

**REGION 5**

CHICAGO, IL 60604

Michelle LaRocco
Cirba Solutions US Inc
265 Quarry Rd. SE
Lancaster, Ohio, 43130

Dear Michelle LaRocco:

Enclosed is a copy a draft of the federal RCRA Class 3 permit modification portion of the Resource Conservation and Recovery Act Hazardous Waste Permit ("draft Federal RCRA Class 3 permit modification") to be issued by U.S. Environmental Protection Agency, Region 5, for Cirba Solutions US Inc, Lancaster, Ohio. This draft permit is based on the Class 3B modification request submitted to EPA on January 17, 2025.

The draft federal RCRA permit modification will be publicly noticed in the "Lancaster Eagle Gazette" newspaper and announced on a local radio station on or about September 7, 2026. A copy of the revised draft federal RCRA permit is available for review at the Fairfield Public Library. The public comment period extends from September 8, 2026, to October 26, 2026.

During the public comment period, you or any interested party may submit comments to the U.S. Environmental Protection Agency on the draft Federal RCRA permit set forth above. At the close of the comment period, EPA will prepare a response to all significant comments. Comments on the draft Federal RCRA permit may be submitted (or email) to:

Land and Chemicals Branch, LL-17J
Land, Chemicals, and Redevelopment Division
77 West Jackson Boulevard
Chicago, Illinois, 60604

Attention: Norberto Gonzalez, PhD (Gonzalez.Norberto@epa.gov)

Following review of any comments received on the revised draft Federal RCRA permit, EPA will issue a final permit decision in accordance with the requirements of 40 Code of Federal

Regulations (C.F.R.) § 124.15. This final permit decision will include a response to public comments received by EPA regarding the previous draft permit and any comments regarding the revised draft. The procedures of permit appeals are found in 40 C.F.R. § 124.19.

If you have any questions, please contact Norberto Gonzalez of my staff at (312) 353-1612.

Sincerely,

M. Cecilia Alford

Digitally signed by M. Cecilia
Alford
Date: 2026.09.03 10:10:25 -05'00'

M. Cecilia Alford, Director
Land, Chemicals, and Redevelopment Division

cc: Bradley Mitchell, OEPA

Draft

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5**

RESOURCE CONSERVATION AND RECOVERY ACT PERMIT

Facility Name and Location: Cirba Solutions US Inc
265 Quarry Rd SE
Lancaster, Ohio, 43130

Owner: Cirba Solutions US Inc
265 Quarry Road
Lancaster, Ohio, 43130

Operator: Cirba Solutions US Inc
265 Quarry Road
Lancaster, Ohio, 43130

U.S. EPA Identification Number: OHD 071 654 958

Effective Date: 30 Days from Issuance Date of the Final Permit

Expiration Date: November 14, 2027

Authorized Activities:

The U.S. Environmental Protection Agency hereby issues a Resource Conservation and Recovery Act (RCRA) permit (hereinafter referred to as the “Permit”) to Cirba Solutions US Inc (addressed in the second person as “You”, “Permittee”, or “Cirba”) in connection with the hazardous waste management operations at Cirba Solutions US Inc, located in Lancaster, Ohio.

This permit is issued under the Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act of 1976, as amended, including by the Hazardous and Solid Waste Amendments (HSWA) of 1984 (42 United States Code (U.S.C.) § 6901 *et seq.*) (collectively referred to as “RCRA”), and EPA’s regulations promulgated thereunder (codified, and to be codified, in Title 40 of the Code of Federal Regulations (40 C.F.R.)).

Specifically, this permit addresses air emission standards for equipment leaks and tanks. See 40 C.F.R. Part 264, Subpart BB and CC.

This permit does not contain 40 C.F.R. Part 264, Subpart AA, Air Emission Standards for Process Vents, because Cirba’s RCRA permit Application states that Cirba currently does not operate process vents. Therefore, the requirements under Subpart AA are not set forth in this Permit.

The RCRA permit consists of both this permit, which contains the effective Federal RCRA permit conditions, and the effective State RCRA permit conditions issued by the State of Ohio's RCRA program authorized under 40 C.F.R. Part 271 (hereinafter called the "State RCRA permit"). Any hazardous waste activity which requires a RCRA permit and is not included in the RCRA permit is prohibited.

Permit Approval:

On June 30, 1989, the State of Ohio received final authorization according to Section 3006 of RCRA, 42 U.S.C. § 6926, and 40 C.F.R. Part 271, to administer the base RCRA hazardous waste program. The State of Ohio has also received final authorization to administer certain additional RCRA requirements on several occasions since then. In April 2026, EPA authorized the State of Ohio to administer certain regulations promulgated under HSWA, including the air emission standards under 40 C.F.R. Part 264, Subpart AA, BB, and CC. Until Ohio EPA issues a State RCRA permit incorporating such conditions, as appropriate, the federal RCRA permit remains in effect. EPA is issuing the RCRA permit requirements for operations at your facility, which fall under these regulations.

