

BEFORE THE

OHIO ENVIRONMENTAL PROTECTION AGENCY

In the Matter of :
:
Wooster Manufacturing, Inc. : Director's Final Findings
: and Orders
Wooster, Ohio :
:
Ohio Revised Code Chapters
3734 and 6111

ADMINISTRATIVE ORDER ON CONSENT

I. JURISDICTION

This Administrative Order on Consent (Consent Order) is issued pursuant to the authority vested in the Director of the Ohio Environmental Protection Agency (OEPA) by Ohio Revised Code (ORC) Chapters 3734 and 6111. Respondent does not admit any of the jurisdictional bases of this Consent Order as recited herein; however, Respondent will not contest the jurisdiction of the Director of Environmental Protection for purposes of this Consent Order or its enforcement.

II. STATEMENT OF PURPOSE

In entering into this Consent Order, the mutual objective of Ohio EPA and Respondent is (1) to complete a full investigation of the Site, (2) to determine the extent of contamination at the Study Area caused by the release at or from the Site of hazardous substances, (3) to develop and evaluate a program of appropriate remedial measures employing sound scientific, engineering and construction practices which shall be consistent with applicable federal, state and local law. These objectives shall be completed as described in this Consent Order.

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By: Mary Carrin Date 1-4-90

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III. DEFINITIONS

As used in this Consent Order and the RI/FS Workplan, to be attached hereto and incorporated herein as Exhibit B, the following shall be defined terms:

A. "The Contractor" shall mean a qualified Contractor retained by Respondent pursuant to this Consent Order, and any subcontractor, representative, agent, or designee thereof.

B. "Days" shall mean calendar days unless business days are specified.

C. "Documents" shall mean any non-privileged correspondence or narrative reports and any and all non-privileged documentary evidence, of any kind, reflecting any information concerning the investigation and remediation of hazardous substances at or migrating from the Site. The term "Document" shall be construed broadly to promote the effective sharing of information and views concerning the work to be done between the Respondent and OEPA.

D. "Remedial Investigation" ("RI") shall mean the investigation conducted at the Study Area to determine the nature and extent of the contamination at and migrating from the Site and to gather necessary data to support the Feasibility Study.

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By: Mary Cavin Date 1-4-90

E. "Feasibility Study" ("FS") means the evaluation, development and design of remedial alternatives for the Site.

F. "Parties" shall mean Respondent and OEPA.

G. "OEPA" shall mean the Ohio Environmental Protection Agency and its designated representatives.

H. "Respondent" shall mean Wooster Mfg. Co. Inc. ("Wooster"), its subsidiaries, successors, and assigns.

I. The "Site" shall mean the facility as that term is defined at 42 U.S.C. 9601(9)(A) where treatment, storage or disposal of hazardous substances was or may have been conducted, located at 770 Spruce St., Wooster, Ohio and which includes the Cookware Manufacturing plant owned and operated by Wooster.

J. The "Study Area" shall mean the facility as that term is defined at 42 U.S.C. 9601(9)(B) and shall mean the Site and any other area contaminated by hazardous substances migrating from the Site.

K. "Workplan" shall mean that document detailing the data needs for characterizing the Study Area including, but not limited to, an outline of proposed investigation activities, a time schedule, personnel and equipment requirements, a sampling plan indicating rationale for sampling activities, location, quantity, and frequency of sampling, a description of sampling and analyses methods, constituents for analysis, quality assurance procedures, and a health and safety plan.

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IV. Findings of Fact, Determinations and Conclusions of Law

OEPA has determined that all findings of fact necessary for the issuance of this Consent Order pursuant to ORC Chapters 3734 and 6111 have been made and are outlined below. Respondent, by entering into this Consent Order, does not admit the findings of fact, determinations, or any conclusions of law set forth below.

OEPA has determined the following:

A. Respondent owns and operates a cookware manufacturing plant located at 770 Spruce Street, Wooster, Wayne County, Ohio.

B. Respondent is a wholly-owned subsidiary of Regal Ware, Inc.

C. Regal Ware, Inc. purchased the plant from Mardigan Corp. in 1964. Respondent purchased the plant from Regal Ware, Inc. in 1989.

D. Two former waste disposal areas have been identified on the Site. A pit was located on the northeast corner of the property that was primarily used for waste acid disposal in the late 1950's and early 1960's. Before Regal Ware purchased the plant, still bottoms were deposited and burned on the ground in an area south of the plant. Use of chlorinated solvents to clean cookware has been estimated to produce from two to twenty barrels of still bottoms per month. Use of chlorinated solvents for degreasing was discontinued when or shortly after Regal Ware purchased the plant.

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E. The still bottoms, referenced in paragraph D above, are hazardous substances and/or "hazardous waste" as defined in ORC Section 3734.01(J) and the placement of these still bottoms prior to the acquisition of the Site by Regal Ware in the former waste disposal areas constituted "disposal" as that term is defined in ORC 3734.01(F).

F. The Director has determined that the conditions at the Site resulting from the past disposal of hazardous wastes as described in paragraph E above constitutes a substantial threat to public health or safety or are causing or contributing to or threatening to cause or contribute to water pollution or soil contamination within the meaning of ORC 3734.20(B).

G. In May of 1987, an engineering consulting firm hired by Regal Ware began a test drilling and soil monitoring program to investigate contamination possibly associated with the suspected disposal area. In June of 1987, the wells were sampled and four samples showed found to contain chlorinated solvents. Some solvent contamination was also detected in soil boring samples taken from the Northeast corner of the plant.

H. Analysis of the groundwater samples indicated the presence of Trichloroethene and 1,1-Dichloroethene in the four groundwater samples:

1,1-Dichloroethene	7.0 ppb maximum
Trichlorethene	12,000.0 ppb maximum

These materials are hazardous substances and/or industrial wastes.

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I. The Site is located within one-half (1/2) mile upgradient from the City of Wooster well field. The City of Wooster is operating two air stripper treatment systems in order to protect its well field.

J. The migration or threatened migration of hazardous substances at or from the Site constitutes a "release" or threatened "release" (as that term is defined in Section 101(22) of CERCLA) into the environment and constitutes a release or threatened release of an industrial waste into the "waters of the State" (as that term is defined in ORC Section 6111.01(H)).

K. The release from the Site of such hazardous substances as are industrial wastes into "waters of the State" is prohibited by ORC 6111.04.

