives at the WTL Transfer Station will initially be evaluated to determine its handling classification. Incoming shipments will be classified as either 1) in-transit storage or for 2) transfer facility processing. A trained WTL technician will determine which classification is appropriate for the incoming shipment based on comparison of the visually observed physical properties of the shipment to the waste profile information. Definitions of the waste handling classifications are provided below:

In-Transit Storage: Shipments that are only being temporarily stored at the transfer facility prior to final routing to a licensed disposal or recycling facility will be identified as in-transit storage. Bulking will not take place with this material. It will be shipped out in the same waste container that it was received in (i.e. roll-off container, drums, vacuum truck, tank trailer, etc.). Shipments of this type will be logged in on the facility's master log sheet for record keeping purposes only. If the material is a RCRA hazardous waste, the in-transit storage will be limited to 10 days at the WTL transfer facility.

Transfer Facility Processing: These shipments are being accepted at the transfer facility for bulking into larger containers, for solidification prior to bulking into larger containers or for oil recovery. Some shipments will be sorted by type or by generator prior to bulking into larger containers.

Each shipment will be logged in on the facility's master log sheet, including the in-transit or transfer facility processing classification. After a shipment is logged in on the facility's master log sheet, it will be routed to a staging area until shipment verification and compatibility evaluation is completed.

5.5 WASTE BULKING, SOLIDIFICATION AND OUT-BOUND TRANSFER OPERATIONS

5.5.1 Shipment Verification and Compatibility Evaluation Process

Each waste shipment that is received at the transfer station facility for transfer facility processing will go through the following screening process: 1) review the waste profile information for completeness and accurate facts; 2) review of the generators analysis and/or MSD sheets; 3) observe physical properties of the waste shipment and compare against the waste profile sheet; and 4) sample the waste shipment as per approved methodology for bench scale or off-site laboratory analysis. Sampling of waste shipments arriving at the WTL Transfer Station will follow EPA SW-846 methods and/or the following American Society for Testing and Materials (ASTM) standards:

- ASTM D 4687-95 - Standard Guide for General Planning of Waste Sampling;
- ASTM D 5679-95a - Standard Practice for Sampling Consolidated Solids in Drums or Similar Containers;
- ASTM D 5680-95a - Standard Practice for Sampling Unconsolidated Solids in Drums or Similar Containers;
- ASTM D 6699-01 - Standard Practice for Sampling Liquids Using Bailers;
- ASTM D 5743-97 - Standard Practice for Sampling Single or Multilayered Liquids, With or Without Solids, in Drums or Similar Containers;
- ASTM D 6063-96 - Standard Guide for Sampling of Drums and Similar Containers by Field Personnel;

- ASTM D 4547-03 - Standard Guide for Sampling Waste and Soils for Volatile Organic Compounds;
- ASTM D 4057-95 - Standard Practice for Manual Sampling of Petroleum and Petroleum Products; and,
- ASTM D 5854-96 - Standard Practice for Mixing and Handling of Liquid Samples of Petroleum and Petroleum Products.

WTL has developed a bench scale evaluation check sheet that will be used to determine if a material is acceptable for bulking and/or solidification. A representative grab sample will be retrieved from each bulk load. Drum and other loose container shipments will be sampled at a rate of 10 percent total piece count from each waste stream accepted. In-house bench scale testing will include: flash point, pH, paint filter, total organic halogens, radioactivity, bottom sediment and water (BS and W) and compatibility testing.

