

OHIO E.P.A.

AUG 15 2014

GENERAL DIRECTOR'S JOURNAL

OHIO ENVIRONMENTAL PROTECTION AGENCY

OHIO EPA - DMWM

MODIFIED OHIO HAZARDOUS WASTE FACILITY
INSTALLATION AND OPERATION PERMIT

AUG 15 2014

Date of Issuance: **AUG 15 2014**

Effective Date: **AUG 15 2014**

U.S. EPA ID No.: OHD000816629

Ohio Permit No.: 05-31-0012

Name of Permittee: Spring Grove Resource Recovery, Inc

Mailing Address: 4879 Spring Grove Avenue
Cincinnati, Ohio 45232

Facility Location: 4879 Spring Grove Avenue
Cincinnati, Ohio 45232

Person to Contact: Mr. Stephen Vasse

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(J) of the Ohio Administrative Code.

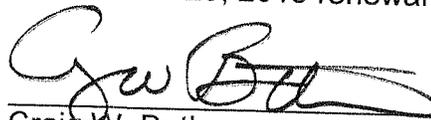
The Ohio Hazardous Waste Facility Installation and Operation Permit with the above-referenced permit number as issued by the Ohio Environmental Protection Agency and journalized on March 26, 2013, is hereby incorporated by reference in its entirety, except as it may be modified herein.

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in effect until such time as the Ohio Hazardous Waste Facility Installation and Operation Permit is renewed, modified, withdrawn, suspended or revoked.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 by Ohio EPA. 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 Ohio EPA 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 March 26, 2013 renewal permit.

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.



Craig W. Butler
Director

By: Steph Vasse Date: 8-15-14

OHIO EPA

Ohio EPA DMWM MAR 26 2013

OHIO ENVIRONMENTAL PROTECTION AGENCY

MAR 26 2013

OHIO HAZARDOUS WASTE FACILITY
INSTALLATION AND OPERATION PERMIT RENEWAL

ENTERED DIRECTOR'S JOURNAL

Permittee: Spring Grove Resource Recovery, Inc.

Mailing Address: Spring Grove Resource Recovery, Inc.
4879 Spring Grove Avenue
Cincinnati, Ohio 45232

Owner: Spring Grove Resource Recovery, Inc.
4879 Spring Grove Avenue
Cincinnati, Ohio 45232

Operator: Spring Grove Resource Recovery, Inc.
4879 Spring Grove Avenue
Cincinnati, Ohio 45232

Location: Spring Grove Resource Recovery, Inc.
4879 Spring Grove Avenue
Cincinnati, Ohio 45232

Ohio Permit No.: 05-31-0012
US EPA ID: OHD000816629
Issue Date: March 26, 2013
Effective Date: March 26, 2013
Expiration Date: March 26, 2023

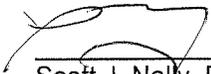
AUTHORIZED ACTIVITIES

In reference to the application of Spring Grove Resource Recovery, Inc. for an Ohio Hazardous Waste Facility Installation and Operation Renewal Permit under Ohio Revised Code (ORC) Chapter 3734 and the record in this matter, you are authorized to conduct at the above-named facility the following hazardous waste management activities:

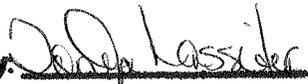
- ❖ Storage of hazardous waste in containers and tanks
- ❖ Treatment of hazardous waste in containers and tanks
- ❖ Corrective Action

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.

PERMIT APPROVAL

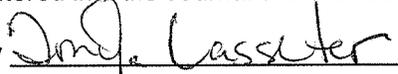


Scott J. Nally, Director
Ohio Environmental Protection Agency

By:  Date: 3-26-13

This permit approval is based upon the record in this matter which is maintained at the offices of the Ohio Environmental Protection Agency. The Director has considered the application, accompanying information, inspection reports of the facility, a report regarding the facility's compliance or noncompliance with the terms and conditions of its permit and rules adopted by the Director under this chapter, and such other information as is relevant to the operation of the facility. The Director has determined that the facility under the existing permit has a history of compliance with ORC Chapter 3734, rules adopted under it, the existing permit, or orders entered to enforce such requirements that demonstrate sufficient reliability, expertise, and competency to operate the facility henceforth under this chapter, rules adopted under it, and the renewal permit.

Entered into the Journal of the Director this 26 day of March, [YEAR].

By  of the Ohio Environmental Protection Agency.

Spring Grove Resource Recovery, Inc.
HW Permit Renewal
Page 2 of 45

MODULE A - GENERAL PERMIT CONDITIONS

A. GENERAL PERMIT CONDITIONS

A.1 Effect of Permit

ORC Sections 3734.02 (E) and (F) and 3734.05
OAC Rule 3745-50-58(G)

(a) The Permittee is authorized to store and treat hazardous waste in containers and tanks in accordance with the terms and conditions of this Ohio hazardous waste permit (hereinafter permit), ORC Chapter 3734, all applicable Ohio hazardous waste rules, all applicable regulations promulgated under the Resource Conservation and Recovery Act (RCRA), as amended, and the permit application. The permit application, as submitted to Ohio EPA on April 2, 2012, and last updated on September 25, 2012, is hereby incorporated into this permit. In the instance of inconsistent language or discrepancies between the above, the language of the more stringent provision shall govern.

(b) Any management of hazardous waste not authorized by this permit is prohibited, unless otherwise expressly authorized or specifically exempted by law. Issuance of this permit does not convey property rights of any sort or any exclusive privilege; nor does it authorize any injury to persons or property, or invasion of other private rights. Compliance with the terms and conditions of this permit does not obviate Permittee's obligation to comply with other applicable provisions of law governing protection of public health or the environment including but not limited to the Community Right to Know law under ORC Chapter 3750.

A.2 Permit Actions

OAC Rule 3745-50-58(F)

This permit may be modified or revoked as specified by Ohio law. The filing of a request by the Permittee for a permit modification, or the notification of planned changes or anticipated noncompliance on the part of the Permittee, does not stay any permit term or condition.

A.3 Permit Effective/Expiration Date

OAC Rule 3745-50-54

The effective date of this permit is the date the permit is entered into the Director's Journal. The permit expiration date is ten years after the date of

journalization of this permit.

A.4 Severability

The provisions of this permit are severable, and if any provision of this permit, or the application of any provision of this permit to any circumstance, is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.

A.5 Duty to Comply
OAC Rule 3745-50-58(A)

The Permittee must comply with all applicable provisions of ORC Chapter 3734, all applicable Ohio hazardous waste rules, and all terms and conditions of this permit, except to the extent and for the duration such noncompliance is authorized by the laws of the State of Ohio. Any permit noncompliance, other than noncompliance authorized by the laws of the State of Ohio, constitutes a violation of ORC Chapter 3734 and is grounds for enforcement action, revocation, modification, denial of a permit renewal application or other appropriate action.

A.6 Duty to Reapply and Permit Expiration
OAC Rules 3745-50-40(D), 3745-50-58(B), 3745-50-56 and ORC Section 3734.05(H)

- (a) If the Permittee wishes to continue an activity allowed by this permit after the expiration date of this permit, the Permittee must submit a completed permit application for a hazardous waste facility installation and operation permit renewal and any necessary accompanying general plans, detailed plans, specifications, and such information as the Director may require, to the Director no later than one hundred eighty (180) days prior to the expiration date of this permit, unless a later submittal date has been authorized by the Director upon a showing of good cause.
- (b) The Permittee may continue to operate in accordance with the terms and conditions of the expired permit until a renewal permit is issued or denied if:
 - (i) the Permittee has submitted a timely and complete permit application for a renewal permit under OAC Rule 3745-50-40; and
 - (ii) through no fault of the Permittee, a new permit has not been issued

pursuant to OAC Rule 3745-50-40 on or before the expiration date of this permit.

- (c) The Corrective Action obligations contained in this permit will continue regardless of whether the facility continues to operate or ceases operation and closes. The Permittee is obligated to complete facility-wide Corrective Action under the conditions of this permit regardless of the operational status of the facility. The Permittee must submit an application for permit renewal at least 180 days before the expiration date of this permit pursuant to OAC Rule 3745-50-40(D) unless a) the permit has been modified to terminate the Corrective Action schedule of compliance and the Permittee has been released from the requirements for financial assurance for Corrective Action; or b) a later submittal date has been authorized by the Director.

A.7 Need to Halt or Reduce Activity Not a Defense
OAC Rule 3745-50-58(C)

It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce a permitted activity in order to maintain compliance with the conditions of this permit.

A.8 Duty to Mitigate
OAC Rule 3745-50-58(D)

The Permittee must take all reasonable steps to minimize releases to the environment and must carry out such measures as are reasonable to prevent significant adverse impact on human health or the environment resulting from noncompliance with this permit.

A.9 Proper Operation and Maintenance
OAC Rule 3745-50-58(E)

The Permittee must at all times properly operate and maintain the facility (and related appurtenances) to achieve compliance with the terms and conditions of this permit. Proper operation and maintenance includes effective management practices, adequate funding, adequate operator staffing and training, and where appropriate, adequate laboratory and process controls, including appropriate quality assurance/quality control procedures. This provision requires the operation of back-up or auxiliary facilities or similar systems only when necessary to achieve compliance with the terms and conditions of this permit.

A.10 Duty to Provide Information
OAC Rule 3745-50-58(H)

The Permittee must furnish to the Director, within a reasonable time, any relevant information which the Director may request to determine whether cause exists for modifying or revoking, or to determine compliance with, this permit. The Permittee must also furnish to the Director, upon request, copies of records required to be kept by this permit.

A.11 Inspection and Entry
OAC Rules 3745-50-58(I) and 3745-50-30, and ORC Section 3734.07

- (a) The Permittee must allow the Director, or an authorized representative, upon stating the purpose and necessity of the inspection and upon proper identification, to:
- (i) enter at reasonable times upon the Permittee's premises where a regulated facility or activity is located or conducted, or where records must be kept under the terms and conditions of this permit;
 - (ii) have access to and copy, at reasonable times, any records required to be kept under the terms and conditions of this permit;
 - (iii) inspect and photograph, at reasonable times, any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under the terms and conditions of this permit; and
 - (iv) sample, document, or monitor, at reasonable times, for the purposes of assuring permit compliance or as otherwise authorized by ORC Chapter 3734 and the rules adopted thereunder, any substances or parameter at any location.
- (b) Any record, report or other information obtained under the hazardous waste rules or Chapter 3734 of the Revised Code shall not be available to the public upon the Permittee's satisfactory showing to Ohio EPA that all or part of the information would divulge methods or processes entitled to protection as trade secrets pursuant to Ohio Trade Secret Law and OAC Rule 3745-50-30.

A.12 Monitoring and Records
OAC Rule 3745-50-58(J)

- (a) Any sample and measurement taken for the purpose of monitoring must be representative of the monitored activity. Further, a sample must be a representative sample; as such term is defined and used in the Ohio hazardous waste rules. The method used to obtain a representative sample of the waste to be analyzed must be the appropriate method from Appendix I of OAC Rule 3745-51-20, Laboratory Methods. Laboratory methods must be those specified in Test Methods for the Evaluation of Solid Waste, Physical/Chemical Methods, EPA Publication SW-846, Third Edition (November 1986), as amended by Updates I (dated July 1992), II (dated September 1994), IIA (dated August 1993), IIB (dated January 1995), III (dated December 1996) and IIIA (dated April 1998), and additional supplements or editions thereof; Standard Methods for the Examination of Water and Wastewater: Twentieth Edition, 1999; or an equivalent method as specified in the approved waste analysis plan, or as this term is defined and used in the Ohio hazardous waste rules.
- (b) Records of monitoring information must specify the:
- (i) date(s), exact place(s), and time(s) of sampling or measurements;
 - (ii) individual(s) who performed the sampling or measurements;
 - (iii) date(s) analyses were performed;
 - (iv) individual(s) who performed the analyses;
 - (v) analytical technique(s) or method(s) used; and
 - (vi) results of such analyses.

A.13 Signatory Requirement and Certification of Records
OAC Rules 3745-50-58(K) and 3745-50-42

All applications, reports or information must be properly signed and certified in accordance with OAC Rule 3745-50-58(K).

A.14 Retention of Records and Information Repository

OAC Rules 3745-50-40(G), 3745-50-58(J), 3745-50-58(M) and 3745-50-58(N)

- (a) The Permittee must retain records of all monitoring information, including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, copies of all reports and records required by this permit, the certification required by OAC Rule 3745-54-73(B)(9), and records of all data used to complete the application for this permit, for a period of at least three (3) years from the date of the sample, measurement, report, certification, or application.
- (b) The record retention period may be extended by request of the Director at any time and is automatically extended during the course of any unresolved enforcement action regarding the facility.
- (c) The Permittee must maintain, in accordance with the Ohio hazardous waste rules, records of all data used to complete the permit application and any amendments, supplements or modifications of such application. The Permittee must retain a complete copy of the current application for the effective life of the permit as indicated in Permit Condition A.3.
- (d) The Permittee must maintain records from all ground water monitoring wells and associated ground water surface elevations for the active life of the facility and for disposal facilities for the post-closure care period as well.
- (e) Reserved
- (f) Corrective Action records must be maintained at least three (3) years after all Corrective Action activities have been completed.

A.15 Planned Changes

OAC Rules 3745-50-51 and 3745-50-58(L)(1)

The Permittee must give notice to the Director as soon as possible of any planned physical alterations or additions to the facility. All such changes must be made in accordance with OAC Rule 3745-50-51.

A.16 Waste Shipments

OAC Rule 3745-53-11, ORC Section 3734.15(C)

The Permittee must only use properly registered transporters of hazardous waste

to remove hazardous waste from the facility, in accordance with all applicable laws and rules.

A.17 Anticipated Noncompliance
OAC Rule 3745-50-58(L)(2)

The Permittee must give advance notice to the Director of any planned changes in the permitted facility or operations which may result in noncompliance with the terms and conditions of this permit. Such notification does not waive the Permittee's duty to comply with this permit pursuant to Permit Condition A.5.

A.18 Transfer of Permits
OAC Rules 3745-50-52, 3745-50-58(L)(3) and 3745-54-12

- (a) The permit may be transferred to a new owner or operator only if such transfer is conducted in accordance with ORC Chapter 3734 and the rules adopted thereunder. This permit may be transferred by the Permittee to a new owner or operator only if the permit has been modified under OAC Rule 3745-50-51. Before transferring ownership or operation of the facility, the Permittee must notify the new owner or operator in writing of the requirements of ORC Chapter 3734 and the rules adopted thereunder (including all applicable Corrective Action requirements).
- (b) The Permittee's failure to notify the new owner or operator of the requirements of the applicable Ohio law or hazardous waste rules does not relieve the new owner or operator of its obligation to comply with all applicable requirements.

A.19 Compliance Reports
OAC Rules 3745-50-58(L)(5) and 3745-50-50

Reports of compliance or noncompliance with, or any progress reports on, interim and final requirements contained in any compliance schedule (developed in accordance with OAC Rule 3745-50-50) of this permit must be submitted to the Director no later than fourteen (14) days following each scheduled date.

A.20 Immediate Reporting of Noncompliance
OAC Rule 3745-50-58(L)(6)

- (a) The Permittee must report orally to Ohio EPA's Division of Environmental Response and Revitalization within twenty-four (24) hours from the time the Permittee becomes aware of any noncompliance with this permit,

ORC Chapter 3734 or the rules adopted thereunder, which may endanger human health or the environment, including:

- (i) information concerning the release of any hazardous waste that may cause an endangerment to public drinking water supplies; and
 - (ii) any information of a release or discharge of hazardous waste or a fire or explosion from the hazardous waste facility, which could threaten the environment or human health outside the facility.
- (b) The report must consist of the following information (if such information is available at the time of the oral report):
- (i) name, address, and telephone number of the owner or operator;
 - (ii) name, address, and telephone number of the facility;
 - (iii) date, time, and type of incident;
 - (iv) name and quantity of material(s) involved;
 - (v) the extent of injuries, if any;
 - (vi) an assessment of actual or potential hazards to the environment and human health outside the facility, where this is applicable; and
 - (vii) estimated quantity and disposition of recovered material that resulted from the incident.

A.21 Follow-Up Written Report of Noncompliance
OAC Rule 3745-50-58(L)(6)(c)

- (a) A written report must also be provided to Ohio EPA's Division of Environmental Response and Revitalization and the Division of Materials and Waste Management Southwest District Office within five (5) days of the time the Permittee becomes aware of the circumstances reported in Permit Condition A.20.
- (b) The written report must address the items in Permit Condition A.20 and must contain a description of such noncompliance and its cause; the period(s) of noncompliance (including exact dates and times); whether the noncompliance has been corrected; and, if not, the anticipated time it is

expected to continue; and steps taken or planned to minimize the impact on human health and the environment and to reduce, eliminate, and prevent recurrence of the noncompliance.

- (c) The Permittee need not comply with the five (5) day written report requirement if the Director, upon good cause shown by the Permittee, waives that requirement and the Permittee submits a written report within fifteen (15) days of the time the Permittee becomes aware of the circumstances.

A.22 Other Noncompliance
 OAC Rules 3745-50-58(L)(10) and 3745-50-58(L)(4)

The Permittee must report to the Director all other instances of noncompliance not provided for in Permit Conditions A.19 and A.20. These reports must be submitted within thirty (30) days of the time at which the Permittee is aware of such noncompliance. Such reports must contain all information set forth within Permit Condition A.20.

A.23 Certification of Construction or Modification
 OAC Rule 3745-50-58(L)(2)

Reserved

A.24 Other Information
 OAC Rule 3745-50-58(L)(11)

If at any time the Permittee becomes aware that it failed to submit any relevant facts, or submitted incorrect information to the Director, the Permittee must promptly submit such facts, information or corrected information to the Director.

A.25 Confidential Information
 OAC Rule 3745-50-30

In accordance with ORC Chapter 3734 and the rules adopted thereunder, the Permittee may request confidentiality for any information required to be submitted by the terms and conditions of this permit, or any information obtained by the Director, or an authorized representative, pursuant to the authority provided under Permit Condition A.11.

A.26 Ohio Annual Permit, Disposal, and Treatment Fees
OAC Rules 3745-50-33 through 3745-50-36

The annual permit fee, calculated pursuant to OAC Rule 3745-50-36 and payable to the Treasurer of the State, must be submitted to the Director on or before the anniversary of the date of issuance during the term of the permit. For the purpose of the payment of the Ohio Annual Permit Fee, the date of issuance is the date the permit was entered into the Journal of the Director of Ohio EPA.

A.27 Compliance Schedule - Documents
OAC Rules 3745-50-50 and 3745-50-51

- (a) Unless specified otherwise, the Permittee must submit the documents listed below to:

Ohio EPA, Director
c/o DMWM, Engineering, Remediation, and Authorizations Section
P.O. Box 1049
Columbus, Ohio 43216-1049

District Office: Southwest District Office

- (b) The Permittee must submit to the Ohio EPA within sixty (60) days after permit journalization, in accordance with Ohio's hazardous waste rules, the following information to be incorporated in the permit application:

- (i) Updated Closure/Post-Closure Cost Estimate
OAC Rules 3745-55-42 and 3745-55-44

Section I of the permit application containing the financial assurance mechanism for closure must be updated to include a copy of the current closure/post-closure cost estimate as set forth in OAC Rules 3745-55-42 and 3745-55-44.

- (ii) Updated Financial Assurance Mechanism for Closure
OAC Rules 3745-55-43

Section I of the permit application containing the financial assurance mechanism for closure must be updated to include a copy of the current financial assurance mechanism, as set forth in OAC Rule 3745-55-43, and as specified by the wording requirements of OAC Rule 3745-55-51. The value of the financial

assurance mechanism must reflect at least the current amount of the closure/post-closure cost estimate.

During the life of the permit the facility may change the financial assurance mechanism as stated in OAC Rule 3745-55-43. The facility must submit the financial assurance mechanism documentation to the Director of Ohio EPA in accordance with the parameters set forth in OAC Rule 3745-55-43.

(iii) Updated Liability Requirements
OAC Rule 3745-55-47

Section I of the permit application containing the mechanism used to demonstrate third party liability coverage must be updated to include a copy of the current liability mechanism as set forth in OAC Rule 3745-55-47 and as specified by the wording requirements of OAC Rule 3745-55-51.