L. Respondent is a "person" as that term is defined in ORC Sections 3734.01(G) and 6111.01(I). Respondent is an "owner" and "operator" and the Site is a "facility", as those terms are used in Section 107 of the Comprehensive Environmental Response, Compensation and Liability Act. 42 U.S.C. 9601 et seq. as amended by the Superfund Amendment and Reauthorization Act of 1986, Pub. L. 99-499 (hereafter referred to as "CERCLA/SARA").

M. The actions to be taken pursuant to this Consent Order are reasonable and necessary to protect the public or welfare or the environment.

N. A reasonable time for beginning and completing the actions required by this Consent Order has been provided herein.

O. Respondent has agreed to undertake the actions in this Consent Order.

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By: Mary Carr Date 1-4-90

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V. COMMITMENT OF RESPONDENT

A. Respondent consents to and will not challenge OEPA's jurisdiction to enter and enforce this Consent Order, and does hereby agree to undertake at its expense all actions required by the terms and conditions of this Consent Order within the time frames specified herein, except as the provisions of paragraph XX, are deemed to apply to the time for performance.

B. Respondent shall undertake and assure, at its expense, the implementation of its obligations under this Consent Order.

C. Respondent shall assume any and all liability arising from or relating to their acts or omissions in the performance of the work or their failure to perform fully or complete the work under this Consent Order.

VI. PARTIES BOUND

A. This Consent Order shall apply to and be binding upon Respondent and OEPA. Respondent agrees to provide copies of this Consent Order to all contractors performing any work called for by this Consent Order and shall ensure that all work performed pursuant to this Consent Order complies with this Consent Order and attached Workplans.

B. No change in ownership or corporate status relating to the facility will in any way alter the Respondent's responsibilities under this Consent Order.

VII. ACCESS

A. To the extent that portions of the Site or areas where work is to be performed are presently owned by parties other than

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Respondent, Respondent shall use its best efforts to obtain voluntary access agreements from the present owners, including any agreements necessary to provide access to OEPA and its authorized representatives. These agreements are attached or will be attached as Exhibits to this Consent Order. In the event Respondent is unable to obtain such access, Respondent shall promptly notify OEPA regarding both the lack of access agreements and the efforts to obtain such access agreements and OEPA will contact the landowners.

B. Respondent shall assure that OEPA and/or any of its authorized representatives shall have access to enter all property at the Site and freely move about at all reasonable times for purposes consistent with this Consent Order, and ORC Sections 3734.20 and 6111.05 including, but not limited to: inspection of records, operating logs, and contracts related to the investigative and cleanup work at the Site; reviewing the progress of the Respondent in carrying out the terms of this Consent Order; conducting such tests as OEPA or its Project Coordinator deems necessary; and verifying the data submitted to OEPA by the Respondent. The Respondent shall permit such OEPA representatives to inspect and request copies of all photographs or Documents including all sampling and monitoring data, which pertain to this Consent Order.

C. All parties with access to the Site and other areas where work is to be performed pursuant to this paragraph shall comply with all approved Health and Safety plans. Nothing herein shall act to

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limit the statutory authority of OEPA to conduct inspections and gather information.

VIII. WORK TO BE PERFORMED

A. Exhibit A to this Consent Order provides a Generic Statement of Work ("SOW") for the completion of the RI/FS which is incorporated into and made a part of this Consent Order. In the event of any conflict between any provision in this Consent Order and the SOW, this Consent Order shall control in resolving any such conflict.

B. The following work shall be performed:

1. Within twenty (20) days of the effective date of this Consent Order, Respondent shall submit a draft RI/FS Workplan to OEPA. The draft RI/FS Workplan submittal shall include and discuss, as appropriate, the items described in the Generic SOW, attached hereto, and shall include a schedule for implementation of the RI and the FS Work.

2. A final RI/FS Workplan incorporating OEPA comments, if any, shall be submitted by Respondent to OEPA within thirty (30) days of receipt of OEPA comments on the draft RI/FS Workplan.

3. Upon approval of the final RI/FS Workplan, Respondent shall proceed promptly to implement the work detailed in the final RI/FS Workplan in accordance with the schedule set forth therein. Unless otherwise directed by OEPA, Respondent shall not commence field activities until approval of the final RI/FS Workplan.

C. Upon completion of Task 13 of the final RI/FS in accordance with Paragraph B, above, Respondent shall recommend in writing Respondent's preferred alternative for remedial action as set forth in the final RI/FS.

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D. When the final RI/FS Workplan, the Final RI Report, and the Final FS Report are approved by OEPA, they shall be attached to this Consent Order and be incorporated into and made a part hereof.

E. All work that is required of Respondent under this Consent Order shall be performed in a manner which complies with State law; is technically sound; and is consistent with the National Contingency Plan, 40 CFR Part 300 as amended, including but not limited to the most current version of the following U.S. EPA guidance documents:

1. Guidance for conducting Remedial Investigations and Feasibility Studies Under CERCLA (EPA/540/G-89/004),
2. CERCLA Model Scope of Work,
3. Technical Enforcement Guidance Document (OSWER Directive 9950),
4. Test Methods for Evaluating Solid Waste (SW-846), and
5. Superfund Public Health Evaluation Manual (EPA/540/1-86/060).

IX. PROJECT COORDINATORS

A. Respondent and OEPA shall each designate a Project Coordinator and an alternate for the purpose of overseeing the implementation of this Consent Order. To the maximum extent possible, except as specifically provided in this Consent Order, communications between Respondent and OEPA concerning the terms and conditions of this Consent Order shall be made between the designated Project Coordinators. Each designated Project Coordinator shall be responsible for assuring that all communications from the other parties are appropriately disseminated and processed. The Project Coordinators shall attempt to resolve disputes informally through good faith discussion of the technical issues.

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B. Without limitation of any authority conferred on OEPA by statutes or regulations, the OEPA Project Coordinator's authority includes, but is not limited to: (1) taking samples or, in accordance with the terms of any workplan, directing the type, quantity and location of samples to be taken by the Respondent in accordance with any workplan; (2) observing, and taking photographs and making such other reports on the progress of the work as the Project Coordinator deems appropriate; (3) directing that work stop for a period not to exceed 72 hours whenever the OEPA Project Coordinator determines that activities at the Site may create a present danger to public health or welfare or the environment; (4) reviewing records, files and documents relevant to the Consent Order.

C. The Respondent's Project Coordinator or an approved alternate shall be on-site at the Site during all hours of work at the Site. More than one alternate may be designated and approved for different phases of the work. The Respondent's Project Coordinator shall be available for the pendency of this Consent Order. The absence of the OEPA Project Coordinator from the Site shall not be cause for stoppage of work unless otherwise provided.

