



**Environmental
Protection Agency**

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

CERTIFIED MAIL

August 10, 2011

Re: Heritage-WTI, Inc.
EPA ID No: OHD 980 613 541
Modified Hazardous Waste Permit

Mr. John Peterka
Heritage-WTI, Inc.
1250 Saint George Street
East Liverpool, Ohio 43920

Dear Mr. Peterka:

On February 8, 2011, Ohio EPA issued a draft permit modification to Heritage-WTI, Inc. facility, (Heritage) to implement site-wide Corrective Action remedies. The permit modification was initiated by Ohio EPA. The modified permit requires Heritage to enter into an environmental covenant restricting future use of the facility and ground water. The Agency received written comments concerning this modification and these comments were addressed in the responsiveness summary. I have enclosed the final modified Ohio hazardous waste facility installation and operation permit (Permit) that was issued by the director August 10, 2011. Please note that the modified Permit remains in effect until it is renewed, withdrawn, suspended or revoked.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:

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

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

Sincerely,

A handwritten signature in black ink, appearing to read "Brian Dearth". The signature is fluid and cursive, with a large initial "B" and "D".

Brian Dearth, Management Analyst Supervisor
Division of Materials & Waste Management

cc: Jeremy Carroll/John Nyers, DMWM, CO
Natalie Oryshkewych/Michelle Tarka, DMWM, NEDO
Shannon Ryan, DERR, NEDO

OHIO ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF MATERIALS AND WASTE MANAGEMENT

**SUMMARY OF MODIFICATIONS TO HAZARDOUS WASTE
INSTALLATION AND OPERATION PERMIT**

Heritage-WTI, Inc.

U.S. EPA ID No.: OHD 980 613 541

Ohio ID No.: 02-15-0589

Modification of the Hazardous Waste Facility Installation and Operation Permit will authorize Heritage-WTI, Inc. to make the following change:

Director Initiated Permit Modification:

Ohio EPA is initiating this modification to administer the implementation of site-wide corrective measures. The modification requires that Heritage-WTI enter into an Environmental Covenant with Ohio EPA to restrict future use of the facility and ground water. In addition, this modification requires that Heritage-WTI, Inc.:

- operate, monitor and maintain the skimmer remediation system;
- develop and implement an Operations and Maintenance plan for the remediation system;
- develop and implement an Integrated Ground Water Monitoring Program;
- develop and implement a Soil Management Plan;
- develop and implement an Operations and Maintenance Plan for the current surface cover;
- develop and implement an Alternate Remedy Plan, if needed, and
- develop and implement an Indoor Air Monitoring Program, if needed.

SR:JN/jms

PUBLIC NOTICE

Columbiana County

OHIO EPA ISSUES FINAL MODIFIED HAZARDOUS WASTE PERMIT

On August 10, 2011, Ohio EPA issued a final modified hazardous waste facility installation and operation permit (Hazardous Waste Permit) to Heritage-WTI Inc. (Heritage), for its facility at 1250 Saint George Street, East Liverpool, Ohio 43920. The EPA Identification Number for this facility is OHD980613541. This permit modification, initiated by Ohio EPA, authorizes Heritage to perform specific corrective measures as a part of its site-wide corrective action activities. The modification requires that Heritage enter into an Environmental Covenant with Ohio EPA to restrict future use of the facility and ground water. In addition, this modification requires Heritage to operate, monitor and maintain the skimmer remediation system, develop and implement an Operations and Maintenance plan for the remediation system, current surface cover, and implement an Integrated Ground Water Monitoring Program, Soil Management Plan, Alternate Remedy Plan, and an indoor Air Monitoring Program if needed. This final action is subject to all rules, regulations, and specified conditions. Persons wishing to be notified of further actions or proceedings for this project must submit a request in writing to Ohio EPA, Division of Materials & Waste Management, Attn: Processing & Records Management Unit, P.O. Box 1049 Columbus, Ohio 43216-1049, tel.: (614) 644-2621. This final action was not preceded by a proposed action and may be appealed to the Environmental Review Appeals Commission, at 77 South High Street, Columbus, OH 43215.