You must comply with all terms and conditions contained in this permit. This permit consists of all the conditions contained herein, the documents attached hereto, all documents cross-referenced in these documents, approved submittals (including plans, schedules and other documents), the applicable regulations in 40 C.F.R. Parts 124, 260, 261, 262, 264, 268, 270, and applicable provisions of RCRA.

This permit is based on the assumption that the information submitted in your RCRA Permit Application Class 3B Modification Request dated January 17, 2025, and all other revisions and addendums to that application (hereinafter referred to as the "Application") is accurate and the facility is configured, operated and maintained as specified in the Application and other relevant documents.

Any inaccuracies in the submitted information may be grounds for EPA to terminate, revoke and reissue, or modify this permit in accordance with 40 C.F.R. §§ 270.41, 270.42 and 270.43; and for enforcement action. You must inform EPA of any deviation from, or changes in, the information in the Application and other pertinent documents that might affect your ability to comply with the applicable regulations or conditions of this permit.

Opportunity to Appeal:

Petitions for review must be submitted within 30 days after EPA serves notice of the final permit decision. Any person who filed comments on the draft permit or participated in the public hearing may petition the Environmental Appeals Board to review any condition of the permit decision. Any person who failed to file comments or failed to participate in the public hearing on

the draft permit may file a petition for review only to the extent of the changes from the draft to the final permit decision. The procedures for permit appeals are found in 40 C.F.R. § 124.19.

Effective Date:

This permit is effective as of **30 Days from Issuance Date of the Final Permit** and will remain in effect until **November 14, 2027**, unless revoked and reissued under 40 C.F.R. § 270.41, terminated under 40 C.F.R. § 270.43, or continued in accordance with 40 C.F.R. § 270.51(a).

By: _____

M. Cecilia Aldord, Director
Land, Chemicals, and Redevelopment Division

OHD 071 654 958

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SECTION I – STANDARD PERMIT CONDITIONS

I.A EFFECT OF PERMIT

This permit contains the federal Resource Conservation and Recovery Act (“RCRA”) permit conditions. You also have an effective State of Ohio RCRA permit. You are hereby allowed to manage hazardous waste at Cirba Solutions Inc (“facility”) in accordance with this permit and the effective state RCRA permit. The storage of RCRA hazardous waste must comply with all terms and conditions in this permit. Other aspects of the storage of RCRA hazardous wastes are subject to the conditions in the state-issued portion of the RCRA permit. Any hazardous waste activity which requires a RCRA permit and is not included either in this permit or the state RCRA permit, is prohibited.

In accordance with 40 C.F.R. § 270.4, compliance with the RCRA permit during its term constitutes compliance, for purposes of enforcement, with Subtitle C of RCRA except for those requirements not included in the permit which: (1) become effective by statute; (2) are promulgated under 40 C.F.R. Part 268 restricting the placement of hazardous waste in or on the land; (3) are promulgated under 40 C.F.R. Part 264 regarding leak detection systems; or (4) promulgated under subparts AA, BB, or CC of 40 C.F.R. Part 265 limiting air emissions.

This permit does not: (1) convey any property rights or any exclusive privilege; (2) authorize any injury to persons or property, or invasion of other private rights; or (3) authorize any infringement of state or local law or regulations. (40 C.F.R. § 270.4). Compliance with the terms of this permit does not constitute a defense to any order issued, or any action brought, under: (1) Sections 3008(a), 3008(h), 3013, or 7003 of RCRA; (2) Sections 104, 106(a), or 107 of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, 42 U.S.C. §§ 9601 *et seq.* (commonly known as “CERCLA”); or (3) any other law protecting public health or the environment.

I.B PERMIT ACTIONS

I.B.1 Permit Review, Modification, Revocation and Reissuance, and Termination

EPA may review, modify, or revoke and reissue this permit, or terminate it for cause, as specified in 40 C.F.R. §§ 270.41, 270.42, and 270.43. EPA may also review and modify this permit, consistent with 40 C.F.R. § 270.41, to include any terms and conditions it determines are necessary to protect human health and the environment under Section 3005(c)(3) of RCRA. The filing of a request for a permit modification, revocation and reissuance, or termination, or a notification of planned changes or anticipated noncompliance on Your part will not stay the applicability or enforceability of any permit condition. (40 C.F.R. § 270.30(f)).

You may request a modification of this permit under the procedures specified in 40 C.F.R. § 270.42. A Class 1 modification is generally allowed without prior approval by EPA, except under certain conditions as described in 40 C.F.R. § 270.42(a)(2).

A Class 2 modification requires approval by EPA as described in 40 C.F.R. § 270.42(b).

