



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

CERTIFIED MAIL

April 17, 2014

Mr. John A. Martin
Delphi Automotive Systems, LLC
P.O. Box 431 – Station 10B
Warren, OH 44486

RE: IRG Warren I, LLC and Delphi
Automotive Systems, LLC
Permit – Long Term
Approval
RCRA – Hazardous Waste
Trumbull County
OHD000817346

Dear Sirs:

On April 17, 2014, Ohio EPA issued a final Permit Modification to IRG Warren I, LLC and Delphi Automotive Systems, LLC for the facility located on North River Road at Larchmont Avenue, Warren, Ohio in Trumbull County. As a result of waste disposal practices conducted at the site, contaminated soil and ground water remains on the property. This permit modification, initiated by Ohio EPA, authorizes IRG and Delphi to perform specific corrective measures as a part of its site-wide corrective action activities. The modification also requires that IRG and Delphi enter into an Environmental Covenant with Ohio EPA to restrict future use of the facility and ground water. I have enclosed the final modified permit which will remain in effect until it is renewed, withdrawn, suspended or revoked.

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 thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00 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 (3) 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:

John A. Martin, Delphi Automotive Systems, LLC
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Environmental Review Appeals Commission
77 South High Street, 17th Floor
Columbus, OH 43215

If you have any questions, please contact Shannon Ryan of Ohio EPA's Northeast District Office at (330) 963-1200.

Sincerely,



Georgia Frakes
Management Analyst
Division of Materials and Waste Management

cc: John Nyers, DMWM, CO
Scott Hester, DMWM, CO
Devan Wolfe, DMWM, CO
Todd Anderson, Legal
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Dina Pierce, PIC
Shannon Ryan, DMWM, NEDO
Frank Popotnik, DMWM, NEDO
John Palmer/Harry Courtright, DERR, NEDO
Natalie Oryshkewych, DMWM, NEDO
Lawrence Kovacs, IRG Warren I, LLC

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ENTERED DIRECTOR'S JOURNAL

OHIO ENVIRONMENTAL PROTECTION AGENCY

**MODIFIED OHIO HAZARDOUS WASTE FACILITY
INSTALLATION AND OPERATION PERMIT**

Date of Issuance: April 17, 2014

Effective Date: April 17, 2014

U.S. EPA ID No.: OHD 000 817 346

Name of Permittee: IRG Warren I, LLC and Delphi Automotive Systems, LLC

Mailing Address: P.O. Box 431 Station 10B
Warren, Ohio 44486

Facility Location: North River Road at Larchmont Avenue
Warren, Ohio 44483

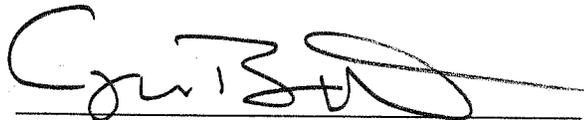
Person to Contact: Mr. John A. Martin

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 ID number, as issued by the Ohio Environmental Protection Agency and journalized on October 19, 2005, 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 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 October 19, 2005 renewal permit.



Craig W. Butler
Director

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: Jonda Kessler Date: 4-17-14

MODULE E - CORRECTIVE ACTION REQUIREMENTS

E. Corrective Action Requirements

The Permittee has closed the following waste management units in compliance with approved closure plans: an obsolete drum storage pad, enamel storage building trench and sumps, four surface impoundments which are in post-closure care and the enclosed drum storage area with four underground sumps as part of the secondary containment system.

Ohio EPA accepted the closure certification of the four hazardous waste surface impoundments on January 27, 2004. The closed surface impoundments, which are the source of ground water contamination (not extending beyond the limits of the unit), are currently under post-closure care under an approved plan (see Module F).

