

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.



John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

OHIO E.P.A.

AUG 15 2014

By: [Signature] Date: 8-15-14

ENTERED DIRECTOR'S JOURNAL

AUG 15 2014

Mr. Larry Albright Sr., Statutory Agent
9150 Group, LLC
7753 Red Fox Trail
Hudson OH 44236-1927

**RE: AEROSOL SYSTEMS INC.
PLAN APPROVAL
PLAN
RCRA C – HAZARDOUS WASTE
SUMMIT COUNTY
OHD050387802**

CERTIFIED MAIL

Subject: Closure Plan Approval, Clean Closure by Risk Assessment, 9150 Group, LLC (Former Aerosol Systems, Inc.), Project ID # 277-000017-003

Dear Mr. Albright:

On May 6, 2010, 9150 Group, LLC submitted to the Ohio Environmental Protection Agency (Ohio EPA) a draft closure plan for the former Aerosol Systems, Inc. facility located at 9150 Valley View Road, Macedonia, Ohio. Revisions to the closure plan were received on May 10, 2011, August 5, 2013, and lastly April 15, 2014, that is dated March 2014. The closure plan was submitted pursuant to the March 22, 2010, Director's Final Findings and Orders to demonstrate that 9150 Group, LLC's (former Aerosol Systems, Inc.) proposal for closure complies with the substantive requirements of Ohio Administrative Code (OAC) rules 3745-55-11 and 3745-55-12.

The owner or operator and the public were given the opportunity to submit written comments regarding the closure plan in accordance with the hazardous waste rule requirements. No public comments were received by Ohio EPA.

Based upon review of 9150 Group, LLC submittal and subsequent revisions, I conclude that the closure plan for the hazardous waste facility at 9150 Valley View Road, Macedonia, as modified herein, meets the performance standard contained in OAC rule 3745-55-11, and complies with the pertinent parts of OAC rule(s) 3745-55-12.

The closure plan submitted to Ohio EPA on May 6, 2010, and as revised through April 15, 2014, by 9150 Group, LLC, is hereby approved with the modifications identified in the enclosed attachment:

- *Division of Environmental Response and Revitalization (DERR) RCRA Closure Plan Approval Modifications, Former Aerosol Systems, Inc.*

Compliance with the approved closure plan, including the modifications specified herein, is expected. Ohio EPA will monitor such compliance. Ohio EPA expressly reserves the right to take action, pursuant to chapters 3734. and 6111. of the Ohio Revised Code, and other applicable law, to enforce such compliance and to seek appropriate remedies in the event of noncompliance with the provisions and modifications of this approved plan. Please be advised that approval of this closure plan does not release 9150 Group, LLC from any responsibilities regarding corrective action for all releases of hazardous waste or constituents from any waste management unit, regardless of the time at which waste was placed in the unit.

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 30 days after notice of the director's action. The appeal must be accompanied by a filing fee of \$70.00 (made payable to "Treasurer, State of Ohio"), 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 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:

Environmental Review Appeals Commission
77 South High Street, 17th Floor
Columbus, Ohio 43215

When closure is completed, OAC rule 3745-55-15 requires the owner or operator of a facility to submit to the director of Ohio EPA, certification by the owner or operator and an independent, registered professional engineer, that the facility has been closed in accordance with the approved closure plan. The certification by the owner or operator shall include the statement found in OAC rule 3745-50-42(D). These certifications should be submitted to:

Ohio Environmental Protection Agency
Division of Environmental Response and Revitalization
P.O. Box 1049
Columbus, Ohio 43216-1049
Attn: Edwin Lim, Engineering Section

A copy should also be sent to:

Ohio Environmental Protection Agency
Division of Environmental Response and Revitalization
Northeast District Office,
2110 East Aurora Road, Twinsburg, Ohio 44087
Attn: Ron Shadrach

If you have any questions about implementing this closure plan, contact Ron Shadrach at (330) 963-1146.