You may perform construction associated with a Class 2 permit modification request beginning 60 days after submission of the request unless the Director establishes a later date. (40 C.F.R. § 270.42(b)(8)). (Pursuant to Chapter 8-6 of the Region 5 Delegation Manual, the authority assigned to the Regional Administrator as Director under 40 C.F.R. § 270.42(b)(8) has been delegated to the Director of the Land, Chemicals and Redevelopment Division of EPA, Region 5. Thus, for the purposes of this permit, the term Director must refer to the Division Director of EPA Region 5's Land, Chemicals and Redevelopment Division.)

Procedures for a Class 3 modification are specified in 40 C.F.R. § 270.42(c). You must not perform any construction associated with a Class 3 permit modification request until such modification request is granted and the modification becomes effective.

I.B.2 Permit Renewal

This permit may be renewed as specified in 40 C.F.R. § 270.30(b) and Section I.E.2 of this permit. In reviewing any application for a permit renewal, EPA will consider improvements in the state of control and measurement technology, and changes in applicable regulations. (40 C.F.R. § 270.30(b) and RCRA Section 3005(c)(3), 42 U.S.C. § 6925).

I.C SEVERABILITY

This permit's provisions are severable. If any permit provision, or the application of any permit provision to any circumstance, is held invalid, such provision's application to other circumstances and the remainder of this permit will not be affected. Invalidation of any statutory or regulatory provision on which any condition of this permit is based does not affect the validity of any other statutory or regulatory basis for that condition. (40 C.F.R. § 124.16(a)).

I.D DEFINITIONS

The terms used in this permit will have the same meaning as in 40 C.F.R. Parts 124, 260 through 266, 268 and 270, unless this permit specifically provides otherwise. Where neither the regulations nor the permit defines a term, the term's definition will be the standard dictionary definition or its generally accepted scientific or industrial meaning.

I.E DUTIES AND REQUIREMENTS

I.E.1 Duty to Comply

You must comply with all conditions of this permit, except to the extent and for the duration for which an emergency permit authorizes such noncompliance (40 C.F.R. § 270.61). Any permit noncompliance, except under the terms of an emergency permit, constitutes a violation of RCRA and will be grounds for: enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. (40 C.F.R. § 270.30(a)).

I.E.2 Duty to Reapply

If You wish to continue an activity this permit regulates after its expiration date, You must apply for and obtain a new permit. You must submit a complete application for a new permit at least 180 calendar days before the permit expires, unless the Director grants permission for a later date. The Director will not grant permission to submit the complete application for a new permit later than the permit's expiration date. (40 C.F.R. §§ 270.10(h) and 270.30(b)).

I.E.3 Permit Expiration

Unless revoked or terminated, this permit and all conditions herein will be effective for 10 years from the effective date of the final permit. This permit and all conditions herein will remain in effect beyond the permit's expiration date if You have submitted a timely, complete application (40 C.F.R. §§ 270.10 and 270.13 through 270.29), and, through no fault of Your own, the Director has not made a final determination regarding permit reissuance. (40 C.F.R. §§ 270.50 and 270.51).

I.E.4 Need to Halt or Reduce Activity Not a Defense

In an enforcement action, You are not entitled to a defense that it would have been necessary to halt or reduce the permitted activity to maintain compliance with this permit. (40 C.F.R. § 270.30(c)).

I.E.5 Duty to Mitigate

In the event of noncompliance with this permit, You must take all reasonable steps to minimize releases to the environment resulting from the noncompliance and must implement all reasonable measures to prevent significant adverse impacts on human health or the environment. (40 C.F.R. § 270.30(d)).

I.E.6 Proper Operation and Maintenance

You must always properly operate and maintain all facilities and treatment and control systems (and related appurtenances) that You install or use to comply with this permit. Proper operation and maintenance include effective performance, adequate funding, adequate operator staffing and training, and adequate laboratory and process controls, including appropriate quality assurance/quality control procedures. This provision requires You to operate back-up or auxiliary facilities or similar systems only when necessary to comply with this permit. (40 C.F.R. § 270.30(e)).

I.E.7 Duty to Provide Information

You must provide the Director, within a reasonable time, any relevant information that the Director requests to determine whether there is cause to modify, revoke and reissue, or terminate this permit, or to determine permit compliance. You must also provide the Director, upon request, with copies of any records this permit requires.

I.E.8 Inspection and Entry

Upon the presentation of credentials and other legally required documents, You must allow the Director or an authorized representative to:

I.E.8.a Enter at reasonable times upon Your premises where a regulated activity is located or conducted, or where records must be kept under the conditions of this permit;

I E.8.b Have access to and copy, at reasonable times, any records that You must keep under the conditions of this permit;

I.E.8.c Inspect, at reasonable times, any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under this permit and;

I.E.8.d Sample or monitor any substances at any location at reasonable times, to assure permit compliance or as RCRA otherwise authorizes.