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OHIO ENVIRONMENTAL PROTECTION AGENCY

MODIFIED OHIO HAZARDOUS WASTE FACILITY
INSTALLATION AND OPERATION PERMIT

ENTERED DIRECTOR'S JOURNAL

Date of Issuance: 8/10/2011

Effective Date: 8/10/2011

U.S. EPA ID No.: OHD 980 613 541

Ohio Permit No.: 02-15-0589

Name of Permittee: Heritage-WTI, Inc.

Mailing Address: Heritage-WTI, Inc.
1250 Saint George Street
East Liverpool, Ohio 43920

Facility Location: Heritage-WTI, Inc.
1250 Saint George Street
East Liverpool, Ohio 43920

Person to Contact: John Peterka

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 23, 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 March 23, 2005 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.

By: Scott J. Nally Date: 8-10-11

Scott J. Nally
Director

E. CORRECTIVE ACTION REQUIREMENTS

Corrective Action Summary

The River Services Company owned and operated a bulk storage terminal for distributing petroleum products from 1955 to 1981 at the site of the current facility. Between 1980 and 1981 the Charter International Oil Company (Charter Oil) leased the petrochemical terminal from the River Services Company. During operations, the Charter Oil facility received solvents including acetone, toluene, xylene, and "mineral spirits" which were transferred from river transport ships to storage tanks and then to tanker trucks for distribution. The petrochemical terminal consisted of ten (10) above ground storage tanks surrounded by an earthen dike. A known spill history at the Charter Oil facility included:

- (1) a release of approximately 19,000 gallons of xylene in 1983;
- (2) release of approximately 33,000 gallons of mineral spirits in 1984;
- (3) an alleged release of approximately 200,000 gallons of an unidentified substance investigated by Ohio EPA in 1984.

On September 2, 1981, the Port Authority for Columbiana County (CCPA), Ohio acquired the Charter Oil facility through eminent domain. Charter Oil continued to lease the property from the Columbiana County Port Authority until May 31, 1984.

Analytical results collected at the facility in March of 1990 indicated the presence of toluene, ethylbenzene, xylene in the ground water and soil and also found benzene, acetone, and trimethylbenzenes in the ground water.

The CCPA negotiated an Administrative Consent Agreement with Ohio EPA to address ground water contamination at the facility. The work required by this consent agreement was designed to contain, abate and mitigate contamination through an interim measure. This consent agreement was journalized on November 22, 1991.

The Permittee purchased the facility property from the CCPA in December of 1992. With the purchase of the property from the CCPA, the Permittee assumed responsibility for the cleanup of the Charter Oil Facility Release Area.

PRC Environmental Management, Inc., under contract by U.S. EPA, performed a preliminary assessment and visual site inspection (PAVSI) to identify and assess the existence and likelihood of releases from solid waste management units (SWMU) and

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other areas of concern (AOC) at the facility in East Liverpool, Columbiana County, Ohio. The PA was completed on August 8, 1993 and the VSI was conducted on August 25 and 26, 1993. The PA/VSI identified eighteen SWMUs and one AOC at the facility. Since the PA/VSI activities conducted in 1993, four additional waste management units have been identified at the facility. One SWMU, the Decontamination Building, has not yet been constructed. Descriptions of the SWMUs and AOC given in the PA/VSI and updated by Ohio EPA are provided in Attachment 4 to this permit. The AOC is the Former Charter Oil Facility Release Area which is under an Administrative Consent Agreement with Ohio EPA. Except for the AOC, no other releases were documented in the PA/VSI. No further action is needed at the other WMUs at this time.

Transition of corrective action authority from U. S. EPA to Ohio EPA occurred on March 23, 2005, the date of the state permit renewal issuance. Subsequent to the transition of corrective action authority, the Permittee performed a focused RCRA Facility Investigation (RFI) in 2007 and 2008 to investigate the releases from the AOC, also known as the Charter Oil Facility Release Area (COFRA). During the RFI, the Permittee sampled and analyzed soil and ground water samples at the facility. The results of the investigation were documented through the submittal of a RFI Report, which was approved by Ohio EPA on April 20, 2009. Based on the findings in the RFI Report, it was determined that Corrective Measures would be necessary at the facility in order to protect human health and the environment.