During the life of the permit the facility may change the mechanism used to demonstrate liability coverage as stated in OAC Rule 3745-55-47. The facility must submit the liability mechanism documentation to the Director of Ohio EPA in accordance with the parameters set forth in OAC Rule 3745-55-47.

This information must be submitted in accordance with OAC Rule 3745-50-51.

A.28 Information to be Maintained at the Facility
OAC Rule 3745-54-74

- (a) Unless otherwise specified by the hazardous waste rules, the Permittee must maintain at the facility, until closure is completed and certified by an independent, registered professional engineer, pursuant to OAC Rule 3745-55-15, and until the Director releases the Permittee from financial assurance requirements pursuant to OAC Rule 3745-55-43, the following documents (including amendments, revisions and modifications):
- (i) waste analysis plan, developed and maintained in accordance with OAC Rule 3745-54-13 and the terms and conditions of this permit;
 - (ii) contingency plan, developed and maintained in accordance with OAC Rule 3745-54-53 and the terms and conditions of this permit;

- (iii) closure plan, developed and maintained in accordance with OAC Rule 3745-55-12 and the terms and conditions of this permit;
 - (iv) cost estimate for facility closure, developed and maintained in accordance with OAC Rule 3745-55-42 and the terms and conditions of this permit;
 - (v) personnel training plan and the training records, developed and maintained in accordance with OAC Rule 3745-54-16 and the terms and conditions of this permit;
 - (vi) operating record, required by OAC Rule 3745-54-73 and the terms and conditions of this permit; and
 - (vii) inspection schedules, developed in accordance with OAC Rules 3745-54-15, 3745-55-74 and 3745-55-95 and the terms and conditions of this permit.
 - (viii) reserved.
 - (ix) annually-adjusted cost estimate for facility closure, as required by OAC Rules 3745-55-42 and 3745-55-44 and the terms and conditions of this permit.
 - (x) all other documents required by Module A, Permit Condition A.12.
- (b) The Permittee must maintain copies of all inspection logs at the facility for a period not less than three (3) years from the date of inspection.

A.29 Waste Minimization Report
 OAC Rules 3745-54-73 and 3745-54-75

- (a) The Permittee must submit a Waste Minimization Report describing the waste minimization program required by OAC Rules 3745-54-75(H), (I), and (J); 3745-54-73(B)(9); and 3745-52-20(A) at least once every five years. The provisions of OAC Rules 3745-54-75(H), (I) and (J); and 3745-54-73(B)(9) must be satisfied annually.
- (b) The Permittee must submit the Waste Minimization Report to Ohio EPA's Office of Compliance Assistance and Pollution Prevention within one hundred eighty (180) days of the effective date of this permit, and must submit updates to this report once every five years thereafter.

DUPLICATE

MODULE B - GENERAL FACILITY CONDITIONS

B. GENERAL FACILITY CONDITIONS

B.1 Design and Operation of Facility
OAC Rule 3745-54-31

- (a) The Permittee must design, construct, maintain and operate the facility to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, ground water or surface waters which could threaten human health or the environment.
- (b) The Permittee must not accept more than 31,500 tons of hazardous waste in any one calendar year from off-site sources during the life of the permit, until such time as this permit condition is modified or renewed. This is a facility wide limitation and includes all units.

B.2 Required Notices
OAC Rule 3745-54-12

(a) Hazardous Waste from Off-Site Sources

When the Permittee is to receive hazardous waste from an off-site source (except where the Permittee is also the generator), he must inform the generator in writing that he has the appropriate permits, and will accept the waste the generator is shipping. The Permittee must keep a copy of this written notice as part of the operating record.

(b) Hazardous Wastes from Foreign Sources

The Permittee must notify the Director in writing at least four weeks in advance of the date the Permittee expects to receive hazardous waste from a foreign source, as required by OAC Rule 3745-54-12(A). Notice of subsequent shipments of the same waste from the same foreign source is not required.

B.3 General Waste Analysis Plan
OAC Rule 3745-54-13

- (a) Before the Permittee treats, stores, or disposes of any hazardous wastes,

or nonhazardous wastes if applicable under OAC Rule 3745-55-13(D), the Permittee must obtain a detailed chemical and physical analysis of a representative sample of the wastes. At a minimum, this analysis must contain all the information which must be known to treat, store, or dispose of the waste in accordance with the requirements of Chapters 3745-54 to 3745-57, 3745-205, and 3745-270 of the Administrative Code.

- (b) The Permittee must follow the procedures described in the waste analysis plan found in Section C of the permit application and the terms and conditions of this permit.
- (c) The Permittee must verify the analysis of each waste stream annually as part of its quality assurance program, in accordance with Test Methods for Evaluating Solid Waste: Physical/Chemical Methods, EPA Publication SW-846, or equivalent methods approved by the Director. At a minimum, the Permittee must maintain proper functional instruments, use approved sampling and analytical methods, verify the validity of sampling and analytical procedures, and perform correct calculations. If the Permittee uses a contract laboratory to perform analyses, then the Permittee must inform the laboratory in writing that it must operate under the waste analysis conditions set forth in this permit.

B.4 Security
OAC Rule 3745-54-14

The Permittee must comply with the security provisions of OAC Rule 3745-54-14(B)(1) and (C) and Section F of the permit application.

B.5 General Inspection Requirements
OAC Rules 3745-54-15 and 3745-54-73

The Permittee must inspect the facility in accordance with OAC Rule 3745-54-15 and the inspection schedule set forth in Section F of the permit application. The Permittee must remedy any deterioration or malfunction discovered by an inspection, as required by OAC Rule 3745-54-15(C). Records of inspection must be kept for a minimum of three years from the date of inspection. These records must be a part of the facility's operating record as required by OAC Rule 3745-54-73.

B.6 Personnel Training
OAC Rule 3745-54-16

The Permittee must conduct personnel training, as required by OAC Rule 3745-54-16. This training program must contain at least the elements set forth in Section H of the permit application. The Permittee must maintain training documents and records as required by OAC Rule 3745-54-16(D) and (E).

B.7 General Requirements for Ignitable, Reactive, or Incompatible Wastes
OAC Rule 3745-54-17

- (a) The Permittee must comply with the requirements of OAC Rule 3745-54-17 and must follow the procedures for handling ignitable, reactive, and incompatible wastes set forth in Sections C, D and F of the permit application.
- (b) The Permittee must provide electrical grounding for all containers, tanks, and transport vehicles during all operations involving the handling of ignitable or reactive wastes.
- (c) The Permittee must provide, and require the use of, spark proof tools during all operations involving the handling of all ignitable or reactive wastes.
- (d) The Permittee must prohibit smoking and open flames in each area where ignitable, reactive or incompatible hazardous wastes are managed and must post appropriate signs.
- (e) All wiring and electrical equipment at the facility must meet the National Fire Protection Association's standards for hazardous locations (See National Fire Protection Association, "National Electric Code" National Fire Codes, 1985 Edition, Vol. 3, Chapter 5, Special Occupancies, Articles 500-503, pp.176 through 189).

B.8 Reserved

B.9 Required Equipment
 OAC Rule 3745-54-32

At a minimum, the Permittee must maintain at the facility all the equipment required by OAC Rule 3745-54-32 and the equipment set forth in the contingency plan contained in Section G of the permit application.

B.10 Testing and Maintenance of Equipment
 OAC Rule 3745-54-33

The Permittee must inspect, test and maintain the equipment required by Permit Condition B.9 as necessary to assure its proper operation in time of emergency, as specified in OAC Rule 3745-54-33, Section F of the permit application and the terms and conditions of this permit.

B.11 Access to Communications or Alarm System
 OAC Rule 3745-54-34

The Permittee must maintain access to the communications and alarm systems, as required by OAC Rule 3745-54-34, Section F of the permit application and the terms and conditions of this permit.

B.12 Required Aisle Space
 OAC Rule 3745-54-35

At a minimum, the Permittee must maintain aisle space to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment to any area of facility operation in an emergency, as required by OAC Rule 3745-54-35.

B.13 Arrangements with Local Authorities
 OAC Rule 3745-54-37

- (a) The Permittee must comply with the requirements of OAC Rule 3745-54-37 (A) by making a diligent effort to:

- (i) make arrangements and familiarize all emergency response agencies which are likely to respond in an emergency with the location and layout of the facility, properties of hazardous waste managed at the facility and associated hazards, places where facility personnel will normally be working, entrances to and roads inside the facility, and possible evacuation routes as depicted and explained in Section G of the permit application;
 - (ii) make arrangements with Ohio EPA emergency response teams, emergency response contractors, and equipment suppliers;
 - (iii) make arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and types of injuries or illnesses which could result from fires, explosions, or releases at the facility; and
 - (iv) make agreements designating primary emergency authority to a specific police and a specific fire department and make agreements with any others to provide support to the primary emergency authority, where more than one police and fire department may respond to an emergency.
- (b) Where authorities decline to enter into such agreements or arrangements set forth in OAC Rule 3745-54-37(A), the Permittee must document the refusal in the operating record as required by OAC Rule 3745-54-37(B).

B.14 Implementation of Contingency Plan
OAC Rules 3745-54-51 and 3745-54-56

The Permittee must immediately carry out the provisions of the contingency plan and follow the emergency procedures described in OAC Rule 3745-54-56, whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents which threatens or could threaten human health or the environment.

In regard to spills and related toxic gas releases, the plan must describe the criteria to be used by the emergency coordinator to determine when the plan will

be implemented. At a minimum, the plan must be implemented in the following situations:

- (a) Any fire involving hazardous waste; or
- (b) Any explosion involving hazardous waste; or
- (c) Any uncontrolled hazardous waste reaction that produces or has the potential to produce hazardous conditions, including noxious, poisonous, flammable and/or explosive gases, fumes, or vapors; harmful dust; or explosive conditions; or
- (d) Any hazardous waste release, outside of a secondary containment system, that causes or has the potential to cause off-site soil and/or surface water contamination; or
- (e) Any hazardous waste release that produces or has the potential to produce hazardous conditions, including noxious, poisonous, flammable and/or explosive gases, fumes, or vapors; harmful dust; or explosive conditions.

B.15 Content of the Contingency Plan
OAC Rule 3745-54-52

The Permittee must comply with OAC Rule 3745-54-52 and the contingency plan, as set forth in Section G of the permit application.

B.16 Contingency Plan - Released Material and Emergency Response Material and By-products
OAC Rule 3745-54-56(G)

- (a) Immediately after an emergency, the emergency coordinator must provide for treating, storing, or disposing of recovered waste, contaminated soil or surface water, or any other material that results from a release, fire, or explosion at the facility.

- (b) All liquid or solid material resulting from fire, explosion, released material or emergency response material and by-products that the Permittee is required to evaluate to determine whether such material is hazardous waste in accordance with OAC Rule 3745-52-11, must be collected and managed as a hazardous waste unless the Permittee can demonstrate that such waste is not hazardous in accordance with OAC Rule 3745-51-03(C) and (D).

B.17 Amendments to Plan
 OAC Rule 3745-54-54

The Permittee must review the contingency plan at least annually and upon the occurrence of any event listed in OAC Rule 3745-54-54. If necessary or appropriate, the Permittee must amend the contingency plan as required by OAC Rule 3745-54-54 in accordance with OAC Rule 3745-50-51.

B.18 Copies of Plan
 OAC Rule 3745-54-53

- (a) The Permittee must comply with the requirements set forth in OAC Rule 3745-54-53 regarding contingency plan distribution. The Permittee must maintain at the facility a copy of the contingency plan and all revisions to the plan.
- (b) The Permittee must, in accordance with OAC Rule 3745-54-53, submit a copy of the contingency plan to all local police departments, fire departments, hospitals and local emergency response teams that may be called upon to provide emergency services. The Permittee must notify such agencies and the local authorities, in writing, within ten (10) days of the effective date of any amendments of, revisions to, or modifications to the contingency plan.
- (c) The Permittee must, in accordance with OAC Rule 3745-54-53, submit a copy of the contingency plan to the Ohio Environmental Protection Agency's Division of Environmental Response and Revitalization.

B.19 Emergency Coordinator
OAC Rule 3745-54-55

The Permittee must comply with the requirements set forth in OAC Rule 3745-54-55 regarding the emergency coordinator.

B.20 Emergency Procedures
OAC Rule 3745-54-56

The Permittee must comply with the requirements regarding emergency procedures set forth in OAC Rule 3745-54-56, Section G of the permit application and the terms and conditions of this permit.

B.21 Availability, Retention and Disposition of Records
OAC Rule 3745-54-74

All records shall be furnished by the Permittee upon request to, and made available at all reasonable times for inspection by, Ohio EPA, in accordance with OAC Rule 3745-54-74.

B.22 Operating Record
OAC Rule 3745-54-73

- (a) The Permittee must comply with the requirements set forth in OAC Rule 3745-54-73 regarding an operating record, including information to be recorded and the maintenance thereof.
- (b) The Permittee is authorized to maintain original copies of waste analysis information (i.e., GWMPs forms and attachments or functional equivalents) and initial notes to generators at its offsite central profile group, provided that: 1) the information is immediately accessible through an electronic data retrieval system; and 2) facsimile or original copies of such records must be made available to the Agency immediately upon request.

B.23 Contingency Plan Records
OAC Rule 3745-54-56(J)

The Permittee must note in the operating record the time, date, and details of any incident that requires the implementation of the contingency plan. Within fifteen (15) days after any such incident the Permittee must submit to the Director a written report of the incident containing the elements set forth in OAC Rule 3745-54-56(J).

B.24 Manifest System
OAC Rules 3745-54-70, 3745-54-71, 3745-54-72 and 3745-54-76

- (a) In managing waste at the facility the Permittee must comply with OAC Chapter 3745-52 and OAC Rules 3745-54-71, 3745-54-72 and 3745-54-76 with regard to the manifest system.
- (b) Manifest discrepancy report. If a significant discrepancy in a manifest is discovered, the Permittee must attempt to reconcile the discrepancy. If not resolved with fifteen (15) days after receiving the waste, the Permittee must submit a letter describing the discrepancy and attempts to reconcile it, and a copy of the manifest, to the Director in accordance with OAC Rule 3745-54-72.
- (c) Unmanifested waste report. If the Permittee receives unmanifested waste which is not excluded from the manifest requirements of OAC Rule 3745-51-05, then the Permittee must submit an unmanifested waste report to the Director within fifteen (15) days after receipt of the waste. The report must include the information required under OAC Rule 3745-54-76.

B.25 Annual Reports and Additional Reports
OAC Rules 3745-54-75 and 3745-54-77

The Permittee must comply with the annual report requirements set forth in OAC Rule 3745-54-75 and the additional report requirements set forth in OAC Rule 3745-54-77.

B.26 Closure Performance Standard
OAC Rule 3745-55-11

During facility closure, the Permittee must implement the provisions of the closure plan found in Section I of the permit application in such a manner as to achieve compliance with OAC Rule 3745-55-11.

B.27 Closure Plan
OAC Rules 3745-55-10, 3745-55-11 and 3745-55-13

The Permittee must implement those procedures detailed within Section I of the permit application, in accordance with OAC Rules 3745-55-10 through 3745-55-20.

B.28 Amendment of Closure Plan
OAC Rules 3745-55-12 and 3745-50-51

Should a change in the facility closure plan become necessary, the Permittee must amend the closure plan in accordance with OAC Rule 3745-55-12(C).

B.29 Content of Closure Plan
OAC Rule 3745-55-12

The Permittee must maintain the closure plan at the facility which contains the elements set forth in OAC Rule 3745-55-12 and all elements required by the terms and conditions of this permit.

B.30 Notification of Closure
OAC Rule 3745-55-12

The Permittee must notify the Director in writing at least 45 days prior to the date on which he expects to begin final closure of a facility, as required by OAC Rule 3745-55-12(D).

B.31 Time Allowed For Closure
OAC Rule 3745-55-13

Within ninety (90) days after receiving the final volume of hazardous waste, the Permittee must remove from the facility, or treat or dispose of on-site, all hazardous waste in accordance with the closure plan. The Director may approve a longer closure period if the Permittee complies with all applicable requirements for requesting a modification to the permit as set forth in OAC Rule 3745-55-13(A). The Permittee must complete all closure activities within one hundred eighty (180) days after receiving the final volume of hazardous waste in accordance with OAC Rule 3745-55-13. The Director may approve a longer closure period if the Permittee complies with all applicable requirements for requesting a modification to the permit as set forth in OAC Rule 3745-55-13(B).

B.32 Disposal or Decontamination of Equipment, Structures, and Soils
OAC Rule 3745-55-14

- (a) The Permittee must decontaminate or dispose of all contaminated facility equipment, structures, and soils, as required by OAC Rule 3745-55-14, the closure plan and the terms and conditions of this permit.
- (b) The Permittee must notify the Ohio EPA Southwest District Office within 5 working days prior to all rinseate and soil sampling.

B.33 Certification of Closure
OAC Rule 3745-55-15

The Permittee and an independent, registered professional engineer must certify that each hazardous waste management unit or the facility has been closed in accordance with the specifications in the closure plan and the terms and conditions of this permit, as required by OAC Rule 3745-55-15. The Permittee must furnish to the Director, upon request, documentation supporting the certification.

B.34 Reserved

B.35 Reserved

B.36 Cost Estimate for Facility Closure

OAC Rule 3745-55-42

- (a) The Permittee's most recent closure cost estimate, prepared in accordance with OAC Rule 3745-55-42 is specified in Section I of the permit application.
- (b) The Permittee must adjust the closure cost estimate for inflation within 60 days prior to the anniversary date of the establishment of the financial instrument(s) used to comply with OAC Rule 3745-55-43.
- (c) The Permittee must revise the closure cost estimate whenever there is a change in the facility's closure plan that increases the cost of closure as required by OAC Rule 3745-55-42(C).
- (d) The Permittee must submit to the Ohio EPA and keep at the facility the latest closure cost estimate as required by OAC Rule 3745-55-42(D) and (E).

B.37 Financial Assurance for Facility Closure

The Permittee must maintain continuous compliance with OAC Rule 3745-55-43 and provide documentation of financial assurance, which meets the requirements of OAC Rule 3745-55-51, in at least the amount of the cost estimates required by Permit Condition B.36.

B.38 Liability Requirements

The Permittee must maintain continuous compliance with the requirements of OAC Rule 3745-55-47 and the documentation of liability by providing liability coverage which meets the requirements of OAC Rule 3745-55-51 for sudden accidental occurrences in the amount of at least \$1 million per occurrence, with an annual aggregate of at least \$2 million, exclusive of legal defense costs.

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B.39 Incapacity of Owners or Operators, Guarantors, or Financial Institutions
OAC Rule 3745-55-48

The Permittee must comply with requirements set forth in OAC Rule 3745-55-48 regarding the incapacity of owners, operators, guarantors or financial institutions.

B.40 General Requirements for Land Disposal Restrictions
OAC Chapter 3745-270

The Permittee must comply with all applicable regulations regarding land disposal prohibitions and restrictions as required by OAC Chapter 3745-270.

MODULE C - CONTAINER STORAGE & TREATMENT

C. CONTAINER STORAGE AND MANAGEMENT

C.1 Container Storage/Quantity Limitation

- (a) The Permittee is authorized to store 150,000 gallons of hazardous waste at any given time in the permitted container storage areas designated as Building H, Flammables Pad, Building F, Tanker Load/Unload Pad, Building D Pad, Truck Dock Area, High Bay, Container Storage Pad, and Outbound Storage Pad (Figure B.4 of the permit application).

The Permittee must store hazardous waste in the types of containers (size and type) described in Section D of the permit application.

- (b) For the purpose of compliance with the capacity limitation of this permit, each container will be considered to be storing an amount of hazardous waste equal to its capacity, regardless of the actual quantity stored in the container.
- (c) Permit Conditions C.1(a) and C.2 shall not apply to the Permittee's activities as a generator accumulating hazardous waste on-site in compliance with OAC Rule 3745-52-34 and 40 CFR Part 265, subparts AA, BB, and CC.

However, when accumulating waste within the permitted container storage area, in accordance with OAC Rule 3745-52-34 and 40 CFR Part 265, subparts AA, BB, and CC, the Permittee must not, for the total amount of hazardous waste stored and accumulated, exceed the maximum container storage inventory established under this permit condition.