Notwithstanding any provisions of this permit, EPA retains the inspection and access authority which it has under RCRA and other applicable laws. (40 C.F.R. § 270.30(i))

I.E.9 Monitoring and Records

I.E.9.a Samples and measurements taken for monitoring purposes must be representative of the monitored activity. The methods used to obtain a representative sample of the feed streams, treatment residues, or other hazardous wastes to be analyzed must be the appropriate methods from Appendix I of 40 C.F.R. Part 261, or the methods specified in “Waste Characteristics” section of the Application, or an equivalent method approved by the Director. Laboratory methods must be those specified in *Test Methods for Evaluating Solid Waste: Physical/Chemical Methods* (SW-846, latest edition), *Methods for Chemical Analysis of Water and Wastes* (EPA 600/4-79-020), or an equivalent method, as specified in the referenced Waste Characteristics. (40 C.F.R. § 270.30(j)(1)).

I.E.9.b You must retain, at the facility, all records as specified in 40 C.F.R. § 264.74.

I.E.9.c You must submit all monitoring results at the intervals specified in this permit.

I.E.9.d You must retain all reports, records, or other documents, required by this permit, and records of all data used to complete the application for this permit, for a period of at least 3 years from the date of the reports, records, or other documents, unless a different period is specified in this permit. The 3-year period may be extended by request of the Director at any time and are automatically extended during the course of any unresolved enforcement action regarding this facility. (40 C.F.R. §§ 270.30(j) and 270.31).

I.E.10 Reporting Planned Changes

You must notify the Director as soon as possible of any planned physical alterations or additions to the permitted facility. (40 C.F.R. § 270.30(l)(1)).

I.E.11 Reporting Anticipated Noncompliance

You must notify the Director, in advance, of any planned changes in the permitted facility or activity that may result in permit noncompliance. Advance notice will not constitute a defense for any noncompliance. (40 C.F.R. § 270.30(l)(2)).

I.E.12 Certification of Construction

You must not operate any RCRA air emission control devices completed after the effective date of this permit until You have submitted to the Director, by certified mail or hand-delivery, a letter signed both by Your authorized representative and by a registered professional engineer, in accordance with 40 C.F.R. 270.30(l)(2)(i). That letter must state

that the portions of the facility covered by this permit (including all air emission control devices required by this permit) have been constructed in compliance with the applicable conditions of this permit. In addition, You must not operate the permitted control devices until either:

I.E.12.a The Director or his/her representative has inspected those portions of the facility and finds them in compliance with the conditions of the permit; or

I.E.12.b Within 15 days of the date of submission of the letter referenced in I.E.12, the Permittee has not received notice from the Director of his or her intent to inspect, prior inspection is waived and the Permittee may commence storage of hazardous waste in accordance with 40 C.F.R. § 270.30(l)(2)(ii)(B).

I.E.13 Transfer of Permits

This permit is not transferable to any person, except after notice to and approval of the Director. You must inform the Director in writing and obtain prior written approval of the Director before transferring ownership or operational control of the facility. (40 C.F.R. § 270.42, Appendix I). Under 40 C.F.R. § 270.40, the Director may require permit modification, or revocation and reissuance to change the name of the Permittee and incorporate other RCRA requirements. Before transferring ownership or operation of the facility during its operating life, You must notify the Director and obtain prior approval, and notify the new owner or operator in writing of the requirements of 40 C.F.R. Parts 264, 268, and 270, and You must provide a copy of the RCRA permit to the new owner or operator. (40 C.F.R. §§ 264.12(c), 270.30(l)(3), and 270.40(a)).

I.E.14 Twenty-Four Hour Reporting

I.E.14.a You must report to the Director any noncompliance that may endanger human health or the environment. Any such information must be promptly reported orally, but no later than 24 hours after You become aware of the circumstances. (40 C.F.R. § 270.30(l)(6)).

I.E.14.b The report must include the following: (1) Information concerning release of any hazardous waste that may cause an endangerment to public drinking water supplies; (2) Any information of a release or discharge of hazardous waste; and/or (3) Any information of a fire or explosion from the hazardous waste management facility, that could threaten the environment or human health outside the facility. You must include the following information:

(1) Name, title, and telephone number of the person making the report;

(2) Name, address, and telephone number of the facility owner or operator;

- (3) Facility name, address, and telephone number;
- (4) Date, time, and type of incident;
- (5) Location and cause of incident;
- (6) Identification and quantity of material(s) involved;
- (7) Extent of injuries, if any;
- (8) Assessment of actual or potential hazards to the environment and human health outside the facility, where applicable;
- (9) Description of any emergency action taken to minimize the threat to human health and the environment; and
- (10) Estimated quantity and disposition of recovered material that resulted from the incident. (40 C.F.R. § 270.30(l)(6)).