Ohio EPA required the Permittee to submit either a Corrective Measures Study to evaluate potential remedies or submit a Presumptive Remedy proposing a specific remedy for the facility. Since the Permittee had already been conducting an Interim Measure to recover contamination from the subsurface in the COFRA area, the Permittee submitted a Final Remedy Workplan on July 17, 2009. The Final Remedy Workplan included a Presumptive Remedy, which built upon the proposed continuation of their current interim measure. 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 proposes the following measures:

- The Permittee and Ohio EPA enter into an Environmental Covenant for the facility restricting future use of the facility and also restricting the use of ground water.

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- The Permittee will operate, monitor and maintain the skimmer Light Non-Aqueous Phase Liquid (LNAPL) remediation system. The Permittee will develop and implement an Operations and Maintenance Plan for the operation, maintenance, monitoring and removal of the remaining free product floating on the water table (i.e., LNAPL) in the Charter Oil Facility Release Area (COFRA), until no more than a sheen is present or until LNAPL is no longer detectable using an interface probe.
- Development and implementation of a facility-wide Integrated Ground Water Monitoring Program.
- Development and implementation of a Soil Management Plan to assure worker health and safety protection and proper soil management for onsite soil excavation activities.
- Development and implementation of an Operations and Maintenance Plan for the maintenance of the current surface cover in the restricted area.
- Development and implementation of an Alternate Remedy Plan should the skimmer LNAPL remediation system fail to achieve the remedial goals within an acceptable timeframe.
- Development and implementation of an Indoor Air Monitoring Program for newly enclosed structures located within the restricted area to ensure continued worker health and safety.

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 wastes have 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 where wastes have been routinely and systematically released. As used in this permit, the term "waste management unit" shall be consistent with, and equivalent to, the term "solid waste management unit" as defined in Section 3004(u) of RCRA. 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 Attachment 5, U.S. EPA's Corrective Action Plan (CAP) and are used herein.

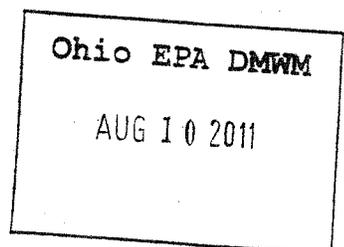
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The Permittee must institute corrective action as necessary to protect human health and the environment for all releases of hazardous waste(s) or hazardous constituent(s) from any waste management units (WMUs) at the facility, regardless of the time 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(s) 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 Waste Management Units (WMUs)
OAC Rules 3745-50-44(D) & 3745-54-101

The 1993 PA/VI documented releases to soil and groundwater at one area of concern (AOC), the former Charter Oil Facility Release Area (COFRA). A previous Interim Measure related to contamination at the former COFRA was ongoing pursuant to a consent agreement with Ohio EPA. This AOC will now be addressed through the Corrective Action process. The previous Interim Measure related to contamination at the former COFRA will be replaced by full implementation of a Final Remedy. No corrective action is being required at the other WMUs at this time.

The following WMUs and AOC have been identified at this facility.

1. WMU 1: Incinerator System
2. WMU 2: Organic Waste Tank Farm
3. WMU 3: Organic Tanker Unload Station
4. WMU 4: Truck Holding and Sampling Area
5. WMU 5: Building B (External Truck Wash)
6. WMU 6: Wastewater Treatment
7. WMU 7: Storm Water Storage Tank Farm
8. WMU 8: Process Water Tanks
9. WMU 9: Laboratory Waste Storage Tank
10. WMU 10: Container Processing Building
11. WMU 11: Building A Storage Area (Drum Warehouse of the Container Processing Building)
12. WMU 12: Pump Out (PT) Tank Farm
13. WMU 13: Extruder
14. WMU 14: Container Receiving Area (unloading docks)
15. WMU 15: Container Holding Building (Slag Canopy)
16. WMU 16: Less Than 90 Day Accumulation Areas
17. WMU 17: Bulk Solid Waste Storage Tanks
18. WMU 18: Building C (Lab Pack Building)
19. WMU 19: Satellite Accumulation Areas
20. WMU 20: Incinerator Feed Building (Direct Organic Tanker South)

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21. WMU 21: Incinerator Feed Building (Direct Drum Pump Out)
22. WMU 22: Decontamination Building
23. AOC: Former Charter Oil Facility Release Area

See Attachment 4 of this permit for a list and description of all WMUs and AOCs.

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 waste(s) and hazardous constituent(s) from any newly identified units per 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 Attachment 5 (U.S. EPA's CAP).