Sincerely,



Craig W. Butler
Director
Ohio Environmental Protection Agency

attached: Division of Environmental Response and Revitalization (DERR) RCRA Closure Plan Approval Modifications, Former Aerosol Systems, Inc.

cc: Don Vogel, DERR, CO
Bob Karl, Ulmer & Berne
Mr. Zach Pierce
BJAAM Environmental, Inc.
472 Elm Ridge Ave.
Canal Fulton, Ohio 44614
Diane Kurlich, DDAGW, NEDO
Shawn Sellers, Enforcement Unit, DMWM, CO
Connie Livchak, FARU-DMWM, CO
Melissa Cheung, DMWM, CO

ec: Ron Shadrach, DERR, NEDO
Harry Courtright, DERR, NEDO
John Palmer, DERR, NEDO
Kim Gallagher, DERR, NEDO
Ed Lim, Manager, ERAS, DERR, CO
Rod Beals, Manager, DERR, NEDO
Brian Ball, EES, AGO
Ohio EPA, CO, DERR (RCRA Info Data Entry) at:
RCRAInfoData@epa.state.oh.us

Division of Environmental Response and Revitalization (DERR) RCRA
Closure Plan Approval Modifications
Former Aerosol Systems, Inc. (OHD 050 387 802)

The Closure Plan, as modified herein, is consistent with rules OAC 3745- 55-11 to 55-15 and the applicable requirements of rules OAC Rule 3745-54-90 to 54-100. The Closure Plan submitted is hereby approved with the following modifications:

The Closure Plan is modified to state that:

Ohio EPA's site coordinator will be provided notice five business days prior to all critical field activities including: sampling, source removal, construction installations, and injection, treatment, disposal or abandonment activities.

Section 1.0 Background

The Closure Plan is modified to revise Section **1.0 BACKGROUND** to: **BACKGROUND AND FACILITY SOIL AND GROUND WATER REMEDIATION STANDARDS**. The Table of Contents is to be updated with all figures, tables and text sections revised accordingly. Table 13 in the text shall be revised at all locations to indicate Table 18 when referencing Facility soil remediation standards. The Closure Plan is modified to replace the statement, "*The investigation of all areas...and be so certified by the facility.*" With the following:

The investigation of all areas and the nature and extent of contamination that remains in soil must meet the remediation standards of the approved Closure Plan. This Closure Plan is modified to provide for a two (2) foot point of compliance (POC) below the ground surface and must meet the soil remediation standards listed in Table 18. This plan provides for the use of engineering controls (e.g. floor slab, paved areas) and institutional controls through an executed Environmental Covenant and Risk Mitigation Plan for direct contact to contaminated soil below the POC. The groundwater remediation standards are found in Table 2, *Groundwater Compounds of Concern, Analytical Methods, Laboratory Method Detection Limits, and Cleanup Objectives* in Appendix E "*Groundwater Monitoring Plan*" and included herein as page 5.

This closure plan is also modified to include documentation of removal and proper disposal of waste media from the stockpile location of closure area (CA) #15. A demonstration must be made that soil that remains after the July 1, 2014 removal meets the two (2) foot POC soil remediation standards in Table 18. This closure documentation demonstrating that the closure performance standards have been met shall be submitted within ninety (90) days of the Closure Plan approval.

During the soil removal activities, waste soil was stockpiled inside the Facility building on concrete floor areas. These areas were cleaned and decontaminated which generated waste wash and rinse waters that were collected in drums and stored inside the Facility. Documentation of the disposal of these waste waters must be provided to Ohio EPA within ninety (90) days of the Closure Plan approval.

Section 3.0 MAPS OF THE FACILITY

The CP is modified to include deletion of the following references here and throughout the plan, including Appendix E:

~~MW-19 will be used as a point of compliance monitoring well instead of MW-14, MW-17, and MW-18 as it will be downgradient of all three. Based on four (4) quarters of groundwater monitoring conducted in 2010 and semi-annual events completed since 2011, shallow groundwater flow has been measured to be west/southwest in the area of MW-3A and towards the drainage ditch. With the exception of select chlorinated VOCs, similar COCs are present in the downgradient monitoring wells SMW-2, UZ-4, UZ-6, and OSMW-1 compared to MW-3A. MW-3A and MW-4 are not located on the property boundary and are upgradient from point of compliance wells SMW-2, UZ-4, UZ-6, and OSMW-1. Additionally, monitoring well UZ-3 was recently sampled and concentrations of VOCs were not detected. Based on these lines of evidence, MW-3A and MW-4 will not be used as point of compliance wells. Point of compliance wells for the property are: SMW-2, DMW-2, UZ-4, UZ-6, OSMW-1, OSDMW-1, UZ-9, and MW-19.~~