Trained WTL personnel under the direct supervision of a degreed environmental scientist and/or chemist will perform all of the above field testing. Sampling bulk containers and drums will generally follow the procedures described below:

- Tank Trailer/Vacuum Truck Sampling: A full strata grab sample will be retrieved from the trailer and/or tank truck utilizing a bailer or collawsa sampler. The sample will be retrieved from the center manway or clean-out cap. The sample will be placed into a 250 ml glass jar with a Teflon lid and taken directly to the WTL in-house laboratory. Floating debris and other observations will be noted on the evaluation sheet. If the sampling device is re-used, it will be rinsed with a mild detergent (Alconox) and distilled water. The sample will be labeled with the unique receiving ID number and will be saved until the material has been properly disposed and/or recycled.
- Roll-Off Container/Dump Trailer Sampling: A metal auger will be used to retrieve a grab sample from the bulk solid load. The auger will be spun into the load to a depth of about one foot. The grab sample will be placed into a 250 ml glass jar with a Teflon lid and taken directly to the WTL in-house laboratory. Debris and other observations will be noted on the evaluation sheet. The sampling auger will be rinsed with a mild detergent (Alconox), rinsed with distilled water, and wiped clean between

uses. The sample will be labeled with the unique receiving ID number and will be saved until the material has been properly disposed and/or recycled.

- Drum, Pail, Super Sack, and Cubic Yard Container Sampling: Drums of liquid and/or sludge will be sampled with a simple drum thief. The sample will be placed into a 250 ml glass jar with a Teflon lid. A minimum of 10 percent of the drums will be sampled for each individual waste stream received. Each drum that is sampled will be marked on the top of the container. Other general observations will be noted and recorded on the sampling log sheet. Drums, super sacks and cubic yard containers of solid material will be sampled utilizing a screw auger or a push auger. The sampling device will be pushed approximately two feet into the container to retrieve a representative grab sample from each container. The sample will be placed into a 250 ml glass jar with a Teflon lid. All samples will be labeled with the unique receiving number, screened in the in-house laboratory, and saved until the material has been properly disposed and/or recycled. The sampling device will be rinsed with a mild detergent (Alconox), rinsed with distilled water, and wiped clean between uses.

5.5.1.1 Description of In-House Testing

The WTL technician will deliver the waste sample from each load directly to the in-house testing laboratory. Each sample will be evaluated against the waste profile that was provided by the generator. Each in-house test that is performed will be recorded on the laboratory log sheet. After the sample has been tested, evaluated, and accepted, the load will be routed to the appropriate unloading area. Listed below are the in-house testing capabilities that will be utilized at the WTL Transfer Station.

- Flash Point Test: an ASTM approved closed cup flash point tester will be used to confirm the actual temperature that the vapor of a liquid material will "flash". Materials that exhibit the definition of a flammable liquid as per 40 CFR Part 261 will be rejected and returned to the generator.
- pH Test: an EPA approved electronic meter will be utilized to determine the pH of a liquid material. Materials that exhibit the definition of a corrosive liquid as per 40 CFR Part 261 will not be accepted at the WTL Transfer Facility.

- Paint Filter Test: as per standard SW-846 methodology, solids will be tested to determine if they contain "free liquids". Loads containing free liquids will require solidification prior to off-site shipment.
- Total Organic Halogen Testing: a colormetric field test approved by the EPA will be utilized to determine if a liquid has chlorides over 1,000 ppm. If over 1,000 ppm, an EPA approved Total Organic Halogen test will have to be performed by a state certified laboratory to determine the actual level.
- Radioactivity Screen: a handheld Geiger Counter will be used to screen all loads that are received at the facility as part of the facility's Radiation Action Plan.
- BS and W Testing: Bottom sediment and water testing is performed by taking a representative sample of a liquid waste stream and putting it into a graduated test tube or similar glassware. The sample is spun in a laboratory grade centrifuge so that material separates into its different phases. The sample can now be described in its percent petroleum, water and solid layers.
- General Physical Properties: the WTL sample technician will observe general physical properties of each load and compare those findings against the submitted waste profile sheet. Physical properties will include: color, phases, state of material, debris content, and odor. If discrepancies are noted, the generator will be contacted to discuss and resolve the irregularity of the shipment. This may involve a letter to discuss any changes, profile amendments and/or a new profile sheet.
- Compatibility Testing: This will be performed prior to bulking of solid shipments or solidification of sludge materials with kiln dust, cement dust and/or fly ash or other solidification agents. A representative solid or sludge sample will be mixed with an equal part of the other bulking solid or solidification agent to determine if there is an observable reaction. A temperature reading will be taken before, during, and after the bench study has been completed. A Sample Evaluation Form will be completed for each bulk solid or sludge load that is going to be combined or solidified at the facility. Only those materials that pass the compatibility testing will be bulked and/or solidified. Each load will be given a unique tracking number that will identify the load as it goes through the facility.