(a) RFI Workplan

The Permittee must submit a written RFI Workplan to Ohio EPA in case of a newly discovered waste management unit, on a time frame established by Ohio EPA.

- (i) If necessary, Ohio EPA will provide written comments on the RFI Workplan to the Permittee.
- (ii) Within forty-five days of receipt of Ohio EPA's comments, the Permittee must submit either an amended or new RFI Workplan that addresses Ohio EPA's comments.
- (iii) Ohio EPA must approve or modify and approve, in writing, the amended or new RFI Workplan. The RFI Workplan, as approved or

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as modified and approved, must be incorporated into this permit and become an enforceable condition of this permit. Subsequent changes to the approved RFI Work Plan must be authorized by Ohio EPA.

(b) RFI Implementation

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

(c) RFI Final Report

Within sixty 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 will provide written comments on the RFI Report to the Permittee.
- (ii) Within forty-five days of receipt of Ohio EPA's comments, 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, must 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 or other information documenting a release of hazardous waste or constituents to the environment, Ohio EPA may require the development and implementation of an interim measure (this may include an IM Workplan) at any time during the life of the permit to mitigate or eliminate a

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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

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 a threat 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 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 will 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.

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(c) Further Investigations

A determination of no further action will 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 will 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 ninety days from the notification by Ohio EPA of the requirement to conduct a CMS.

- (i) If necessary, Ohio EPA will provide written comments on the CMS Workplan to the Permittee.
- (ii) Within forty-five days of receipt of Ohio EPA's comments, the Permittee must submit either an amended or new CMS Workplan that addresses Ohio EPA's comments.
- (iii) 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.

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Subsequent changes to the approved CMS Workplan must be authorized by Ohio EPA.

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(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 sixty 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 will provide written comments on the CMS Final Report to the Permittee.
- (ii) Within forty-five days of receipt of Ohio EPA's comments, the Permittee must submit either an amended or new CMS Final Report that addresses Ohio EPA's comments.
- (iii) Ohio EPA will 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, must 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 Measure Implementation (CMI)

The Corrective Measures 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.

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If two or more of the corrective measures studied meet the threshold criteria set out above, Ohio EPA will authorize the CMI 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.

In authorizing the proposed corrective measure(s), Ohio EPA may also consider such other factors as may be presented by site-specific conditions.

The Permittee must implement corrective measures as described below.

(a) Environmental Covenant

- (i) 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 portions of the property, including the Charter Oil Facility Release Area (COFRA), 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. If an acceptable onsite ground water use demonstration, conducted in accordance with Permit Condition E.9(a)(iii), is submitted by the Permittee and approved by Ohio EPA, then this use will be reflected when developing the Environmental Covenant. The Environmental Covenant will include a legal description of the subject Facility, identifying the contaminated areas and describing acceptable and unacceptable land uses. The Permittee must submit a survey plat and legal description with the Environmental Covenant, specifying the areas of the facility to be restricted, and indicating the anticipated future use for each parcel. These restrictions will run with the land and will be binding upon all future Facility owners should the Facility be transferred. 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 Facility may include:

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- (ii) Industrial land use limitations. Designated portions of the Facility must not be used for residential, commercial (other than those associated with and incidental to industrial operations) or agricultural activities, but may be used for certain industrial activities. The term "residential activities" must 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 a part of industrial activities within the Facility) and religious facilities;
 - (E) Restaurants and other food and beverage services (except as a part of industrial activities within the Facility);
 - (F) Entertainment and recreational facilities (except as a part of industrial activities within the Facility);
 - (G) Hospitals and other extended care medical facilities (except as a part of industrial activities within the Facility); and
 - (H) Transient or other residential facilities.
- (iii) Use of onsite ground water. If the Permittee intends to use onsite ground water for uses other than sampling, monitoring, or remediation pursuant to a ground water remedial action, then the Permittee must notify Ohio EPA and demonstrate that the alternative use does not pose an unacceptable risk to human health or the environment. This demonstration must include, at a minimum, where the extraction well will be located, how the ground water would be extracted, how the extracted ground water will be used onsite, any necessary sampling and analytical results of the ground water being extracted, the results of a pump test for the well that would be used to extract ground water and a demonstration that the ground water plume is not expanding and that there are no unacceptable risks to human health or the environment. This demonstration must be reviewed and the intended use must receive prior approval by Ohio EPA. All uses must adhere to restrictions and requirements in the Environmental Covenant.