D. OEPA and Respondent each have the right to change their respective Project Coordinator or approved alternates. Such a change shall be accomplished by notifying the other party in writing at least five calendar days prior to the change.

X. PLANS AND REPORTS

A. Respondent shall provide a preliminary and final RI Report and FS Report and the other plans or reports required by the RI/FS Workplan to OEPA according to the schedule contained in the RI/FS Workplan and Consent Order.

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1. The draft Remedial Investigation Report shall be due within two hundred forty (240) days from the approval of the RI/FS Workplan by the Respondent.

2. The final Remedial Investigation report shall be due within sixty (60) days after approval by OEPA of the draft report by the Respondent.

3. The draft Feasibility Study shall be due within one hundred twenty (120) days after submission of the final RI report.

4. The final Feasibility Study Report shall be due within thirty (30) days from OEPA's approval of the Draft FS Report by the Respondent.

5. Respondent shall submit these reports to OEPA as described below in Section X, Paragraph E.

B. If OEPA disapproves any preliminary or final plan or report, the Respondent shall submit a revised plan or report to OEPA within twenty one (21) days or such longer period as OEPA may establish, which plan or report shall incorporate any OEPA modifications.

C. In the event of subsequent disapproval of any revised plan or report, OEPA retains the right to perform additional studies, to conduct or complete the RI/FS, and/or to enforce the terms of this Consent Order.

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D. Respondent shall submit written progress reports which describe the progress achieved during that period toward compliance with this Consent Order during the previous month, as well as activities which are scheduled for the next month, to OEPA by the tenth day of every month following the effective date of this Consent Order, unless otherwise designated pursuant to this Consent Order.

At a minimum, these reports shall:

1. Identify the Site and activity;
2. Describe status of work at the Site and progress since the last report;
3. Demonstrate the percentage of completion;
4. Describe difficulties encountered during the reporting period;
5. Describe actions being taken to rectify problems;
6. Describe activities planned for the next month; and
7. Identify changes in key personnel.

The monthly progress reports will list target and actual completion dates for each element of activity, including the project completion, and provide an explanation of any deviation from the milestones in the workplan schedules.

E. All notices, documents, reports, approvals, or correspondence submitted pursuant to this Consent Order shall be sent by certified mail return receipt requested to the OEPA at the

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By: Mary Carini Date 1-4-90

following addresses (or to such other address as the OEPA may hereafter designate in writing):

Ohio Environmental Protection Agency
1800 WaterMark Drive
Columbus, Ohio 43266
Attn: Remedial Response Section
Coordinator and
Cynthia Hafner, Legal

Ohio Environmental Protection Agency
Northeast District Office
2110 East Aurora Road
Twinsburg, Ohio 44087
Attn: Dan Markowitz, DERR

All correspondence to the Respondent shall be directed to the following:

Albert C. Oak
Wooster Mfg. Co. Inc.
770 Spruce Street
Wooster, Ohio 44691

and

Louis Rundio
McDermott, Will & Emery
111 West Monroe Street
Chicago, IL 60603-4067

OEPA may, in its discretion, direct that reports or plans or proposals made pursuant to the Consent Order be submitted at extended intervals or that no further reports need be submitted.

XI. ADDITIONAL WORK

A. In the event that the OEPA determines or the Respondent proposes that work additional to that specified in the RI/FS Workplan is necessary to complete the RI/FS, then the proponent of such additional work shall, in writing to the other party, technically substantiate the need for the additional work, describe the proposed additional work, and propose a schedule for implementation. If the recipient agrees to the additional work, then the Respondent shall implement the additional work in accordance with OEPA the approved plan and schedule. If the recipient rejects the proposed additional work, the matter will be resolved under the Dispute Resolution, Section XIV.

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B. Any additional work determined to be necessary by the Respondent shall be subject to approval by the OEPA.

XII. SAMPLING AND DATA/DOCUMENT AVAILABILITY

A. OEPA and the Respondent shall make available to each other the results of sampling, tests or other data generated by any of them, or on their behalf, with respect to the implementation of this Consent Order.

B. At the request of OEPA, the Respondent shall allow split or duplicate samples to be taken by the OEPA of samples collected by the Respondent during the implementation of the Consent Order. The Respondent shall notify the OEPA Project Coordinator not less than ten (10) business days (unless otherwise agreed between the Project Coordinators) in advance of any sample collection and the OEPA Project Coordinator will indicate at that time that he or she wants to obtain split or duplicate samples.

C. Respondent agrees that it shall preserve during the pendency of this Consent Order and for a minimum of seven (7) years after its termination one copy of all records and documents within its possession or that of its divisions, employees, agents, accountants, or contractors which relate to work performed under this Consent Order, despite any document retention policy to the contrary. After the seven (7) year period, Respondent shall notify OEPA at least 30 days prior to the destruction of any such documents required to be kept pursuant to this paragraph. Upon request by OEPA, Respondent shall make available to OEPA, such records or certified copies of any such records.

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D. Respondent may assert a claim of confidentiality covering the information requested by this Consent Order, except for analytical data, pursuant to Ohio Administrative Code Rule 3745-49-03(A). Information determined to be confidential by OEPA will be afforded protection under Ohio Administrative Code Rule 3745-49-03. If no such claim accompanies the information when it is submitted to OEPA, it may be made available to the public by the OEPA without further notice to Respondent.

XIII. REVIEW OF SUBMITTALS AND PROPOSED MODIFICATIONS

A. Respondent shall submit all raw data and all copies of original reports of analytical procedures and results to OEPA with the monthly report for the month in which Respondent receives the data and reports from each laboratory involved in the analyses of any samples collected in the Study Area. Respondent shall submit to OEPA any interpretive reports and written explanations concerning such raw data and original laboratory reports.

B. With regard to each plan or report that Respondent is required under this Consent Order to submit to OEPA for review and approval, OEPA shall notify Respondent in writing within thirty (30) days after receipt of such plan or report of approval or disapproval, or required modification of the plan or report, or any parts thereof, specifying deficiencies in the event of any disapproval or proposed modification. In the event that any plan or report requires a longer review period, OEPA shall notify Respondent in writing of that fact within thirty (30) days after receipt of the plan or report.

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1. Within seven (7) days of receipt of the written notice required by Paragraph B of this Section, Respondent may request a meeting with OEPA to discuss and/or dispute any deficiencies specified in the notice or the necessity of any proposed modification to the document under review. Such meeting shall be held within ten (10) days of such request, if possible, and may be conducted by telephone.

