



State of Ohio Environmental Protection Agency

**STREET ADDRESS:**

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Columbus, Ohio 43215

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**MAILING ADDRESS:**

P.O. Box 1049  
Columbus, OH 43216-1049

**CERTIFIED MAIL**

August 20, 2008

Re: **Envirosafe Services of Ohio, Inc.**  
EPA ID No: OHD 045 243 706  
Ohio ID No: 03-48-0092  
Modified Hazardous Waste Permit

Mr. Douglas Roberts  
Envirosafe Services of Ohio, Inc.  
876 Otter Creek Road  
Oregon, Ohio 43616

Dear Mr. Roberts:

On May 22, 2008, Ohio EPA received Envirosafe Services of Ohio, Inc.'s (Envirosafe) request to discontinue the semi-annual analysis of the naturally occurring constituents sodium, chloride, and fluoride as early warning indicators of a potential release from regulated units. For this modification, Envirosafe submitted a Class 2 modification application<sup>1</sup>. The Agency did not receive any verbal or written comments concerning this Class 2 modification application. I have enclosed the final modified Ohio hazardous waste facility installation and operation permit (Permit) that was issued by the director today. Please note that the modified Permit remains in effect until it is renewed, withdrawn, suspended or revoked.

You are hereby notified that this action of the Director is final and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio 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 the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00 which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

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<sup>1</sup>Ohio EPA assigned tracking # 080522-2-1 to this modification application.

Ted Strickland, Governor  
Lee Fisher, Lieutenant Governor  
Chris Korleski, Director

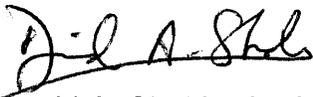
Ohio EPA is an Equal Opportunity Employer

Mr. Douglas Roberts  
Envirosafe Services of Ohio, Inc.  
August 20, 2008  
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Environmental Review Appeals Commission  
309 South Fourth Street, Room 222  
Columbus, OH 43215

If you have any questions, please contact Gary Deutschman of Ohio EPA's  
Northwest District Office at (419) 352-8461.

Sincerely,



David A. Sholtis, Assistant Chief  
Division of Hazardous Waste Management

cc: Edwin Lim, ERAS, DHWM, CO  
Jeremy Carroll, ERAS, DHWM, CO  
John Pasquarette/Gary Deutschman/Michael Terpinski, DHWM, NWDO  
Carol Hester, Ohio EPA, PIC

## PUBLIC NOTICE

Lucas County

### OHIO EPA ISSUES CLASS 2 MODIFIED HAZARDOUS WASTE PERMIT

On August 20, 2008, Ohio EPA issued a modified Hazardous Waste Facility Installation and Operation Permit (Permit) to Envirosafe Services of Ohio, Inc. for its facility at 876 Otter Creek Road, Oregon, Ohio 43616. The EPA Identification Number for this facility is OHD045243706.

#### **Why is Envirosafe Services of Ohio, Inc. modifying its Permit?**

Envirosafe Services of Ohio, Inc. (Envirosafe) is permitted to operate a hazardous waste landfill and other related hazardous waste management units at its facility. Envirosafe wishes to discontinue the semi-annual analysis of the naturally occurring constituents sodium, chloride, and fluoride as early warning indicators of a potential release from regulated units. This final modified permit will allow Envirosafe to make the requested changes. To issue this final modified Permit, Ohio EPA determined that the modification application is complete and meets appropriate standards.

#### **Can I appeal this final modified Permit?**

Yes, if you are an officer of an agency of the state or of a political subdivision, acting in a representative capacity, or any person who would be aggrieved or adversely affected by this modified Permit, you have the right to appeal this Permit decision to the Environmental Review Appeals Commission (ERAC).