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(b) Operations and Maintenance Plan for remediation system

- (i) The Permittee must operate, maintain and monitor the skimmer LNAPL remediation system. The Permittee must also prepare and submit an Operation and Maintenance Plan (OMP) for the LNAPL remediation system within 90 days of the date of this permit modification. The OMP should document how to operate, maintain, and monitor the LNAPL remediation system to achieve optimal performance. The OMP should include the following elements:
- (A) A description of the LNAPL remediation system and how it operates,
 - (B) A description of how to maintain the LNAPL remediation system to ensure it is operating for optimal performance,
 - (C) A description of how the LNAPL remediation system is monitored and the frequency of the monitoring,
 - (D) A description of the monthly progress reports that will be submitted to the Agency documenting the operation, maintenance, and monitoring of the LNAPL remediation system.
 - (E) A description of the report that will be submitted to Ohio EPA every five years to document the effectiveness of the current LNAPL remediation system.
- (ii) Within 45 days of receipt of any Ohio EPA comments on the OMP, the Permittee must submit either an amended or new plan that addresses Ohio EPA's comments.
- (iii) Ohio EPA will approve or modify and approve, in writing, the amended OMP or new OMP. The OMP, 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 OMP must be authorized by Ohio EPA.

(c) Integrated Ground Water Monitoring Plan

- (i) The Permittee must submit an Integrated Ground Water Monitoring Plan (IGWMP) as described in the permit conditions found in Module Z of this permit. The IGWMP must be submitted within 90 days of the date of this permit modification.

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- (ii) Within 45 days of any Ohio EPA comments on the IGWMP, the Permittee must submit either an amended or new plan that addresses Ohio EPA's comments.
 - (iii) Ohio EPA will approve or modify and approve, in writing, the amended or new IGWMP. The IGWMP, 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 GWMP must be authorized by Ohio EPA.
- (d) Soil Management Plan
- (i) The Permittee must prepare and submit a Soil Management Plan (SMP) within 90 days of the date of this permit modification. The SMP will provide procedures that ensure worker health and safety protection and proper soil management for onsite activities that involve soil excavation within the restricted portion of the facility. The SMP will address intrusive activities and identify procedures to ensure worker protection and the proper management of potentially impacted material that may be encountered.
 - (ii) Within 45 days of receipt of any Ohio EPA comments on the SMP, the Permittee must submit either an amended or new plan that addresses Ohio EPA's comments.
 - (iii) Ohio EPA will approve or modify and approve, in writing, the amended SMP or new SMP. The SMP, 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 SMP must be authorized by Ohio EPA.
- (e) Operation and Maintenance Plan for surface cover
- (i) The Permittee must prepare and submit an OMP for the maintenance of the current surface cover (e.g., backfill, concrete cap, asphalt pavement, vegetation, and structures) for the use restricted area within 90 days of the date of this permit modification.
 - (ii) Within 45 days of receipt of any Ohio EPA comments on the OMP, the Permittee must submit either an amended or new plan that

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addresses Ohio EPA's comments.

- (iii) Ohio EPA will approve or modify and approve, in writing, the amended OMP or new OMP. The OMP, 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 OMP must be authorized by Ohio EPA.

(f) Alternate Remedy Plan

- (i) The Permittee must prepare and submit an Alternate Remedy Plan should the skimmer LNAPL remediation system fail to prevent the contaminated ground water plume from expanding or fail to effectively remove the LNAPL until no more than a sheen is present or until LNAPL is no longer detectable using an interface probe. If it is determined that the existing LNAPL remediation skimmer system is not performing adequately (i.e., the skimmers are no longer successfully removing the LNAPL present at the facility until no more than a sheen is present or until LNAPL is no longer detectable using an interface probe), then Ohio EPA may request the Permittee to submit an Alternate Remedy Plan which evaluates and proposes an alternate LNAPL collection method and remediation system.

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- (ii) Within 45 days of receipt of any Ohio EPA comments on the Alternate Remedy Plan the Permittee must submit either an amended or new plan that addresses Ohio EPA's comments.
- (iii) Ohio EPA will approve or modify and approve, in writing, the amended Alternate Remedy Plan or new Alternate Remedy Plan. The Alternate Remedy Plan, 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 Alternate Remedy Plan must be authorized by Ohio EPA.

