Subject: Closure Plan Approval for Clean Closure 
by REMOVAL or DECONTAMINATION 
Rees Plating Co., Inc.
OHD004463998

Dear Mr. Buxton:

On December 7, 2017, Gekko Holdings, LLC (Gekko) submitted to Ohio Environmental Protection Agency (Ohio EPA) a revised closure plan for the Former Rees Plating Co., Inc. (Rees) facility located at 5020 Southway Street, SW, Canton, Ohio, 44706 (facility).

The closure plan was submitted in response to a Judicial Consent Order issued to Gekko on January 27, 2017 for closure of hazardous waste management units at the Rees facility. Ohio EPA announced a public comment period which concluded January 22, 2018. No public comments were received.

Based upon review of Gekko's submittal, I conclude that the closure plan for the Rees facility, as modified herein, meets the performance standard contained in OAC rule 3745-55-11, and complies with the pertinent parts of OAC rule 3745-55-12.

The revised closure plan submitted to Ohio EPA on December 7, 2017 is hereby approved with the following modification(s):

1. Paragraph 2 of Section 1.1, page 2, and Paragraph 1 of Section 2.1, page 6.
   Present the U.S. EPA hazardous waste codes for all listed hazardous wastes in each hazardous waste management unit.

2. Section 4.0, page 9 and Table 3, Paragraph 2.
   List all U.S. EPA SW 846 analytical methods for environmental media analyses.
Gekko must modify the closure plan thoroughly addressing each of the above modifications and submit to Ohio EPA within ten days of this notice the modified closure plan.

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

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

Environmental Review Appeals Commission
30 East Broad Street, 4th Floor
Columbus, Ohio 43215

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

Ohio Environmental Protection Agency
Division of Environmental Response and Revitalization
P.O. Box 1049
Columbus, Ohio 43216-1049
Attn: Erik Hagen, ERAS
A copy should also be sent to:

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

If you have any questions about the modifications and Ohio EPA concurrence prior to implementing this closure plan, contact Don Vogel at 614-644-4826.

Sincerely,

Craig W. Butler
Director

cc: Natalie Oryshkewych, DERR, NEDO
    John Palmer, DERR, NEDO
    Karen Nesbit, DERR, NEDO
    Erik Hagen, ERAS, DERR, CO
    Mitch Matthews, Enforcement Unit, DMWM
    Don Vogel, DERR, CO
    RCRAInfo Data Entry
    Jim Smith, Brownfield Restoration Group, LLC