In addition to the four surface impoundments, other Waste Management Units (WMUs) were identified in the Final RCRA Facility Assessment (RFA) Preliminary Review/Visual Site Inspection (PR/VSI) Report performed by USEPA in August 1987. According to the PR/VSI, contaminated soil was detected in the area of the Bulk Material Transfer Station (BMTS) in 1985. At that time contaminated soil was removed and the area reconstructed to prevent further release of material. In 2006 and 2007, the Facility performed a voluntary site-wide RCRA Facility Investigation (RFI), during which sampling at the BMTS revealed the presence of hazardous constituents in soil. On March 2, 2010, Delphi submitted a risk assessment intended to address the contamination found at the BMTS. Ohio EPA has reviewed Delphi's *Bulk Material Transfer Station (AOI-04) Risk Assessment Revision and Evaluation of Construction Worker Particulate Inhalation Exposure* (Supplement) and has determined remedies in order to address the contamination found at the site.

Neither USEPA nor Ohio EPA has found evidence of releases from any other Waste Management Units (WMUs).

E.1 Corrective Action at the Facility OAC Rules 3745-50-10 & 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 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 Measures

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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

For a list of the WMUs see Table 1.

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.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, in the case of a newly discovered waste management unit, on a time frame established by Ohio EPA.

- (i) If necessary, Ohio EPA shall provide written comments on the RFI Workplan to the Permittee.

- (ii) Within 45 days of receipt of any Ohio EPA comments on the RFI Workplan, the Permittee must submit either an amended or new RFI Workplan that addresses Ohio EPA's comments.
- (iii) 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 must implement the RFI according to the terms and schedule in the approved RFI Workplan.

(c) RFI Final Report

Within 60 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 Final Report must contain adequate information to support further decisions concerning Corrective Action at the Facility.

- (i) If necessary, Ohio EPA shall provide written comments on the RFI Final Report to the Permittee.
- (ii) Within 45 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 addresses Ohio EPA's comments.
- (iii) 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)

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.

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E.7 Determination of No Further Action

(a) Permit Modification

Based on the results of the completed RFI and other relevant information, the Permittee may submit an application to Ohio EPA for a permit modification under OAC Rule 3745-50-51 to terminate the Corrective Action tasks of the Schedule of Compliance. Other tasks identified in the Schedule of Compliance shall remain in effect. This permit modification application must conclusively demonstrate that there are no releases of hazardous waste or constituents from WMUs at the Facility that pose an unacceptable risk to human health and the environment.

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 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) 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

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

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

(b) CMS Workplan Implementation

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

(c) CMS Final Report

Within 60 days after the completion of the CMS, the Permittee must submit a CMS Final Report to Ohio EPA. The CMS Final Report must summarize the results of the investigations for each remedy studied and must include an evaluation of each remedial alternative.

- (i) If necessary, Ohio EPA shall provide written comments on the CMS Report to the Permittee.
- (ii) Within 45 days of receipt of any Ohio EPA comments, the Permittee must submit either an amended or new CMS Final Report that addresses Ohio EPA's comments.

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- (iii) Ohio EPA shall approve or modify and approve, in writing, the amended or new CMS Final Report. The CMS 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 CMS Final Report must be authorized by Ohio EPA.

E.9 Corrective Measures Implementation (CMI)

The Corrective Measure selected for implementation must: (1) be protective of human health and the environment; and as applicable, (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.

Ohio EPA considered, as applicable, 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.

Ohio EPA has reviewed the Permittee's *Bulk Material Transfer Station (AOI-04) Risk Assessment Revision and Evaluation of Construction Worker Particulate Inhalation Exposure* (Supplement) and has determined the remedies appropriate to address the contamination found at the Facility. However, it has been determined, while contamination at the Facility is not believed to be above industrial standards, that it is possible that additional residual contamination above unrestricted levels exists at the Facility due to the industrial legacy of the property.

Based upon this review, the remedy selected is the Environmental Covenant. The Environmental Covenant will eliminate the potential for residential land use of the Facility and restrict ground water use. The Permittee shall initiate entering into an Environmental Covenant within sixty (60) days of issuance of this Permit Modification. The Environmental Covenant shall be for the entire Facility.