At the discretion of the WTL sample technician, a representative sample from the bulk liquid storage tank farm may be mixed with an in-bound shipment to confirm compatibility prior to bulking the liquids together.

Following testing to determine waste shipment acceptance and compatibility for bulking or solidification, accepted loads will be directed to one of the following areas for unloading:

- Drum Storage Area;
- Solidification Basin;
- Bulk Liquids Unload Pad/Bulk Liquids Storage Tanks;
- Roll-Off Container Staging Areas; and,
- Bulk Liquids Staging Area.

The designated unloading areas will be properly labeled with weather resistant signs.

A WTL technician will accompany the operator to the appropriate unloading area. The material will be off-loaded and the vehicle will be sent back to the scale for lightweight determination. The difference between the gross and lightweight is the net weight of the material accepted.

Drum Storage Area: Drums, overpacks, pails, totes, one yard boxes and other small containers that are accepted at the facility will be directed to the Unload/Loading Dock/Ramp, where they will be unloaded and moved to the Drum Storage Area, logged in using a unique lot number for tracking purposes and quantities recorded. Containers will be stored with isle space between drums, which will not be stacked more than two drums high prior to bulking, solidification or off-site shipping (in-transit processing).

Compatible materials will be emptied into a lined, roll off box located at the Unload/Loading Dock/Ramp. A small percentage of materials processed at the Drum Storage Area will be directed to the Solidification Basin if there is a significant amount of liquids or sludges in the incoming container. Also, drums that contain entirely oily water will be off-loaded into a vacuum truck and directed to the Bulk Liquid Unload.

The Drum Storage Area will also include a designated area to store drummed, in-transit non-hazardous and hazardous wastes, prior to an off-site destination. In-transit non-hazardous and

hazardous wastes will not be bulked into larger containers. Temporary storage of hazardous wastes will not exceed ten (10) days.

Solidification Basin: Incoming sludges, drilling muds, etc. will be processed by mixing with drying and bulking agents in the Solidification Basin. Shipments of accepted loads of sludges will be off-loaded into the Solidification Basin along with appropriate proportions of drying and bulking agents. Mixing will be accomplished using a long-reach hydraulic excavator with a smooth-edged bucket that will minimize wear to the Solidification Basin structure. Berms will be constructed within the basin using drier material to separate sludges with higher liquid content during the mixing process. Material that can pass the paint filter test, will be loaded into the transfer trailers using the same excavator used to mix the sludge and drying agent materials.

Bulk Liquids Unload Pad/Bulk Liquids Storage Tanks: The WTL Transfer Station includes eight (8), 600 barrel above-ground steel tanks for bulk liquid storage. Oily wastewater stored in these tanks will be processed to recover oils in the Oily Water Processing Area. Hazardous waste liquid will not be stored in this area at any time. Bulk liquids from tanker trucks and vacuum trucks that are accepted into the WTL Transfer Station will be sent to the Bulk Liquids Unload Pad and pumped off into the Bulk Liquids Storage Tanks. Liquid drums from the Drum Storage Area will be pumped off into a vacuum truck or tanker trailer and unloaded into the Bulk Liquid Storage Tanks. The logbook will be updated to show the movement and quantity of liquids transferred to the Bulk Liquid Storage Tanks.

Bulk Liquids Staging Area: The WTL Transfer Station will have a reinforced concrete pad in the northeastern area of the site for temporary staging of tanker trailers and vacuum trucks used for bulk liquid transport. This concrete staging area will be curbed and graded toward a catch basin in order to contain potential spillage from these vehicles. The catch basin will be constructed with a sediment and oil absorbent filter (FloGard® or approved equivalent) that will attenuate any liquids that could potentially spill or leak from the bulk liquid transport vehicles. Any spills or leaks observed at this staging area will be recorded on the facility daily log and included in the annual operation report for Ohio EPA.