2. Within twenty (20) days of the date of the meeting, or if no meeting is requested by Respondent, within twenty (20) days of the receipt of written notice of any deficiency and required modification to the document under review, Respondent shall submit a revised document to OEPA which incorporates OEPA modifications as revised or amended as the result of any meeting held between the parties.

3. In the event of subsequent OEPA disapproval of any document, OEPA retains the right to conduct or complete the RI/FS, and/or to enforce the terms of this Consent Order. Respondent retains its rights to contest such action by OEPA, except as set forth in Section V, above.

C. No modification or addition shall be made by the Respondent in the RI/FS Workplan as approved and described in Section VIII without written notification to and written approval of the OEPA. The notification required by this paragraph shall set forth the nature of and reasons for the requested modification.

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By: Mary Gavin

Date: 1-4-90

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XIV. DISPUTE RESOLUTION

A. The Project Coordinators shall, wherever possible, operate by consensus, and in the event that there is a disapproval of any plan or report, study or other document; or disagreement about the conduct of the work performed under this Consent Order; modified or additional work required under this Consent Order; or another dispute arises concerning this Consent Order, the Project Coordinators shall negotiate in good faith to resolve the differences. During the dispute or disagreement Respondent and OEPA shall communicate by telephone or in person as often as possible.

B. In the event that the Project Coordinators are unable to resolve the dispute informally by good faith negotiation, then Respondent shall within seven (7) days of the conclusion of the good faith negotiations present written notice of the dispute to OEPA which shall set forth the specific points of the dispute, Respondent's position and the technical basis therefor, and any actions which Respondent considers necessary. Within seven (7) days of receipt of such notice, OEPA shall provide a written response to Respondent setting forth OEPA's position on the points of dispute, list any additional points of dispute, the technical basis for OEPA's position, and any action which OEPA considers necessary.

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By: Mary Carini Date 1-4-90

C. Following the exchange of written positions, the parties shall have an additional ten (10) days (or such other time as established by mutual agreement due to scheduling conflicts) to resolve their differences during which period OEPA and Respondent shall meet on at least one occasion in an attempt to negotiate in good faith a resolution of their differences with participation of a representative of OEPA's management and Respondent's management and their attorneys. If OEPA concurs with the position of the Respondent, the Consent Order will be modified to include necessary extensions of time or variances of required work. If OEPA does not concur with the position of the Respondent, OEPA will resolve the dispute, based upon, and consistent with, the Consent Order, the Workplan and State law, and notify Respondent in writing of OEPA's resolution.

XV. RESERVATION OF RIGHTS

A. Notwithstanding compliance with the terms of this Consent Order, the Respondent is not released from liability, if any, for any actions beyond the terms of this Consent Order. To the extent not restricted by Sections XXII and XXIII, OEPA reserves the right to take any enforcement action pursuant to any available legal authority, including the right to seek injunctive relief, monetary penalties, natural resources damages, and punitive damages for any violation of CERCLA/SARA, this Consent Order or ORC Chapters 3734, 3745 and 6111 of the Ohio Revised Code. Respondent reserves its rights to contest such action except as set forth in Section V, above.

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B. The Respondent and OEPA expressly reserve all rights and defenses that they may have, including OEPA's right both to disapprove the work performed by the Respondent and to request that the Respondent perform tasks in addition to those detailed in the RI/FS Workplan, as provided in this Consent Order.

C. Nothing herein shall waive the right of OEPA to enforce this Consent Order under ORC Chapters 3734, 3745 and 6111.

D. Nothing herein shall waive the right of OEPA to take action pursuant to ORC Chapters 3734, 3745 and 6111 or any other applicable law, including CERCLA/SARA.

XVI. OTHER CLAIMS

Nothing herein is intended to release, discharge, or in any way effect any claims, causes of action or demands in law or equity against any person, firm, partnership or corporation not a signatory to this Consent Order from any liability it may have arising out of or relating in any way to the generation, storage, treatment, handling, transportation, release or disposal of any hazardous wastes, industrial wastes contaminants or pollutants at, to or from the Site. The Parties to this Consent Order expressly reserve all rights (including any right to contribution or indemnity possessed by the Respondent against any other parties who may be responsible for actual or threatened releases at the Site), claims, demands and causes of action they have or may have against any and all other persons and entities who are not parties to this Consent Order.

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By: Mary Caron Date 1-4-90

XVII. DEED NOTICE, LAND USE AND CONVEYANCE OF TITLE

While Respondent owns or operates the Site, Respondent shall assure that no portion of the Site will be used in any manner which would adversely affect the integrity of any containment systems which may remain at the Site or monitoring systems installed pursuant to this Consent Order. Respondent will not convey title, easement or other interest in the Site or any portion of the Site without provision for continued operation and maintenance of any containment or monitoring system installed pursuant to this Consent Order. Respondent shall notify OEPA by registered mail at least ninety (90) calendar days prior to any conveyance or an intent to convey any interest in land which is known to comprise the Site and of the provision made for continued maintenance of the system or systems. Respondent shall assure that an appropriate notice shall be put in the deed as to the condition of the property. The notice shall first be approved by the OEPA.

XVIII. OTHER APPLICABLE LAWS

All actions required to be taken pursuant to this Consent Order shall be undertaken in accordance with the requirements of all applicable laws and regulations. Respondent shall obtain all permits or approvals necessary for work under federal state or local laws and shall submit timely and complete applications and requests for any such permits and approvals.

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XIX. INDEMNITY

Respondent agrees to indemnify, save and hold harmless OEPA from any and all claims or causes of action arising from or on account of, acts or omissions of the Respondent, its officers, employees, receivers, trustees, agents, or assigns, in carrying out any activities pursuant to this Consent Order. OEPA shall not be considered a party to and shall not be held liable under any contract entered into by the Respondent in carrying out the activities pursuant to this Consent Order. Consistent with federal, state and common law, nothing in this Consent Order shall render Respondent liable for any act or omission of OEPA.

XX. FORCE MAJEURE

Respondent shall cause all work to be performed within the time limits set forth herein, unless performance is delayed or obviated by events which constitute a "force majeure." For purposes of this Consent Order, a "force majeure" is defined as any event arising from causes beyond the control of the Respondent which cannot be overcome by due diligence and which delays a performance date required by this Consent Order. Reasonable and foreseeable changes in the economic circumstances of the Respondent or increased costs of work shall not constitute force majeure. Respondent shall verbally notify the OEPA Project Coordinator within two (2) business days and provide written notice within ten (10) business days after any event which Respondent determines to constitute a force majeure. Such notice shall describe fully the nature of the delay, the reasons for it, if known, the anticipated length of the delay. In the event that

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the delay in question is attributable to a force majeure, the time period for performance under this Consent Order shall be extended for the time period of delay attributable to the event constituting a force majeure. In the event OEPA does not concur that the time of performance under the Consent Order shall be extended, this shall be deemed a dispute subject to resolution pursuant to the disputes resolution procedure set forth above, Section XIV.

