



Protective Operational Procedures

Protective operational procedures for the proposed WTL Transfer Station will include:

- Generator certification for incoming waste;
- Hauler registration;
- Appropriate material manifests;
- Waste profile documentation;
- Shipment verification procedures;
- Representative in-house (bench scale) material and compatibility testing;
- Third party (off-site) laboratory material testing, if needed;
- Regular monitoring of the solidification basin leak detection system;
- Regular inspection of the concrete floors within the facility;
- Regular wet/dry cleanup in the waste handling areas;
- Replacement of filters in the erosion control system;
- Visual inspection of flow to the detention basin structure; and
- Contingency plans for:
 - Discovery of unauthorized wastes;
 - Fire, explosion, and spills;
 - Equipment failure; and
 - Unavailability of the Transfer Station.

These protective operational procedures are discussed in detail in Sections 5.4 through 5.11 of this PTI Application.

Proper record keeping will provide a tracking mechanism to confirm facility compliance with applicable regulations, and will provide 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., surface water permits, air permits [if necessary], etc.);



- Facility's Contingency Plans;
- Daily Logs; and,
- Copies of the Annual Operational Reports.

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.

Facility Closure and Financial Assurance

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.



In accordance with OAC 3745-27-15, a financial assurance instrument will be prepared based on the cost estimate for facility closure that is provided in Attachment A2 and Appendix G included in this PTI Application. The financial assurance instrument will be reviewed and analyzed annually and adjusted whenever a change in the final closure activities is identified and also for annual inflation adjustments. Details of the facility closure and financial assurance are provided in Sections 6.1 through 6.4 of this PTI Application.

WTL appreciates the Director's consideration of this exemption request to accept industrial wastes containing liquids at the proposed WTL Transfer Station. We believe that the proposed facility design and operation will provide a high-level of protection to public health, safety and the environment in the vicinity of the proposed transfer station facility. WTL will quickly respond to any requests from Ohio EPA for additional information.

Appendix B



APPENDIX B

**LETTERS OF INTENT
AND ACKNOWLEDGEMENT**