#### **If I decide to appeal this final modified Permit, how and when must I make the appeal?**

If you file an appeal, you must put it in writing no later than **September 22, 2008**. Your appeal must explain why you are appealing the action and the grounds you are using for your appeal. The appeal must be accompanied by a filing fee of \$70.00 which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. You must file your appeal, according to Ohio Revised Code § 3745.04 with ERAC at the following address: **Environmental Review Appeals Commission**, 309 South Fourth Street, Room 222, Columbus, Ohio 43215. You must send a copy of the appeal to the director of Ohio EPA at the following address no later than three (3) days after you file it with ERAC: **Chris Korleski, Director of Ohio EPA**, P.O. Box 1049, Columbus, Ohio 43216-1049.

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## OHIO ENVIRONMENTAL PROTECTION AGENCY

MODIFIED OHIO HAZARDOUS WASTE FACILITY  
INSTALLATION AND OPERATION PERMIT

JOURNALIZED DIRECTOR'S JOURNAL

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

Date of Issuance: August 20, 2008

Effective Date: August 20, 2008

U.S. EPA ID No.: OHD 045 243 706

Ohio Permit No.: 03-48-0092

By: *John Kossiter* Date: 8-20-08

Name of Permittee: Envirosafe Services of Ohio, Inc.

Mailing Address: 876 Otter Creek Road  
Oregon, Ohio 43616-1200Facility Location: 876 Otter Creek Road  
Oregon, Ohio 43616-1200

Person to Contact: Doug Roberts

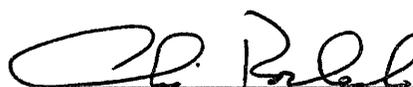
This Modified Ohio Hazardous Waste Facility Installation and Operation Permit is issued pursuant and subject to Section 3734.05(I) of the Ohio Revised Code and Rule 3745-50-51(D) of the Ohio Administrative Code.

The Ohio Hazardous Waste Facility Installation and Operation Permit with the above-referenced permit number as issued by the Ohio Environmental Protection Agency and journalized on December 29, 2005, is hereby incorporated by reference in its entirety, except as it may be modified herein.

This modification of the permit shall remain in effect until such time as the Ohio Hazardous Waste Facility Installation and Operation Permit is renewed, modified, withdrawn, suspended or revoked.

The Permittee shall comply with all requirements of the modified Part B permit application as amended or supplemented on May 22, 2008. The information contained in the modified Part B permit application is incorporated herein by reference. Specifically, all written statements regarding the specifications, locations or capabilities of the processes, equipment, containment devices, safety devices or programs or other matters made by the applicant in the permit modification application are hereby incorporated as express, binding terms and conditions of this modified permit.

The modified Terms and Conditions of this permit are attached hereto and are incorporated herein by reference. The modified Terms and Conditions supersede and replace the corresponding pages found in the December 29, 2005 renewal permit.



Chris Korleski  
Director

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- (iv) Submit a report to Ohio EPA Northwest District Office detailing the results due to Permit Conditions K.1(e)(i), (ii) and (iii). This report is due along with the semi-annual data report for the event immediately following the end of the first year after the installation of the new well. The schedule for semi-annual reports is found in Permit Condition K.7. The Permittee must enter the Appendix to OAC Rule 3745-54-98 sampling and analysis data generated pursuant to Permit Condition K.1(e)(i) into the operating record as described in Permit Condition K.7;
- (v) If the comparison of ground water quality pursuant to Permit Condition K.1(e)(iii) shows a statistically significant difference between that of the original well and the replacement well, then the report described in Permit Condition K.1(e)(iv) must include an evaluation as to whether this difference has an effect on the ground water monitoring program, including the assessment of risk for the ground water medium; and,
- (vi) If any changes are necessary to the ground water monitoring program as a result of a statistically significant difference in ground water quality between a replacement well and the well it replaced, the Permittee must submit a request for permit modification in accordance with Permit Condition K.8.

**K.2 Comparison Methods and Ground Water Protection Standard**  
OAC Rules 3745-54-95 through 3745-54-101

(a) Compliance Point

The Permittee must monitor the wells listed in Attachment K-1 at the locations shown on Attachment K-2 and any other well described in Permit Condition K.1(a) that meet the intent of compliance point wells per OAC Rule 3745-54-95 for at least the constituents specified in Tables K-1, K-2 and K-3.