XXI. AMENDMENT AND EFFECTIVE DATE

A. The provisions of this Consent Order may be amended by mutual agreement of the OEPA and the Respondent.

B. Any amendment of this Consent Order under this Article shall be in writing, signed by the OEPA and the Respondent.

C. The effective date of this Consent Order or an amendment thereof shall be the date on which the Consent Order or Amendment is entered into the Journal of the Director of OEPA.

XXII. RELEASE AND COVENANT NOT TO SUE

Prior to termination of this Consent Order as long as Respondent is in compliance with this Consent Order, and upon termination of this Consent Order pursuant to Section XXIII of this Consent Order, OEPA covenants not to sue Respondent for the conduct and completion of the activities and work called for in this Consent Order except as otherwise reserved herein, and Respondent shall be released from obligations embodied in this Consent Order.

XXIII. TERMINATION AND SATISFACTION

The provisions of this Consent Order shall be deemed satisfied upon completion of all the work required under this Consent Order. Respondent shall notify OEPA in writing when it has completed such work. Within thirty (30) days of receipt of such notice OEPA shall

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By: Mary Cover Date 1-4-90

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certify to Respondent in writing that the terms of this Consent Order are satisfied or shall specify the work remaining to be performed.

XXIV. REIMBURSEMENT OF COSTS

A. OEPA has incurred Nine Thousand Seven Hundred Seventy-Seven and 60/100 Dollars (\$9777.60) through the effective date of this order and will continue to incur oversight and response costs in connection with the Study Area. Within thirty (30) days of the effective date of the Consent Order, Respondent shall remit a check to the OEPA for Nine Thousand Seven Hundred Seventy-Seven and 60/100 Dollars (\$9777.60).

B. At the end of each calendar year thereafter the OEPA shall submit an accounting to the Respondent of all oversight costs incurred by the OEPA with respect to this Consent Order. Within thirty (30) days of receipt of such tabulation Respondent shall remit a check to the OEPA for the full amount.

C. Payment to the OEPA for response and oversight costs incurred by the OEPA shall be payable to "Treasurer, State of Ohio" and forwarded to Counsel for the Director of the Ohio Environmental Protection Agency, Hazardous Waste Materials Cleanup Account, P.O. Box 1049, Columbus, Ohio 43266-0149. Written notice of each payment to the State of Ohio shall be provided to the OEPA Project Coordinator at the time of each payment.

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By: Mary Carr Date 1-4-90

XXV. ADMISSIONS

Except for Section V, nothing in this Consent Order, including the Workplans to be attached hereto as Exhibits, is intended by the parties to be, nor shall it be an admission of facts or law, an estoppel or a waiver of defenses by Respondent for any purpose or an acknowledgment by Respondent of any liability whatsoever. Participation in this Consent Order by the Respondent is not intended by the parties to be, and shall not be, an admission of any fact or opinion developed by the Respondent or its contractor in the completion of the work. It is further agreed that the payments referred to in Section XXIV and the costs of implementing the work herein do not constitute a fine or penalty of any kind. The terms of this Consent Order, including the Workplans, shall not be construed more or less favorably for or against any party hereto.

IT IS SO ORDERED:

By: *Richard Shank*
Richard Shank Director
Ohio Environmental Protection Agency

Date: _____

I certify this to be a true and accurate copy of the official document as filed in the records of the Ohio Environmental Protection Agency.

By: *Mary Cavin* Date *1-4-90*

By signature below, Wooster Mfg. Co. Inc. signifies consent to the issuance of this Consent Order, and hereby waives any right to appeal the issuance of this Consent Order.

IT IS SO AGREED:

By: *Allen A. C. [Signature]*
Wooster Mfg. Co. Inc.
Vice Pres of Gen. Mgr.
Title

Date: *11/17/89*

WAYNE COUNTY

PUBLIC NOTICE

OHIO ENVIRONMENTAL PROTECTION AGENCY

Notice is hereby given that the director of the Ohio Environmental Protection Agency (Ohio EPA) has issued as a final action, an Administrative Consent Order in the matter of the investigation of contamination at the Wooster Manufacturing site located in Wooster, Ohio. The effective date of this action is January 4, 1990. The action of the Director is final and may be appealed to the Environmental Board of Review (EBR) pursuant to Section 3745.04 of the Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with EBR within thirty (30) days after notice of the Director's action. A copy of the appeal must be served upon the Director of Ohio EPA within three (3) days of filing at EBR. EBR's address is:

Environmental Board of Review
236 East Town Street
Room 300
Columbus, Ohio 43215

A copy of the Administrative Consent Order may be obtained from the Hearing Clerk, Ohio EPA, P. O. Box 1049, 1800 WaterMark Drive, Columbus, Ohio 43266-0149.

GENERIC STATEMENT OF WORK
REMEDIAL INVESTIGATION/FEASIBILITY STUDY
STATE VERSION

REMEDIAL INVESTIGATION

PURPOSE:

The purpose of this remedial investigation is to determine the nature and extent of the problem at the site and to gather all necessary data to support the feasibility study. The Engineer shall furnish all personnel, materials, and services necessary for, or incidental to, performing the remedial investigation at [specific site].

SCOPE:

The remedial investigation consists of seven tasks:

- Task 1 -- Description of Current Situation
- Task 2 -- Investigation Support
- Task 3 -- Site Investigations
- Task 4 -- Site Investigation Analysis
- Task 5 -- Laboratory and Bench-Scale Studies
- Task 6 -- Final Report
- Task 7 -- Additional Requirements

TASK 1 -- DESCRIPTION OF CURRENT SITUATION

The Engineer shall describe the background of the site and its problems and outline the purpose and need for remedial investigation of the site. Data gathered during previous investigations, site inspections, and other relevant activities shall be used. Previous investigations shall be summarized and referenced.

- a. Site Background. Prepare a summary of the regional location, pertinent area boundary features, and general site physiography, hydrology, geology, and current and historic land and water use. The total area of the facility and the general history relative to the use of the facility for hazardous waste/hazardous substance activity should be defined.