C.2 Limitations on Treatment of Hazardous Waste in Containers

- (a) The Permittee is authorized to treat hazardous waste in the permitted treatment areas designated as Building H, Flammables Pad, Building F, Tanker Load/Unload Pad, Building D Pad, Truck Dock Area, High Bay, Container Storage Pad, and Outbound Storage Pad (Figure B.4 of the permit application). The Permittee is authorized to treat (T04) a maximum of 3,650,000 gallons per year in containers with a daily limit of 80,800 gallons per day in containers. The Permittee must treat hazardous waste in containers in the manner described in Section D of the permit application.

- (b) Permit Condition C.2(a) shall not apply to the Permittee's activities as a generator treating hazardous waste in containers on-site in compliance with OAC Rule 3745-52-34.

However, when treating waste within the permitted treatment area, in accordance with OAC Rule 3745-52-34, the Permittee must not, for the total amount of hazardous waste treated, exceed the maximum throughput capacity established under this condition.

C.3 Waste Identification

The Permittee must store or treat in containers only the hazardous waste codes specified in Attachment I

C.4 Limitation of Time of Storage

The Permittee must not store hazardous waste for a period which exceeds one year, except that upon good cause shown, the Ohio EPA may extend such time period. Each container stored must be clearly marked to identify its contents and the date each period of storage begins.

C.5 Condition of Containers

OAC Rule 3745-55-71

If a container holding hazardous waste is not in good condition (e.g., severe rusting, apparent structural defects) or if it begins to leak, the Permittee must transfer the hazardous waste from such container to a container that is in good condition or otherwise manage the waste in compliance with the conditions of this permit and the hazardous waste facility chapters of the OAC.

C.6 Compatibility of Waste with Containers

OAC Rule 3745-55-72

The Permittee must use a container made of or lined with materials which will not react with, and are otherwise compatible with, the hazardous waste to be stored, so that the ability of the container to contain the waste is not impaired.

C.7 Management of Containers

OAC Rule 3745-55-73

- (a) The Permittee must keep all containers closed during storage, except

when it is necessary to add or remove waste, and must not open, handle, or store containers in a manner which may rupture the container or cause it to leak.

- (b) In the event lab-pack wastes are generated they must be handled in compliance with applicable storage requirements.
- (c) In the event lab-pack wastes are generated they must be packaged in drums containing absorbent material that is compatible with the waste.

C.8 Containment Systems
OAC Rule 3745-55-75

- (a) The Permittee must maintain the containment system in accordance with the plans and specifications contained in Section D of the permit application.
- (b) The Permittee must maintain the containment system as described in the permit application, designed with sufficient capacity to contain ten percent of the total volume of the containers or the volume of the largest container, whichever is greater. The containment system must be free of cracks and gaps and sufficiently impervious to contain leaks and spills and accumulated precipitation until the collected material is detected and removed.
- (c) The base of the containment system must be sloped or the containment system must be otherwise designed and operated to drain and remove liquids resulting from leaks, spills, or precipitation, unless the containers are elevated or are otherwise protected from contact with accumulated liquids.
- (d) Run-on into the containment system must be prevented unless the collection system has sufficient excess capacity in addition to that required in Permit Condition C.7(b) above.
- (e) Spilled or leaked waste and accumulated precipitation must be removed from the sump or collection area in a timely manner. This time period is not to exceed twenty-four (24) hours from the time spilled and/or leaked waste is discovered.

C.9 Reserved

C.10 Inspection Schedules and Procedures
OAC Rules 3745-54-15 and 3745-54-73

The Permittee must inspect the container storage area in accordance with the inspection schedule contained in Section F of the permit application and in accordance with OAC Rule 3745-54-15. The inspection schedule must be designed to detect for leaking containers, deteriorating containers, and/or containment systems. The Permittee must note the results of these inspections in the inspection log along with any remedial action taken.

Areas subject to spills, such as loading or unloading areas, shall be inspected daily when in use pursuant to the inspection procedure described in Section F of the permit application. The Permittee must maintain these inspection results in the facility operating record.

C.11 Recordkeeping
OAC Rule 3745-54-73

The Permittee must comply with all recordkeeping requirements of OAC Rule 3745-54-73 as part of the facility operating record.

C.12 Special Container Provisions for Ignitable or Reactive Waste
OAC Rules 3745-54-17 and 3745-55-76

- (a) The Permittee must not store ignitable or reactive waste except in accordance with OAC Rules 3745-54-17 and 3745-55-76.
- (b) The Permittee must not locate containers holding ignitable or reactive waste within 15 meters (50 feet) of the facility's property line.
- (c) The Permittee must take precautions to prevent accidental ignition or reaction of ignitable or reactive waste and shall follow the storage procedures specified in Section D of the permit application.

C.13 Special Container Provisions for Incompatible Waste
OAC Rules 3745-54-17(B) and 3745-55-77

- (a) The Permittee must not store incompatible waste except in accordance with OAC Rules 3745-54-17(B) and 3745-55-77.
- (b) The Permittee must not place hazardous waste in an unwashed container that previously held an incompatible waste or material.

-
- (c) The Permittee must separate or protect (by means of a dike, berm, wall, or other device) a storage container holding a hazardous waste that is incompatible with any waste or other materials stored nearby in other containers, piles, open tanks, or surface impoundments.

C.14 Reserved

C.15 Closure and Post-Closure

OAC Rules 3745-55-10 through 3745-55-20, and 3745-55-78

At closure of the container area, the Permittee shall remove all hazardous waste and hazardous waste residues from the containment system, in accordance with the procedures in the closure plan set forth in Section I of the permit application.

MODULE D - TANK STORAGE AND MANAGEMENT

D. MODULE HIGHLIGHTS

D.1 Tank Storage Quantity Limitation/Waste Identification

- (a) The Permittee may store a total volume of 75,450 gallons of hazardous waste in 8 tanks, subject to the terms of this permit and as detailed in the table below.

The Permittee shall store in tanks only the hazardous waste codes specified in the permit application and summarized below:

Tank No.	Capacity (Gallons)	Dimensions of Tank	Secondary Containment Volume (Gallons)	Treatment Type	Hazardous Waste No.
Tank #5	7,000	10 ft. (diam) x 12 ft.	143,368 Gallons - total capacity of Tank Farm	Consolidation for Fuels Blending	See Attachment I
Tank #6	7,000	10 ft. (diam) x 12 ft.			See Attachment I
Tank #7	15,000	11 ft. (diam) x 22 ft.			See Attachment I
Tank #8	15,000	11 ft. (diam) x 22 ft.			See Attachment I
Tank #9	15,000	11 ft. (diam) x 22 ft.			See Attachment I
Tank #10	15,000	11 ft. (diam) x 22 ft.			See Attachment I
Tank #11, Dispersion Unit*	1,200	72 in. (diam) x 68.75 in.	4,039 Gallons - total capacity in the Dispersion Unit Processing Room		See Attachment I
Tank #12, Pump Feed Chamber	250	Not given (integral to Tank #11)			See Attachment I

*Dispersion Unit includes: 1) Dispersion Tank; 2) over flow tank; 3) drum scraping auger; 4) Drum Dumping chamber; 5) coarse shredder; 6) pump feed chamber; 7) drum movement chamber; and 8) any other ancillary equipment.

- (b) During any calendar year, the Permittee must not manage through tank storage hazardous waste in excess of the maximum annual quantity set forth in Permit Condition B.1(b).

D.2 Limitations on Treatment of Hazardous Waste in Tanks

- (a) The Permittee is authorized to treat hazardous waste in the tanks specified in the table above. The Permittee shall treat in tanks only the

hazardous waste codes specified in the permit application and summarized above.

- (b) The provision of Condition D.2(a) shall not apply to the Permittee's activities as a generator treating hazardous waste in tanks on-site in compliance with the provisions of OAC Rule 3745-52-34.

D.3 Reserved

D.4 Containment and Detection of Releases.
OAC Rule 3745-55-93

- (a) Reserved

- (b) Existing Tank Systems with Secondary Containment. The Permittee must operate and maintain the secondary containment system in accordance with the detailed design plans and descriptions contained in the permit application.

- (c) Reserved

D.5 Operating Requirements
OAC Rule 3745-55-94

- (a) The Permittee must not place hazardous wastes or treatment reagents in the tank system if they could cause the tank, its ancillary equipment, or a containment system to rupture, leak, corrode, or otherwise fail.

- (b) The Permittee must prevent spills and overflows from the tank or containment systems using the methods described in the permit application. The Permittee must comply with the requirements of OAC Rule 3745-55-96 if a leak or spill occurs in the tank system.

D.6 Inspection Schedules and Procedures
OAC Rule 3745-55-95

- (a) The Permittee must inspect the tank systems, in accordance with the Inspection Schedule found in Section F of the permit application and must complete the items in Permit Conditions D.6(b) and D.6(c) as part of those inspections:

- (b) The Permittee must inspect the overfill controls, in accordance with the

procedure and schedule in the permit application.

- (c) The Permittee must inspect the following components of the tank system once each operating day:
 - (i) Aboveground portions of the tank system, if any, to detect corrosion or releases of waste;
 - (ii) Data gathered from monitoring and leak detection equipment (e.g., pressure or temperature gauges, monitoring wells) to ensure that the tank system is being operated according to its design; and
 - (iii) Construction materials and the area immediately surrounding the externally accessible portion of the tank system, including the secondary containment system, to detect erosion or signs of releases of hazardous waste (e.g., wet spots, dead vegetation).
- (d) Reserved
- (e) The Permittee must document compliance with Permit Condition D.6 in the operating record of the facility.

D.7 Response to Leaks or Spills
OAC Rule 3745-55-96

- (a) In the event of a leak or a spill from the tank system, from a secondary containment system, or if a system becomes unfit for continued use, the Permittee must remove the system from service immediately and complete the following actions:
 - (i) Immediately stop the flow of hazardous waste into the tank system or secondary containment system and inspect the system to determine the cause of the release.
 - (ii) If the release was from the tank system, the owner/operator must, within twenty-four hours after detection of the leak, or, if the owner/operator demonstrates that it is not possible, at the earliest practicable time, remove as much of the waste as is necessary to prevent further release of hazardous waste to the environment and to allow inspection and repair of the tank system to be performed.

If the material released was to a secondary containment system, all

released materials must be removed within twenty-four hours or in as timely a manner as possible to prevent harm to human health and the environment.

- (iii) The Permittee must immediately conduct a visual inspection of all releases to the environment and based on that inspection: (1) prevent further migration of the leak or spill to soils or surface water and (2) remove and properly dispose of any visible contamination of the soil or surface water.

- (b) Unless the requirements of Permit Conditions D.7(b)(i) through D.7(b)(vi) are satisfied, the Permittee must close its tank system in accordance with OAC Rule 3745-55-97 and its closure plan if there has been a leak or spill from the tank system, from a secondary containment system, or if a system becomes unfit for continual use.
 - (i) For a release caused by a spill that has not damaged the integrity of the system, the Permittee must remove the released waste and make any necessary repairs to fully restore the integrity of the system before returning the tank system to service.
 - (ii) For a release caused by a leak from the primary tank system to the secondary containment system, the Permittee must repair the primary system prior to returning it to service.
 - (iii) Reserved.
 - (iv) Reserved.
 - (v) Reserved.
 - (vi) If the Permittee replaces a component of the tank system to eliminate the leak, that component must satisfy the requirements for new tank systems or components in OAC Rules 3745-55-92 and 3745-55-93.

- (d) For all major repairs (e.g., installation of an internal liner, repair of a ruptured tank, or repair or replacement of a secondary containment vault) to eliminate leaks or restore the integrity of the tank system, the Permittee must obtain a certification by an independent, qualified, registered professional engineer in accordance with OAC Rule 3745-50-42(D)(1) that the repaired system is capable of handling hazardous wastes without

release for the intended life of the system before returning the system to service. This certification must be submitted to the Director within seven days after returning the tank system to use.

D.8 Recordkeeping and Reporting

OAC Rules 3745-55-96, 3745-55-91(A), and 3745-55-92(G)

- (a) The Permittee must report to the Director, within 24 hours of detection, when a leak or spill occurs from the tank system or secondary containment system to the environment. A leak or spill of one pound or less of hazardous waste, that is immediately contained and cleaned-up, need not be reported. Releases that are contained within a secondary containment system need not be reported.
- (b) Within 30 days of detecting a release to the environment from the tank system or secondary containment system, the Permittee must report the following information to the Director:
 - (i) Likely route of migration of the release;
 - (ii) Characteristics of the surrounding soil (including soil composition, geology, hydrogeology, and climate);
 - (iii) Results of any monitoring or sampling conducted in connection with the release. If the Permittee finds it will be impossible to meet this time period, the Permittee should provide the Director with a schedule of when the results will be available. This schedule must be provided before the required 30-day submittal period expires;
 - (iv) Proximity of downgradient drinking water, surface water, and populated areas; and
 - (v) Description of response actions taken or planned.
- (c) Reserved.
- (d) The Permittee must keep on file at the facility the written assessment of the tank system's integrity.
- (e) Reserved.

D.9 Closure and Post-Closure Care

OAC Rule 3745-55-97

- (a) At closure of the tank system(s), the Permittee must follow the procedures in the closure plan in Section I of the permit application.
- (b) If the Permittee demonstrates that not all contaminated soils can be practically removed or decontaminated, in accordance with the closure plan, then the Permittee must close the tank system(s) and perform post-closure care.

D.10 Special Tank Provisions for Ignitable or Reactive Wastes
OAC Rule 3745-55-98

- (a) The Permittee must not place ignitable or reactive waste in the tank system or in the secondary containment system, unless the procedures specified in the permit application are followed. The Permittee must document compliance with this condition and place it in the operating record.
- (b) The Permittee must comply with the requirements for the maintenance of protective distances between the waste management area and any public ways, streets, alleys, or an adjoining property line that can be built upon, as required in Tables 2-1 to 2-6 of the National Fire Protection Association's "Flammable and Combustible Liquids Code" (1996 or most recent edition) incorporated by reference in OAC Rule 3745-50-11.

D.11 Special Tank Provisions for Incompatible Wastes
OAC Rule 3745-55-99

- (a) The Permittee must not place incompatible wastes, or incompatible wastes and materials, in the same tank system or the same secondary containment system, unless the procedures specified in the permit application are followed. The Permittee must document compliance with this condition and place that documentation into the operating record.
- (b) The Permittee must not place hazardous waste in a tank system that has not been decontaminated and that previously held an incompatible waste or material, unless the requirements of Permit Condition D.11(a) are met.

D.12 Reserved

MODULE E - CORRECTIVE ACTION REQUIREMENTS

The goals of the Corrective Action program are to evaluate the nature and extent of releases of hazardous substances from facilities, and to develop and implement appropriate corrective measures to protect human health and the environment. On December 20, 1996, the United States Environmental Protection Agency issued a Resource Conservation and Recovery Act (RCRA)/Hazardous and Solid Waste Amendments (HSWA) permit to Spring Grove Resource Recovery, Inc. (SGRR), requiring Corrective Action activities at the facility. Upon issuance of the state renewal permit on September 30, 2002, Ohio EPA assumed authority for conducting regulatory oversight of all RCRA Corrective Action activities required at this facility, as detailed in Conditions E.5 through E.12.

SGRR submitted to U.S. EPA the Workplan for Phase 1 of the RCRA Corrective Action Facility Investigation (RFI) on June 30, 1999. The purpose of an RFI is to obtain information to fully characterize the nature, extent and rate of migration of releases of hazardous waste or constituents and to interpret this information to determine if interim corrective measures and/or a Corrective Measures Study may be necessary. According to the Workplan, the initial investigation focused on affirming suspected site conditions in a manner and using methods in accordance with U.S. EPA approved quality assurance measures. Based upon the results of the initial investigation, a Phase 2 investigation was initiated to further define the nature and extent of any releases to soil or groundwater.

The first step of the Phase 1 RFI conducted an ecological screening assessment, described in detail in Section 5.7 of the Workplan. The results of the screening assessment were submitted to U.S. EPA in November 2001. On April 29, 2002, U.S. EPA approved the Ecological Site Characterization Report. The action levels, found in Figure 1-1 of the Workplan, were based on the outcome of the ecological screening assessment.

Field work was conducted as detailed in the Phase 1 RFI Workplan in accordance with the approved schedule. Upon completion of field activities and receipt and evaluation of data, SGRR submitted the Phase I Final Report on February 18, 2003, which included both conclusions and recommendations regarding the need for further investigation. On January 7, 2004, Ohio EPA approved the Phase I Final Report. SGRR submitted a Phase 2 RFI Workplan for Ohio EPA review on March 26, 2004.

The Phase 2 Workplan included sections addressing detailed approaches to both human health and ecological risk assessment. The intent of the Phase 2 effort was to complete delineation of releases at the facility and to supply all information necessary to both characterize the site and determine the need for Corrective Measures. Upon

MODULE E - CORRECTIVE ACTION REQUIREMENTS

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both characterize the site and determine the need for Corrective Measures. Upon approval of the Workplan by Ohio EPA on May 8, 2004, field work was conducted as detailed in the plan in accordance with the approved schedule. On August 29, 2005, SGRR submitted the RFI Phase II Final Report, with approval from Ohio EPA on December 9, 2005. Based upon Ohio EPA's review of the Phase I and II RFI activities, SGRR submitted a Supplemental Phase II RFI Workplan on May 12, 2006. The Supplemental Phase II Workplan required additional site characterization activities. Ohio EPA approved the Supplemental Phase II Workplan on July 6, 2006.

On January 31, 2008, SGRR submitted to Ohio EPA the RFI Final Report which included both conclusions and recommendations regarding the need for Corrective Measures. On June 19, 2008, EPA approved the RFI Final Report which determined releases had occurred that require remediation. In accordance with Condition E.8, SGRR submitted a Corrective Measures Study Workplan to Ohio EPA on February 27, 2009. Ohio EPA approved the CMS Workplan on March 11, 2009.

On November 9, 2010, SGRR submitted the CMS Report which summarized the results of the investigations for each remedy studied and included an evaluation of each remedial alternative. Ohio EPA approved the CMS Report on January 3, 2011.

Ohio EPA evaluated the proposed remedy and believes that continuation of the interim measure, along with additional conditions and restrictions, would be protective of human health and the environment.

In brief, Ohio EPA imposes the following measures:

- Integrated Ground Water Monitoring
- Monitored Natural Attenuation Process
- Environmental Covenant to Restrict Ground Water Use

E.1 Corrective Action at the Facility
OAC Rules 3745-50-10 and 3745-54-101

In accordance with OAC Rule 3745-50-10, waste management unit means any discernible unit at which solid waste, hazardous waste, infectious waste (as

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those terms are defined in ORC Chapter 3734), construction and demolition debris (as defined in ORC Chapter 3714), industrial waste, or other waste (as those terms are defined in ORC Chapter 6111), has been placed at any time, irrespective of whether the unit was intended for the management of waste or hazardous waste. Such units include any area at a facility at which wastes have been routinely and systematically released. For the purpose of Corrective Action, facility is defined as all contiguous property under the control of the owner or operator seeking a permit under Subtitle C of RCRA. The terms Interim Measure (IM), RCRA Facility Investigation (RFI), Corrective Measures Study (CMS) and Corrective Measure Implementation (CMI) are defined in U.S. EPA's Corrective Action Plan (CAP) (OSWER Directive 9902.3-2A, May 1994).

The Permittee must institute Corrective Action as necessary to protect human health and the environment for all releases of hazardous wastes or hazardous constituents from any waste management units (WMUs) at the Facility, regardless of the time at which waste was placed in such units.

E.2 Corrective Action Beyond the Facility Boundary
OAC Rule 3745-54-101

The Permittee must implement Corrective Action beyond the Facility property boundary, where necessary to protect human health and the environment, unless the Permittee demonstrates to the satisfaction of Ohio EPA that, despite the Permittee's best efforts, the Permittee was unable to obtain the necessary permission to undertake such actions. The Permittee is not relieved of all responsibility to clean up a release that has migrated beyond the Facility boundary where off-site access is denied. On-site measures to address such releases will be addressed under the RFI, CMS, and CMI phases, as determined to be necessary on a case-by-case basis.

E.3 Identification of WMUs
OAC Rules 3745-50-44(D) and 3745-54-101

The table below describes the WMUS at SGRR. Please refer to Figure Z.1 (attached) for a map of the WMUS.