(b) Monitoring Constituents and Comparison Standards

Constituents specified below must be monitored at the locations specified in Permit Condition K.2(a) to determine if the constituent concentration is elevated due to the past or current operations of the facility. A constituent

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must be considered elevated if its concentration is equal to or greater than the comparison standard in Permit Condition K.2(b)(i) or greater than a comparison standard determined in accordance with Permit Condition K.2(b)(ii) and an alternate source demonstration in accordance with Permit Condition K.6(i) has not been submitted.

(i) Table K-1. Constituents With Specified Comparison Standards

Constituent	Comparison Standard for Unaffected Wells ( $\mu\text{g/L}$ )
acetone	10
Benzene	1
chloroform	1
1,1-dichloroethane	1
1,2-dichloroethane	1
1,4-dioxane	50
ethylbenzene	1
methylene chloride	1
methyl ethyl ketone	10
total phenols	5
tetrahydrofuran	2
toluene	1
1,1,1-trichloroethane	1
trichloroethene	1
vinyl chloride	2
total xylenes	1
cadmium (dissolved)	1
chromium (dissolved)	25
dissolved lead	5
cyanide	10

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- (ii) Table K-2. Constituents With Comparison Standards listed in Appendix E.7 of the approved Part B permit application:

Constituent
Barium (dissolved)

- (iii) For constituents without comparison standards listed in Appendix E.7 of the approved Part B permit application (e.g., new or replacement wells or Appendix to OAC Rule 3745-54-98 constituents where comparison standards are required as a result of a well being identified as affected), comparison standards must be developed in accordance with the following requirements and submitted as a permit modification to Appendix E.7 of the approved Part B permit application.
- (a) The Permittee must evaluate currently available analytical results and determine, based on historical data at the site, regional data, geologic information and other relevant information, whether the constituent concentration at each well has been affected by past or current operations at the facility per Permit Condition K.6(c). The determination and justification supporting the determination must be submitted with the first semi-annual final data.
- (b) In the case that the Permittee finds, in accordance with Permit Condition K.2(b)(iii)(a), that the concentration of a constituent at a well has been affected by past or current operations at the facility or the director does not concur with the Permittee's findings that it is not elevated, then that constituent at that well will be considered elevated until demonstrated, to the director's satisfaction, that it is not elevated due to past or current operations of the facility.

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- (c) In the case that the Permittee finds, in accordance with Permit Condition K.2(b)(iii)(a), that the concentration (first analytical result following the approval of this permit modification) of a constituent at a well has not been affected by past or current operations at the facility, then the Permittee must develop comparison standards using intrawell statistical methods in accordance with OAC Rule 3745-54-97(G), (H) and (I). If there are less than 8 historical data points for background, then the Permittee must collect the necessary background data within the first year following the approval of this permit modification. Background must be updated in accordance with the procedures in Permit Condition K.2(b)(iii)(d) until the background data set consists of at least 16 data points.
- (d) Background for comparison standards in Appendix E.7 and developed in accordance with Permit Condition K.2(b)(iii)(c) and OAC Rule 3745-54-97(G), (H) and (I) may be updated in accordance with the following requirements:
- (i) Background is not updated with less than 4 new data points at any one time.
- (ii) The new background (previous background data plus new background data) must be checked for slowly increasing trends. If a slowly increasing trend is identified, then the background must not be updated unless concurrence from Ohio EPA is received that the Permittee has adequately demonstrated that the increasing trend is not the result of a release from the facility.
- (iii) Background updates must be accumulative and not a moving window, unless a trend is identified in the background data. As required in Permit Condition K.2(b)(iii)(d)(ii), the Permittee must adequately demonstrate that the identified trends are not the result of a release from the facility before the background update would be accepted by Ohio EPA.