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Non-NPL Site
Revised 3/22/85

By: Mary Cavin Date 1-4-90

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- b. Nature and Extent of Problem. Prepare a summary of actual and potential on-site and off-site health and environmental effects. This summary shall include: the types, physical states, and amounts of hazardous substances; the existence and condition of drums, tanks, landfills, surface ponding, and other containers; affected media and pathways of exposure; contaminated releases such as leachate and runoff; and any human or environmental exposure. Emphasis shall be placed on describing the threat or potential threat to public health and the environment.
- c. History of Response Actions. Prepare a summary of any response actions conducted by Federal, State, local, or private parties. This summary shall include field inspections, sampling surveys, cleanup activities, and other technical investigations.

TASK 2 -- INVESTIGATION SUPPORT

The Engineer shall conduct preliminary work necessary to scope and conduct the site investigations and feasibility study.

- a. Safety Plan. A safety plan shall be developed to protect the health and safety of personnel involved in the site investigations and the surrounding community. The plan will be consistent with:

Section 111(c)(6) of CERCLA

EPA Order 1440.3 -- Respiratory Protection

EPA Order 1440.2 -- Health and Safety Requirements
for Employees Engaged in Field Activities

EPA Occupational Health and Safety Manual

EPA Interim Standard Operating Safety Procedures
and other EPA guidance as developed by EPA

Site Conditions

The Safety Plan should identify problems or hazards that may be encountered and their solution. Safety procedures to be followed to protect third parties, such as visitors or the surrounding community, should also be provided.

- b. Define Boundary Conditions. Establish facility boundary conditions to limit the area of remedial investigations. The boundary conditions shall be set so that subsequent investigations will cover the contaminated media in sufficient detail to support following activities, e.g. feasibility study. Boundary conditions will also be used to identify boundaries for site access control and site security.

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By: Mary Covin Date 1-4-90

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- c. Site Map. Prepare a facility map showing all wetlands, surface water features, tanks, buildings, utilities, paved areas, easements, right-of-ways, and other features. The map shall be of sufficient detail and accuracy to locate all current or future work performed at the facility.
- d. Community Relations Plan. Prepare a plan, based on discussions with responsible local and State officials and interested community leaders, for the dissemination of information to the public regarding investigation and feasibility study activities and results. Opportunities for comment and input by citizen, community and other groups must also be identified and incorporated into the plan.
- e. Pre-Investigation Evaluation. Prior to starting any remedial investigations, the Engineer shall assess the site conditions to identify potential remedial technologies applicable to the site and associated data needed to evaluate alternatives based on these technologies for the feasibility studies. A report shall be prepared for State review identifying broad categories of remedial technologies that may be applicable to the site and data needs.

TASK 3 -- SITE INVESTIGATIONS

The Engineer shall conduct investigations necessary to characterize the site and its actual or potential hazard to public health and the environment. The investigations shall produce sufficient data to assess remedial alternatives and support the detailed evaluation of alternatives during the feasibility study.

- a. The Engineer shall prepare and submit for State review and concurrence a detailed work plan outlining data needs for characterizing the site and for support of the feasibility study. The work plan shall include an outline of proposed investigation activities, a time schedule, personnel and equipment requirements. The work plan shall also include a sampling plan indicating rationals for sampling activities, location, quantity, and frequency of sampling, sampling and analysis methods, constituents for analysis, and quality assurance procedures. In addition to these general sampling plan elements, other requirements will be identified in the following subtasks as they apply.

All sample analyses will be conducted at laboratories following EPA protocols while following strict chain-of-custody procedures.

1. Chain-of-Custody. Any field sampling collection and analyses conducted shall be documented in accordance with chain-of-custody procedures as provided by EPA. The Engineer shall prepare and submit as part of the work plan a description of the chain-of-custody procedures to be used.

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By: Mary Corwin Date 1-4-90

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2. Quality Assurance/Quality Control (QA/QC). The Engineer shall prepare and submit as part of the work plan a Quality Assurance Project Plan for the sampling, analysis, and data handling aspects of the remedial investigation. The plan shall be consistent with the requirements of EPA's Contract Laboratory Program. The plan shall address the following points:

- a) QA Objectives for Measurement Data, in terms of precision, accuracy, completeness, representativeness, and comparability of the
- b) Sampling Procedures
- c) Sample Custody
- d) Calibration Procedures, References, and Frequency
- e) Internal QC Checks and Frequency
- f) QA Performance Audits, System Audits, and Frequency
- g) QA Reports to Management
- h) Preventive Maintenance Procedures and Schedule
- i) Specific procedures to be used to routinely assess data precision, representativeness, comparability, accuracy, and completeness of specific measurement parameters involved.
- j) Corrective Action

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By: Mary Caron Date 1-4-90

b. Waste Characterization. Develop and conduct a complete sampling and analysis program to supplement existing data and to physically and chemically characterize all potentially hazardous waste/hazardous substances at the site. This activity should include identification of the location and probable quantities of subsurface wastes using appropriate methods.

The sampling plan developed for this subtask shall address incompatibility testing of wastes (tank and drum opening procedures if necessary). Wastes shall be analyzed and grouped in compatibility classes to support any subsequent conclusions about segregating wastes on-site and developing remedial alternatives.

As part of this subtask, all containers of hazardous waste/hazardous substances such as drums, tanks, piles, abandoned vehicles, etc. must be located on the site map. The physical condition of each container, characteristics (color and type) as well as other identifying marks (labels, manufacturer's names, graffiti, etc.) must be recorded in an orderly fashion and should be correlated with the results of chemical analysis for each container when available. A photographic record of each container should also be prepared and included in the Remedial Investigation Report.

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By: Mary Caven Date 1-4-90

- c. Hydrogeologic Investigation. Develop and conduct a program to determine the present and potential extent of groundwater contamination and to evaluate the suitability for on-site waste containment. A sampling program shall be developed to determine the location of water bearing strata and other subsurface geologic features, groundwater flow direction, vertical and horizontal distribution of contaminants, background levels of contamination, and the ability of the facility and local geology to control or contain the contaminants. Long-term disposition of contaminants will be evaluated based on mobility of the contaminants, attenuation capacity of local soils and other geologic features, regional flow direction and quantity, effects of local pumping, and the presence of discharge/recharge areas. Computer models of flow and contaminant transport may be used to demonstrate conclusions reached as a result of this investigation and predict effects of future remedial actions.

The sampling plan developed for this subtask shall define the type of well construction and any geophysical or modeling techniques proposed.