Roll-Off Container Staging Areas: The Transfer Station will include three (3) designated roll-off container staging areas that are shown on Drawing 3A – Site Layout. Bulk solids transported to the facility may require temporary staging in these areas while waiting for laboratory results for waste characterization verification. Empty roll off containers may also be temporarily staged

in these areas. These staging areas will be constructed with a concrete curb and an aggregate base that will be graded toward a catch basin that will include a sediment and oil absorbent filter (FloGard® or approved equivalent) that will attenuate any leaks from the containers staged in this area.

5.5.2 Outbound Transfer Waste Profiles

Outbound waste materials will be characterized to document that the material is non-hazardous and to satisfy the requirements of the receiving disposal facility. WTL will be listed as the generator on out-bound waste profiles and shipping documents. Waste characterization may include the following: waste profile completion, appropriate MSD sheets, and/or characterization analysis at an accredited laboratory. If laboratory testing is required, a WTL sample technician will retrieve a representative grab sample of the appropriate waste material or waste stream. WTL will have the ability to isolate and store outbound waste shipments until approved for off-site shipment.

WTL will develop multiple, generic, waste profiles for the shipment of out-bound materials from routine generation sources that are regularly shipped to dedicated disposal facilities. For example, when WTL generates a bulk shipment prepared from a generation source that routinely is handled at the WTL facility, a profile of this material will be prepared for the out-bound disposal facility based upon the contents that were bulked together. As generic waste profiles are being established, it will be necessary to perform initial waste composite sampling and characterization analysis as per the most current edition of the EPA SW-846 methodology. Sampling of the bulk materials will be performed as per ASTM methodology. The sample analysis will be predicated on the components that make up the waste stream and specific landfill requirements. These results will be included in the generic waste profile. The following characterization analysis will be performed as required at an accredited laboratory:

- Ignitability / SW846-1010
- Reactivity Cyanide / SW846-9010
- Reactivity Sulfide / SW846-9030
- PH Corrosivity / SW846-9040
- TCLP Metals (8 RCRA) / SW846-600B (TCLP Mercury / SW846-7470A)
- TCLP Extraction / SW846-1311
- TCLP BNA / SW846-8270C

- TCLP VOA / SW846-8260B
- TCLP Pesticides / SW846-8081A
- TCLP Herbicides / SW846-8151A
- ZHE Extraction / SW846-1311
- PCB / SW846-8082

After the out-bound waste profile has been established for the receiving waste disposal facility, WTL will have the ability to utilize that profile for multiple yearly shipments. Annual re-certification of waste profiles will be completed if required by per state, federal and/or landfill operator.

Oily water waste streams that are being stored and bulked at the transfer facility, will be tested for the following waste oil sample analytes: TCLP metals (8 RCRA), pH, PCB's, flash point, and total organic halogens.

5.6 OILY WATER PROCESSING

The WTL Transfer Station will include bulk liquid processing, which will consist primarily of technology that recovers hydrocarbons from oily water waste streams. Each incoming liquid load will be profiled and tested as described previously, then the liquid shipment will be off-loaded at the Bulk Liquids Unload/Bulk Liquids Storage Tanks. Liquids will be pumped directly to the Oily Water Processing Area from the storage tanks, where the liquids will undergo separation, flocculation and chemical treatment to recover oils. Residual liquids will be discharged to sanitary sewer or to the Ohio River. Effluent standards for discharge to the sanitary sewer will be developed base on requirements of the Village of Matamoras Water & Sewer Department.

5.7 FACILITY ACCESS

Access to the facility will be from Ohio State Route (S.R.) 7. Only commercial hauling companies will be allowed access to the WTL Transfer Station. Private citizens will not be admitted for disposal of waste materials.