I.E.14.c In addition to the oral notification required under Sections I.E.14.a and I.E.14.b of this permit, a written report must also be provided within 5 calendar days after You become aware of the circumstances. The written report must include, but is not limited to, the following:

- (1) Name, address and telephone number of the person reporting;
- (2) Incident description (noncompliance and/or release or discharge of hazardous waste), including cause, location, extent of injuries, if any, and an assessment of actual or potential hazards to the environment and human health outside the facility, where applicable;
- (3) Period(s) in which the incident (noncompliance and/or release or discharge of hazardous waste) occurred, including exact dates and times;
- (4) Whether the incident's results continue to threaten human health and the environment, which will depend on whether the noncompliance has been corrected and/or the release or discharge of hazardous waste has been adequately cleaned up; and
- (5) If the noncompliance has not been corrected, the anticipated period for which it is expected to continue and the steps taken or planned to reduce, eliminate, and prevent the recurrence of the noncompliance.

The Director may waive the requirement that written notice be provided within 5 calendar days; however, You must then submit a written report within 15 calendar days of the day on which You must provide oral notice, in accordance with Sections I.E.14.a and I.E.14.b of this permit. (40 C.F.R. §§ 270.30(1)(6) and 270.30(h)).

I.E.15 Other Noncompliance

You must report all instances of noncompliance not reported under Section I.E.14 of this permit, at the time monitoring reports are submitted. The reports must contain the information listed in Section I.E.14 of this permit. (40 C.F.R. § 270.30(l)(10)).

I.E.16 Other Information

I.E.16.a Whenever You become aware that You failed to submit or otherwise omitted any relevant facts in the Application or other submittal, or submitted incorrect information in the Application or other submittal, You must promptly notify the Director of any incorrect information or previously omitted information, submit the correct facts or information, and explain in writing the circumstances of the incomplete or inaccurate submittal. (40 C.F.R. §§ 270.30(l)(11) and 270.30(h)).

I.E.16.b All other requirements contained in 40 C.F.R. § 270.30 not specifically described in this permit are incorporated into this permit and You must comply with all those requirements.

I.F SIGNATORY REQUIREMENT

You must sign and certify all applications, reports, or information this permit requires, or which are otherwise submitted to the Director, in accordance with 40 C.F.R. § 270.11. (40 C.F.R. § 270.30(k)).

I.G REPORTS, NOTIFICATIONS AND SUBMITTALS TO THE DIRECTOR

Except as otherwise specified in this permit, all reports, notifications, or other submittals that this permit requires to be sent or given to the Director should be sent by certified mail or express mail, or hand-delivered to the U.S. Environmental Protection Agency Region 5, Land and Chemicals Branch, at the following address:

Land and Chemicals Branch, LL-17J
Land, Chemicals, and Redevelopment Division
U.S. EPA Region 5
77 West Jackson Boulevard
Chicago, Illinois 60604

I.H CONFIDENTIAL INFORMATION

In accordance with 40 C.F.R. Part 2, Subpart B, You may claim any information this permit requires, or otherwise submitted to the Director, as confidential. You must assert any such claim at the time of submittal in the manner prescribed on the application form or instructions or, in the case of other submittals, by stamping the words “Confidential Business Information” on each page containing such information. If You make no claim at the time of submittal, the Director may make the information available to the public without further notice. If You assert a claim, the information will be treated in accordance with the procedures in 40 C.F.R. Part 2. (40 C.F.R. § 270.12). You have the burden of substantiating that the claimed information is confidential, and EPA may request further information from You regarding such claim and may reasonably determine which such information to treat as confidential.

I.I DOCUMENTS TO BE MAINTAINED AT THE FACILITY

You must maintain at the facility, until closure is completed and certified by an independent registered professional engineer, the documents listed below and all amendments, revisions, and modifications to them.

I.I.1 Operating Record

You must maintain in the facility’s operating record the documents required by this permit, and by the applicable portions of 40 C.F.R. §§ 264.13, 264.73, 264.1035, 264.1064, 264.1084, 264.1088, 264.1089.

I.I.2 Notifications

You must maintain notifications from generators that are required by 40 C.F.R. § 268.7 to accompany an incoming shipment of hazardous wastes subject to 40 C.F.R. Part 268, Subpart C, that specify treatment standards, as required by 40 C.F.R. §§ 264.73, 268.7, and this permit.

I.I.3 Copy of Permit

You must keep a copy of this permit on site, including all the documents listed in any attachments, and You must update it as necessary to incorporate any official permit modifications.

I.J ATTACHMENTS AND DOCUMENTS INCORPORATED BY REFERENCE

I.J.1 All attachments and documents that this permit requires to be submitted, if any, including all plans and schedules are, upon the Director’s approval, incorporated into this permit by reference and become an enforceable part of this permit. Since required items

are essential elements of this permit, failure to submit any of the required items or submission of inadequate or insufficient information may subject You to enforcement action under Section 3008 of RCRA. This may include fines, or permit suspension or revocation.

I.J.2 This permit also includes the documents attached hereto, all documents cross-referenced in these documents, and the applicable regulations contained in 40 C.F.R. Parts 124, 260, 261, 262, 264, 266, 268, and 270, and applicable provisions of RCRA, all of which are incorporated herein by reference.