- d. Soils Investigation. Develop and conduct a program to determine the nature and vertical and horizontal extent of contamination of surface and subsurface soils. Cores from groundwater monitoring wells may serve as soils samples.
- e. Surface Water and Sediments Investigation. Develop and conduct a program to determine the nature and extent of contamination of surface water and sediments. This program shall also evaluate the impacts of the contaminants on the floral and faunal communities in the surface water, sediments, and any adjacent wetlands.
- f. Air Investigation. Develop and conduct a program to determine the nature and extent of on-site and off-site contamination. This program shall also address the tendency of the substance identified through Waste Characterization to enter and disperse in the atmosphere, considering seasonal weather conditions and wind patterns.

The above tasks should be summarized in a single sampling plan which is to be included in the detailed work plan. (Other categories of investigations may be needed for specialized problems. These could include additional biological or radiological investigations.)

TASK 4 -- SITE INVESTIGATION ANALYSIS

The Engineer shall prepare a thorough analysis and summary of all site investigations and their results. The objective of this task will be to ensure that the investigation data are sufficient in quality and quantity to adequately describe the nature and extent of contamination and to support the feasibility study.

The results and data from all site investigations shall be organized and presented logically so that the relationships between remedial investigations for each media are apparent.

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- a. Data Analysis. Analyze all site investigation data and develop a summary of the type and extent of contamination at the site. This analysis shall include all significant pathways of contamination and an exposure assessment. The exposure assessment shall describe any actual or potential threats to public health, welfare, and the environment.
- b. Application of Potential Remedial Technologies. Analyze the results of the site investigations in relation to the potential remedial technologies applicable to the site. This analysis will determine the adequacy of data quality and quantity to support the feasibility study and will identify any additional data needs.

TASK 5 -- LABORATORY STUDIES AND BENCH-SCALE STUDIES (Optional)

The Engineer shall conduct any necessary laboratory and bench scale treatability studies required to evaluate the applicability of remedial technologies, e.g., leachate treatment, groundwater treatment, compatibility of waste/leachate with liners, cover, or other materials proposed for use in the remedy. The scope of this Task will depend on the results of Task 4. The Engineer will submit a separate work plan for any proposed laboratory studies for State concurrence.

TASK 6 -- FINAL REPORT

The Engineer shall prepare a final report covering the remedial investigations and submit copies to the Ohio EPA. The report shall include the results of Task 1 through 5.

TASK 7 -- ADDITIONAL REQUIREMENTS

- a. Reporting Requirements. Monthly Technical Progress Reports are required of the Engineer.

Content. For each on-going work assignment, the Engineer shall submit progress reports with the following elements:

1. Identification of site and activity.
2. Status of work at the site and progress to date.
3. Percentage of completion.
4. Difficulties encountered during the reporting period.
5. Actions being taken to rectify problems.
6. Activities planned for the next month.
7. Changes in personnel.

The progress monthly report will list target and actual completion dates for each element of activity including project completion and provide an explanation of any deviation from the milestones in the work plan schedule.

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By: Mary Cover Date 1-4-90

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FEASIBILITY STUDY

PURPOSE

The purpose of this feasibility study is to develop and evaluate remedial alternatives for [specific site].

The Engineer shall furnish the necessary personnel, materials, and services required to prepare the remedial action feasibility study.

SCOPE

The feasibility study consists of ten tasks:

Task 8 -- Description of Current Situation

Task 9 -- Work Plan

Task 10 -- Development of Alternative

Task 11 -- Initial Screening of Alternatives

Task 12 -- Detailed Analysis of Alternatives

Task 13 -- Evaluation and Selection of Cost-Effective Alternative

Task 14 -- Final Report

Task 15 -- Additional Requirements

TASK 8 -- DESCRIPTION OF CURRENT SITUATION

Any changes to the description of the current situation from Task 1 shall be presented. Justification for changes must be based on results of the remedial investigation.

A site-specific statement of purpose for the response, based on the results of the remedial investigation, should be presented. The statement of purpose should identify the actual or potential exposure pathways that should be addressed by remedial alternatives. This statement of purpose shall be submitted to the State for concurrence before continuing the remaining tasks of the Feasibility Study.

TASK 9 -- WORK PLAN

A work plan that includes a detailed technical approach, personnel requirements, and schedules shall be submitted to the State for review and concurrence for the proposed feasibility study.

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By: Mary Cavin Date: 1-4-90

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TASK 10 -- DEVELOPMENT OF ALTERNATIVES

Based on the results of the remedial investigation, the Engineer shall develop a limited number of alternatives for source control or off-site remedial actions, or both, on the basis of objectives established for the response.

a. Establishment of Remedial Response Objectives

Establish site-specific objectives for the response based on public health and environmental concerns, information gathered during the remedial investigation, Section 300.68 of the National Contingency Plan (NCP), EPA interim guidance, and the requirements of any other applicable Federal or State statutes. Preliminary cleanup objectives shall be developed in consultation with and for concurrence by the State.

b. Identification of Remedial Technologies

Based on the remedial response objectives established above and the statement of purpose identified in Task 8, identify appropriate remedial technologies as a basis for the development of remedial alternatives. These technologies shall be identified on a media-specific basis, although consideration should be given to the interrelationship of the media. The technologies should be able to meet the response objectives. The list of potential remedial technologies developed in Tasks 2e and Task 4b shall be considered a master list of applicable technologies and shall be screened based on site conditions, waste characteristics, and technical requirements, to eliminate or modify those technologies that may prove extremely difficult to implement, will require unreasonable time periods to implement, or will rely on insufficiently developed technology.

c. Identification of Remedial Alternatives

Develop alternatives to incorporate remedial technologies, response objectives, and other appropriate considerations into a comprehensive, site-specific approach. Alternatives developed should include the following:

- 1) Alternatives for off-site treatment or disposal;
- 2) Alternatives which attain applicable and/or relevant Federal and State public health or environmental standards;
- 3) Alternatives which exceed applicable and/or relevant Federal and State public health or environmental standards;
- 4) No action alternative for comparison with other developed alternatives.

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By: Mary Corwin Date 1-4-90

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By: Mary Caron Date 1-4-90

There may be overlap among the alternatives developed. All alternatives except the no action alternative must meet the requirements of all applicable State and Federal environmental laws including permitting requirements. Alternatives shall be developed in close consultation with the State.

TASK 11 -- INITIAL SCREENING OF ALTERNATIVES

The alternatives developed in Task 10 shall be screened by the Engineer to eliminate alternatives, prior to detailed analysis, that are clearly not feasible or appropriate. All decisions made as a part of this screening of alternatives should be documented.