An Environmental Covenant, pursuant to Ohio Revised Code (ORC) 5301.80 to 5301.92, is a legally enforceable mechanism that will delineate the affected areas of the property and impose use and/or activity limitations on those areas. The Covenant will run with the land and be binding upon existing and any future property owner, should the property be sold. Ohio EPA will monitor the Facility owner's adherence to the Environmental Covenant to ensure continued protection of human health and the environment. The types of limitations for this property include:

Activity and Use Limitation

a. The Property shall not be used for Residential Activities or Restricted Agricultural Activities. The term "Residential Activities" shall include, but not be limited to, the following:

- (1) Single and multi-family dwelling and rental units;
- (2) Day care centers and preschools;
- (3) Child educational (except as a part of industrial or commercial activities within the Property) and religious facilities;
- (4) Outdoor parks and playgrounds;
- (5) Correctional facilities;
- (6) Hospitals and other extended care medical facilities;
- (7) Transient or other residential facilities.

The term "Restricted Agricultural Activities" shall mean the production of food-chain products by outdoor soil based agricultural means for animal and human consumption.

Site-wide Ground Water Restrictions

b. Unless approved in writing by Ohio EPA, the extraction of groundwater from the Berea/Cussewago Sandstone Formation and any overlying unit for any purpose, other than monitoring or pursuant to a groundwater remediation action, on the Property is prohibited. Ohio EPA will consider the potential exposure risks before extraction of groundwater from the Berea/Cussewago Sandstone Formation and any overlying geologic unit is allowed. Groundwater use below the Berea/Cussewago Sandstone Formation will not be restricted.

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, including 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 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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Table 1
Information on Identified WMUs and Determination of RFI Status
(Adapted from PR/VS)

Unit	Description	Status	Notes on RFI/Corrective Action
1	Old Drum Storage Area	Closed	No Further Action - Closed with approved closure plan, no indication of release during inspection
2	New Drum Storage Area	Closed	No Further Action - Closed with approved closure plan. Currently being used as a less than ninety day accumulation area. Subject to generator closure.
3	Enamel Storage building	Building Demolished	No Further Action - Closed with approved closure plan, no indication of release during inspection
4	Bulk Material Transfer Station	Inactive	Unit subject of Interim Measure investigations, meets industrial risk-based standards
5	Lift Station #701	Active	No Further Action - Regulated under CWA, no indication of release during inspection
6	Lift Station #703	Active	No Further Action - Regulated under CWA, no indication of release during inspection
7	Lift Station #705	Active	No Further Action - Regulated under CWA, no indication of release during inspection
8	Recirculation Tank #702	Removed	No Further Action - Tank demolished and removed in 1993, no concerns during inspection.
9	Wastewater Tank #704	Active	No Further Action - Regulated under CWA, no indication of release during inspection

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10	Wastewater Tank #706	Active	No Further Action - Regulated under CWA, no indication of release during inspection
11	Wastewater Tank #708	Inactive	No Further Action - Regulated under CWA, no indication of release during inspection
12	Wastewater Tank #709	Inactive	No Further Action - Regulated under CWA, no indication of release during inspection
13	Wastewater Treatment Building Sump #730	Active	No Further Action - Regulated under CWA, no indication of release during inspection.
14	Trench Sump #717	Active	No Further Action - Regulated under CWA, no indication of release during inspection
15	Wastewater Tank #711	Removed	No Further Action - Tank demolished and removed in 1993, no indication of release during inspection
16	Wastewater Tank #713	Removed	No Further Action - Tank demolished and removed in 1993, no indication of release during inspection
17	Wastewater Tank #712	Inactive	No Further Action - Regulated under CWA, no indication of release during inspection
18	Wastewater Tank #714	Inactive	No Further Action - Regulated under CWA, no indication of release during inspection
19	Wastewater Tank #716	Inactive	No Further Action - Regulated under CWA, no indication of release during inspection
20	Wastewater Tank #715	Inactive	No Further Action - Regulated under CWA, no indication of release during inspection