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RFI ACTIVITIES AND FINDINGS

WMU #	RFI Activities	RFI Findings
#1 Rear Yard	Soil sampling	Polynuclear aromatic hydrocarbons (PAHs), antimony and lead were detected in samples containing fill material comprised of fly ash and foundry sand – typical sources of PAHs, antimony and lead. Arsenic was also detected in soil samples with fill material and without. Samples that did not contain fill material were within natural background levels. PAHs exceeded threshold levels indicating a potential cancer risk to commercial/industrial workers therefore necessitating a soils management plan and environmental land use restriction.
#2 Flammables Pad/Solidification Room	Soil sampling	PAHs and lead were detected in samples containing fill material comprised of fly ash and foundry sand – typical sources of PAHs and lead. Arsenic was also detected in soil samples with fill material and without. Samples that did not contain fill material were within natural background levels. PAHs and lead exceeded threshold levels indicating a potential cancer risk to commercial/industrial workers therefore necessitating a soils management plan and environmental land use restriction.
#3 Tank Farm	Soil sampling	PAHs and lead were detected in samples containing fill material comprised of fly ash and foundry sand – typical sources of PAHs and lead. Arsenic was also detected in soil samples with fill material and without. Samples that did not contain fill material were within natural background levels. Levels detected were not in excess of the threshold value, excluding the unit from a soils management plan and environmental land use restriction.
#4 Tanker Unloading Area	Soil sampling	PAHs, cadmium, lead, zinc, and arsenic were detected in samples containing fill material consisting of foundry sand, brick, asphalt and coal – typical sources of PAHs and metals. Arsenic detected was within natural background levels. PAHs, lead, and arsenic exceeded threshold levels indicating a potential cancer risk to commercial/industrial workers therefore necessitating a soils management plan and environmental land use restriction.

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WMU #	RFI Activities	RFI Findings
#5 High Bay	Soil sampling	Arsenic was detected in samples that did not contain fill material, but were within natural background levels. Levels detected were not in excess of the threshold value, excluding the unit from a soils management plan and environmental land use restriction.
#6 Maintenance Building (formerly #38)	Review file information	No documented spill history and limited activity in unit – no further investigation required.
#37 Bone Yard (now part of #1)	Review file information	No documented spill history and limited activity in unit – no further investigation required.

E.4 Reserved

E.5 RCRA Facility Investigation (RFI)
 OAC Rule 3745-54-101

In the event of a newly discovered unit, the Permittee must conduct an RFI to thoroughly evaluate the nature and extent of the release of hazardous wastes and hazardous constituents from all applicable WMUs identified in Permit Condition E.3 above and Permit Condition E.10. The major tasks and required submittal dates are shown below. The scope of work for each of the tasks is found in U.S. EPA's CAP.

(a) RFI Workplan

The Permittee must submit a written RFI Workplan to Ohio EPA within ninety (90) days after the effective date of this permit or, in case of a newly discovered waste management unit, on a time frame established by Ohio EPA.

- (i) Within ninety (90) days of receipt of any Ohio EPA comments on the RFI Workplan, the Permittee must submit either an amended or new RFI Workplan that incorporates Ohio EPA's comments.

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- (ii) Ohio EPA will approve or modify and approve, in writing, the amended or new RFI Workplan. The RFI Workplan, as approved or as modified and approved, shall be incorporated into this permit and become an enforceable condition of this permit. Subsequent changes to the approved RFI Workplan must be authorized by Ohio EPA.

(b) RFI Implementation

The Permittee implemented the RFI Workplan according to the terms and schedule in the approved RFI Workplan.

(c) RFI Final Report

Within ninety (90) days after the completion of the RFI, the Permittee must submit an RFI Final Report to Ohio EPA. The RFI Final Report must describe the procedures, methods, and results of the RFI. The RFI Final Report must contain adequate information to support further decisions concerning Corrective Action at the Facility.

- (i) Within ninety (90) days of receipt of any Ohio EPA comments on the RFI Final Report, the Permittee must submit either an amended or new RFI Final Report that incorporates Ohio EPA's comments.
- (ii) Ohio EPA will approve or modify and approve, in writing, the amended or new RFI Final Report. The RFI Final Report, as approved or as modified and approved, shall be incorporated into this permit and become an enforceable condition of this permit. Subsequent changes to the approved RFI Final Report must be authorized by Ohio EPA.

E.6 Interim Measure (IM)

Based on the RFI Final Report the Permittee was not required to develop and implement an IM.

In the event of a future release of hazardous waste or constituents to the environment, Ohio EPA may require (or the Permittee may propose) the development and implementation of an IM (this may include an IM Workplan) at any time during the life of the permit to mitigate or eliminate a threat to human health or the environment. The Permittee must implement the IM upon a time frame established by Ohio EPA.

E.7 Determination of No Further Action

(a) Permit Modification

If, based upon review of the Permittee's request for a permit modification, the results of the completed RFI, and other information, Ohio EPA determines that releases or suspected releases which were investigated either are nonexistent or do not pose an unacceptable risk to human health and the environment, Ohio EPA will approve the requested modification. Decisions regarding the completion of RCRA corrective action and no further action may be made for the entire facility, for a portion of the facility, or for a specific unit or release.

(b) Periodic Monitoring

A determination of no further action shall not preclude Ohio EPA from requiring continued or periodic monitoring of air, soil, ground water, or surface water, if necessary to protect human health and the environment, when site-specific circumstances indicate that a potential or an actual release of hazardous waste or constituents exists.

(c) Further Investigations

A determination of no further action shall not preclude Ohio EPA from requiring further investigations, studies, or remediation at a later date, if new information or subsequent analysis indicates that a release or potential release from a WMU at the Facility may pose an unacceptable risk to human health or the environment. In such a case, Ohio EPA shall initiate a modification to the terms of the permit to rescind the determination made in accordance with Permit Condition E.7(a). Additionally, in the event Ohio EPA determines that there is insufficient information on which to base a determination, the Permittee, upon notification, is required to develop a Work Plan and upon Ohio EPA approval of that Work Plan, perform additional investigations as needed.

E.8 Corrective Measures Study (CMS)

If Ohio EPA determines, based on the results of the RFI and any other relevant information, that corrective measures are necessary, Ohio EPA will notify the Permittee in writing that the Permittee must conduct a CMS either as described below or as described in Ohio EPA's notification to the Permittee. The purpose of the CMS will be to develop and evaluate the corrective action alternative(s)

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and to outline one or more alternative corrective measure(s) that will satisfy the performance objectives specified in Permit Condition E.9.

(a) CMS Workplan

(b) CMS Workplan Implementation

The Permittee implemented the CMS Workplan according to the terms and schedule in the approved CMS Workplan.

(c) CMS Final Report

The Permittee must submit a written CMS Workplan to Ohio EPA within ninety (90) days from the notification by Ohio EPA of the requirement to conduct a CMS.

(i) Within ninety (90) days of receipt of any Ohio EPA comments, the Permittee must submit either an amended or new CMS Workplan that incorporates Ohio EPA's comments.

(ii) Ohio EPA will approve or modify and approve, in writing, the amended or new CMS Workplan. The CMS Workplan, as approved or as modified and approved, must be incorporated into this permit and become an enforceable condition of this permit. Subsequent changes to the approved CMS Workplan must be authorized by Ohio EPA.

E.9 Corrective Measures Implementation (CMI)

Based on the results of the CMS, the Permittee must implement one or more of the Corrective Measures authorized by Ohio EPA. Ohio EPA will authorize one or more of the Corrective Measures in the CMS, and will notify the Permittee in writing of the decision. The Corrective Measure selected for implementation must: (1) be protective of human health and the environment; (2) attain media cleanup standards; (3) control the source(s) of releases so as to reduce or eliminate further releases of hazardous waste(s) (including hazardous constituent[s]); and (4) comply with all applicable standards for management of wastes.

If two or more of the Corrective Measures studied meet the threshold criteria set

out above, Ohio EPA will authorize the Corrective Measures Implementation by considering remedy selection factors including: (1) long-term reliability and effectiveness; (2) the degree to which the Corrective Measure will reduce the toxicity, mobility or volume of contamination; (3) the Corrective Measure's short-term effectiveness; (4) the Corrective Measure's implementability; and (5) the relative cost associated with the alternative.

- (a) The Permittee must implement the corrective measures as described below:
 - (i) Integrated Ground Water Monitoring Program: see Module Z of this permit.
 - (ii) Monitored Natural Attenuation to achieve the corrective action clean-up goals.
 - (iii) Soil Management Plan to assure protection of human health and the environment for required operation and maintenance and future construction activities.
 - (iv) Environmental Covenant to restrict the facility to industrial use and restrict ground water use.
- (b) Within ninety (90) days after the effective date of this permit modification, the Permittee must submit to Ohio EPA for its review and comment a Corrective Measures Implementation (CMI) Work Plan for the above selected corrective measures. The CMI Work Plan must be developed in conformance with Module Z of this permit.
 - (i) Within thirty (30) days of receipt of Ohio EPA's comments on the CMI Work Plan, the Permittee must submit a new or revised CMI Work Plan that incorporates Ohio EPA's comments.
 - (ii) Ohio EPA will approve or modify and approve, in writing, the amended or new CMI Work Plan. The CMI Work Plan, as approved or as amended and approved, shall be incorporated in and made an enforceable part of this permit. The approved CMI Work Plan must be implemented in accordance with the terms, conditions, and schedules contained herein. Subsequent changes to the approved CMI Work Plan must be authorized by Ohio EPA
- (c) Soil Management Plan

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- (i) Within ninety (90) days of the effective date of this permit modification, the Permittee must submit to Ohio EPA for its review and comment a Soil Management Plan (SMP). The SMP will provide procedures that ensure worker health and safety protection and proper soil management for onsite activities that involve excavation and movement of contaminated soil required by operation and maintenance activities for the facility.
- (ii) Within forty-five (45) days of receipt of Ohio EPA comments on the SMP, the Permittee must submit a new or revised SMP that incorporates Ohio EPA's comments.
- (iii) Ohio EPA will approve or modify and approve, in writing, the amended or new SMP. The SMP, as approved or modified and approved, must be incorporated into this permit and become an enforceable condition of this permit. Subsequent changes to the SMP must be authorized by Ohio EPA

(d) Additional Work:

Ohio EPA may determine that, in addition to the tasks defined in the CMI Work Plan, additional work may be necessary to accomplish the objectives of this permit.

Within thirty (30) days after receipt of written notice from Ohio EPA that additional work is necessary; the Permittee must submit a Work Plan for the performance of the additional work. The Work Plan, as approved by Ohio EPA, must be incorporated in and made an enforceable part of this permit. Upon approval of the work plan by Ohio EPA, the Permittee must implement the work plan in accordance with the schedules contained therein.

(e) Environmental Covenant

The permittee must initiate entering into an Environmental Covenant (Ohio Revised Code 5301.80 through 5301.92) within sixty (60) days of issuance of this permit modification. The Environmental Covenant will restrict the property to industrial use. The Environmental Covenant will also prohibit the extraction of ground water for the entire facility for any purpose other than sampling, monitoring or remediation pursuant to a ground water remedial action. Excavation of any or all of the affected areas shall be prohibited except: (i) as may be required in furtherance of corrective action activities ordered by any governmental entity with jurisdiction over such

matters, (ii) as may be authorized by the Operation and Maintenance Plan approved by Ohio EPA, or (iii) as may be otherwise approved in writing by Ohio EPA.

- (f) Financial Assurance
OAC Rule 3745-54-101

Within 30 days after receiving approval of the CMI, the Permittee must provide financial assurance in the amount necessary to implement the corrective measure(s) as required by OAC Rule 3745-54-101 (B) and (C).

E.10 Newly Identified WMUs or Releases
OAC Rule 3745-54-101

- (a) General Information

The Permittee must submit to Ohio EPA, within 30 days of discovery, the following information regarding any new WMU identified at the Facility by Ohio EPA or the Permittee:

- (i) The location of the unit on the site topographic map;
- (ii) Designation of the type of unit;
- (iii) General dimensions and structural description (supply any available drawings);
- (iv) When the unit was operated; and
- (v) Specification of all waste(s) that have been managed at the unit.

- (b) Release Information

The Permittee must submit to Ohio EPA, within 30 days of discovery, all available information pertaining to any release of hazardous waste(s) or hazardous constituent(s) from any new or existing WMU.

E.11 Corrective Action for Newly Identified WMUs and Releases
OAC Rule 3745-54-101

If Ohio EPA determines that an RFI is required for newly identified WMUs, the Permittee must submit a written RFI Workplan to Ohio EPA upon a time frame established in written notification by Ohio EPA in accordance with Permit

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Condition E.5. This determination will be made based on the information submitted in accordance with Permit Condition E.10.

Further investigations or corrective measures will be established by Ohio EPA.

The Permittee must make such submittal in accordance with time frames established by Ohio EPA.

E.12 Completion of Corrective Action
OAC Rule 3745-54-101

After completing Corrective Action as necessary to protect human health and the environment for all releases of hazardous wastes or hazardous constituents from any WMUs at the Facility, the Permittee shall submit a Corrective Measures Completion of Work (CMCW) Report. The CMCW Report shall document that Corrective Action construction is complete, cleanup objectives and standards have been met, and any releases of hazardous waste or constituents no longer pose an unacceptable risk to human health and the environment. The CMCW Report may be submitted for any part of the Facility for which corrective measures are complete, or for the entire Facility. The CMCW Report must be submitted as a request for permit modification pursuant to OAC Rule 3745-50-51.

E.13 Documents Requiring Professional Engineer Stamp
ORC Section 4733.01

Preparation of the following Corrective Action documents constitutes the "practice of engineering" as defined by ORC Section 4733.01:

Final Interim Measures Report

Corrective Measures Final Design

Corrective Measures Construction Completion Report

Corrective Measures Attainment of Groundwater Performance Standards Report

Corrective Measures Completion of Work Report

As such, the Permittee must ensure that these documents, as submitted to Ohio EPA, are stamped by a Professional Engineer licensed to practice in the State of Ohio.

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MODULE Z - INTEGRATED GROUND WATER MONITORING OAC RULES 3745-54-101

This module presents permit conditions addressing the requirements for an integrated monitoring program at **Spring Grove Resource Recovery, Inc. (SGRR)** facility. Ground water contamination has been found adjacent to waste management units (WMUs) which are regulated under OAC Rule 3745-54-101. It is not practical to separate WMUs either for ground water monitoring purposes or remedial efforts. A more efficient approach is to combine the ground water monitoring program for the WMUs. This combined approach is hereafter referred to as the Integrated Ground Water Monitoring Program or IGWMP and will be regulated under 3745-54-101.

Z.1. Applicability
OAC Rule 3745-54-101

- (a) The Permittee must comply with the applicable requirements in OAC Rule 3745-54-101 and institute corrective action as necessary to protect human health and the environment for all releases of hazardous wastes or constituents from any waste management unit/area at the facility, regardless of the time at which waste was placed in such unit/area for the following units/areas:

<u>Waste Management Unit (WMU)</u>
1 Rear Yard / 37- Portion of Bone Yard
2 Flammables Pad / Solidification Room
3 Tank Farm
4 Tanker Unloading Area
5 High Bay
6 Maintenance Building (formerly #38)

The final RFI and CMS reports have been submitted and accepted by Ohio EPA. As detailed in Module E, Ohio EPA has selected corrective measures for the site which includes these units in a site-wide ground water monitoring program. These units are shown in attached Figure Z-1.

(b) The Permittee must implement corrective actions within and beyond the facility property boundary, where necessary, as defined in Permit Condition Z.9(d) to protect human health and the environment, unless the Permittee demonstrates to the satisfaction of the director that, despite the Permittee's best efforts, the Permittee was unable to obtain the necessary permission to undertake such actions off property. The Permittee is not relieved of all responsibility to clean up a release that has migrated beyond the facility boundary where off-site access is denied. On-site measures to address such releases will be determined on a case-by-case basis. Assurances of financial responsibility for such action must be provided.

Z. 2. Ground Water Attenuation Compliance Indicator (GWACI)

The Permittee must ensure that the hazardous constituents or constituents listed in this Permit Condition detected in the ground water from a unit/area do not exceed the GWACI in the uppermost aquifer underlying the units/areas beyond the point of compliance during the permit period. The Permittee must respond with any necessary corrective action to bring the ground water back into compliance with those standards. The GWACI has been established in this Permit due to hazardous constituents being detected in the ground water.

(a) List of Hazardous Constituents and GWACI

The Permittee must monitor the ground water to determine whether units/areas are in compliance with the GWACI. The site specific hazardous constituents are those listed in the Appendix to OAC Rule 3745-54-98 detected in the ground water above their respective PQLs underlying a unit/area, and reasonably expected to be contained in or derived from the waste contained in the unit/area to which the GWACI applies. The site-specific hazardous constituents and their GWACI are listed below:

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Table Z-1 Hazardous Constituent GWACI

Parameter	CAS Number	GWACI (ug/L)
Tetrachloroethylene	127-18-4	25.0 ¹
Trichloroethylene	79-01-6	25.0 ¹
Cis 1,2- Dichloroethylene	156-59-2	70.0 ²
Trans 1,2- Dichloroethylene	156-60-5	100 ²
1,1,1- Trichloroethane	71-55-6	200 ²
1,1-Dichloroethylene	75-35-4	7.0 ²
Vinyl Chloride	75-01-4	2.0 ²

¹ – Site specific GWACI; ² – U.S. EPA Maximum Contaminant Level (MCL)

In addition to the hazardous constituents listed above, the Permittee must monitor the following parameters:

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Table Z-2 Ground Water Quality or Field Parameters:

Parameter	Stabilization Criteria / Preservation	Target PQL (mg/L)
Temperature	$\pm 0.5^{\circ}$ Celsius ¹	Field Measurement
pH	± 0.2 standard units ¹	Field Measurement
Conductivity	$\pm 3\%$ ¹	Field Measurement
Dissolved Oxygen	$\pm 10\%$ of reading value or ± 0.2 mg/L, whichever is greater ¹	Field Measurement
Oxidation-reduction potential (ORP)	± 20 milivolts ¹	Field Measurement
Turbidity	less than or equal to 10 NTUs, or $\pm 10\%$ if turbidity is > 10 NTUs ¹	Field Measurement
Alkalinity	Cool 0-6°C ¹	10.0
Iron	HNO ₃ to pH <2, at least 24-hours prior to analysis ¹	0.050
Sulfate	Cool 0-6°C ¹	5.0
Nitrate	Cool 0-6°C ¹	0.1
Chloride	None required ¹	5.0

¹ – 1995 Ohio EPA Technical Guidance for Ground Water Investigations (Chapter 10 Revised. May 2012).

(b) Point of Compliance

The Permittee has integrated the ground water monitoring programs site-wide due to their close proximity to each other. The combined point of compliance (POC) at which the GWACI applies is the property boundary

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as indicated on attached Figure Z-1. The Permittee must monitor the following wells, MW-1A, MW-4, MW-5, MW-6, MW-7 and MW-8 representing the quality of ground water passing the point of compliance.

(c) Permit Period

The permit period, during which the GWACI applies, is equal to 10 years from the permit renewal date of March 26, 2013. The permit must continue to be renewed until all contaminants of concern in ground water are below the final clean-up standards found in Table Z-4 for four consecutive semi-annual sampling events (see Permit Condition Z.9(d)(v)). During the permit period, the Permittee must establish and implement a monitoring program that will detect, respond, and report as necessary to protect human health and the environment all releases of hazardous constituents above the GWACI in Table Z-1 at the point of compliance.

Z.3. Well Location, Installation, Maintenance, and Removal

- (a) The Permittee's ground water monitoring system must consist of a sufficient number of wells, installed and screened at appropriate locations and depths, to yield ground water samples from the sand and gravel lenses which are considered to be the uppermost aquifer. Please refer to Section 4.0 Geology, Hydrogeology and Physical Conditions of the facility's RFI report for a description of this aquifer zone. The samples must:
- (i) Represent the quality of background water that has not been affected by leakage from the units/areas;
 - (ii) Represent the quality of ground water passing the point of compliance, between the point of compliance and the down gradient property boundary, and beyond the property boundary, where necessary, to protect human health and the environment;
 - (iii) Allow for the detection and measurement of contamination for all potential release pathways to the uppermost aquifer from the waste management units/areas based on site-specific hydrogeologic characterization when hazardous constituents have migrated from the unit/area to the uppermost aquifer; and
 - (iv) Demonstrate the effectiveness of any corrective action program. The well system should be effective in determining compliance with the GWACI and in determining the success of the corrective action

program.