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- (iv) When a trend in background data has been identified and it has been adequately demonstrated to not be the result of a release from the facility, then a moving window background should be used. The size of the moving window will be dependent upon the rate of change and the best balance between background size and variance.
- (iv) In addition to the constituents in Tables K-1 and K-2, the Permittee must collect and analyze samples from each well for the parameters listed in Table K-3 below.

Table K-3. Ground Water Quality Parameters

Parameters
pH
specific conductance
temperature
turbidity

Note: The parameters in Table K-3 will be measured in the field in accordance with the Permittee's Standard Operating Procedures for the collection of ground water samples as described in Appendix E.9 of the Part B Permit Application. These parameters will be collected to demonstrate that the collected ground water samples are representative of formation water.

(c) Concentration Limits

In lieu of establishing individual concentration limits for elevated constituents determined in Permit Condition K.2(b)(i), (ii) and (iii), K.6(c), (d), (e)(iii) and (g), per OAC Rule 3745-54-94 for the affected wells and their constituents, the Permittee must apply the ACL Model in accordance with Appendix E-11 of the approved Part B permit application.

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(d) Compliance Period

The Permittee must monitor for the constituents identified in Tables K-1, K-2 and K-3 in Permit Condition K.2(b) during the compliance period described in Permit Condition I.1(c).

K.3 Corrective Action Program

OAC Rules 3745-54-98, 3745-54-99, 3745-54-100 and 3745-54-101

When target risk levels, calculated in accordance with the ACL model in Appendix E-11 of the approved Part B permit application, are exceeded in the wells listed in Permit Condition K.2(a), the Permittee must:

- (a) In accordance with OAC 3745-54-99(H), notify the director in writing within seven days of this finding.
- (b) Within 90 days of this finding, submit a permit modification to establish and implement a corrective action program that prevents constituents in the ground water from exceeding the risk standards specified in Permit Condition K.6(l)(i) by removing the hazardous waste constituents or by treating them in place. If corrective action pursuant to OAC Rule 3745-54-101 and Permit Module E is already occurring, then any corrective action necessary in response will be coordinated with Permit Module E to the extent practical.
- (c) The Permittee may demonstrate that a source other than the facility caused exceedance of the ACL risk goal or that the exceedance is an artifact caused by an error in sampling, analysis or statistical evaluation or natural variation in the ground water. In making such a demonstration, the Permittee must:
  - (i) Notify the director in writing, within seven (7) days of determining that the facility has reached or exceeded the ACL risk goal of the intent to make a demonstration.
  - (ii) Include in the Final Report in Permit Condition K.7(c)(v) a report which successfully demonstrates that a source other than the facility caused the standard to be exceeded of that the apparent noncompliance with the standards resulted from error in sampling, analysis or evaluation.

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- (iii) Include in the Final Report in Permit Condition K.7(c)(v) an application for a permit modification to make any appropriate changes to the IGWMP at the facility.
- (iv) The Permittee may make this demonstration in addition to, or in lieu of, submitting a permit modification application to modify the IGWMP for corrective action as required by Permit Condition K.3(b) and OAC Rule 3745-54-99(H)(2). However, the same period of ninety (90) days is required for both a successful "Other Source Demonstration" and the submittal of the permit modification application in accordance with Condition K.3(b). The Permittee is not relieved of the ninety (90) day requirement for a permit modification unless the "Other Source Demonstration" is deemed successful by the Agency prior to the ninety (90) day time limit.
- (v) Continue to monitor in accordance with the IGWMP at the facility.

**K.4 Sampling and Analysis Procedures**  
OAC Rule 3745-54-97(D) and (E)

The Permittee must use the following techniques and procedures when obtaining and analyzing samples from the ground water monitoring wells described in Permit Condition K.1:

- (a) Ground water elevations must be measured using the techniques described in Appendix E.9 of the approved Part B permit application.
- (b) Each well must be checked for the present of immiscible layers using an interface probe prior to purging where dissolved concentrations of any site-specific parameter indicates that immiscible layers could be present using the methods described in Appendix E.9 of the approved Part B permit application.