21	Wastewater Tank #718A	Active	No Further Action - Regulated under CWA, no indication of release during inspection
22	Wastewater Tank #718B	Active	No Further Action - Regulated under CWA, no indication of release during inspection
23	Andco Heavy Metals Removal Units	Inactive	No Further Action - Regulated under CWA, no indication of release during inspection
24	Heavy Metals Treatment Degas Tank	Inactive	No Further Action - Regulated under CWA, no indication of release during inspection
25	Heavy Metals Treatment Clarifier	Inactive	No Further Action - Regulated under CWA, no indication of release during inspection
26	Heavy Metals Treatment Sludge Thickening Tank	Removed	No Further Action - removed from service in 1993, no indication of release during inspection.
27	Andco Filter Press	Removed	No Further Action - removed from service in 1993, no indication of release during inspection.
28	Filter Press #402	Active	No Further Action - Regulated under CWA, no indication of release during inspection
29	Sludge Thickening Tank	Active	No Further Action - Regulated under CWA, no indication of release during inspection
30	Clarifier #301	Active	No Further Action - Regulated under CWA, no indication of release during inspection
31	Clarifier #302	Active	No Further Action - Regulated under CWA, no indication of release during inspection
32	Sand Filter #1	Active	No Further Action - Regulated under CWA, no indication of release during inspection

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33	Sand Filter #2	Active	No Further Action - Regulated under CWA, no indication of release during inspection
34	Sand Filter #3	Active	No Further Action - Regulated under CWA, no indication of release during inspection
35	Clean Water Sump #722	Removed	No Further Action - Removed in 1995 and replaced with a clean water tank, no indication of release during inspection
36	Wastewater Tank #733A	Active	No Further Action - Regulated under CWA, no indication of release during inspection
37	Wastewater Tank #733B	Active	No Further Action - Regulated under CWA, no indication of release during inspection
38	Wastewater Inflow Sump	Active	No Further Action - Regulated under CWA, no indication of release during inspection
39	Skimmed Oil Tank	Removed	No Further Action - Tank demolished and removed in 1997, no concerns during inspection.
40	Waste Compound Storage Tank	Active	No Further Action - Tank did have indication of release at time of inspection. This was investigated by the facility and it was determined that no hazardous constituents were released to the environment. Also, there is no potential for future releases. See letter from Delphi dated June 14, 2005.
41	Lime Slurry Settling Lagoon	Inactive/closed	No Further Action - Non-RCRA regulated unit.
42	Lined Surface Impoundment	Closed	No Further Action - Closed with approved closure plan, in post-closure process

43	Lined Surface Impoundment	Closed	No Further Action - Closed with approved closure plan, in post-closure process
44	Lined Surface Impoundment	Closed	No Further Action - Closed with approved closure plan, in post-closure process
45	Lined Surface Impoundment	Closed	No Further Action - Closed with approved closure plan, in post-closure process
46	Mill Pond	Inactive/Filled	No Further Action - Taken out of service in 1970, clean filled in 1995.
47	Wastewater Sewer System	Active	No Further Action - Regulated under CWA, no indication of release during inspection
48	Equalization Tank #3	Active	No Further Action - Constructed in 1995, regulated under CWA
49	Clean Water Tank	Active	No Further Action - Constructed in 1995, regulated under CWA
50	Sand Filter #4	Active	No Further Action - Constructed in 1995, regulated under CWA
51	Sand Filter #5	Active	No Further Action - Constructed in 1995, regulated under CWA
52	Sand Filter Backwash Reject Tank	Active	No Further Action - Constructed in 1995, regulated under CWA
53	Lamella Clarifier	Active	No Further Action - Constructed in 1995, regulated under CWA
54	Compliance Tank #1	Inactive	No Further Action - Constructed in 1995, regulated under CWA
55	Compliance Tank #2	Inactive	No Further Action - Constructed in 1995, regulated under CWA