- (b) The monitoring system consists of the ground water wells as specified in Table Z-3 and shown on the ground water elevation map in attached Figure Z-2.

Table Z-3 Ground Water Monitoring Wells

Well	Gradient	Purpose
MW-1A	Side gradient	Potentiometric Map, Concentrations
MW-2A	Up gradient	Potentiometric Map, Concentrations
MW-4	Down gradient	Potentiometric Map, POC ¹ , Concentrations
MW-5	Down gradient	Potentiometric Map, POC ¹ , Concentrations
MW-6	Down gradient	Potentiometric Map, POC ¹ , Concentrations
MW-7	Down gradient	Potentiometric Map, POC ¹ , Concentrations
MW-8	Down gradient	Potentiometric Map, POC ¹ , Concentrations

¹ – Point of compliance.

- (c) Wells identified in Permit Condition Z.3(b) must be cased in a manner that maintains the integrity of the monitoring well bore hole and complies with the detailed plans and specifications presented in Appendix Z. The casing must be screened and packed with gravel or sand, where necessary, to enable collection of ground water samples. The annular space above the sampling depth must be sealed to prevent contamination of samples and the ground water.
- (d) The Permittee must remove or replace any monitoring well in Permit

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Condition Z.3(b) in accordance with the Appendix to OAC Rule 3745-50-51 permit modification process. Each change must be accompanied by a revised map as specified on Figures Z-1 and Z-2.

- (e) Whenever any of the wells specified in Permit Condition Z.3(b) are replaced, the Permittee must demonstrate to Ohio EPA that the ground water quality at the replacement well meets the criteria in Permit Condition Z.3(a) within a 365 day period of the date of replacement.

Z.4. Sampling and Analysis Procedures

- (a) The Permittee must implement an IGWMP as presented in the Quality Assurance Project Plan (QAPP) found in Appendix Z. This program includes procedures designed to ensure monitoring results that provide a reliable indication of ground water quality below the units/areas and are in compliance with this Permit Condition.
- (b) The Permittee must implement the Sampling and Analysis Plan (SAP), as presented in Appendix Z, SOP - 5006, which includes sampling and analytical methods (Table Z-1A in Appendix Z) that are appropriate for ground water sampling and that accurately measure hazardous constituents in ground water samples.
- (c) Field and analytical data must be validated in accordance with the procedures specified in the data validation procedures that are outlined in Appendix Z – SOP- 5006.
- (d) Ground water sample purge water must be sent to an appropriate facility for disposal and/or treatment according to the sampling results.

Z.5. Ground Water Surface Elevation

The Permittee must determine the ground water surface elevation at each well identified in the table in Permit Condition Z.3(b) each time ground water is sampled using the methods in the Standard Operating Procedure found in Appendix Z, SOP- 5006 of the Permit Application.

Z.6. Sampling Frequency

Data on each hazardous constituent specified in Permit Condition Z.2(a) will be collected from all wells listed in Permit Condition Z.3(b). Frequency of sampling is to be on a semiannual basis for wells MW-1A, MW-5, MW-6, and MW-7, and quarterly for MW-4 and MW-8. Wells are identified in attached Figures Z.1 and

Z.2.

Z.7. Statistical Procedures

- (a) The Permittee must submit statistical analytical methods to be used in evaluating ground water monitoring results for each hazardous constituent in Permit Condition Z.2(a) in each well in Permit Condition Z.3(b) that would identify increasing trend(s). Movement to corrective action shall be based upon a confirmed single exceedance of a site-specific GWACI as specified in Table Z-1:

The Permittee shall submit to Ohio EPA the Statistical Plan within 45 days after receipt of the permit modification approval.

- (b) The Permittee's statistical procedures must be protective of human health and the environment. The statistical procedures must comply with the following performance standards:
- (i) The statistical evaluation of ground water monitoring data must be conducted separately for each hazardous constituent specified in Permit Condition Z.2 (a) in each well.
- (ii) The statistical method must be in accordance with the U.S. EPA Statistical Analysis of Groundwater Monitoring Data at RCRA Facilities, Unified Guidance March 2009 (EPA 530/R-09-007) appropriate for the distribution of the data used to establish background or clean-up standards. If the distribution of the constituents differs, more than one statistical method may be needed.
- (c) For each of the constituents identified Table Z-1, following the first four sampling events and annually thereafter, the Permittee shall present a graph of analysis results versus time using all historical analysis results. The Permittee shall provide a qualitative discussion concerning any anomalies, trends, or changes in ground water.

Z.8. Operating Record and Reporting

OAC Rules 3745-54-73, 3745-54-75, and 3745-54-77

(a) Operating Record

The Permittee must enter all of the following information obtained in accordance with Permit Module Z in the operating record:

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- (i) Ground water monitoring data collected in accordance with this permit including actual levels of constituents.
- (ii) The laboratory results from each of the wells and their associated qualifiers including the laboratory sheets for the full volatile and semi-volatile analyses (must include method codes, method detection limits, and units of measurement);
- (iii) The date each well was sampled (tabulated);
- (i) The date, time, and identification of all blanks and duplicates;
- (ii) Any field log documentation of deviation from the procedures in Appendix Z, including documentation of parameter omissions during the sampling event;
- (iii) The date the Permittee received the results from the laboratory;
- (iv) The date the Permittee completed their review of the analytical laboratory's verification of the accuracy and precision of the analytical data and determined its quality.
- (v) The results of the data validation review per Permit Condition Z.8(a)(vii) including: report completeness, chain of custody, sample receipt form, signed statement of validity, technical holding time review, data qualifiers including their definitions, dilutions, blank data, spikes, spike percent recovery, surrogate recovery, and an explanation of any rejected results;
- (vi) Results of all blanks and duplicates (trip, field, equipment, and method);
- (vii) Results of the field parameters;
- (viii) The statistical evaluation of the data (must include all computations, results of statistical tests, and date the statistical evaluation was completed) as specified in the Statistical Plan required in Permit Condition Z.7;
- (ix) Any change in well status (i.e., going from unaffected to affected status and vice versa);

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- (x) Ground water surface elevations taken at the time of sampling of each well;
 - (xi) Data and results of the annual determination of the ground water flow rate and direction per Permit Condition Z.9(c)(vi);
 - (xii) The results of the last three years of all inspections required under OAC Rule 3745-54-15(D) related to ground water monitoring and equipment as required under OAC Rule 3745-54-73(B)(5).
 - (xiii) Evaluation of the efficiency of any corrective actions performed to bring the ground water quality into compliance with the GWACI per Permit Condition Z.2. Reports will be due 75-days after each quarterly or semiannual sampling event and must include a potentiometric map (including water levels from MW-2A), laboratory analytical results, field sample and stabilization forms, summary tables, and data evaluation including any documentation of deviations.

(b) Annual and Other Periodic Required Reporting

(i) Required Annual Reporting

The Permittee must submit a Supplementary Annual Ground Water Monitoring Report to the Director by March 1st of the following year. This annual report must reference the titles and dates of any other periodic reports required by the permit or any updates to those reports, but generally does not need to include duplicates of hard copies previously submitted.

The Supplementary Annual Ground Water Monitoring Report must include, at a minimum, the analytical results required by Permit Conditions Z.6 and Z.9, the ground water elevation data required by Permit Condition Z.5 and Z.8 (a)(xiii) and (xiv), and the results of any statistical analyses required by Permit Condition Z.7 and Z.9. Submittal of all ground water and blank data will use the Ohio EPA Supplementary Annual Ground Water Reporting electronic format (GWData.dbf). In addition, a hard copy of well-specific information (location (latitude and longitude), depth, construction, etc.) for any new/replacement wells, and any other information specified in the instructions for the Supplementary Annual Ground Water Report not addressed in this Permit Condition must be submitted as part of this report.

For each of the constituents identified in Table Z-1, following the first four sampling events and annually thereafter, the Permittee shall present a graph of analysis results versus time using all historical analysis results. The Permittee shall provide a qualitative discussion concerning any anomalies, trends, or changes in ground water.

(ii) Required Semiannual Reports

Reports will be due 75 days after each semiannual sampling event and must include a potentiometric map (including water levels from MW-2A), laboratory analytical results, field sample and stabilization forms, summary tables, and comparisons to GWACI in Table Z-1. The previous quarter's sampling data for wells MW-4 and MW-8 will be combined within the next semiannual report.

(iii) Required 3-year Reports

Every three years, the Permittee must report, in writing, to the Director on the effectiveness of the Monitored Natural Attenuation (MNA) corrective action monitoring program. This report should discuss the progress in meeting the final clean-up standards listed in Table Z-4, the projected time frame for meeting the final clean-up standards and a summary of newly acquired data since the last report. An evaluation section must be presented that discusses the effectiveness of the institutional controls, a trend analysis for constituents listed in Table Z-1, and a statistical evaluation in accordance with Permit Condition Z.7 on whether MNA remains a timely and effective remediation strategy. This includes modeling (i.e., BIOCHLOR or others) to confirm results and suggest enhancements so that remediation goals are met. Any changes to enhance the performance of the selected remedy should be presented in a recommendation section. Ohio EPA will evaluate the recommendations and determine whether MNA remains a timely and effective remediation strategy. If reduction goals are not being met, the Permittee will be required to perform a specific MNA scientific study using select wells to determine whether MNA can effectively reduce concentrations to meet remediation goals and/or determine what enhancements to the remedy can be effective. The Permittee will identify and provide a list of the wells, test parameters and evaluation criteria selected for this investigation to Ohio EPA for review prior to implementation.

(iv) Other Reports

The Permittee must comply with any other reporting requirements that become necessary under Permit Condition Z.9 in accordance with the schedules covered by that permit condition and as required by OAC Rule 3745-54-77(C).

Z.9. Integrated Ground Water Monitoring Program
OAC Rule 3745-54-101

- (a) The Permittee is required to establish and implement a ground water corrective action program under OAC Rule 3745-54-101 and must take corrective action, as necessary, to ensure that units/areas are in compliance with the GWACI as specified in Permit Condition Z.2.
- (b) The Permittee must implement, as necessary, a corrective action program that prevents hazardous constituents specified in Permit Condition Z.2(a) from exceeding their respective GWACI specified in Table Z-1 at the compliance point specified in Permit Condition Z.2(b) which is the down gradient property boundary, and beyond the property boundary during the permit period specified in Permit Condition Z.2(c) by removing the hazardous constituents or by treating them in place.
- (c) The Permittee must establish and implement a ground water monitoring program to fully characterize the contaminated ground water as required by OAC Rule 3745-50-44(B)(8)(a) and to demonstrate the effectiveness of the corrective action program. Ground water monitoring must be effective in determining compliance with the GWACI in Permit Condition Z.2 and in determining the success of any corrective action program in this condition. The ground water monitoring program must include:
- (i) Installation and maintenance of a ground water monitoring system at the compliance point as defined in Permit Condition Z.2(b), and, as necessary to protect human health and the environment, beyond the property boundary. The ground water monitoring system must comply with the requirements in Permit Condition Z.3.

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- (ii) Collection, preservation, and analysis of samples pursuant to Permit Conditions Z.4, Z.5, and Z.6. Statistical analysis must be conducted pursuant to Permit Condition Z.7
 - (iii) The Permittee must conduct a semiannual sampling program for each chemical parameter and hazardous constituent specified in Permit Condition Z.2(a) from each well (background and compliance) specified in Permit Condition Z.3(b) during the permit period and any extensions due to corrective action implementation.

Additional quarterly sampling will be conducted at MW-4 and MW-8. Modifications to this frequency will be considered after trend analyses have been conducted.

- (iv) The Permittee shall compare the concentration of each hazardous constituent measured at each well at the compliance point specified in Permit Condition Z.2(b) to its GWACI specified in Table Z-1 each time water quality is determined in accordance with procedures specified in Permit Condition Z.7.
 - (v) The Permittee must maintain a record of ground water analytical data as measured and in a form necessary for the determination of statistical significance under Permit Conditions Z.7 and Z.8 for the permit period.
 - (vi) The Permittee must determine the ground water flow rate and direction in the uppermost aquifer at least annually using the procedures specified in Appendix Z of the Permit Application.
- (d) Response Action
- (i) Based on the results of the Permittee's ground water monitoring program, if the GWACI detailed in Table Z-1 have not been exceeded, then the Permittee shall continue under routine IGWMP monitoring. OR
 - (ii) Based on the results of the Permittee's ground water monitoring program, if the GWACI in Table Z-1 have been exceeded or an increasing trend is determined, then the Permittee must implement corrective actions to remove or treat in place any hazardous

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constituents specified in Permit Condition Z.2(a) that exceed their respective GWACI in ground water within 180 days from the time the GWACI was exceeded.

- (a) Wells beyond the property boundary shall be installed and sampled where necessary when an increasing trend is observed or GWACI is exceeded at any compliance point monitoring well specified in Permit Condition Z.3(b) to protect human health and the environment, unless the Permittee demonstrates to the Agency that, despite the Permittee's best efforts, the Permittee was unable to obtain the necessary permission to undertake such action. The Permittee is not relieved of all responsibility to clean up a release that has migrated beyond the facility boundary where off-site access is denied. On-site measures to address such releases will be determined on a case-by-case basis.
- (b) If results from on-site wells MW-1A and MW-5 exceed GWACI or show increasing trends, then an on-site investigation shall be initiated.
- (iii) Within 90 days from the date of determination of exceedance, corrective action measures required under Permit Condition Z.9(d)(ii) must be initiated and a schedule submitted of detailed plans and an engineering report describing the corrective actions to be taken and a description of how the ground water monitoring program will assess the adequacy of the corrective action. The corrective action must be implemented within 180 days from the date of determination of exceedance
- (iv) The Permittee must continue corrective action measures during the permit period to the extent necessary to ensure that the GWACI is not exceeded and for as long as necessary to achieve compliance with the final clean-up standards in Table Z-4.

Table Z-4 Site-Specific Final Clean-up Standards

Hazardous Constituent	CAS Number	Final Clean-Up Standards (ug/L)	Target PQL (ug/L)
Tetrachloroethylene	127-18-4	5.0 ¹	1.0
Trichloroethylene	79-01-6	5.0 ¹	1.0
Cis 1,2-Dichloroethylene	156-59-2	70.0 ¹	1.0
Trans 1,2-Dichloroethylene	156-60-5	100 ¹	1.0
1,1,1-Trichloroethane	71-55-6	200 ¹	1.0
1,1-Dichloroethylene	75-35-4	7.0 ¹	1.0
Vinyl Chloride	75-01-4	2.0 ¹	1.0
Chloroethane	75-00-3	21,000 ²	5.0

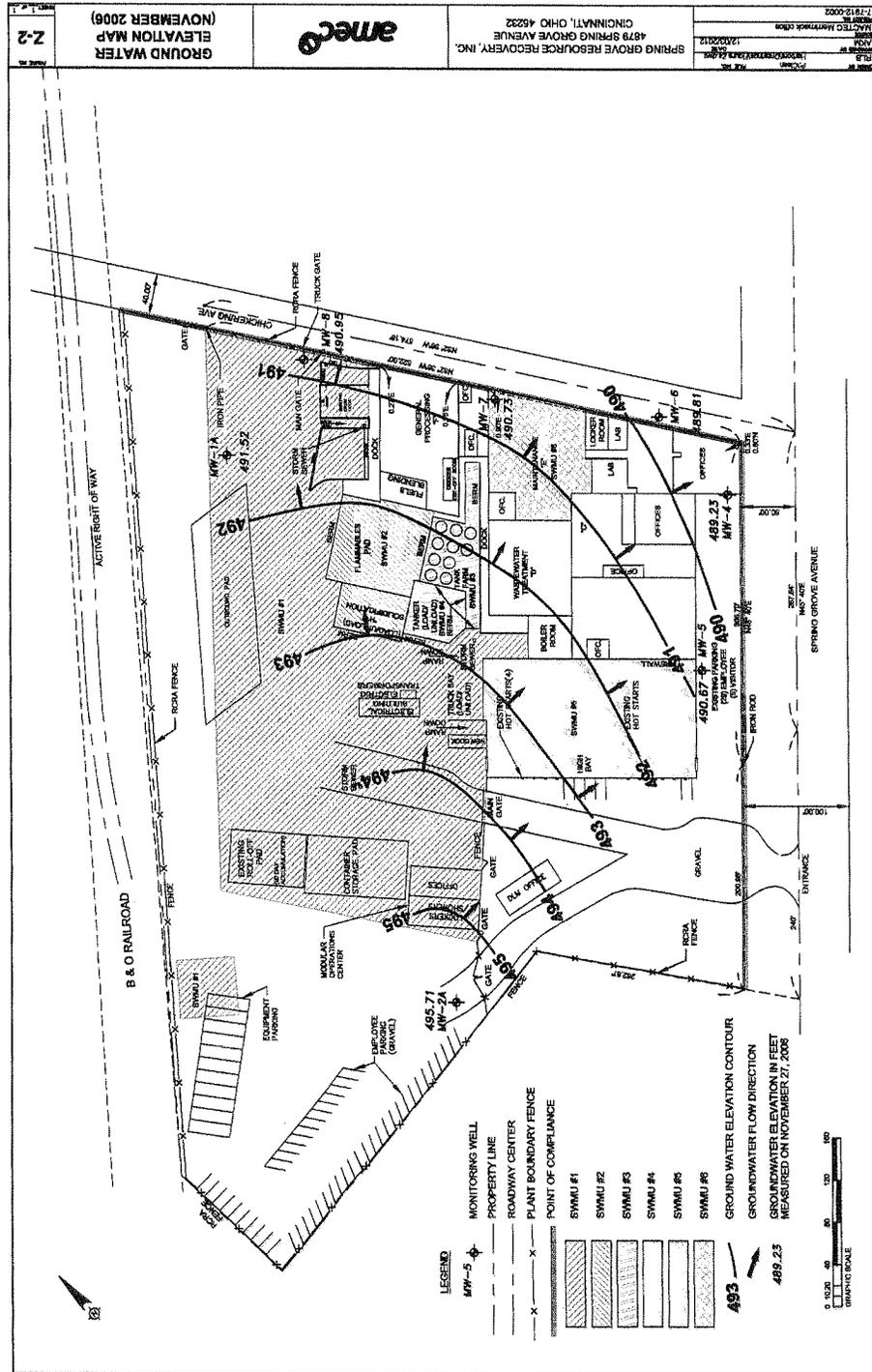
¹ – U.S. EPA Maximum Contaminant Level (MCL); ² – USEPA Combined Regional Screening Level – Tap Water Standard.

- (v) If the Permittee has not met the Site-Specific Final Clean-up Standards specified in Permit Condition Z.9(d)(iv) by the end of the permit period listed in Permit Condition Z.2(c), the Permittee must continue implementation of the IGWMP for as long as necessary until compliance with Permit Condition Z.9(d)(iv) has been achieved.
- (e) Every three years the Permittee must report in writing to the Director on the effectiveness of the MNA corrective action monitoring program according to Permit Condition Z.8(b)(iii).
- (f) If the Permittee determines the corrective action program established by this permit no longer satisfies the requirements of OAC Rule 3745-54-101, the Permittee must, within ninety (90) days of that determination, submit an application for a permit modification per OAC Rule 3745-50-51 to make any appropriate changes to the program.

End Conditions

Attachments

Figure Z-1. Facility diagram showing WMUs...



ATTACHMENT A
CORRECTIVE MEASURES IMPLEMENTATION
SCOPE OF WORK

PURPOSE

This Scope of Work (SOW) sets forth the requirements for the implementation of the design, construction, operation, maintenance, and monitoring of the corrective measure or measures pursuant to the Permittee's part B Permit to which this SOW applies. The work performed under this permit modification will implement the corrective measures that have been selected by Ohio EPA in the Statement of Basis and any amendments thereto. The Permittee will furnish all personnel, materials, and services necessary for the implementation of the corrective measure or measures.