All solid and liquid hauling trucks will be required to pass over the scales prior to proceeding to a staging or unload area. All other visitors to the site will proceed to the parking area outside of

the existing WTL office building where they must sign in and out. Commercial traffic will enter the facility from the southern most existing driveway. Commercial traffic may exit the facility at the northern-most existing driveway. Existing facility driveways are shown on Drawing No. 3A – Site Layout.

WTL personnel will be directed to report unauthorized visitors to the facility manager. No scavenging, salvaging, etc. will be permitted at the facility.

Existing asphalt and proposed concrete pavement will aid in minimizing fugitive dust at the site. WTL will apply water to aggregate covered areas on an as needed basis to minimize fugitive dust during dry periods.

5.8 LEACHATE MANAGEMENT SYSTEM MAINTENANCE

The leachate management system is designed to operate with a minimal amount of equipment. This will minimize the potential system failures and required maintenance of mechanical equipment. The leachate management system operates as a gravity system with the exception of the Central Manhole Sump located adjacent to the Solidification Basin, which includes an electric grinder pump. The system design is described fully in Section 4.11 Leachate Management System.

The leachate management system, including both the waste handling area and transfer trailer tunnel components, will be inspected on a routine basis for evidence of leaks and/or spills, clogs, blockages, equipment malfunctions, etc. Maintenance of the system and cleanup of spills and/or leaks will be performed immediately upon discovery. The facility is designed so that spilled liquids or solids can undergo wet/dry clean up using catch basins within the Transfer Station Building. These catch basins drain under gravity to the Central Manhole Sump where the collected liquids are pumped to the Solidification Basin. Solids which collect in the catch basins or Central Manhole Sump will be removed using a vacuum truck or other vacuum system and disposed in the Solidification Basin.

5.9 EROSION CONTROL SYSTEM MAINTENANCE

Catch basins in the staging and access areas will each include a FloGard® filter system (or approved equivalent) which will minimize the potential for oil and grease to reach the detention

basin. Catch basins will be inspected regularly and whenever a spill occurs at the site. Filtration materials will be replaced as needed upon inspection.

5.10 CONTINGENCY PLANS

This section discusses procedures WTL will implement to address the following emergencies:

- Discovery of unauthorized wastes;
- Fire, explosion, and spills;
- Equipment failure; and,
- Unavailability of the Transfer Station.

5.10.1 Discovery of Unauthorized Wastes

WTL technicians and equipment operators will be trained regarding wastes and materials that will not be accepted for processing and transfer at the facility. Upon discovery of any unauthorized waste material(s), the technician(s) and/or equipment operator(s) will immediately notify the shift supervisor. The unauthorized material(s) will be segregated and temporarily placed in an isolated area of the facility in either the Drum Storage Area or the Truck Unload Floor. Once the unauthorized material(s) is identified, the operators, at the direction of the shift supervisor, will place the material(s) in containers that are designated for the storage and removal of such items.

WTL will attempt to determine where the unauthorized material(s) were from and who was responsible for their delivery to the facility. Arrangements will be made with the identified party to return to the site to remove the unauthorized material(s) and to inform the party that the material(s) are not an acceptable waste material. If the originating party of the unauthorized material(s) cannot be identified, WTL will make arrangements to have the unauthorized material(s) transported off-site for disposal in an appropriate licensed facility(ies).

5.10.2 Fire, Explosion, and Spills

The WTL Transfer Station will have an Emergency Response Plan (ERP) which will direct the facility personnel to take appropriate actions in accordance with the level of needs. The ERP will include the emergency response telephone numbers for all key WTL contacts, along with the

local fire and emergency medical response teams. In addition, fire extinguishers will be located throughout the facility for use in controlling minor fires.

Minor spills of known material(s) (e.g., oils, gasoline, liquids in the maintenance area, etc.) will be contained by facility personnel using spill kits located throughout the facility. In the instance of a spill of an unknown substance, facility personnel will notify the local fire department that will deal with the spill and/or notify hazardous materials responders as needed. The appropriate government agencies will be contacted by the WTL Safety Director to assure compliance of all notification and cleanup issues.