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(c) Sample Collection

- (i) Samples must be collected and handled (including well evacuation, sample withdrawal, preservation, containerization, filtration and shipment) to ensure representative samples are obtained using the techniques and equipment described in Appendix E.9 of the approved Part B application.
- (ii) The Permittee must collect samples from the wells least likely to exhibit ground water contamination prior to collecting samples from wells with known or suspected ground water contamination.

(d) Field analysis must be performed using instruments, procedures and forms described in the approved Part B permit application. Instruments must be calibrated as described in Appendix E.9 of the approved Part B permit application.

(e) Sampling equipment must be decontaminated using techniques described in Appendix E.9 of the approved Part B permit application.

(f) Purge water must be disposed in accordance with procedures described in Appendix E.9 of the approved Part B permit application.

(g) Laboratory Analysis

(i) Laboratory analytical methods, detection limits and sample holding time must be in accordance with techniques described in Appendix E.9 of the approved Part B permit application.

(ii) Laboratory selection for sample analysis shall not be contingent upon Ohio EPA approval of laboratories.

(h) Quality Assurance/Quality Control

(i) Quality assurance, including field/lab/equipment blanks, duplicate samples and identification of potential interferences, must be in accordance with the methods described in Appendix E.9 of the approved Part B permit application.

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comparison standards, then the Permittee must note this occurrence in the sampling report for that event. Ohio EPA will determine on a case-by-case basis whether such constituents and wells must be considered elevated constituents and affected wells.

(e) Elevated Constituents

(i) Sampling and analysis of constituents listed in Appendix to OAC Rule 3745-54-98 must be conducted in accordance with the following:

(a) Whenever the concentration of a hazardous constituent listed in Permit Condition K.2(b)(i) is confirmed to be equal to or greater than its associated comparison standard, or whenever the concentration of a constituent listed in Permit Condition K.2(b)(ii) is confirmed to exceed its associated comparison standard at an unaffected well, the Permittee must conduct Appendix to OAC Rule 3745-54-98 sampling at all of the monitoring wells in that particular cluster and at adjacent wells screened in the same horizon as described in Section E.8b of the approved Part B permit application, initiated no later than the next regularly scheduled sampling event.

(ii) The Permittee may confirm the initial results of Appendix to OAC Rule 3745-54-98 sampling conducted pursuant to Permit Condition K.6(e)(i) in the same manner as described in Permit Condition K.6(c); otherwise any constituents reported initially will be assumed to be present.

(iii) All non-naturally occurring constituents reported to be present at or above the practical quantitation limit (PQL) during the Appendix to OAC Rule 3745-54-98 sampling in accordance with Permit Condition K.6(e)(i) and (ii) must be considered elevated. For naturally occurring constituents the Permittee must determine if the constituents are elevated by developing comparison standards in accordance with the requirements of Permit Condition K.2(b)(iii).

(iv) The Permittee must report to the director in writing, according to the schedule in Permit Condition K.7:

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- (a) The change in status from unaffected to affected for the wells found to have elevated constituents in accordance with Permit Conditions K.6(c) through (g);
  - (b) The concentrations of all constituents reported following the Appendix to OAC Rule 3745-54-98 sampling in Permit Conditions K.6(e)(i) and (ii), K.6(f) and K.6(g).
  - (c) A list of elevated constituents for each well; and
  - (d) A permit modification request to add the elevated constituents to the constituent list for the affected wells and the wells monitoring the vertical and horizontal extent of elevated constituents (adjacent wells in the same horizon and wells in the same cluster monitoring the zone above or below). The Permittee must begin sampling for the elevated constituents in the associated affected wells and adjacent (vertical and horizontal) wells during the next semi-annual sampling event.
- (f) If the results of Appendix to OAC Rule 3745-54-98 sampling in accordance with Permit Condition K.6(e) indicate constituents are present exceeding comparison standards, in accordance with Permit Condition K.6(e)(iii), in any of the wells adjacent to the well with the initial exceedence of a comparison standard, determined in accordance with Permit Condition K.2.(b)(i), (ii) and (iii), then the Permittee must conduct additional Appendix to OAC Rule 3745-54-98 sampling using the well sampling strategy described in Permit Condition K.6(e) not later than the next regularly scheduled sampling event at these adjacent wells. A well need only be sampled once within a given sampling event, excluding resampling or confirmation considerations, to meet the requirements of this Permit Condition, even if it is identified for this sampling more than once due to overlap.
- (g) The Permittee must analyze samples from all affected monitoring wells for all constituents contained in the Appendix to OAC Rule 3745-54-98 annually to determine if there are any new elevated constituents. The Permittee may confirm the initial results of this sampling in the same manner as described in Permit Condition K.6(c); otherwise, any