SCOPE

The Corrective Measures Implementation consists of four tasks:

Task I: Corrective Measures Implementation Work Plan

- A. Project Management Plan
- B. Preliminary CMI Design Plan
- C. Public Involvement Plan

Task II: Corrective Measure Design

- A. Design Plans and Specifications
- B. Operation and Maintenance Plan
- C. Health and Safety Plan
- D. Sampling and Analysis Plan/Performance Monitoring Plan
- E. Cost Estimate

Task III: Corrective Measure Construction and Construction Completion Report

Task IV: Reports and Submissions

- A. Quarterly Progress Reports of Corrective Measures Implementation
- B. Annual Progress Reports
- C. 5-Year Report

D. Attainment of Ground Water Performance Standards Report

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E. Corrective Measures Completion of Work (CMCW) Report

Further specifications of the work outlined in this SOW will be provided in the Corrective Measures Implementation Work Plan and subsequent plans to be reviewed and approved by Ohio EPA. Variations from the SOW will be made, if necessary, to fulfill the objectives of the Corrective Measures set forth in the Statement of Basis and any amendments thereto.

Additional studies may be necessary as part of the Corrective Measures Implementation to supplement the available data. At the direction of Ohio EPA for any such studies required, the Permittee shall furnish all services, including field work, materials, supplies, labor, equipment, investigations, and superintendence. Sufficient sampling, testing and analysis shall be performed to optimize the operation of the required treatment, disposal, containment and/or monitoring system.

TASK I: CORRECTIVE MEASURE IMPLEMENTATION WORK PLAN

The Permittee shall prepare a Corrective Measure Implementation ("CMI") Work Plan. The CMI Work Plan shall outline the design, construction, operation, maintenance and monitoring of all actions taken to implement the Corrective Measures as defined in the Statement of Basis and any amendments thereto. This CMI Work Plan will include the development and implementation of several plans, which require concurrent preparation. It may be necessary to revise plans as necessary during corrective measures implementation.

The CMI Work Plan shall include the following:

- A. Project Management Plan: The Permittee shall prepare a Project Management Plan which will address the following items, as necessary and appropriate:
 - 1. Documentation of the overall management strategy for performing the design, construction, operation, maintenance, and monitoring of corrective measure(s);

2. Description of the responsibility and authority of all organizations and key personnel involved with the implementation;
3. Description of the qualifications of key personnel directing the CMI, including contractor personnel;
4. An outline of proposed field activities necessary to complete the CMI Design including proposed locations of groundwater monitoring wells and air monitoring stations;
5. A description of how the conceptual design is expected to meet the technical requirements of the Statement of Basis and any amendments thereto; and
6. Schedule of work including sequence of activities to be performed during the CMI and proposed timing for submittals required during the CMI.

B. Public Involvement Plan: A Public Involvement Plan will be developed to describe the community relations program to be implemented by the Respondent during the design and construction. At the request of Ohio EPA, the Permittee may participate in the preparation of information disseminated to the public and in providing information for public meetings that may be held or sponsored by Ohio EPA.

TASK II: CORRECTIVE MEASURE DESIGN

The Permittee shall prepare a Final Design Report including specifications and a construction plan to implement the corrective measures at the facility as set forth in the Decision Document and any amendments thereto.

A. Design Plans and Specifications: The Permittee shall develop clear and comprehensive design plans and specifications which include, but are not limited to, the following:

1. Discussion of the design strategy and the design basis, including: (a) compliance with all applicable or relevant environmental and public health standards; (b) minimization of environmental and public health impacts, and; (c) updated schedules, if necessary, from commencement through completion of construction of the CMI.
 2. Discussion of the technical factors of importance including: (a) use of currently accepted environmental control measures and technology; (b) the constructability of the design, and; (c) use of currently accepted construction practices and techniques.
 3. Description of models and assumptions made and detailed justification of these assumptions.
 4. Detailed drawings of the proposed design.
 5. Tables listing equipment and specifications;
 6. Appendices including: (a) sample calculations (one example presented and explained clearly for significant or unique design calculations); (b) results of laboratory or field tests; (c) list of specifications to be provided in full in the Final Design submittal, and; (d) list (an outline/table of contents) of documents and plans to be prepared and submitted with Final Design.
 7. Real Estate Easements, Environmental Covenant, and permit requirements. When preparing the Environmental Covenant(s), the Permittee shall use the template in Attachment A.2.
- B. Operation and Maintenance Plan: The Permittee shall prepare an Operation and Maintenance ("O&M") Plan to cover both the implementation and long term maintenance of the corrective measure(s). The O&M Plan shall identify and describe the processes to occur, submissions required during O&M, and schedule for O&M activities consistent with remedial objectives set forth in the Statement of Basis and any amendments thereto. The O&M Plan shall include, but not be limited to, the following elements:

1. Description of routine O&M including tasks required to operate and maintain treatment systems or other components of corrective measures and a schedule showing frequency and duration of each O&M task.
2. Description of potential operating problems including the procedures to be used to analyze and diagnose potential operation problems, sources of information regarding problems, and common or anticipated trouble-shooting steps and remedies.
3. Description of routine monitoring and laboratory testing including a description of specific monitoring tasks required for the corrective measures, a description of required laboratory tests and their interpretation/reporting, a description of required QA/QC activities, and a schedule of monitoring frequency and date, if appropriate, and a description of what conditions may allow monitoring to cease or the frequency of monitoring to change.
4. Safety plan including description of precautions for specific equipment, etc., level of personal protection and type of monitoring for site personnel, and safety tasks required in the event of systems failure.
5. Description of equipment including the identification, layout and installation of monitoring components, maintenance of site equipment, and replacement schedule for equipment and installed components.
6. Records and reporting mechanisms including operating logs, inspections, laboratory records and test results, operating and maintenance cost records, mechanism for reporting emergencies, personnel and maintenance records, and progress reports to State and Federal agencies.

- C. Health and Safety Plan: The Permittee shall prepare a Health and Safety Plan to address all work to be performed at the facility to implement the corrective measures set forth in the Statement of Basis. This document will be submitted to Ohio EPA for review although it does not require approval by Ohio EPA. The Health and Safety Plan shall be designed to protect on-site personnel and area residents from physical, chemical and other hazards posed by the CMI, including pre-design studies if applicable.

The major elements of the Health and Safety Plan should include but not be limited to: facility description; description of known hazards and an evaluation of risks; list of key personnel responsible for site safety, delineation of work area, description of protective clothing; procedures to control access; description of decontamination procedure for personnel and equipment; site emergency procedures; and procedures for protecting workers from weather-related problems.

The Health and Safety Plan, as appropriate, shall be consistent with U.S. EPA. (1992) Standard Operating Safety Guides; U.S. EPA (2000) Hazardous Materials Incident Response Operations (165.5); OSHA regulations such as 29 CFR Section 1910.120 (Hazardous Waste Operations and Emergency Response); 29 CFR Section 1910.132 through 1910.138 (Personnel Protective Equipment); 29 CFR Section 1910.1000 (Air Contaminants); and 29 CFR Part 1926 (Safety and Health Regulations for Construction); and, U.S. Department of Health and Human Services (1985) Occupational Safety and Health Guidance Manual for Hazardous Waste Site Activities.

- D. Sampling and Analysis Plan/Performance Monitoring Plan: The Permittee shall update the Sampling and Analysis Plan, including the QAPP as necessary and appropriate, to reflect changes in the following:

responsibility and authority; personnel qualifications; inspection activities; sampling requirements; and documentation and reporting. Additional revisions shall be made, or a separate document prepared (Performance Monitoring Plan) to describe the performance monitoring program that will be used to measure the effectiveness of the corrective measures set forth in the Statement of Basis. The performance monitoring plan shall describe all sampling, monitoring, data analysis and reporting activities that will be completed to demonstrate the effectiveness of the corrective measures.

- E. Cost Estimate: Permittee shall refine the cost estimate developed in the CMS to reflect the more detailed/accurate design plans being developed and specifications being developed. The cost estimate shall include both capital and O&M costs.

TASK III: CORRECTIVE MEASURES COMPLETION OF WORK (CMCW) REPORT

Following Ohio EPA approval of the Final CMI Design Report, the Permittee shall implement construction in accordance with procedures, specifications, and schedules in the EPA-approved Final CMI Design Report and the EPA approved CMI Work Plan. During the Construction Phase, the Permittee will continue to submit periodic progress reports (Task IV). The Permittee shall also implement the elements of the approved Sampling and Analysis Plan and O&M plan, as necessary and appropriate. Upon completion of construction and an initial period of performance monitoring, and in accordance with the schedule included in the Ohio EPA-approved CMI Work Plan and the Ohio EPA-approved Final CMI Design Report, the Permittee will prepare and submit a CMI Corrective Measures Completion of Work (CMCW) Report.

The CMI CMCW Report shall describe activities performed during construction, provide actual specifications of the implemented remedy, and provide a preliminary

assessment of CMI performance. The CMI CMCW Report shall include, but not be limited to, the following elements:

1. Synopsis of the corrective measure and certification of the design and construction;
2. Explanation of any modifications to the Ohio EPA-approved construction and/or design plans and why these were necessary for the project;
3. Listing of the criteria, established in the Ohio EPA-approved CMI Work Plan, for judging whether the corrective measure is functioning properly, and also explaining any modification to these criteria;
4. Certification by registered professional engineer that the construction is complete, consistent with contract documents and the Ohio EPA-approved Final CMI Design;
5. Signature of a Respondent's responsible official as designated in accordance with Permit Condition A. 13.; and,
6. A summary of the Field log book, any problem identification and correction, photographic records, deviations from design and material specifications (with justifying documentation), and as-built drawings.

TASK IV: PROGRESS REPORTS AND SUBMISSIONS

The Permittee shall prepare plans, drawings, specifications, and reports as set forth in Tasks I through III to document the design, construction, operation, maintenance, and monitoring of the corrective measure. The documentation shall include, but not be limited to the following:

- A. Quarterly Progress Reports of Corrective Measures Implementation: Until the Corrective Measures have been implemented, the Permittee shall provide the Ohio EPA with signed, quarterly progress reports containing:

1. A description of the work performed during the preceding monitoring interval and estimate of the percentage of the Corrective Measures Implementation completed;
2. Summaries of all findings;
3. Summaries of all changes made in the CMI during the reporting period;
4. Summaries of all contacts with representatives of the local community, public interest groups, or State government during the reporting period;
5. Problems encountered and any actions taken to rectify problems;
6. Changes in personnel during the reporting period;
7. Projected work for the next reporting period; and
8. Copies of daily reports, inspection reports, laboratory/monitoring data, etc.

B. Annual Progress Reports: Once the Corrective Measures have been implemented, the Permittee shall provide Ohio EPA with signed annual progress reports and/or Corrective Measures Assessment Reports containing:

1. A narrative summary of principal activities conducted during the reporting period;
2. Graphical or tabular presentations of monitoring data, including but not limited to groundwater levels and flow direction, and groundwater quality;
3. A schedule of sampling and field activities to be performed and reported in the following year; and
4. A Corrective Measures Assessment Report assessing the performance of the corrective measures over time. The Assessment Report shall include:

- a. Summarized data representing corrective measure performance;
 - b. Any proposed changes to the corrective measure and summary of previous changes;
 - c. Iso-concentration maps for each contaminant of concern listed in the CMI Design Plan; and
 - d. Statistical assessment of the progress of the corrective measure towards achievement of media clean-up standards.
- C. Five-Year Report: In lieu of every fifth annual report, the Permittee shall provide Ohio EPA with signed Five-Year Corrective Measures Progress Reports containing:
1. All items required for the Annual Progress Reports; and
 2. In depth analysis of the Corrective Measures Implementation including:
 - a. Complete re-assessment of models, plans and goals used by the CMI process;
 - b. Changes and/or additions to the existing systems that may be required to meet CMI goals.
 - c. Notification that corrective actions media cleanup standards have been achieved, when appropriate.
- D. Attainment of Ground Water Performance Standards Report: Within 30 days after the Permittee concludes that the ground water performance standards have been attained, the Permittee shall submit a written report and certification to Ohio EPA for review and approval. In the report, an independent registered professional engineer and the Permittee's Project Coordinator shall state that the ground water performance standards have been attained in full satisfaction of the requirements of this Permit.

The report shall be signed by a responsible official in accordance with Permit Condition A. 13.

- E. Completion of Work Report: This report shall be submitted by the Permittee when construction is complete, performance standards have been attained, and O&M is complete. Within 30 days after the Permittee concludes that all phases of the work (including O&M and monitoring) have been completed, the Permittee shall schedule and conduct a pre-certification inspection to be attended by representatives of the Permittee and Ohio EPA. After the pre-certification inspection and any pre-final or subsequent final inspections required by Ohio EPA, the Permittee shall submit, within 30 days of a successful final inspection, a written Completion of Work Report to Ohio EPA for approval. In the report, an independent registered professional engineer and the Permittee's Project Coordinator shall state that the Corrective Measures have been completed in full satisfaction of the requirements of this permit. The written report shall include as built drawings stamped by a registered professional engineer, unless there were no modifications to the Corrective Measures after submittal of as-built drawings at the completion of construction. The report shall be signed by a responsible official in accordance with Permit Condition A. 13.
- F. Submittal Summary: A summary of the information reporting requirements is presented in the table in Attachment A.1.

ATTACHMENT A.1

Submittal	Due Date
Draft CMI Work Plan Project Management Plan Preliminary Design Plan Public Involvement Plan	Within 90 days of the signing of the orders.
Final CMI Work Plan (revision of Draft CMI Work Plan)	30 days after receipt of Ohio EPA's comments on Draft CMI Work Plan
Draft Final Design Report Design Plans and Specifications Operation and Maintenance Plan Health and Safety Plan/ Sampling Analysis Plan/Performance Monitoring Plan Cost Estimate	In accordance with the schedule in the Final CMI Work Plan
Final Design Report	30 days after receipt of Ohio EPA's comments on Draft CMI Work Plan
CMI Report Overview of CMI, design certification & construction, Explanation of modifications to approved plan Performance criteria listing Certification by Registered Professional Engineer	In accordance with the approved design schedule
Quarterly Progress Reports	Submitted by the last day of every third month until implementation of corrective measures.
Annual Progress Reports	Submitted in January, annually, except for years requiring a Five-year Report.

Five Year Report	Submitted in January every five years.
Attainment of Ground Water Performance Standards Report	Within 30 days after the Respondent concludes that the ground water performance standards have been attained.
Corrective Measures Completion of Work (CMCW) Report	30 days after Respondent concludes that all phases of the work (including O&M and monitoring) have been completed.

ATTACHMENT A.2**To be recorded with Deed
Records - ORC § 317.08****ENVIRONMENTAL COVENANT**

This Environmental Covenant is entered into by _____ ("Owner") [Also include the identity of any Holders] and the Ohio Environmental Protection Agency ("Ohio EPA") pursuant to Ohio Revised Code ("ORC") §§ 5301.80 to 5301.92 for the purpose of subjecting the Property to the activity and use limitations set forth herein.

Whereas, Owner is the owner of certain real property located at _____ and legally described in Exhibit ___ attached hereto (collectively referred to herein as the "Property"); and

Add summary of conditions at the Property, e.g.:

Whereas, as a result of past hazardous waste activities at the Property, certain contaminants were stored and have been released at certain portions on the Property. These contaminants include, but are not limited to, tetrachloroethene (PCE) and trichloroethene (TCE). Potential pathways of exposure from the contaminants located within these portions of the Property include direct contact with groundwater; and

Whereas, as a result of the contaminants identified above, Owner was required to submit to Ohio EPA a corrective measures plan for portions of the Property and to implement the approved plan; and

Whereas, _____ submitted a [describe document, e.g., closure plan, corrective action submittal, etc.] to Ohio EPA and an amended closure plan was approved on April 5, 2006; and

Whereas, Owner is implementing the approved [e.g. closure plan, corrective action document, etc.] on the Property in accordance with Ohio EPA's hazardous waste requirements contained in ORC Chapter 3734. As part of the [closure, corrective action, etc.], Owner has agreed to place certain restrictions on the future use of portions of the Property, as described herein; and

Whereas, the Administrative Record of the [closure, corrective action, etc.] is maintained as the file titled _____ in the Ohio EPA [identify location of the administrative record, including address, e.g., Northeast District Office]; and

Whereas, the implementation of appropriate use restrictions that restrict land and

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ground water use on the Property is required to protect human health and the environment, based upon a human health risk assessment performed for the [describe area, e.g., hazardous waste management units, waste management units, etc.] addressed in the [closure, corrective action, etc.].

Now therefore, Owner and Ohio EPA agree to the following:

1. Environmental Covenant. This instrument is an environmental covenant developed and executed pursuant to ORC §§ 5301.80 to 5301.92.

2. Property. This Environmental Covenant concerns real property _____ and more particularly described in Exhibit __ attached hereto and hereby incorporated by reference herein ("Property").

3. Owner. _____ ("Owner") is the owner of the Property located at _____.

4. Holders. Owner, whose address is listed above, is the holder of this Environmental Covenant. [Also identify all other Holders]

5. Activity and Use Limitations. As part of the [closure, corrective action, etc.] of [hazardous waste management units, waste management units, etc.] on the Property, Owner hereby imposes and agrees to comply with the following activity and use limitations:

- A. The Property shall not be used for residential activities but may be used for industrial activities. The term "residential activities" shall include, but not be limited to, the following:
- (i) Single and multi-family dwelling and rental units;
 - (ii) Day care centers and preschools;
 - (iii) Hotels and motels;
 - (iv) Educational (except as part of industrial activities within the Property) and religious facilities;
 - (v) Restaurants and other food and beverage services (except as a part of industrial activities within the Property);
 - (vi) Entertainment and recreational facilities (except as part of industrial activities within the Property);
 - (vii) Hospitals and other extended care medical facilities; and
 - (viii) Transient or other residential facilities.

The term "industrial activities" shall include manufacturing, processing operations and office and warehouse use, including but not limited to production, storage and sales of durable goods and other non-food-chain products and parking/driveway use.

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[Add any specific restrictions required at the Property. See bold paragraph B below for example]:

B. Ground water located within or upon the Property shall not be used except for investigation, monitoring or remediation purposes.

C. In the event that any activity by the holder of an encumbrance on the Property, identified in paragraph 12 below, constitutes a violation of these activity and use restrictions, Owner or Transferee shall notify Ohio EPA within thirty (30) days of becoming aware of the event, and shall remedy the breach of the covenant within sixty (60) days of becoming aware of the event, or such other time frame as may be agreed to by the Owner or Transferee and Ohio EPA.

6. Running with the Land. This Environmental Covenant shall be binding upon the Owner and all assigns and successors in interest, including any Transferee, and shall run with the land, pursuant to ORC § 5301.85, subject to amendment or termination as set forth herein. The term "Transferee," as used in this Environmental Covenant, shall mean any future owner of any interest in the Property or any portion thereof, including, but not limited to, owners of an interest in fee simple, mortgagees, easement holders, and/or lessees.

7. Compliance Enforcement. Compliance with this Environmental Covenant may be enforced pursuant to ORC § 5301.91 or other applicable law. Failure to timely enforce compliance with this Environmental Covenant or the activity and use limitations contained herein by any party shall not bar subsequent enforcement by such party and shall not be deemed a waiver of the party's right to take action to enforce compliance. Nothing in this Environmental Covenant shall restrict the Director of Ohio EPA from exercising any authority under applicable law.

8. Rights of Access. Owner hereby grants to Ohio EPA, its agents, contractors, and employees and to Holder(s), the right of access to the Property for implementation or enforcement of this Environmental Covenant.

9. Compliance Reporting. Owner and any Transferee shall submit to Ohio EPA and Holder(s) on an annual basis a written certification which complies with the requirements of Ohio Administrative Code rule 3745-50-42(B), (C), and (D) that the activity and use limitations remain in place and are being complied with.

10. Recordation of Environmental Covenant. Within thirty (30) days after the date of the final required signature upon this Environmental Covenant, Owner shall record, in the office of the Hamilton County Recorder, this Environmental Covenant in the same manner as a deed to the Property, pursuant to ORC §

5301.88. Owner shall certify to Ohio EPA that the Environmental Covenant has been filed for recording, and include with the certification a file and date-stamped copy of the Environmental Covenant.