5.10.3 Equipment Failure

Trained and experienced maintenance employees will be onsite who can repair, replace, and correct minor mechanical and/or electrical malfunctions that might occur to stationary equipment (e.g., scales, sump pump, piping, etc.). Repairs to mobile equipment (hydraulic excavators, trucks, etc.) will be made at off-site repair facilities. If equipment failure(s) is of a magnitude large enough to render the WTL Transfer Station inoperable, WTL will initiate the contingency procedures discussed below.

5.10.4 Unavailability of the Transfer Station

In the event that all or part of the WTL Transfer Station should become unavailable to handle, remove, or dispose of waste, the waste materials will be directed to another licensed solidification or solid waste disposal facility for proper disposal. Additionally, WTL will contact the Ohio EPA SEDO, the Washington County Health Department, the Southeastern Ohio Joint Solid Waste Management District, municipalities, private haulers, and other area solid waste processing facilities in order to notify them of the conditions. Each entity will be informed that the facility has temporarily ceased accepting waste and, if known, the anticipated time that the facility will re-open.

5.11 RECORD KEEPING

Proper record keeping is essential for efficient operation, to confirm facility compliance with applicable regulations, and providing the ability to track the type and volume of waste materials

processed at the facility. The following types of records will be kept on file for review throughout the life of the facility:

- Copy of the approved PTI Application including the detailed plans and specifications and any revisions and modifications to the original submittal;
- Copies of the facility's Annual License Applications and licenses;
- Copies of permits required in addition to the PTI (e.g., NDPES, air permits [if necessary], etc.);
- Facility's Contingency Plans;
- Daily logs; and
- Copies of the Annual Operational Reports.

5.11.1 Daily Logs

Daily Logs will be completed each day to provide a record of the day-to-day operations at the facility. WTL will use a Daily Log form prescribed by the Ohio EPA Director. The Daily Logs will be filed onsite for inspection upon request and the Daily Logs can be copied for submittal, if requested.

Any non-acceptable materials received and segregated for transportation and off-site disposal will be documented in the Daily Log and the facility's master log sheet. The type, volume, and final destination of the non-acceptable materials will be recorded.

5.11.2 Annual Operational Report

WTL will prepare and submit, on forms prescribed by the Director, an Annual Operational Report for each year of operation to the Ohio EPA SEDO and the Washington County Health Department by April 1 of each year providing operational information for the preceding year. At a minimum, the Annual Operational Report will provide the following information:

- Calendar year which the report represents
- A summary of the following:
 - Wastes received (tons or cubic yards)
- County and state of waste and/or recyclable material origin
- Quantities and location of solid wastes transferred

- Summary of unauthorized wastes discovered, if applicable
- Annual adjustment of the final closure cost estimate
- Revisions to the facility's final closure contract, if applicable
- Summary of maintenance activities performed on the Solidification Basin, Leachate Management System, or stationary equipment, if applicable
- Summary of maintenance activities performed on other monitoring and/or control system(s) at the facility, if applicable
- A statement of the compliance of the waste handling areas with applicable regulations and discussion of any repairs made, if applicable
- A notarized statement attesting to the truthfulness and accuracy of the annual report

6.0 FACILITY CLOSURE

Closure of the WTL Transfer Station will be performed in accordance with OAC 3745-27-24 – Final Closure of Solid Waste Transfer Facilities. WTL will initiate closure activities under one or more of the following scenarios:

- The WTL Transfer Station will cease accepting waste;
- If the WTL Transfer Station license expires and a new license will not be applied for;
- If the WTL Transfer Station license expires and a new license application has been denied and all remedies for the denial have either been exhausted, or waived by failure to pursue remedies in a timely manner;
- If the WTL Transfer Station license has been suspended or revoked, and all remedies for the revocation or suspension have either been exhausted, or waived by failure to pursue remedies in a timely manner; and/or
- If updated design plans, specifications, and information submitted by order of the Director are disapproved and all remedies for the disapproval have either been exhausted, or waived by failure to pursue remedies in a timely manner.