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constituents reported initially will be assumed to be present. The Permittee must identify the constituents that are elevated in accordance with the procedures in Permit Conditions K.2(b)(iii) and K.6(e)(iii). The Permittee must report the analysis results and identify any new elevated constituents to the director in writing as well as submit a modification request to add any newly identified elevated constituents to the constituent list for the affected wells and the adjacent wells (vertical and horizontal), according to the schedule in Permit Condition K.7(c)(iii). The Permittee must begin sampling and analyzing for the new constituents in the associated affected wells during the next semi-annual sampling event.

- (h) Affected well will revert to unaffected status when there have been no elevated constituents detected at the well for three consecutive sampling events. Non-naturally occurring constituents at the site listed in Permit Condition K.2(b)(i) or the Appendix to OAC Rule 3745-54-98 are no longer considered elevated when they have not been detected at or above the practical quantitation limit (PQL) for three consecutive sampling events. Naturally occurring constituents listed in Permit Condition K.2(b)(i) or K.2(b)(ii) or the Appendix to OAC Rule 3745-54-98 are no longer considered elevated when they are less than the associated comparison standard for three consecutive sampling events. Constituents that were added to a well's sampling and analysis list must remain on the well's sampling and analysis list.
- (i) If a constituent's analytical result is equal to or greater than its comparison standard for non-naturally occurring constituents, or greater than its comparison standard for naturally occurring constituents, then in accordance with OAC Rule 3745-54-98(G)(1), the Permittee must notify the director, in writing, within seven (7) days of this finding. Comparison standards are determined in accordance with Permit Conditions K.2(b), K.6(c), (e), (f) or (g). The notification must indicate what chemical parameters or hazardous constituent have shown statistically significant evidence of contamination. The Permittee may demonstrate that a source other than the facility caused the contamination or that the detection is an artifact caused by an error in sampling, analysis or statistical evaluation or natural variation in the ground water. In making such a demonstration, the Permittee must:

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- (a) Notify the director, in writing, within seven (7) days of determining that a constituent has reached or exceeded its comparison standard, of the intent to make a demonstration.
- (b) Include in the Final Report in Permit Condition K.7(c)(v) a report which successfully demonstrates that a source other than the facility caused the newly elevated constituent(s), or that the newly elevated constituent(s) exceedance resulted from error in sampling, analysis or evaluation.
- (c) Include in the Final Report in Permit Condition K.7(c)(v) an application for a permit modification to make any appropriate changes to the IGWMP at the facility.
- (d) If this exceedance also causes an exceedance of the risk standard in the ACL model in Appendix E.11 of the approved Part B permit application, the Permittee may make this demonstration in addition to, or in lieu of, submitting a permit modification application to modify the IGWMP for corrective action as required by Permit Condition K.3(c) and OAC Rule 3745-54-99(H)(2). However, under Permit Condition K.3(c), the same period of ninety (90) days is required for both a successful "Other Source Demonstration" and the submittal of the permit modification application. The Permittee is not relieved of the ninety (90) day requirement for a permit modification unless this "Other Source Demonstration" is deemed successful by the Agency prior to the ninety (90) day time limit.
- (e) Continue to monitor in accordance with the IGWMP at the facility.
- (j) For each elevated constituent the Permittee must report the extent of the plume. The report must include an isoconcentration map and isoconcentration cross section for each elevated constituent. The concentration or value of the parameter must be printed on the map and cross section next to the appropriate well location and concentration contours must be drawn on the map and cross section. The estimated extent of the plume must be indicated on the map and cross section. The report must include an evaluation of the need for additional monitoring wells to determine the full extent of the plume. If additional wells are needed to determine the extent of the plume, a Class 2 permit modification in accordance with Permit Condition K.1(c) must be included