11. Notice upon Conveyance. Each instrument hereafter conveying any interest in the Property or any portion of the Property shall contain a notice of the activity and use limitations set forth in this Environmental Covenant, and provide the recorded location of this Environmental Covenant. The notice shall be substantially in the following form:

THE INTEREST CONVEYED HEREBY IS SUBJECT TO AN ENVIRONMENTAL COVENANT, DATED _____, 20__, RECORDED IN THE DEED OR OFFICIAL RECORDS OF THE HAMILTON COUNTY RECORDER ON _____, 20__, IN [DOCUMENT ____, or BOOK ____, PAGE ____]. THE ENVIRONMENTAL COVENANT CONTAINS THE FOLLOWING ACTIVITY AND USE LIMITATIONS:

The Property shall not be used for residential activities but may be used for industrial activities. The term "residential activities" shall include, but not be limited to, the following:

- (a) Single and multi-family dwelling and rental units;
- (b) Day care centers and preschools;
- (c) Hotels and motels;
- (d) Educational (except as part of industrial activities within the Property) and religious facilities;
- (e) Restaurants and other food and beverage services (except as a part of industrial activities within the Property);
- (f) Entertainment and recreational facilities (except as part of industrial activities within the Property);
- (g) Hospitals and other extended care medical facilities; and
- (h) Transient or other residential facilities.

The term "industrial activities" shall include manufacturing, processing operations and office and warehouse use, including but not limited to production, storage and sales of durable goods and other non-food-chain products and parking/driveway use.

[Include specific restrictions identified in paragraph 5 above. See bold paragraph below for example]

Ground water located within or upon the Property shall not be used except for investigation, monitoring or remediation purposes.

In the event that any activity by the holder of an encumbrance on the Property, identified in paragraph 12 below, constitutes a violation of these activity and use restrictions, Owner or Transferee shall notify Ohio EPA within thirty (30) days of becoming aware of the event, and shall remedy the breach of the covenant within sixty (60) days of becoming aware of the event, or such other time frame as may be agreed to by the Owner or Transferee and Ohio EPA.

Owner shall notify Ohio EPA within ten (10) days after each conveyance of an interest in any portion of the Property. Owner's notice shall include the name, address, and telephone number of the Transferee, a copy of the deed or other documentation evidencing the conveyance, a legal description of the Property being transferred, a survey map of the Property being transferred, and the closing date of the transfer of ownership of the Property.

12. Representations and Warranties. Owner hereby represents and warrants to the other signatories hereto:

- A. that the Owner is the sole owner of the Property;
- B. that the Owner holds fee simple title to the Property which is subject to the interests or encumbrances listed and described in Exhibit ___ attached hereto, which is fully incorporated by reference herein;
- C. that the Owner has the power and authority to enter into this Environmental Covenant, to grant the rights and interests herein provided and to carry out all obligations hereunder;
- D. that the Owner has identified all other persons, identified in Exhibit ___, described above, that hold any interest (e.g. encumbrance) in the Property and notified such persons of the Owner's intention to enter into this Environmental Covenant; and
- E. that this Environmental Covenant will not materially violate or contravene or constitute a material default under any other agreement, document or instrument to which Owner is a party or by which Owner may be bound or affected.
- F. To the extent that any other interests in or encumbrances on the Property conflict with the activity and use limitations set forth in this Environmental Covenant, the persons who own such interests or hold such encumbrances have agreed to subordinate such interests or encumbrances to the Environmental Covenant, pursuant to ORC § 5301.86, and the Waiver of Priority of Mortgage attached hereto as Exhibit ___ and incorporated by reference.

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13. Amendment or Termination. This Environmental Covenant may be amended or terminated by consent of all of the following: the Owner or a Transferee, the Holder, and the Ohio EPA, pursuant to ORC § 5301.90 and other applicable law. Amendment means any changes to the Environmental Covenant, including the activity and use limitations set forth herein, or the elimination of one or more activity and use limitations when there is at least one limitation remaining. Termination means the elimination of all activity and use limitations set forth herein and all other obligations under this Environmental Covenant.

This Environmental Covenant may be amended or terminated only by a written instrument duly executed by the Director of Ohio EPA and the Owner or Transferee and the Holder of the Property or portion thereof, as applicable. Within thirty (30) days of signature by all requisite parties on any amendment or termination of this Environmental Covenant, the Owner or Transferee shall file such instrument for recording with the Hamilton County Recorder's Office, and shall provide a true file and date-stamped copy of the recorded instrument to Ohio EPA.

14. Severability. If any provision of this Environmental Covenant is found to be unenforceable in any respect, the validity, legality, and enforceability of the remaining provisions shall not in any way be affected or impaired.

15. Governing Law. This Environmental Covenant shall be governed by and interpreted in accordance with the laws of the State of Ohio.

16. Effective Date. The effective date of this Environmental Covenant shall be the date upon which the fully executed Environmental Covenant has been recorded as a deed record for the Property with the _____ County Recorder.

17. Distribution of Environmental Covenant. The Owner shall distribute copies of the recorded Environmental Covenant to: Ohio EPA, any lessee, each person who signed the Environmental Covenant, each person holding a recorded interest in the Property, each unit of local government in which the Property is located, and any other person designated by Ohio EPA.

18. Notice. Any document or communication required by this Environmental Covenant shall be submitted to:

Mr. Jeremy A. Carroll, P.E, Manager
Ohio Environmental Protection Agency
Lazarus Government Center
Division of Materials and Waste Management
P.O. Box 1049
Columbus, Ohio 43216-1049

and

ATTACHMENT I

Hazardous Wastes for Storage, Transfer and Treatment

D001	F005	K025	K097	K174	P044	P104	U007	U059	U111	U161	U215	
D002	F006	K026	K098	K175	P045	P105	U008	U060	U112	U162	U216	
D003	F007	K027	K099	K176	P046	P106	U009	U061	U113	U163	U217	U387
D004	F008	K028	K100	K177	P047		U010	U062	U114	U164	U218	U389
D005	F009	K029	K101	K178	P048	P108	U011	U063	U115	U165	U219	
D006	F010	K030	K102	K181	P049	P109	U012	U064	U116	U166	U220	
D007	F011	K031	K103		P050	P110	U014	U066	U117	U167	U221	
D008	F012	K032	K104		P051	P111	U015	U067	U118	U168	U222	
D009	F019	K033	K105		P054	P112	U016	U068	U119	U169	U223	U394
D010	F020	K034	K106		P056	P113	U017	U069	U120	U170	U225	U395
D011	F021	K035	K107	P001	P057	P114	U018	U070	U121	U171	U226	
D012	F022	K036	K108	P002	P058	P115	U019	U071	U122	U172	U227	U404
D013	F023	K037	K109	P003	P059	P116	U020	U072	U123	U173	U228	U409
D014	F024	K038	K110	P004	P060	P118	U021	U073	U124	U174	U234	U410
D015	F025	K039	K111	P005	P062	P119	U022	U074	U125	U176	U235	U411
D016	F026	K040	K112	P006	P063	P120	U023	U075	U126	U177	U236	
D017	F027	K041	K113	P007	P064	P121	U024	U076	U127	U178	U237	
D018	F028	K042	K114	P008	P065	P122	U025	U077	U128	U179	U238	
D019	F032	K043	K115	P009	P066	P123	U026	U078	U129	U180	U239	
D020	F034	K044	K116	P010	P067	P127	U027	U079	U130	U181	U240	
D021	F035	K045	K117	P011	P068	P128	U028	U080	U131	U182	U243	
D022	F037	K046	K118	P012	P069	P185	U029	U081	U132	U183	U244	
D023	F038	K047	K123	P013	P070	P188	U030	U082	U133	U184	U246	
D024	F039	K048	K124	P014	P071	P189	U031	U083	U134	U185	U247	
D025		K049	K125	P015	P072	P190	U032	U084	U135	U186	U248	
D026		K050	K126	P016	P073	P191	U033	U085	U136	U187	U249	
D027	K001	K051	K131	P017	P074	P192	U034	U086	U137	U188	U271	
D028	K002	K052	K132	P018	P075	P194	U035	U087	U138	U189		
D029	K003	K060	K136	P020	P076	P196	U036	U088	U140	U190	U278	
D030	K004	K061	K141	P021	P077	P197	U037	U089	U141	U191	U279	
D031	K005	K062	K142	P022	P078	P198	U038	U090	U142	U192	U280	
D032	K006	K064	K143	P023	P081	P199	U039	U091	U143	U193	U328	
D033	K007	K065	K144	P024	P082	P201	U041	U092	U144	U194	U353	
D034	K008	K066	K145	P026	P084	P202	U042	U093	U145	U196	U359	
D035	K009	K069	K147	P027	P085	P203	U043	U094	U146	U197	U364	
D036	K010	K071	K148	P028	P087	P204	U044	U095	U147	U200		
D037	K011	K073	K149	P029	P088	P205	U045	U096	U148	U201		
D038	K013	K083	K150	P030	P089		U046	U097	U149	U202	U367	
D039	K014	K084	K151	P031	P092		U047	U098	U150	U203	U372	
D040	K015	K085	K156	P033	P093		U048	U099	U151	U204	U373	
D041	K016	K086	K157	P034	P094		U049	U101	U152	U205		
D042	K017	K087	K158	P036	P095		U050	U102	U153	U206		
D043	K018	K088	K159	P037	P096		U051	U103	U154	U207		
	K019	K090		P038	P097	U001	U052	U105	U155	U208		
	K020	K091	K161	P039	P098	U002	U053	U106	U156	U209		
F001	K021	K093	K169	P040	P099	U003	U055	U107	U157	U210		
F002	K022	K094	K170	P041	P101	U004	U056	U108	U158	U211		
F003	K023	K095	K171	P042	P102	U005	U057	U109	U159	U213		
F004	K024	K096	K172	P043	P103	U006	U058	U110	U160	U214		

1955 U.S. MAPS BOARD APPROVED

2.2 SWMU DESCRIPTIONS

Based upon the findings of the RFA (U.S. EPA, 1991), five SWMUs were formally identified in the 1996 RCRA Part B Permit. The five Permit SWMUs identified in the 1996 permit were each composed of multiple units that ranged from #1 to #36. Since the 1996, two additional SWMUs, which were identified as #37 (the bone yard) and #38 (the maintenance building), have been added to the RCRA Part B Permit. For ease of comparison with the existing RFA discussions and maps, the original RFA unit numbers are shown on Figure 2-3 and are referenced within each Permit SWMU description provided below.

Brief descriptions of other areas, i.e., wastewater treatment system and Building F, that were not included in the Part B permit, but were voluntarily investigated further during the RFI, are also included in this section.

2.2.1 Permit SWMU #1

Permit SWMU #1 encompasses much of the northern portion of the SGRR facility, and includes truck bays and associated sumps and storm sewers, a building used for storage of supplies and equipment, the facility's rear yard, and a scrap yard. Several portable units (a roll-off box, a tank trailer, a trash dumpster, and a backhoe) that were present at the time of the RFA and are referenced in SWMU #1 no longer exist within this area. The various RFA units incorporated into Permit SWMU #1 are described as follows:

#9: Truck Bay, Associated Sumps, and Storm Sewer, Building E: This unit consists of a concrete dock with three diked concrete truck bays, 3 associated sumps and 1 storm sewer. The bay on the northeast end of the dock is enclosed and the concrete slopes toward a sump. The middle bay has a sump at the top of the slope and a storm sewer at the bottom. The storm sewer is actually a sump with an overflow pipe that leads directly to the sewer system and typically manages rainwater run-off. The northwest bay also slopes toward a sump. At the time of the RFA, the concrete was not sealed with a chemical-resistant coating nor was it poured as a single unit. The joint seams were not sealed and showed signs of wear. There were cracks in the concrete which have been sealed. Integrity of the sumps and storm sewer could not be determined during the RFA.

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#10: Roll-Off Box, Building F Truck Bay: This unit was a tarp-covered roll-off box formerly located in the middle truck bay outside Building F. The roll-off box is no longer at the SGRR facility and was not part of Clean Harbors' purchase of the facility. It contained methylene chloride and tetrachloroethene (PCE)-contaminated soil and concrete excavated in October 1990 during installation of roof footers for the Flammable-Waste Storage and Processing Pad. See RFA unit #12 for additional information.

#11: Tank Trailer, Building F Truck Bay: This unit was located in the northeast enclosed truck bay outside Building F and was not part of Clean Harbors' purchase. It contained PCB waste at >50 ppm and therefore, fell under Land Disposal Restrictions. It was being held in storage until approval/acceptance of the waste was granted by an off-site commercial treatment, storage, and disposal facility (TSDF). Subsequent to the RFA, it was removed to Rollins Incinerator in Deer Park, Texas.

#17: Storm Sewer: This unit is located to the south of the tank-truck loading/unloading pad (RFA unit #16) at the bottom of a concrete ramp and contains an overflow pipe that goes to the Cincinnati Metropolitan Sewer District (MSD) combined sewer. This unit is designed to manage any rainwater that may escape the release controls of the tank truck unloading pad. Integrity as a whole appeared to be good; however, at the time of the RFA, there were cracks in the surrounding concrete which were not sealed with a chemical-resistant coating.

#18: Solid Waste BFI Trash Dumpster containing solid waste: The solid waste dumpster is still in use, but its location has been changed. It is usually located near Building H, but may be placed anywhere in the yard depending on space availability. The storm sewer (RFA unit #17) to the northeast and the diked concrete pad (that is sloped toward the sewer) under and around the unit act as release controls for this unit.

#21: Scrap Yard for former CECOS Environmental Services (CES): This was an area of gravel and weeds in the west corner of the facility that at the time of the RFA contained various tanks, barrels, and other pieces of scrap metal. These scraps were left from various off-site clean-up/remediation projects done by CES for customers and decontaminated prior to being brought on-site. The scrap identified during the RFA has since been shipped off-site. A diked concrete pad was poured in this area in 1993, and included a blind sump. The area is now used as a 90-day generator accumulation area.

#22: Concrete Pad, Building L: This is a concrete pad that was located inside former Building L. This building was used mostly for supply/equipment storage. During the RFA, it was noted that there were several boxes of solid waste (i.e., Tyvek, construction lumber, trash) located in the south corner of the building. According to facility personnel, none of the material was contaminated with hazardous waste or hazardous constituents. There are no sumps or drains associated with this unit. The integrity as a whole appeared to be good during the Visual Site Inspection (VSI) (EPA, 1991), although the concrete was not poured as a single unit, was cracked, and was not sealed with a chemical-resistant coating. The building was removed; however, the concrete pad remains.

#23: Truck Bay at High Bay: This is a concrete ramp sloped towards a sump at the base of the concrete dock attached to the High Bay Building. Although the edge of the dock dropping down to the sump is not diked, the sides of the dock effectively prevent a spill from spreading outside that area. The truck bay, where two trucks may park simultaneously, is used to load/unload transformers, drums of non-hazardous waste, and 5-gallon pails of solid fuels (i.e., paint waste). The concrete is not chemical-resistant sealed and was not poured as a single unit. There were no visible cracks in the concrete.

#35: Backhoe: This mobile equipment was used for the solidification process (mixing) in Building H. It was located behind the electrical building in August 1991, but is no longer at this location.

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#36: Rear Yard: This location is the partially graveled, black-topped, and concrete-paved outside area traveled by vehicles bringing waste to the facility. The Roll-off Box (RFA unit #10) containing contaminated debris from the soil excavation and various other waste containers have been located in the rear yard at various times.

2.2.2 Permit SWMU #2

Permit SWMU #2 consists of one flammable-waste storage and processing pad and adjacent solidification bin and concrete pad within Building H. The RFA units incorporated into Permit SWMU #2 are described as follows:

#12 The Flammable Waste Storage and Processing Pad: This unit is located to the west of Building F. This reinforced concrete pad is approximately 80 feet by 80 feet, diked, six inches thick, and sloped towards its center. The dikes are made of 6 inch high by 6 inch thick concrete. A blind sump is located near the middle of the pad. The diked pad holds up to 26,400 gallons of liquids. A roof was constructed in 1990 to protect the pad from rainfall. This unit stores approximately 1,000 drums of solid and liquid flammable wastes until they are blended for off-site incineration. In the southeast corner of the pad is a pumping station to pump the drummed contents into the flammable waste blending tanks (RFA unit #13). The unit manages any spills/leaks from the loading/unloading storage and processing of flammable wastes and also from the pumping of fuel from drums into the flammable waste blending tanks (RFA unit #13). The dike and sump act as release controls. The concrete pad was not poured as a single unit, nor was it sealed with a chemical-resistant coating. There was no evidence of cracking. There are no drains associated with this unit.

#19 Solidification Bin, Building H: This is an 800-gallon open mixing bin used for waste solidification and dewatering of spent carbon from the wastewater treatment system (RFA unit #33). The unit formerly managed F006 waste and currently manages F039 waste. The bin itself, as well as the underlying diked concrete pad and the sump (RFA unit #20) act as release controls. The startup date for this unit was 1989.

#20: Concrete Pad, Building H: This unit is a 70 feet by 70 feet reinforced diked concrete pad with a sump. The unit is under a roof and enclosed on three sides. It is located to the west of the flammable waste storage and processing pad (RFA unit #12). This unit has been used primarily to support waste solidification. Additional activities have included drum crushing, drum storage for up to 200 drums, and carbon dewatering. The unit is currently being used to store containers of various wastes. This unit manages any spills/leaks of F006 waste sludge as well as various RCRA wastes being stored and spent carbon.

2.2.3 Permit SWMU #3

Permit SWMU #3 consists of above-ground storage tanks located immediately southeast of the Permit SWMU #2 flammables processing pad. These include six flammable-waste blending tanks and associated carbon adsorption system and piping, four PCB-waste storage tanks and associated piping, and a tank farm secondary containment system. The RFA units incorporated into Permit SWMU #3 are described as follows:

#13: Flammable Waste Blending Tanks, Carbon Adsorption System and Piping: This unit includes two vented, 8,000 gallon and four 15,000 gallon, cone-bottom tanks constructed of carbon steel located in the northeast corner of the tank farm. The tanks contain liquid fuels and RCRA wastes destined for incineration. They have a carbon adsorption system consisting of carbon canisters for vapor control. The tanks are part of a pumping system, located on the flammable waste storage and processing pad (RFA unit #12; see Permit SWMU #2). This unit was designed primarily to consolidate drummed quantities into

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bulk and ship off-site via tanker truck. Release controls for this unit include the tank farm secondary containment (RFA unit #15), the carbon canisters for vapor control, and the capacity alarms on the tanks themselves. The integrity of the secondary containment appeared to be good. The two 8,000 gallon tanks had a start-up date of approximately April 1987, but were replaced by two 7,000 gallon carbon steel tanks (Tanks 5 and 6) which were installed in 2000. The four 15,000 gallon tanks (Tank 7 through 10) were installed around 1992.

#14: Former PCB-Waste Storage Tanks and Piping: This area consists of four vented 10,000 gallon pedestal design, cylindrical, carbon steel tanks (Tanks 1 through 4). Two of the tanks contained PCB-contaminated oil from the decommissioning of transformers; another contained spent trichlorofluoroethane (TCTF, aka freon) used as a flush solvent in the transformer treatment process; and another contained distilled TCTF from the flush-solvent recovery process. Two sets of double-walled, above-ground pipes run between the tanks and the High Bay decommissioning area, and between the tanks and the tanker-truck loading/unloading pad (RFA unit #16) for loading/unloading of the PCB waste oil. The tanks have a start-up date of around 1982 or 1983; however, the piping to the high bay was not installed until 1986/1987. The use of these tanks for PCB-waste storage was discontinued in approximately 1989 or 1990. The tanks have been closed under the Toxic Substance Control Act (TSCA), and are currently used to hold wastewater.

#15: Tank Farm Secondary Containment: This area is located to the southwest of the flammable-waste storage and processing pad (RFA unit #12, see Permit SWMU #2). The unit consists of an excavated concrete pad that was 6-inch thick and approximately four feet below the flammable waste storage and processing pad (SWMU #2). It is contained by a reinforced concrete wall four feet high and eight inches wide. The concrete is coated with a protective epoxy that is compatible with the wastes stored in the tanks. This unit has a containment volume of approximately 130,000 gallons. A 15 gallon blind sump, located in the middle of the unit, is used to collect spills and run-on. The water in the blind sump is pumped to the wastewater treatment plant on a daily basis using a portable sump pump. The unit contains the flammable waste blending tanks and the wastewater tanks. This unit has a start-up date of 1983. Although the integrity of the sump could not be determined during the RFA, the integrity of the unit as a whole appeared to be good. There were no visible cracks in the concrete.