I.J.3 Any inconsistency or deviation from the approved designs, plans and schedules is a permit noncompliance. The Director may grant written requests for extensions of due dates for submittals required in this permit.

I.J.4 If the Director determines that actions beyond those provided for, or changes to what is stated herein, are warranted, the Director may modify this permit according to procedures in Section I.B of this permit.

I.J.5 If any documents attached to this permit are found to conflict with any of the conditions in this permit, the condition in this permit will take precedence.

I.K COORDINATION WITH THE CLEAN AIR ACT

You must fully comply with the RCRA requirements contained in this permit. This permit does not include the requirements imposed by the Clean Air Act.

You must not operate process vents as defined in 40 C.F.R. § 264.1031.

SECTION II – AIR EMISSION STANDARDS FOR PROCESS VENTS (40 C.F.R. PART 264, SUBPART AA)

Cirba has certified that the facility does not operate process vents. 40 C.F.R. § 264.1031 defines process vents to mean any open-ended pipe or stack that is vented to the atmosphere either directly, through a vacuum-producing system, or through a tank (e.g., distillate receiver, condenser, bottoms receiver, surge control tank, separator tank, or hot well) associated with hazardous waste distillation, fractionation, thin-film evaporation, solvent extraction, or air or steam stripping operations. If during the length of this permit Cirba intends to or operates any process vents that fall within the definition of process vents at 40 C.F.R. § 264.1031, Cirba must submit a Class 3 permit modification as described in 40 C.F.R. § 270.42(c). As set forth in condition I.K. above, this permit prohibits the operation of process vents as defined in 40 C.F.R. § 264.1031. That is the definition that governs whether a vent is a process vent for the purposes of the prohibition at I.K.

Determinations as to what is a process vent should be made pursuant to the regulations. Except for § 264.1034(d) and (e), which govern determinations that total organic concentration is less than 10 ppmw, Subpart AA applies to process vents associated with distillation, fractionation, thin-film evaporation, solvent extraction, or air or steam stripping operations that manage hazardous wastes with organic concentrations of at least 10 ppmw. See 40 C.F.R. § 264.1030(b).

SECTION III - AIR EMISSION STANDARDS FOR EQUIPMENT (40 C.F.R. PART 264, SUBPART BB)

III.A EQUIPMENT LEAKS

You must comply with all applicable requirements of 40 C.F.R. Part 264 Subpart BB (Subpart BB), regarding air emission standards for equipment leaks. Subpart BB applies to equipment that contains or contracts hazardous waste with organic concentrations of at least 10 percent by weight that are managed in certain units as provided in 40 C.F.R. § 264.1050 (b), however; and the Application represents your facility does not have any such equipment subject to the permitting requirements of 40 C.F.R. Part 270. You must not manage hazardous waste with organic concentrations equal to or greater than 10 percent by weight in any equipment, as defined in 40 C.F.R. § 264.1031, that is subject to subpart BB under 40 C.F.R. § 264.1050(b).

III.B TEST METHODS AND PROCEDURES

You must comply with the requirements of 40 C.F.R. § 264.1063(d).

III.C RECORDKEEPING AND REPORTING REQUIREMENTS

You must comply with the requirements of 40 C.F.R. § 264.1064(k).

SECTION IV - AIR EMISSION STANDARDS FOR TANKS AND CONTAINERS (40 C.F.R. PART 264, SUBPART CC)

You must comply with all applicable requirements of 40 C.F.R. Part 264 Subpart CC (Subpart CC), regarding air emission standards for containers. All containers not exempt from 40 C.F.R. Part 264 Subpart CC must be managed using the applicable standards at 40 C.F.R. § 264.1086. The containers subject to Cirba's State RCRA permit, described below, include Level 1 containers, and therefore must comply with the standards at 40 C.F.R. § 264.1086(c), container Level 1 Standards.

The State RCRA permit allows you to store hazardous wastes in containers in ~~four~~ two separated permitted storage areas. The first permitted storage area is located within the 265 building (designated 265). That storage unit ~~has integrated secondary containment is permitted for storage of free liquids, has a permitted capacity of 5,590,000 pounds (lbs) (equivalent of 559,000 gallons), divided into four contiguous areas (designated 265-1, 265-2, 265-3, 265-4), and a footprint of 36,709 square feet (ft²) with the option of expanding the foot print by 20,000 ft² for a total of 56,709 square feet (ft²).~~ While the Permittee may not utilize the area 265-4 for permitted storage until applicable information is provided to the State to construct the expansion at this time, should the Permittee seek and obtain the required approvals, including any permit modifications to construct the expansion, the construction must be performed in accordance with the requirements of the State RCRA permit. If the expansion occurs, the capacity will not change and must not exceed 5,900,000 lbs. The second permitted storage area is located within the 295 building (designated 295-1), has a permitted capacity of 2,100,000 lbs and a footprint of 2,990,173 ft². The third permitted storage area is located within the 295 building (designated 295-2), has a permitted capacity of 300,000 lbs, and a footprint of 2,459 ft². The fourth permitted storage area is located within the 341 building (designated 341), has a permitted capacity of 4,000,000 lbs, and a footprint of 17,216 ft². The 295-1, 295-2, and 341 storage units do not have integrated secondary containment for free liquids. Therefore, if free liquids are stored within 295-1, 295-2, or 341 appropriate portable secondary containment must be utilized (e.g., spill pallet). All four permitted storage areas have a design capacity that is larger than the permitted capacity. As such, the permitted capacity of each may be increased if the permittee submits a modification to the State RCRA permit that is approved by the State.