6.1 CLOSURE NOTIFICATIONS

A notice stating the anticipated date on which the solid waste transfer facility will cease to accept waste will be provided by certified mail to the Washington County Health Department, Southeastern Ohio Joint Solid Waste Management District and to the Director of the Ohio EPA at least ninety (90) days prior to facility closure. Concurrently, the notice of closure will also be published, at three-week intervals, in Washington County in a newspaper of general circulation and any county which contributed 25 percent or more of the solid waste transferred through the facility over the previous 12 months. A notice will also be posted in prominent location(s) throughout the facility which states the date when the WTL Transfer Station will cease to accept solid waste.

Notice shall be provided by certified mail to the Director of the Ohio EPA and to the Washington County Health Department affirming that notices have been published. Not less than 30 days prior to closure, notice shall be provided by certified mail to the Director of the Ohio EPA of any changes to the information that identifies the facility's final closure contact person.

6.1.1 Final Closure Contact

The final closure contact for the facility is:

Daryl Heiser, Vice President.
Weavertown Transport Leasing, Inc.
2 Dorrington Road
Carnegie, Pennsylvania 15106
Telephone: 724-746-4850
Mobile: 412-779-4097
E-Mail dheiser@weavertown.com

6.2 CLOSURE ACTIVITIES

No later than 30 days after the facility has ceased to accept waste for transfer, WTL will initiate closure activities to include the thorough cleaning of all areas where waste materials were handled and/or stored and the equipment used in the waste handling operations. At a minimum the cleaning will include, but not be limited to, the following:

- All solid and liquid wastes will be removed from the site and disposed off-site at appropriate licensed disposal or recycling facilities.
- All areas of the facility and appurtenances (i.e., the Solidification Basin, Truck Unload Floor, Transfer Trailer Loading Ramp, Drum Storage Area, etc.) that were in contact with waste materials and will not be removed from the site as part of the facility closure will be washed down in such a manner as to substantially reduce or eliminate any remaining wastes, constituents, or sources of contaminants.
- The wash down activities will be conducted to allow the fluids generated during the cleaning to be directed to and be contained in the Solidification Basin, then pumped out for off-site disposal.
- Following required cleaning activities, WTL will remove off the site all containers, roll off boxes, refuse trucks, and transfer trailers and tractors associated with the Transfer Station.

WTL will keep the site access gate(s) locked and will post signs easily visible at all access gate(s) leading into the facility for at least six months after closure, stating that the facility is closed for all waste transfer activities. During this period the condition of the sign(s) will be monitored to ensure the sign(s) are legible and have not been removed.

No later than 60 days after the facility has ceased to accept waste materials for transfer, WTL will complete the following activities:

- The leachate management system will be modified by sealing the collection system piping and surface access grates; and,
- If deemed necessary, the facility shall be baited for rodents and treated for other vectors.

Within 30 days of completing the requirements of this closure plan and the applicable regulations (3745-27-24 (C) and (D)), WTL will certify to the Washington County Health Department and the Director of the Ohio EPA that the facility has been thoroughly cleaned and closed.

6.3 RIGHT OF ENTRY

WTL recognizes and accepts the Director's, the health commissioner's, and their authorized representatives' right to enter the WTL Transfer Station to inspect and monitor the site to determine compliance of the closure activities. Entry to the site will be granted at any reasonable time upon presentation of proper identification.

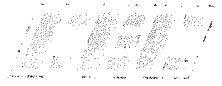
6.4 FINANCIAL ASSURANCE

In accordance with OAC 3745-27-21 (C)(4) and OAC 3745-27-15 (C)(1)(a), this PTI Application includes an estimated cost for final closure of the WTL Transfer Station. The financial assurance instrument is based on the final closure activities presented in Section 6.2 – Closure Activities and estimated costs provided in Table G-1 – Final Closure Cost Estimate which is provided in Appendix G – Financial Assurance Instrument. The executed final closure financial assurance instrument will be provided following Ohio EPA approval of the closure cost estimate and will comply with OAC 3745-27-15.