2.2.4 Permit SWMU #4

Permit SWMU #4 consists of a tanker loading/unloading pad and associated blind sump, which was originally labeled SWMU #16 in the RFA. The 60 feet by 40 feet diked reinforced concrete pad was constructed in 1982. A blind sump collects rainwater and/or any spills or leaks during loading/unloading of tanker trucks containing TSCA or RCRA wastes. The area is used primarily for pumping out the contents of tanker trucks but is also permitted to store containers. The slope and diking of the concrete pad toward the sump act as release controls. The concrete was not poured as a single unit but it has been sealed with a chemical-resistant coating.

2.2.5 Permit SWMU #5

Permit SWMU #5 includes current or former waste management areas within the high bay building in the central portion of the SGRR facility. The following RFA units are incorporated in Permit SWMU #5:

#24: Concrete Pad, High Bay: This unit is a concrete pad on which PCB drums, empty drums, and flammable solids are stored in various diked areas throughout the building. A drum crusher, used for crushing RCRA-empty containers, (RFA unit #27) and a Roll-off Box (RFA unit #26) are located on the pad. The high bay pad was used for the decommissioning of PCB transformers which included the freon recovery system (RFA unit #29). The SGRR facility also has its container consolidation system on the pad. This system is contained within an area marked by moveable dikes and the concrete pad is covered

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with plastic sheeting within the dikes. The dikes and the vapor collection system (RFA unit #25) act as release controls for this unit. The concrete was poured as a single unit. There were visible cracks in the concrete that had been individually sealed.

#25: Vapor Collection System: This area consists of 1) a vapor collection system which runs along the west, south and half of the east walls of the high bay, and has three suction/blower units that formerly vented to the atmosphere. Each vent had activated carbon acting as a filter; and 2) a fan located in the roof above the container consolidation (there is not a release control system on the fan). This unit managed any vapors from the container consolidation system or spills/leaks of wastes from processes in Building B (RFA unit #24). The system has since undergone TSCA/PCB closure. The decontaminated equipment remains on-site, but is not in use.

#26: Roll-off Box, High Bay: This unit is an uncovered roll-off box located in the northwest corner of high bay. It holds crushed drums that previously contained paint and other semi-solid hazardous waste.

#27: Drum Crusher: This unit is a large drum crusher located in the high bay that can crush up to six drums at a time. Before the drums are placed in the crusher they are "scraped clean" in the area in which they are processed. The unit manages any residual hazardous waste from the crushing of drums, including vapors.

#29: Freon Recovery System: This area consists of two freon distillation units and a venting system surrounded by a diked concrete pad (RFA unit #24). This unit is located in the northeast corner of the high bay. The unit ceased operations in 1989 after one month of operation. The system has undergone TSCA/PCB closure. The still pots have been removed from the SGRR facility and disposed. The decontaminated base remains in place.

2.2.6 Permit SWMU #37 Bone Yard

On July 31, 2004, SGRR Submitted a Class I modification to its operating permit to document a newly identified SWMU. A gravel staging area identified as SWMU #37 Bone Yard had been used to stage outgoing RCRA and non-RCRA materials prior to shipment. Based upon the limited activity in the SWMU and no documented spill history, no further investigation of the SWMU was required.

2.2.7 Permit SWMU #38 Maintenance Building

On April 5, 2006, SGRR Submitted a Class I modification to its operating permit to document a newly identified SWMU. A concrete pad located in the northern portion of the Building E had been used for maintenance and to stage non-hazardous materials prior to shipment. SWMU #37 is located in the northwestern portion of the site. Based upon the limited activity in the SWMU and no documented spill history, no further investigation of the SWMU was required.

2.2.8 Other Areas – Wastewater Treatment System and Building F

2.2.8.1 Wastewater Treatment System

The wastewater treatment system (RFA unit # 33) is located in Building D and contains six carbon-steel tanks with phenoxy coating inside and painted outside. They are housed in a 40 x 50 foot, diked, raised concrete area located in Building D. The system as a whole has a maximum treatment capacity of 250 gallons per minute (GPM) and can hold a volume of 17,000 gallons. The pipes, fittings, and valves are inspected for leaks, corrosion and deterioration on a weekly basis, and the levels in the tanks are inspected daily. The tanks are equipped with over pressurization alarms. The system discharges to the MSD via a sewer line. The discharge is sampled every 10,000 gallons and a report is submitted monthly to MSD. This unit began operating in 1981; however, the current design was installed in 1985. Industrial

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wastewater, wastes from on-site sumps, low-level organically contaminated leachate water from the closed CECOS landfill in Williamsburg, Ohio, and small drummed volumes of acids and bases for neutralization prior to discharge to MSD are managed in this unit.

2.2.8.2 Building F

Building F is completely enclosed and roofed, consisting of 15,000 square feet and a maximum inventory of 33,000 gallons. Acids (corrosives) are stored in a bermed location along the north wall in 55-gallon drums. PCB and non-hazardous wastes are stored in containers in a diked area on the east wall. Various wastes are also stored throughout the remainder of the building as part of the lab pack operation. The building includes the following RFA units:

#5: Sample Storage Lockers: This unit consists of the sample storage lockers for flammable waste, and includes two metal storage lockers containing flammable and U.S. Department of Transportation (DOT)-compatible waste samples located between the office and Building F. These lockers are vented to the outside. The unit has a start-up date of 1985.

#6: Analysis Station: The analysis station for flammable waste includes a work table and a hood which vents to the outside of the SGRR facility. It is located between the office and Building F, next to the sample storage lockers. This unit has a start-up date of 1986-1987 and is used to quality control (QC) inbound wastes for analysis of representative samples.

#7 Trash Compactor: This unit is a small (2-foot high) trash compactor located immediately inside the doorway of Building F from Building E. It has a start-up date of 1987. The compactor is used for personnel safety equipment (i.e., gloves, Tyvek). This waste is then incinerated or landfilled.

#8 Concrete Pad: This unit is a concrete pad on which PCB wastes, non-regulated wastes, corrosives, and flammable wastes are stored.

2.3 SWMU REPORTED RELEASES

The following includes the releases that were reported in the RFI Workplan and includes the releases and findings and orders that occurred after the RFI Workplan was revised in December 2001.

2.3.1 Permit SWMU #1

As reported in the RFI Workplan, the following releases have been recorded at Permit SWMU #1.

Chart 3. Recorded Releases at SWMU #1

Location	Date	Description
Truck Bay	June 1, 2000	25 gallons of flammable liquid were released from a pierced drum while unloading at the 4 bay dock. The spill was completely contained within a sealed concrete area and was immediately cleaned up with a water wash.
Truck Bay	December 21, 1999	25 gallons of non-RCRA coolant were released when a drum was pierced while loading at the highbay dock. The spill was completely contained within a sealed concrete area and was immediately cleaned up with absorbent.

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Location	Date	Description
Truck Bay	May 22, 1998	A drum containing non-RCRA wastes was pierced by a forklift on the 4 bay dock. The spill was immediately cleaned up with absorbent.
--	April 21, 1998	One quart of non-RCRA paint leaked from a container on a trailer parked on the existing sealed concrete pad. The spill was immediately cleaned up with absorbent.
Truck Bay and Rear Yard	February 22, 1991	A small release (less than one quart of residue of unknown composition) occurred on as a pump was being moved from the truck loading/unloading pad, around Building H and in through Building F via the Truck Bay. Ground clay, penetone, and acid rinse were applied to the spilled residue.
Truck Bay	January 29, 1989	A drum containing PCBs, oil and solvents ruptured; the material was absorbed and the area was wiped clean with absorbent pads.
Rear Yard	August 5, 1987	PCBs spilled when a PCB tanker driver pulled out over a berm without securing the dome lid. A trail of spilled material ran from the tanker pad around Building H in front of the docks. The truck was placed in the flat dock (between the covered dock and the sloped docks behind Building F). Some asphalt from along the path taken by the truck in the rear yard was excavated and disposed of off-site. The spill was limited to areas covered with concrete and/or asphalt and did not reach soil. SGRR facility records indicate that soil and asphalt samples were collected, but there are no details of these samples in the facility's files.
Truck Bay	July 8, 1986	Based on the detection of PCBs in samples collected from the bottom of the sumps, the sumps, concrete and piping were excavated and analyzed for PCBs. The dock areas were found not to be water tight; therefore, soils were excavated and cleaned until PCBs <10 ppm. The area was then backfilled and covered over with concrete.
Truck Bay	--	Approximately 2 gallons of PCB oil leaked onto the truck-bay dock floor after a drum was punctured while being unloaded. The spill was cleaned up using ground clay and Chemsolve rinse.

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Location	Date	Description
Storm Sewer	--	No evidence of past releases was identified; however, some liquid in the collection sump had an oil sheen.

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2.3.2 Permit SWMU #2

As reported in the RFI Workplan, the following releases have been recorded at Permit SWMU #2.

Chart 4. Recorded Releases at SWMU #2

Location	Date	Description
Fuels Blending Room	December 1, 1999	Approximately 7 to 100 gallons of flammable liquid were released within a sealed concrete area when a pump failed in the fuels blending room (east of SWMU #2). The area was immediately cleaned up with absorbents and the floor was washed with water.
Concrete Pad, Building H	August 12, 1998	20 gallons of non-RCRA oil and water were released from a roll-off onto the sealed concrete floor in Building H. The spill was immediately cleaned up with absorbent.
Concrete Pad, Building H	August 4, 1998	Five gallons of non-RCRA paint and resins were released from a drum in Building H. The spilled was contained within a sealed concrete area and was immediately cleaned up with absorbents.
Flammables Waste Storage and Processing Pad	April 21, 1998	20 gallons of non-RCRA oil spilled onto the sealed concrete floor when a drum was pierced on the flammables pad. The spill was immediately cleaned up with absorbent. A second release occurred in the sealed concrete area of the flammables pad when a drum fell while being moved with a forklift. The spill consisted of 15 gallons of non-RCRA oil-based ink, which was immediately cleaned up with absorbent.
Flammables Waste Storage and Processing Pad	April 8, 1998	One gallon of flammable liquid containing xylene and methylene chloride spilled from a tanker onto the flammables pad. The spill was contained by the sealed concrete floor and was immediately cleaned up with soap and water.
Flammables Waste Storage and Processing Pad	March 30, 1998	Ten gallons of flammable liquid spilled onto the sealed concrete flammables pad in the vicinity of the pump station. The liquid was immediately cleaned up with absorbent.

Location	Date	Description
Flammables Waste Storage and Processing Pad	March 3, 1998	Ten gallons of flammable liquid spilled onto the sealed concrete at the pump station on the flammables pad. The spill was immediately cleaned with absorbent.
Fuels Blending Room	June 6, 1997	Approximately one quart of flammable liquid was released from a pump onto the sealed concrete floor in the fuels blending room (east of SWMU #2) The release was immediately cleaned with absorbent.
Concrete Pad, Building H	1994	Soil excavated from a location in front of Building H was submitted for laboratory analysis in 1994. The soil sample contained 1,2-dichloroethene, several metals, including lead, cadmium, chromium and mercury, and several SVOCs.
Flammable Waste Storage and Processing Pad	1991	Soil excavated for the footers to a new roof was submitted for laboratory analysis in 1991. Several VOCs, including tetrachloroethene, trichloroethene, ethylbenzene, toluene, and xylenes; and SVOCs were detected in samples of the excavated soil. The contaminated soil, which was stored in a roll-off box (RFA unit #10) was ultimately disposed of off-site (see Permit SWMU #1).
Solidification Bin	November 11, 1989	F006 liquid splashed out of the solidification bin onto the concrete pad. Ground clay and water were used to clean up the spill.
Flammable Waste Storage and Processing Pad	May 10, 1989	Less than one pound of PCB material was spilled from a drum onto the pad when it fell from the drum grabber. Ground clay was placed over the spilled area, and the pad was scrubbed with soapy water and then wiped with absorbent pads containing trichloroethane.
Flammable Waste Storage and Processing Pad	April 20, 1989	Two gallons of F006 sludge leaked out onto the pad when the sludge was being unloaded from a roll-off box into a container in Building H. No other information is available.

Location	Date	Description
Concrete Pad, Building H	November 24, 1988	At 10:50 pm, the local fire department received a report from the SGRR facility that a vapor cloud was being emitted from a fire in a roll-off box. The fire was from 40,000 lbs of still bottom residue from the production of the gasoline additive MMT (methyl-cyclopenta-dienyl-manganese tricarbonyl) that the SGRR facility had attempted to solidify. Ohio EPA emergency response personnel were called in to assess the situation at 12:10 A.M. on November 25, 1988. No other release information is available.
Concrete Pad, Building H	July 30, 1984	A drum of resins pressurized itself on-site. The bung of the drum blew out and the reaction of monomer resins caused the resin to be sprayed from Building H to the dock area. Neither the clean up method nor the quantity of constituents released was documented.

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2.3.3 Permit SWMU #3

As reported in the RFI Workplan, the following releases have been recorded at Permit SWMU #3.

Chart 5. Recorded Releases at SWMU #3

Location	Date	Description
Tank Farm	December 16, 2004	A reaction in the tank farm. The reaction involved 70 drums of waste profiled as CH9412. The fire department responded. The area was cleaned with absorbents.
Tank Farm	June 19, 2000	600 gallons of TSCA oil from the wastewater treatment system were released within a sealed concrete area in the tank farm. The impacted area was immediately cleaned with soap and water. Grid sampling was performed per 761 to confirm that the impacted area was clean. Aroclor 1260 was detected in only one of the 36 samples that were analyzed for PCB. Aroclor 1260 was detected at 5.7 ug/100 cm ² in PCB wipe sample #99, which is below the 100 ug/cm ² action level.
Tank 7	May 2, 2000	Fifty gallons of hazardous liquid were released from Tank 7 onto the sealed concrete pad. The impacted area was immediately cleaned up with a water wash.
Tank Farm	April 18, 2000	100 gallons of hazardous liquid were released from the wastewater treatment tank in the tank farm. The spill was completely contained by the sealed concrete pad and was immediately cleaned up with a water wash.

Location	Date	Description
Tank Farm	March 17, 2000	Ten gallons of hazardous liquid were released from a defective valve in the tank farm. The spill was confined to a sealed concrete area and was immediately cleaned up with absorbents.
Tank Farm	March 26, 1999	150 gallons of TSCA water were released within a sealed concrete area while unloading a tanker in the tank farm. The area was immediately cleaned with soap and water, and grid sampling was conducted per 761 to confirm that the impacted area had been cleaned. No PCB were detected in any of the three samples that were submitted for analysis.
Tank Farm	March 24, 1999	50 gallons of TSCA water were released within a sealed concrete area while unloading a tanker in the tank farm. The area was immediately cleaned with soap and water, and grid sampling was conducted per 761 to confirm that the impacted area had been cleaned. No PCBs were detected in any of the 23 samples that were submitted for analysis.
Tank Farm	August 28, 1998	Three gallons of flammable liquid containing xylenes and toluene were released from a hose while loading a tanker at the tank farm. The spill was completely contained within a sealed concrete area and was immediately cleaned up with absorbents.
--	January 18, 1991	Contaminated soil excavated for the footers to the new roof for the flammables waste storage and processing pad (see Permit SWMU #2) was discovered. VOCs, including PCE, and SVOC were detected in the samples. The contaminated soil, which was stored in a roll-off box (RFA unit #10) was disposed of off-site.
Tank Farm Concrete Pad	1991	Soil was excavated from beneath the tank farm concrete pad in 1991 as part of the installation of the new tanks. Metals, VOCs, including dichlorobenzene, ethylbenzene, PCE, toluene and xylenes, and an SVOC, naphthalene, were detected in samples of the excavated soil.

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2.3.4 Permit SWMU #4

As reported in the RFI Workplan, the following releases have been recorded at Permit SWMU #4.

Chart 6. Recorded Releases at SWMU #4

Location	Date	Description
Tanker Pad	April 26, 2000	Less than one gallon of TSCA water was released while unloading a tanker on the sealed concrete tanker pad. The spill was immediately cleaned with soap and water and grid sampling per 761 was performed to confirm that the impacted area was clean.
Tanker Pad	November 2, 1999	10 gallons of TSCA water were released onto the sealed concrete pad while unloading a tanker on the tanker pad. The impacted area was immediately cleaned with soap and water, and grid sampling per 761 was conducted to confirm that the impacted area was clean.
Tanker Pad	October 29, 1999	Less than one gallon of hazardous liquid was released from a tanker on the tanker pad. The spill was completely contained within a sealed concrete area and was immediately cleaned be with absorbents.
Tanker Pad	May 6, 1999	25 gallons of formaldehyde bisulfite solution spilled onto the sealed concrete pad while loading a tanker on the tanker pad. The release was immediately cleaned up with absorbents.
Tanker Pad	July 23, 1997	Two quarts of non-RCRA Polyol were released onto the sealed concrete tanker pad. The concrete was immediately cleaned with absorbents. A second spill of less than 1/2 gallon of unknown material that was released from a hole in a drum onto the sealed concrete was also reported on July 23, 1997. The exact location of this spill was not identified; however, the spill was cleaned up immediately. It appears that these two reports may actually refer to the same release but this assumption could not be verified during a review of the facility's records.
Tanker Pad	February, 18 1991	Approximately 100 gallons of alphasethyl styrene wastes were released on the concrete pad when a cam lock on a hose came loose from a tanker. The spill was cleaned up with soap and water immediately.

Location	Date	Description
Rear Yard	August, 5 1987	PCBs spilled when a PCB tanker driver pulled out over a berm without securing the dome lid. A trail of spilled material ran from the tanker pad around Building H in front of the docks. The truck was placed in the flat dock (between the covered dock and the sloped docks behind Building F). Some asphalt from along the path taken by the truck in rear yard was excavated and disposed of off-site. The spill was limited to areas covered with concrete and/or asphalt and did not reach soil. SGRR facility records indicate that soil and asphalt were sampled but there are no details recorded in the facility's files.

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2.3.5 Permit SWMU #5

As reported in the RFI Workplan, the following releases have been recorded at Permit SWMU #5.

Chart 7. Recorded Releases at SWMU #5

Location	Date	Description
High Bay	August 8, 2006	A fire started in one of the roll-offs that was located in the high bay. The source of the fire was believed to be a drum that contained hazardous waste solids with metals. The fire was contained to the roll-off.
High Bay	February 11, 2005	A fire started in one of the roll-offs that was located in the high bay. The Cincinnati fire department responded to the fire.
High Bay	July 12, 1998	One gallon of hazardous liquid containing perchloroethylene and xylene was released from a leaking drum onto the sealed concrete floor in high bay. Absorbents were used to immediately clean up the spill.
High Bay	July 7, 1998	A 55 gallon drum of styrene ruptured in a sealed concrete area in high bay. The sealed concrete in the vicinity of the release was cleaned with absorbent and water.
High Bay	April 22, 1998	Five gallons of non-RCRA water spilled in a sealed concrete area in the high bay when a container fell while being moved by a forklift. The spill was immediately cleaned up with absorbent.
High Bay	February 27, 1997	Less than one pound of non-RCRA liquid was released from a roll-off onto the high bay sealed concrete floor. The release was immediately cleaned with absorbent.

Location	Date	Description
High Bay	March 7, 1991	Floor sweepings contaminated with low levels of PCBs (<0.012 ppm) created dust when they were being transferred to another container in the high bay. The entire area was swept and decontaminated with commercial degreaser in water.
	February 14, 1991	Five bottles, each containing about 5 ounces of material, fell out of a drum (thought to contain only rags) while workers were emptying it. The material ignited almost immediately. The material was residue in one-pint bottles which originally held phosphorus/cryolite Getter solution (according to the manufacturer, the residue was red phosphorus). Other chemicals involved may have been methanol and sodium fluoaluminate. The fire was quickly extinguished. Combustion products suspected from the fire were carbon monoxide, carbon dioxide and phosphorus pentoxide.
High Bay	September 15, 1987	An OHIO EPA inspection found an oily spot approximately one foot in diameter in the high bay. The area was triple rinsed with #2 fuel oil.

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2.3.6 SWMU # 37 Bone Yard

There have been no documented spills in the Bone Yard.

2.3.7 SWMU # 38 Maintenance Building

During September 2005, paint filters, which were profiled as non-hazardous by the generator, were stored on the concrete pad located next to the wastewater treatment office. After some of the paint filters had been processed and disposed, SGRR discovered the waste was incorrectly characterized and should have been RCRA-regulated as hazardous for chromium. There were no documented releases associated with the staging filters. In addition, SGRR has corrected the circumstances that led to the improper staging and disposal of the hazardous paint filters.