And to be replaced by the following language with the appropriately revised figures and tables:

The locations of all of the monitoring wells at the facility are shown on Figure 3 in the Remedial Design for Groundwater (Appendix E). Wells located at the point of compliance (POC) are designated with the "*" symbol. Table 1 in the Groundwater Monitoring Plan documents the wells that are sampled during each semi-annual sampling event. Point of compliance wells are also designated by the "*" symbol on this table. Currently, the POC wells are: UZ-9, MW-17, MW-14, MW-18, UZ-6, MW-4, OSMW-1, OSDMW-1, UZ-4, SMW-2, DMW-2, and MW-3A. The POC monitoring well locations may be submitted for modification in the future based on the comprehensive evaluation of ground water flow direction, the potentiometric surfaces, the contaminants detected, and the Conceptual Site Model (CSM). The placement or removal of POC ground water monitoring points and monitoring wells, including MW-19 (proposed in the Closure Schedule) to delineate chloroethane contamination associated with MW-14, shall be subject to Ohio EPA approval.

The Shallow Potentiometric Surface Map, Figure 4 in the Remedial Design for Groundwater (Appendix E) shows the ground water elevation data for all wells including: MW-15, 16, 17, 18, UZ-8A, and SMW8. Potentiometric surface maps for each zone will be constructed and submitted to Ohio EPA for review each time the ground water is sampled. These maps will always show the water level elevation data for all of the wells in each zone that is monitored.

Section 4.0 HISTORY OF RELEASE OF HAZARDOUS WASTE

The fifth (5th) paragraph of this section that begins as follows shall be preserved:

"Hazardous wastes historically generated at the Facility included...."

Section 6.0 REMOVAL OF WASTES

This section is amended with the following sentence added to the end of the existing paragraph to identify where the soil remediation standards for the Facility can be found:

The soil remediation standards for the Facility are identified in Table 18 of the Closure Plan and in Table 2 of the Soil Management Plan of Appendix I.

Section 9.2.1 Conceptual Site Model (CSM)

The existing paragraph is clarified with the following additional paragraph:

The CSM will include, but not be limited to: maps showing the locations of the hazardous waste management units, the monitoring wells, and the cross section lines; comprehensive potentiometric surface maps showing the direction(s) of ground water flow with respect to the hazardous waste management units in each water bearing zone in the uppermost aquifer; and cross sections depicting the site geology, including the locations of and interconnections between the different water bearing zones, the locations of the monitoring wells and their screened intervals with respect to the water bearing zone(s), and, where appropriate, the detected concentrations of constituents in the ground water and/or soils at a location. The CSM is a dynamic model that will be updated periodically with all new installations (boring data, well installations, treatment piping) and additional geologic and ground water data summarizing the current understanding of contamination as it relates to pathways, potential receptors and the POC wells. The CSM, geology, ground water contaminant data and ground water flow mapping will be the primary decision-making tools for evaluating any proposed changes in the required POC monitoring well locations.

Section 10.0 GROUNDWATER

This section is modified with the following new paragraph at the end of the section:

The Remedial Design for Groundwater and the Groundwater Monitoring Plan are located in Appendix E. Table 2 (included herein as page 5) of the Groundwater Monitoring Plan, in Appendix E, presents the ground water cleanup standards for the facility. The ground water risk-based standards on Table 2 have not been adjusted for the presence of multiple contaminants. Prior to beginning the three years of verification monitoring, the facility will calculate the revised risk-based standards that are adjusted for the presence of multiple chemicals. The multi-chemical adjustments will take into account all contaminants without MCLs that are still being detected in the ground water.