Drawings

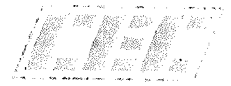


SEE ATTACHED DRAWINGS



TABLES

Appendix A



APPENDIX A

EXEMPTION REQUEST



**EXEMPTION TO ACCEPT INDUSTRIAL WASTE
SOLID WASTE TRANSFER STATION PERMIT TO INSTALL APPLICATION
WTL TRANSFER STATION
GRANDVIEW TOWNSHIP, WASHINGTON COUNTY, OHIO
WEAVERTOWN TRANSPORT LEASING, INC.**

Weavertown Transport Leasing, Inc. (WTL) is requesting an exemption from the Ohio Administrative Code (OAC) 3745-27-23(O)(3) in accordance with the Ohio Revised Code (ORC) 3734.02(G) to allow the acceptance of industrial waste containing liquids, sludges, semi-solids as defined in ORC 6111.01(C) "*Industrial waste" means any liquid, gaseous, or solid waste substance resulting from any process of industry, manufacture, trade, or business, or from the development, processing, or recovery of any natural resource, together with such sewage as is present.*". Only non-hazardous, industrial wastes will be included in this exemption request. This exemption request is included as part of the Solid Waste Transfer Station Permit to Install (PTI) Application for the proposed WTL Transfer Station that is being submitted to the Ohio Environmental Protection Agency (Ohio EPA), Southeast District Office (SEDO) in accordance with the requirements of OAC 3745-27-21. WTL is requesting that the Director consider this exemption request and coordinate the issuance of the Solid Waste Transfer Station Permit with relevant divisions of Ohio EPA in accordance with ORC 3734.02(G), being that the proposed WTL Transfer Station design and operation plan demonstrates that the facility is capable of fulfilling all appropriate regulatory requirements for protecting public health, safety, surface water, ground water, and air.

WTL is requesting this exemption to OAC 3745-27-23(O)(3) in order to accept and process non-hazardous, industrial waste streams containing liquids followed by transport to a licensed municipal solid waste disposal facility. WTL proposes to combine and/or solidify industrial wastes, consisting of liquids, sludges, and solids, at the proposed WTL Transfer Station prior to off-site transport. Examples of some anticipated industrial wastes include drilling muds and drill cuttings generated from oil and gas exploration, sludges generated from industrial tank cleaning operations, and other industrial liquids, sludges and solids. Solidification will consist of mixing the industrial wastes with non-hazardous, solid wastes that exhibit drying, bulking and solidification properties. A description of the proposed facility is included in Section 2.0 – Facility Description of this PTI Application.



PROTECTION OF PUBLIC HEALTH, SAFETY AND THE ENVIRONMENT

The proposed WTL Transfer Station is designed, and will be operated, to protect public health, safety and the environment. Protective design features and operational procedures for the proposed WTL Transfer Station are described below:

Protective Design Features

Protective design features for the proposed WTL Transfer Station will include:

- The waste handling areas will be in an enclosed building to provide a controlled operational environment, minimize contact with precipitation, and to reduce noise and odors;
- A dual-contained solidification basin with leak detection will allow evaluation of the integrity of the structure to contain liquids;
- Dual-contained catch basins and piping comprising the leachate collection system provide additional protection to contain leachate;
- The closed-loop leachate management system is a zero discharge system which eliminates potential impact to local surface water quality;
- Concrete interior floors that slope to the leachate management system which significantly reduces the potential for a spill-release from the transfer station building;
- An erosion control system that includes catch basin filters that will absorb leaked or spilled hydrocarbons and a detention basin that will reduce suspended solids prior to storm water discharge;
- Concrete containment in the bulk liquid staging area, bulk liquid unload area and bulk liquid storage area which significantly reduces the potential for a spill-release from the transfer station facility;
- Appropriate signage including a list of unacceptable wastes and emergency contact numbers that will minimize unauthorized waste from entering the facility; and
- Fencing and security at the facility that will also minimize unauthorized waste from entering the facility.

These protective design features are discussed in detail in Sections 4.1 through 4.13 of this PTI Application.