



John R. Kasich, Governor
Mary Taylor, Lt. Governor
Craig W. Butler, Interim Director

OHIO E.P.A.

JUN 10 2014

ENTERED DIRECTOR'S JOURNAL

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

By: Don Cassler Date: 6-10-14

Re: Reserve Environmental Services, Inc.
Pond 1 at Site A (Old)
Amended Closure/Post-Closure Plan Approval
For Waste-in-Place
RCRA C - Hazardous Waste
Ashtabula County
OHD980793384

JUN 10 2014

Mr. Yogi V. Chokshi
Vice President
Reserve Environmental Services, Inc.
4633 Middle Road
P.O. Box 1038
Ashtabula, OH 44005-1038

Dear Mr. Chokshi:

On October 30, 2013, Reserve Environmental Services, Inc. (RES) submitted to the Ohio Environmental Protection Agency (Ohio EPA) an amended closure/post-closure plan for Pond 1, S04, located at Site A (Old), 4633 Middle Road, Ashtabula, Ohio. Latest revisions to the amended closure/post-closure plan were received on April 2, 2014. The amended closure/post-closure plan was submitted pursuant to the October 14, 1993 Consent Order, in order to demonstrate that RES's proposal for closure/post-closure complies with the substantive requirements of Ohio Administrative Code (OAC) rules 3745-66-11 and 3745-66-12.

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

Based upon review of RES's submittal and subsequent revisions, I conclude that the amended closure/post-closure plan for the hazardous waste facility at 4633 Middle Road, Ashtabula, Ohio, as modified herein, meets the performance standard contained in OAC rules 3745-66-11, 3745-66-12, and 3745-66-18.

The amended closure/post-closure plan submitted to Ohio EPA on October 30, 2013, and revised on April 2, 2014, by RES, is hereby approved with the attached modifications.

Compliance with the approved closure/post-closure plan, including the modifications specified herein, is expected. Ohio EPA will monitor such compliance. Ohio EPA expressly reserves the right to take action, pursuant to chapters 3734. and 6111., of the

Ohio Revised Code (ORC), and other applicable law, to enforce such compliance and to seek appropriate remedies in the event of noncompliance with the provisions and modifications of this approved plan. Please be advised that approval of this amended closure/post-closure plan does not release RES 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 ORC. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within 30 days after notice of the director's action. The appeal must be accompanied by a filing fee of \$70.00 (made payable to "Ohio, Treasurer of State"), which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the director within three days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

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

When closure is completed, OAC rule 3745-66-15 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 the Engineering Section Manager's attention at the following address:

Ohio Environmental Protection Agency
Division of Environmental Response and Revitalization
P.O. Box 1049
Columbus, Ohio 43216-1049

A copy should also be sent to Kim Gallagher's attention at the following address:

Ohio Environmental Protection Agency
Division of Environmental Response and Revitalization
NEDO District Office
2110 East Aurora Rd.
Twinsburg, OH 44087

If you have any questions about implementing this amended closure/post-closure or plan, contact Kim Gallagher at (330) 963-1214.

Sincerely,



Craig W. Butler
Director
Ohio Environmental Protection Agency

cc: Kim Gallagher, NEDO, DERR
Tim Christman, CO, DERR
Connie Livchak, CO, DMWM/FARU
Ohio EPA, CO, DERR (RCRA Info Data Entry) at:
RCRAInfoData@epa.state.oh.us
Attorney General's Office

ec: Ed Lim, Manager, Engineering, CO, DERR
Kelly Smith, Enforcement Unit, CO, DMWM
Harry Courtright, NEDO, DERR
John Palmer, NEDO, DERR

RESERVE ENVIRONMENTAL SERVICES, INC.
AMENDED CLOSURE/POST-CLOSURE PLAN APPROVAL ATTACHMENT

1. The plan is hereby modified on Page VI-2 and Page VI-3 to state that:
 - a. "Three months after start-up of reclaiming operations, RES shall undertake a study to determine the optimal method to stabilize waste returned to Pond 1 in order to support the final cover. The study shall also include collection of data needed to assess the settlement and slope stability (solidification study) of the final configuration of Pond 1 by providing a bench scale study to determine the physical properties of the treated waste: unconfined compressive strength, compression index, the coefficient of consolidation and the coefficient of secondary compression of the stabilized waste. The study shall include the densities (lb./cubic ft.) property for all components (fly ash, treated waste) placed in Pond 1. RES shall also provide the shear angle (friction coefficient) property for the fly ash before the fly ash placement in Pond 1. RES shall provide Ohio EPA with a report and the results of this study 90 days after initiation of the study."
 - b. "Three months after the submission of the study report to the Agency (referenced above), RES shall provide Ohio EPA the final settlement and slope stability assessment showing acceptable performance for the proposed design of the post-closure unit."
2. The plan is hereby modified on Page VI-3, to state that, "RES shall stabilize or solidify the waste in Pond 1 utilizing a cell-by- cell method to ensure complete mixing throughout the depth of the waste."
3. The plan is hereby modified on Page VI-4 to state that:
 - a. "RES shall return the waste (coke and silica) to Pond 1, after the rutile ore is removed."
 - b. "RES shall utilize barriers to segregate the treated waste from the untreated material in Pond 1."
 - c. "RES shall solidify the waste that is returned to Pond 1 until a market is available for the waste."
 - d. "RES shall define the bottom of the waste in Pond 1, as it pertains to stabilization or solidification, as the depth at which excavation stops."; and
 - e. "RES shall stabilize or solidify the waste to the bottom of the excavation in Pond 1."