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in the report. This report information must be included in each Final Data Report and Evaluation submitted in accordance with the schedule in Permit Condition K.7(c)(vi).

- (k) The Permittee will evaluate all elevated constituents in accordance with the ACL model in Appendix E.11 of the approved Part B permit application.
- (l) When evaluating the results of the ACL model:
  - (i) The comparison standard for noncarcinogenic risk is a hazard index of unity. The comparison standard for carcinogenic risk is  $1.0 \times 10^{-5}$ . The Permittee must calculate the total noncarcinogenic and carcinogenic risks for all of the constituents detected (and confirmed, optionally or as required) in all of the unaffected and affected wells, in accordance with the scenarios described in Appendix E.11 and Data Usability Guidelines in Attachment F of Appendix E.12 of the approved Part B permit application.
  - (ii) If the total noncarcinogenic and carcinogenic risks in a particular vicinity do not exceed their respective standards in Permit Condition K.6(l)(i), then routine monitoring will continue.
- (m) Applying the ACL Model
  - (i) If the results of the ACL model indicate that the Permittee has not met the risk standards in Permit Condition K.6.(l)(i), then corrective action will apply, and must be conducted in accordance with Permit Condition K.3.
  - (ii) Once the results of the ACL model have been evaluated for an area, and that area is determined to be subject to Corrective Action in accordance with Permit Condition K.3, it is not necessary to reevaluate the ACL for that area unless one or more of the following condition apply:
    - (a) New constituents of concern or wells are added to the affected well listing,
    - (b) Significant changes in constituent concentrations are observed,or

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- (c) New information regarding model input becomes available (e.g., toxicity data, fate and transport parameters).
- (iii) In addition to the risk standards for the ACL model, no concentrations in the uppermost aquifer in excess of maximum concentration levels (for constituents that have them) are permitted to leave the facility, including easements and rights-of-way. If such an exceedence occurs, then corrective action will apply, and must be conducted in accordance with Permit Condition K.3.
- (n) The Permittee must determine and report the ground water flow rate and direction in the uppermost aquifer semi-annually in accordance with Permit Condition K.7(b)(xvi).

**K.7 Record Keeping and Reporting**  
OAC Rule 3745-54-75

- (a) The Permittee must submit semi-annually both a Preliminary Data Report and a Final Data Report and Evaluation for each semi-annual sampling and analysis event, conducted in April and October each year. Preliminary Data Reports must be submitted on or before July 1<sup>st</sup> for April events and January 2<sup>nd</sup> for October events. Final Data Reports and Evaluations must be submitted on or before September 1<sup>st</sup> for April events and March 1<sup>st</sup> for October events. If any of these dates fall on a weekend or state holiday, the reports will be due no later than the following business day. The reports must be submitted to Ohio EPA Northwest District Office and entered into the operating record in accordance with OAC Rule 3745-54-73. The Permittee must maintain all documentation from the laboratories regarding analysis of ground water samples. Ohio EPA may require submittal of a copy of the full quality assurance/quality control (QA/QC) report for a particular event if circumstances warrant; but, in general, this will not be required except as described in Permit Conditions K.7(b) and (c).
- (b) Preliminary Data Reports required by Permit Condition K.7(a) must include all the information listed below for: 1. Replacement well sampling required by Permit Condition K.1(e); 2. Background sampling for statistics required by Permit Condition K.2(b)(iii)(c); 3. Semi-annual sampling and analysis events required by Permit Condition K.6(b); 4. Appendix to OAC Rule 3745-54-98 sampling and analysis required by Permit Condition

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K.6(e)(i) and K.6.(f); and, 5. Annual Appendix to OAC Rule 3745-54-98 sampling and analysis required by Permit Condition K.6(g).