All containers storing hazardous waste at the site are considered Level 1 containers as defined in 40 C.F.R. 264.1086(b)(i) and (ii). You must not store hazardous waste in the containers other than Level 1 containers.

You must not conduct a waste stabilization process, as defined at 40 C.F.R. § 265.1081, in containers which contain hazardous waste.

IV.A LEVEL 1 CONTAINER REQUIREMENTS

You must manage the containers with a design capacity of greater than 0.1 m³ (26.4 gallons) and less than or equal to 0.46 m³ (121 gallons), and the containers with a design capacity greater than 0.46 m³ (121 gallons) that are not in light material service, as defined in 40 C.F.R. § 264.1081, with container Level 1 standards as described at 40 C.F.R. § 264.1086(c). When storing hazardous waste in Level 1 containers You must comply with the following requirements:

IV.A.1 A Level 1 container must satisfy one of the following requirements (40 C.F.R. § 264.1086(c)(1)):

- (a) meet the applicable Department of Transportation (DOT) regulations as specified in 40 C.F.R. § 264.1086(f),
- (b) be equipped with a cover and closure devices that form a continuous barrier over the container openings such that when the cover or closure devices are secured in the closed position there are no visible holes, gaps, or other open spaces into the interior of the container as specified in 40 C.F.R. § 264.1086(c)(1)(ii), or
- (c) be an open-top container with organic vapor suppressing barrier placed on or over the hazardous waste in the container such that no hazardous waste is exposed to the atmosphere as specified in 40 C.F.R. § 264.1086(c)(1)(iii).

Containers, which do not meet DOT regulations specified in 40 C.F.R. § 264.1086(f), must be equipped with covers and closure devices, as applicable to the container, that are composed of suitable materials to minimize exposure of the hazardous waste to the atmosphere and to maintain equipment integrity, for as long as the container is in service. Factors to be considered in selecting the materials of construction and designing the cover and closure devices shall include: organic vapor permeability, the effects of any contact with the hazardous waste or its vapor managed in the container; the effects of outdoor exposure of the closure device or cover material to wind, moisture, and sunlight and the operating practices for which the container is intended to be used. (40 C.F.R. § 264.1086(c)(2))

IV.A.2 All covers and closure devices must be installed, as applicable to the container, and secured and maintained in the closed position whenever hazardous waste is in a container. Opening of a closure device or cover is allowed if it meets the purpose of and operates as defined in 40 C.F.R. § 264.1086(c)(3)(i) through (v).

IV.A.3 You must inspect the containers and their covers and closure devices as specified in 40 C.F.R. § 264.1086(c)(4)(i) and (ii) and repair defects in accordance with 40 C.F.R. § 264.1086(c)(4)(iii). Additionally, You must conduct the procedures for determining no detectable organic emission for containers as described in 40 C.F.R. § 264.1083. For the containers with capacity of 0.46 m³ or greater, which do not meet applicable DOT regulations, You must maintain at the facility a copy of the procedure used to determine those containers are not managing hazardous waste in light material service, as specified in 40 C.F.R. § 264.1086(c)(5).



Draft Hazardous Waste Permit Renewal and Comment Period
September 2026

Facility Name: Cirba Solution Inc.
U.S. EPA I.D.: OHD 071 654 958

295 Quarry Road
Lancaster, Ohio 43130

Location

295 Quarry Road
Lancaster, Ohio 43130

Facility Owner

Cirba Solutions, Inc.
295 Quarry Road
Lancaster, Ohio 43130

Facility Operator

Cirba Solutions.

Comment Period

September 8, 2026 – October 26, 2026

Submit Comments to

U.S. EPA, Region 5
Norberto Gonzalez, PhD
RCRA/TSCA Programs Section, LL-17J
77 West Jackson Boulevard
Chicago, Illinois 60604-3590
gonzalez.norberto@epa.gov

Activity

Class 3 permit modification to allow Cirba Solutions, Inc. to continue operation as a commercial hazardous waste storage and treatment facility and increase container storage capacity by greater than 25 percent.