The following consideration shall be used as a basis for the initial screening:

- 1) Cost. An alternative that far exceeds the cost of other alternatives evaluated and that does not provide substantially greater public health or environmental benefits will usually be excluded from further consideration.
- 2) Effects of the Alternative. Only those alternatives that effectively contribute to protection of public health, welfare, and the environment will be considered further. Any alternatives that inherently present significant adverse effects will be excluded from further consideration.
- 3) Acceptable Engineering Practices. Alternatives that may prove extremely difficult to implement, will not achieve the remedial objectives in a reasonable time period, or that rely on unproven technologies will be excluded from further consideration.

TASK 12 -- DETAILED ANALYSIS OF ALTERNATIVES

The Engineer shall prepare a detailed analysis of the alternatives that pass through the initial screening in Task 11.

This detailed analysis shall consist of the following elements:

a. Detailed Description

The detailed description of each remaining alternative shall include as a minimum:

- 1) Description of appropriate treatment and disposal technologies.
- 2) Special engineering considerations required to implement the alternative, e.g., pilot treatment facility, additional studies needed to proceed with final remedial design.
- 3) Operation, maintenance, and monitoring requirements of the completed remedy.

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By: Mary Corin Date 1-4-90

- 4) Off-site disposal needs and transportation plans.
- 5) Temporary storage requirements.
- 6) Safety requirements for remedial implementation, including both on-site and off-site health and safety considerations.
- 7) An analysis of how the alternative could be phased into individual operations and a discussion of how these operations could best be implemented, individually or in groups, to produce significant environmental improvement.
- 8) A review of any off-site treatment or disposal facilities to ensure compliance with applicable RCRA, TSCA and State requirements, both current and proposed.
- 9) An analysis of the projected performance and expected results of the alternative with emphasis on potential for further future release of hazardous substances.

b. Environmental Assessment

An Environmental Assessment (EA) shall be performed for each alternative including, as a minimum, an evaluation of each alternative's environmental effects, an analysis of measures to mitigate adverse effects, physical or legal constraints, and compliance with Federal and State regulatory requirements.

Each alternative will be assessed in terms of the extent to which it will mitigate damage to, or protect, public health, welfare, and the environment, in comparison to the other remedial alternatives.

The no action alternative will be fully evaluated to describe the current site conditions and anticipate environmental conditions if no actions are taken. The no action alternative will serve as the baseline for the Environmental Analysis.

c. Cost Analysis

The present worth cost of implementing each remedial alternative (and each phase of the alternative) as well as the annual operating and maintenance cost shall be presented. The cost shall be provided as a total cost and on an annual cost basis.

TASK 13 -- EVALUATION AND SELECTION OF COST-EFFECTIVE ALTERNATIVE

The State shall review the results of the detailed analysis of alternatives prepared under Task 12 and select the cost-effective alternative. The lowest cost alternative that is technologically feasible and reliable and which effectively mitigates and minimizes damage to and provides adequate protection of public health, welfare, or the environment will be considered the cost-effective alternative.

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The following considerations shall be used as the basis for selecting the cost-effective alternative:

1. Reliability. The alternatives that minimize or eliminate the potential for release of wastes into the environment will be considered more reliable than other alternatives.
2. Implementability. The alternatives most easily implemented shall be favored.
3. Effects of the Alternative. The alternatives posing the greatest improvement to (and least negative impact on) public health, welfare, and the environment will be favored.
4. Safety Requirements. The alternatives with the lowest adverse safety impacts and associated costs will be favored.
5. Cost. Total cost will include the cost of implementing the alternative and the cost of operation and maintenance of the proposed alternative.

TASK 14 -- FINAL REPORT

A final report shall be prepared for submission to the State, including the results of Task 8 through 13. Copies of the report shall be submitted to the State.

TASK 15 -- ADDITIONAL REQUIREMENTS

Monthly Technical Progress Reports are required of the Engineer. These documents are described in Task 7 of the remedial investigation scope of work.

The design and implementation of the selected alternative will follow this RI/FS process.

0165S

I certify this to be a true and accurate copy of the official document as filed in the records of the Ohio Environmental Protection Agency.

By: Mary Caron Date: 1-4-90

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Deliverables:

Remedial Investigation

1. Task 1a - Site Background
 - b - Nature and Extent of Problem
 - c - History of Response Actions
2. Task 2a - Safety Plan
 - c - Site Map
 - d - Community Relations Plan
 - e - Pre-investigation Evaluation
3. Task 3a - Work Plan
4. Task 4 - Site Investigation Analysis
5. Task 5 - Work Plan for Laboratory and Bench Scale Studies (optional)
6. Task 6 - Final Remedial Investigation Report
7. Task 7 - Monthly Technical Progress Reports

The State shall review and concur with Items 2 and 3 before field activities begin.

Feasibility Study

8. Task 8 - Statement of Purpose
9. Task 9 - Work Plan for Feasibility Study
10. Task 10a - Remedial Response Objectives
 - c - Identified Remedial Alternatives
11. Task 12 - Detailed Analysis of Alternatives Including Decisions Documents
12. Task 14 - Final Feasibility Study Report
13. Task 15 - Monthly Technical Progress Reports

The State shall review and concur with Items 8 and 9 before work on the feasibility study begins.

I certify this to be a true and accurate copy of the official document as filed in the records of the Ohio Environmental Protection Agency.

By: Mary Cowi Date 1-4-90

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COVER MEMO

- 1892

- For Director's Signature
- For Assistant Director's Signature
- For Deputy Director's Signature
- For Division Chief's Signature
- DRAFT for the Governor's Signature

Subject: Wooster Manufacturing Co., Inc.

Prepared by: Cynthia A. Hafner, Legal
(name and division)

Date: DEC 18 1989

Additional blind copies should be sent to:

_____	_____
_____	_____
_____	_____

Necessary Approvals

- Office Chief D. Vitale
- Legal C. Hafner
- Unit Supervisor DO
- Section Manager CO D. Strayer
- District Office Chief
- Division Chief J. Tiell
- Deputy Director M. Walsh
- Assistant Director
- Other

Approved By

Date

<u><i>D. Vitale</i></u>	<u>12/15/89</u>
<u><i>Cynthia A. Hafner</i></u>	<u>12/14/89</u>
_____	_____
<u><i>D. Strayer</i></u>	<u>12/14/89</u>
_____	_____
<u><i>Jennifer Tiell</i></u>	<u>12/14/89</u>
<u><i>Mary Walsh</i></u>	_____
_____	_____
_____	_____

RETURN ALL SUPPORTING DOCUMENTS TO: Cynthia A. Hafner

Legal -