- (i) The laboratory results from each of the wells, including duplicates, and their associated data qualifiers;
- (ii) The date each well was sampled (tabulated);
- (iii) The date, time and identification of all blanks and duplicates (tabulated);
- (iv) Any field log documenting deviation from the procedures in Appendix E.9 of the approved Part B permit application including documentation of parameter omissions during the sampling event;
- (v) The date the Permittee received the results from the laboratory.
- (vi) The date the owner or operator completed their preliminary review of the analytical laboratory's verification of the accuracy and precision of the analytical data and determined its quality. This review must be based upon the elements in Permit Condition K.7(b)(vii) and the data validation procedures in Appendix E.12 of the approved Part B permit application. Compliance will be facilitated by referring to:  
  
Ohio EPA Technical Guidance Manual for Hydrogeologic Investigations and Ground Water Monitoring, February 1995;
- (vii) The results of the preliminary data validation review per K.7(b)(vi) including: report completeness, chain of custody, sample receipt form, technical holding time review, data qualifiers including their definitions, dilutions, blank data, spikes, spike recovery %, surrogate recovery, and an explanation of any rejected results consistent with the U.S. EPA and Ohio EPA guidelines for data review;
- (viii) The results from all blanks (temperature, trip, field, equipment, method, etc.), matrix spike analysis, and laboratory control samples;

- (ix) Results of the field parameters;
  - (x) All Chains-of-Custody;
  - (xi) A list of affected wells;
  - (xii) The constituent lists for the affected wells;
  - (xiii) Identified of the person(s) performing the statistical evaluation;
  - (xiv) Ground water elevation data, tabulated and evaluated as required by Permit Conditions K.5(a) and K.6(n);
  - (xv) Potentiometric surface maps for each monitored zone based on the ground water elevation data [one map for each zone based on data from all wells and five maps (one for each month preceding the sampling event) for the bedrock aquifer based on data from DUG-1, DUG-2, DDG-3, DDG-1 and CR-1], whether the data are contourable or not; and,
  - (xvi) A discussion of flow characteristics, including any changes in ground water flow direction in the bedrock zone.
- (c) Final Data Reports and Evaluations required by Permit Condition K.7(a) must include the following:
- (i) The information specified in Permit Condition K.7(b)(i) through (xiii) for all resampling and analysis and confirmation sampling and analysis conducted to satisfy the requirements of the Permit Conditions referenced in paragraph K.7(b);
  - (ii) The date of completion of all data evaluation (ACL model, statistical analysis, etc.);

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- (iii) In accordance with Permit Condition K.6(c) and (g), identification of elevated constituents for each well; in accordance with Permit Condition K.6(d), identification of non-naturally occurring constituents that are confirmed in an unaffected well but at concentrations less than their associated comparison standards; in accordance with Permit Condition K.6(e)(iv), notice of change in well status from unaffected to affected; and, in accordance with Permit Condition K.6(h) notice of change in well status from affected to unaffected, and change in constituent from elevated to non-elevated;
  - (iv) The date the owner or operator completed their final review of the analytical laboratory's verification of the accuracy and precision of the analytical data and determined its quality and a signed statement of validity. This review must be based upon the elements in Permit Condition K.7(b)(vii) and the data validation procedures in Appendix E.12 of the approved Part B permit application.
  - (v) Plan maps, cross sections, and evaluations for each elevated constituent showing the extent of the plume in accordance with permit Condition K.6(j);
  - (vi) The results of applying the ACL model, including a discussion of the effect of using any qualified data;
  - (vii) A report on the effectiveness of the IGWMP, performed by a qualified hydrogeologist; and,