



CERTIFIED MAIL

Mr. Sterling Derrick
Washington State Department of Ecology
3100 Port of Benton Blvd.
Richland, WA 99354

March 7, 2013
2013-LTR-1004

Ms. Linda Meyer
United States Environmental Protection Agency - Region 10
1200 Sixth Avenue, Suite 900, AWT-121
Seattle, WA 98101

RE: Perma-Fix Northwest Richland, Incorporated
EPA Site Identification Number WAR 00001 0355
Mixed Waste Facility Class 2 Modification Request: Aerosol Can Puncture Unit

Dear Mr. Derrick and Ms. Meyer:

Perma-Fix Northwest Richland, Incorporated (PFNW-R) is requesting a modification to the permit in accordance with permit conditions I.B.3, I.B.4, and V.F.5.b. The requested changes to the permit and attachments would add the capabilities to process mixed waste, non-punctured aerosol cans in accordance with the requirements of WAC 173-303-680. This permit modification request is being submitted as a Class 2 modification as described in WAC 173-303-830(b).

Description of Change(s)

PFNW-R will purchase and operate a commercially-available aerosol can puncturing apparatus specifically designed to safely puncture aerosol cans and treat any volatile organic compounds. The maximum rate of processing aerosol cans will be two cans per minute. The contents of the punctured aerosol cans will drain and be collected in a compatible container. The propellants, compressed gases, and volatile organic compounds will be filtered through a carbon filter mounted on the drum prior to being discharged as a fugitive emission. Once emptied, the punctured aerosol cans will be placed back into the original waste stream and sent to the low-level building for further treatment. Any spent aerosol cans purchased by PFWN-R (as a generator) will be segregated from aerosol cans found in the various mixed waste debris wastes that come from customers. In addition, all personnel will be trained on how to properly use the puncturing device and ensure that incompatible materials will be stored separately. The puncturing device and carbon filter are commercially available and mount to the general containers (Attachment 9). The carbon filter cartridge will be periodically changed in accordance with the manufacturers' recommendations.

Justification

This permit modification is needed initially for an upcoming mixed waste stream primarily made up of aerosol cans co-mingled with other mixed waste debris. This drum-mounted equipment is a portable unit

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and would be used throughout the mixed waste building. Current policies and practices have us segregating these items as non-conforming wastes and sent back to the generator. By permitting this treatment process, PFNW-R will be capable of compliantly treating aerosol cans that are occasionally found in future mixed wastes received. As always, PFNW-R works to ensure that the generator provides the most accurate EPA waste codes for their waste profiles prior to being shipped to PFNW-R. Based on discussions with Washington State Department of Ecology, PFNW is submitting this permit modification request as a Class 2 modification.

Attachments

The following permit/permit conditions and attachments have been revised to accommodate the aerosol can puncturing device that will be used in the Mixed Waste Building.

1. Certification Statement
2. Permit Modification Notification
3. Public Notice & Meeting
4. Interested Party Letter
5. RCRA/TSCA Permit
6. Permit Attachment BB
7. Permit Attachment CC
8. Permit Attachment GG
9. Permit Attachment NN
10. Permit Attachment PP
11. Permit Attachment TT
12. Permit Attachment XX

Public Comment

A 60-day public comment period will begin on or about March 11, 2013. A public meeting has been scheduled for April 11, 2013 at 6:00pm at the Richland Public Library, 955 Northgate Drive, Richland Washington.

Should you have any questions regarding this matter, please do not hesitate to contact me on (509) 375-7026.

Thank you,



Richard Grondin
Perma-Fix Northwest Richland, Incorporated
Vice President and General Manager

Cc:

Rick Bond	Ecology	w/o attachments
Ron Skinnarland	Ecology	w/o attachments
Regulatory File		

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The following certification statement fulfills the requirements of Hazardous Waste Management Act, in accordance with WAC 173-303-810(13)(a), and Toxic Substance Control Act, in accordance with 40 CFR 761.3, for Perma-Fix Northwest Richland, Inc. permit for the Storage and Treatment of Mixed Waste and for the Storage and Disposal of Mixed-Toxic Substance Control Act (TSCA) Regulated Polychlorinated Biphenyl (PCB) Wastes.

The certification below covers the documentation and submission of the Permit Modification submitted in letter No. 2013-LTR-1004, dated March 7, 2013.

As the Vice President/General Manager of the Mixed Waste Facility, I have the authority to certify on behalf of the corporation.

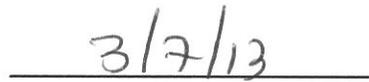
HWMA CERTIFICATION
[WAC 173-303-810(13)(a)]

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

PFNW-R Inc.

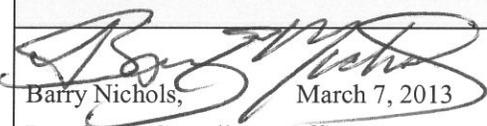
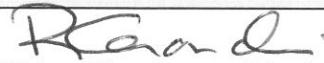


Richard Grondin Vice President/General Manager



Date: March 7, 2013

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MWF Mixed Waste Permit Modification/Notification				
PMN#: 132	Unit Name: Mixed Waste Facility	Permit Number: WAR 0000 10355		
LTR#: 2013-LTR-1004	Unit Number: N/A	Permit Condition: I.B.3, I.B.4, V.F.5.b		
Description of Modification: ▼				
Permit Modification Class¹: ▶	Class 1	Class¹1	Class 2	Class 3
			X	
Justification for Classification of Modification²: ▶		Based on discussion with the Department of Ecology, PFNW submits this as a class 2 modification.		
Relevant WAC 173-303-830, Appendix I Modification: ▶		N/A		
Enter wording of the modification from WAC 173-303-830, Appendix I citation: ▼				
N/A				
Prepared By:		Date:		Reviewed By:
				Date:
Barry Nichols, Regulatory Compliance Officer		March 7, 2013		
				Richard Grondin, Vice-President and General Manager
WDOE Accepted:				

¹Class 1 modifications requiring prior Agency approval.

²If the proposed modification matches a modification listed in WAC 173-303-830 Appendix I, then enter the wording "Listed in Appendix I of WAC 173-303-830" here



March 5, 2013

Dear Interested Person:

This letter serves as notice that Perma-Fix Northwest Richland Inc. (PFNW) located at 2025 Battelle Boulevard in Richland, WA has requested a Class 2 Permit Modification to its Permit No. WAR 0000 10355. Pursuant to WAC 173-303-830(4)(a)(i)(B), PFWN is mailing this notice to everyone who has requested that they be notified of modifications to the facility's permit and is on the facility mailing list.

SUMMARY OF CLASS 2 PERMIT MODIFICATIONS

The following changes were made:

PMR 132

PFNW modified the facility mixed waste permit to add an aerosol can puncturing device to its list of miscellaneous units.

Should you no longer wish to receive these updates or would like to receive updates electronically, please call (509) 375-7001 or send an email to bnichols@perma-fix.com. If you have any questions or comments on the permit modification, please contact Sterling (Bud) Derrick with the Washington Department of Ecology at (509) 372-7896.

Sincerely,

A handwritten signature in black ink, appearing to read "Richard Grondin".

Richard Grondin
Vice President and General Manager