Information Repository/Document Review

U.S. EPA, Region 5
RCRA Branch, LL-17J
77 West Jackson Boulevard
Chicago, Illinois 60604-3590
312-886-3781

Fairfield Public Library
219 North Broad Street
Lancaster, OH 43130
(740) 653-2745

The federal draft permit is available for review on [EPA Region 5's website](#)

Public Meeting Information

All persons, including the applicant, may submit written comments relating to this draft action. Written comments or requests for a public meeting may be submitted before the end of the comment period to the address above. EPA will hold a public meeting if requests indicate a significant degree of public interest. The agency may modify the proposed permit modification

or take other action based on new information or public comments, so your opinion is important.

What does the facility do?

Cirba Solutions, Inc. specializes in the management, reutilization, and recycling of various types of industrial/military, automotive, and household batteries. Battery identification, collection, consolidation, and recycling services are provided to industry, government, and the public.

What would this hazardous waste permit allow the facility to do?

This permit modification allows Cirba Solution, Inc. to continue operation as a commercial hazardous waste storage and treatment facility that engages in treatment and recovery of industrial wastes.

How can I become more involved?

The comment period begins on September 8, 2026, and ends on October 26, 2026. All persons, including the applicant, may submit written comments relating to this draft action. Written comments or requests for a public meeting may be submitted before the end of the comment period to the address in the box located on the front page of this factsheet. The agency may modify the proposed permit modification or take other action based on new information or public comments, so your opinion is important

Copies of the permit modification application and the draft Class 3 permit modification are available for review by the public at:

<https://www.epa.gov/aboutepa/epa-region-5> under the “Events and Public Notices” section.

Additionally, copies of the federal draft permit modification are available for review at the Fairfield Public Library located at 219 North Broad Street, Lancaster, OH 43130.

After the close of the public comment period, EPA will review all comments received and decide whether to issue the Class 3 permit modification. The final decision will include notification to those who submitted written comments during the official comment period.

EPA will also prepare and send to all responders a document answering significant comments. Within thirty (30) days of a final decision, any person who submitted written comments or made a statement at the hearing, if one is held, may petition EPA’s Environmental Review Appeals Commission Board to review the decision.

EPA’s permit decision making procedures are governed by the regulations at 40 C.F.R. Part 124, which among other things, provide for administrative records at §§ 124.9 and 124.18, public notice and comment at § 124.10, submission of written public comments and requests for hearing by interested persons at § 124.11, public hearings, including the criteria, at § 124.12, obligations to raise issues and providing information during the comment period at § 124.13,

reopening comment periods at § 124.14, issuance of permits at § 124.15, response to comments at § 124.17, and appeals at § 124.19.

EPA will also issue a response to comments at the time it issues its final permit decision and briefly describe and respond to all significant comments as set forth in 40 C.F.R. § 124.17. Pursuant to 40 C.F.R. § 124.13, any interested person may submit written comments on the draft permit and may request a public hearing during the public comment period if no hearing has already been scheduled. The applicable procedures at 40 C.F.R. Part 124 govern EPA's permitting, including 40 C.F.R. § 124.12, on holding public hearings. Under 40 C.F.R. 124.19(a)(2), any person who filed comments on the draft permit or participated in a public hearing on the draft permit may file a petition for review as provided in that section. Additionally, any person who failed to file comments or failed to participate in the public hearing on the draft permit may petition for administrative review of any permit conditions set forth in the final permit decision, but only to the extent that those final permit conditions reflect changes from the proposed draft permit.

What is the history of the hazardous waste program?

The Resource Conservation and Recovery Act (RCRA), an amendment to the Solid Waste Disposal Act, was passed in 1976. The main reason for the amendment was to address the growing volume of municipal and industrial solid waste generated across the United States. A few goals established by RCRA include: to protect human health and the environment from potential hazards of waste disposal, to reduce the amount of waste generated, and to ensure that waste produced are managed in an environmentally sound manner.

When RCRA was written, U.S. Congress' intent was for the states to assume primary responsibility for implementing the hazardous waste regulations with oversight from the United States Environmental Protection Agency (U.S. EPA). U.S. EPA must approve each state as an authorized state. To become an authorized state, each must demonstrate that the state program is at least equivalent to and consistent with federal laws, provides adequate enforcement authority and provides availability of information similar to the federal program. Since 1989, the State of Ohio has been an authorized state by U.S. EPA for the majority of their hazardous waste program.

On April 2, 2026, the State of Ohio was authorized by U.S. EPA to issue a permit for RCRA organic air emissions (40 CFR Part 264, Subparts AA, BB, and CC) for hazardous waste storage units. However, because Cirba Solutions, Inc. submitted a Class 3 permit modification prior to the State of Ohio's authorization, and EPA continues to administer its 2018 federal permit, EPA is issuing the modifications to its 2018 permit, which addresses the RCRA organic air emission requirements at the facility.

Who can I contact for more information?

For additional information, to obtain notices in a different language, or to request a hearing on the permit modification please contact Norberto Gonzalez at (312) 353-1612 or gonzalez.norberto@epa.ohio.gov.