Section 11.3 Vapor Intrusion Work Plan

The second paragraph of this section is modified as follows:

In lieu of the J & E models, U.S. EPA and Ohio EPA recommend the new vapor intrusion guidance and Vapor Intrusion Screening Level (VISL) Calculator, Version 3.2 (listed below and in the Section 19.0 – References). The following guidance may be used to assess the off and onsite facility conditions, develop a CSM, and sampling work plan(s) to identify the vapor intrusion risk in the existing structures at the facility. A RMP and engineering controls will be prepared, as needed, to protect existing and potential future structures at the property.

For offsite VI, when ground water MCLs and ground water risk-based standards are met at the POC wells, a risk assessment will be conducted to verify offsite standards are being met.

REMEDIAL DESIGN PLAN FOR GROUNDWATER

Figure 4, Potentiometric Surface Shallow is modified to include the water level elevation data for all of the wells in the shallow zone, including UZ-8A, SMW-8, MW-15, MW-16, MW-17, and MW-18. The ground water contours are also accurately modified to incorporate these wells into the potentiometric surface map and show the calculated direction(s) of ground water flow in each shallow zone. Figure 3, Monitoring Well Locations Map, is modified to include a definition in the legend of the “*” symbol as denoting the POC wells.

GROUNDWATER MONITORING PLAN

Table 1 is modified to designate the point of compliance wells with the symbol “*”. The notes with the table are modified to include this symbol and its definition. The wells designated as point of compliance wells are UZ-9, MW-17, MW-14, MW-18, UZ-6, MW-4, OSMW-1, OSDMW-1, UZ-4, SMW-2, DMW-2, and MW-3A. Footnote 2 of this table is modified to state, “Hydraulic data will be collected manually using electronic water level measuring tapes, performed within as short a time frame as possible during each monitoring event to allow for effective contouring evaluation of site-wide conditions. Water levels will be measured and recorded for all monitoring wells at the site during each sampling event.”

The facility shall submit, within 30 days of receipt of these modifications, a complete Closure Plan as modified herein.

RCRA APPROVAL MODIFICATIONS – JUNE 18, 2014
 FORMER AEROSOL SYSTEMS, INC. (OHD 050 387 802)
 CLOSURE PLAN DATED MARCH 2014
 PAGE 5

Table 2. Groundwater Compounds of Concern, Analytical Methods, Laboratory Method Detection Limits, and Cleanup Objectives
 Former Aerosol Systems Facility; 9150 Valley View Road; Macedonia, Ohio

Compound of Concern	CAS Number	Analytical Method	Groundwater	
			Cleanup Objective (CUO) ¹	Method Detection Limit (MDL) ²
1,1-Dichloroethane	75-34-3	8260B	252	<1.0
1,1-Dichloroethene	75-35-4	8260B	7	<1.0
1,2-Dichloroethane	107-06-2	8260B	5	<1.0
1,1,1-Trichloroethane	71-55-6	8260B	200	<1.0
Chloroethane	75-00-3	8260B	217	<1.0
Chloroform	67-66-3	8260B	1.53	<1.0
cis-1,2-Dichloroethene	156-60-2	8260B	70	<1.0
Acetone	67-64-1	8260B	8,070	<10.0
Benzene	71-43-2	8260B	5	<1.0
Ethyl Acetate	141-78-6	8260B	--	<5.0
Ethylbenzene	100-41-4	8260B	700	<1.0
Methylene Chloride	75-09-2	8260B	5	<1.0
Methyl Ethyl Ketone	78-93-3	8260B	2,300	<10.0
Tetrachloroethene	127-18-4	8260B	5	<1.0
Toluene	108-88-3	8260B	1,000	<1.0
trans-1,2-Dichloroethene	156-60-5	8260B	100	<1.0
Trichloroethene	79-01-6	8260B	5	<1.0
Trichlorofluoromethane	75-69-4	8260B	367	<2.0
Vinyl Chloride	75-01-4	8260B	2	<1.0
Xylenes (total)	1330-20-7	8260B	10,000	<2.0

Notes:

All concentrations in micrograms per liter (ug/L).

¹ CUOs reflect MCLs/RBS as per the Closure Plan.

² Analytical laboratory will report any detections between this Method Detection Limit and the laboratory's achievable MDLs with the applicable qualifier(s).