



**Environmental  
Protection Agency**

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

OHIO E.P.A.

JUN 14 2012

ENTERED DIRECTOR'S JOURNAL

**JUN 14 2012**

**CERTIFIED MAIL**

Mr. William Sommer  
Glenn Springs Holdings, Inc.  
5005 LBJ Freeway  
Suite 1350  
Dallas, Texas 75244

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.

By: John R. Kasich Date: 6-14-12

**Re: Amended Post-Closure Plan Approval  
Durez Corporation, Hardin County  
OHD 990 747 859**

Dear Mr. Sommer:

On February 23, 2012, Glenn Springs Holdings, Inc. (GSH) submitted to Ohio EPA two amended post-closure plans for Former Surface Impoundment 1 (FSI-1) and Former Surface Impoundment 2 (FSI-2) at the Durez Corporation facility located at 13717 State Route 68 South, Kenton, Ohio. The amended post-closure plans were submitted pursuant to rule 3745-66-18 of the Ohio Administrative Code (OAC) in order to demonstrate that GSH's proposal for amended post-closure complies with the ground water monitoring and response requirements of OAC chapters 3745-54 and 55, as well as with OAC rule 3745-66-18.

GSH is petitioning to eliminate inorganic constituents from the ground water monitoring list in the Post-Closure Plans for both FSI-1 and FSI-2. Inorganic parameters will no longer be evaluated at any of the wells except at background wells P-21 and P-11 (for FSI-1 and FSI-2) and at newly installed monitoring well P-29R3. Continued ground water sampling at wells P-21 and P-11 will allow background prediction limits to be periodically updated. Ground water monitoring of inorganic parameters at P-29R3 will continue for a minimum of two years (until November 2013). After that time, the requirement to continue monitoring of inorganic parameters at P-29R3 will be re-evaluated by GSH.

In addition, fluoride will be eliminated from the Chemicals of Concern (COC) list for FSI-1 and FSI-2 as the chemical has not been detected above background in ground water samples collected since November 2009. Several volatile organic compounds (VOCs) and semi-volatile organic compounds (SVOCs) will remain on the COC list because of past detections.

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

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Based upon a review of GSH's submission, I conclude that the amended post-closure plans for the hazardous waste facility at 13717 State Route 68 South, Kenton, Ohio, meet the ground water monitoring and response requirements of OAC chapters 3745-54 and 55, and comply with the pertinent parts of OAC rule 3745-66-18.

The amended post-closure plans submitted to Ohio EPA on February 24, 2012 by GSH are hereby approved.

Compliance with the approved post-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 amended post-closure plan does not release GSH 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 "Ohio Treasurer of State") 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, 17<sup>th</sup> Floor  
Columbus, OH 43215

When post-closure is completed, OAC rule 3745-66-20 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 completed the post-closure caser period in accordance with the approved post-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  
Northwest District Office,  
347 North Dunbridge Road  
Bowling Green, Ohio 43402  
Attn: Dawn Pleiman

If you have any questions about implementing this post-closure plan, contact Dawn Pleiman at (419) 373-3148.

Sincerely,



Scott J. Nally  
Director

cc: Ed Lim, Manager, DERR, CO  
Dawn Pleiman, DERR, NWDO  
Don Vogel, DERR, CO  
Connie Livchak, FARU-DMWM, CO  
Brad Hauser, RADMU-DMWM, CO  
Dale McLane, DDAGW, NWDO  
NWDO File: DMWM-HW, Hardin County, Durez, General