(g) Indoor Air Monitoring Plan

- (i) The Permittee must prepare and submit an indoor air monitoring plan to sample the indoor air if structures located within the use restricted portion of the facility are modified (e.g., newly enclosed). The indoor air monitoring plan should also include levels to which the sampling results will be compared to and any steps necessary to prevent unacceptable exposures from the vapor intrusion pathway if the sampling data indicates results above the levels identified.
- (ii) Within 45 days of receipt of any Ohio EPA comments on the indoor air monitoring plan, the Permittee must submit either an amended or new plan that addresses Ohio EPA's comments.
- (iii) Ohio EPA will approve or modify and approve, in writing, the amended indoor air monitoring plan or new indoor air monitoring plan. The indoor air monitoring plan, 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 indoor air monitoring plan must be authorized by Ohio EPA.

(h) Permit Modification
OAC Rule 3745-50-51

Ohio EPA will initiate a permit modification, as provided by OAC Rule 3745-50-51 to require implementation of the corrective measure(s) authorized.

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The Permittee must not implement the corrective measure until the permit is modified pursuant to OAC Rule 3745-50-51.

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

Within sixty days of the modification of this permit to incorporate the CMI, the Permittee must provide to Ohio EPA financial assurance documentation in the amount necessary to implement the corrective measure(s) as required by OAC Rules 3745-54-101 (b) and (c).

E.10 Newly Identified Waste Management Units or Releases
OAC Rule 3745-54-101

(a) General Information

The Permittee must submit to Ohio EPA, within thirty days of discovery, the following information regarding any new WMU identified at the facility:

- (i) the location of the unit on the site topographic map;
- (ii) designation of the type of unit;

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- (iii) general dimensions and structural description (supply any available drawings);
- (iv) when the unit was operated; and
- (v) specifications of all waste(s) that have been managed at the unit.

(b) Release Information

The Permittee must submit to Ohio EPA, within thirty 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

The Permittee must submit a written RCRA Facility Investigation Workplan to Ohio EPA upon a time frame established in written notification by Ohio EPA that further investigations or corrective measures are necessary.

Further investigations or corrective measures will be established by Ohio EPA. Permittee must make such submittal in accordance with time frames established by Ohio EPA.

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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 must submit a Corrective Measures Completion of Work (CMCW) Report. The CMCW Report must 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 Ground Water 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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- (b) an unexpired dated stabilized bleach product that is also a U.S. EPA registered hospital disinfectant that is also tuberculocidal, for a contact time as specified by the manufacturer, or
- (c) a minimum ten percent household bleach solution prepared immediately prior to use with a minimum thirty minutes of contact time with the waste.
- (ii) Remove and properly dispose of any quench pit or liquid residues remaining at the facility.
- (d) Not later than thirty days after completing the requirements as specified, or before the closed facility may be converted to other uses, whichever occurs first, the Permittee shall submit to the appropriate Ohio EPA district office, written certification that the facility has been closed in accordance with these requirements.

I(B).11. Treatment Residuals

Unless the Permittee can show otherwise, per OAC Rule 3745-51-03(D), treatment residual from the incinerator is hazardous waste and the Permittee is considered the generator. The Permittee shall ensure the treatment residual does not contain any incompletely combusted MIHW, in accordance with the Part B permit application.

The Permittee shall manage the treatment residue generated from the incineration system and all ancilliary systems in accordance with the procedures outlined in Sections C and D of the permit application, SOPs, and all applicable Ohio hazardous waste regulations.

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

Z. INTEGRATED GROUND WATER MONITORING

The Permittee maintains a network of ground water monitoring wells around the site for the purpose of detecting releases of hazardous constituents from the active incinerator operations and from the historic Charter Oil operations. The Permittee previously maintained two separate ground water programs. However, the two programs are now combined to form one Integrated Ground Water Monitoring Program (IGWMP). The IGWMP is specifically designed to coordinate the requirements of two programs: 1) ongoing monitoring for the detection of new contaminant releases and 2) site-wide RCRA Corrective Action requirements. Specific RCRA Corrective Action requirements are found in Module E of this permit.

The Permittee must implement the Integrated Ground Water Monitoring Plan (IGWMP) for the facility to ensure that ground water contamination is not migrating off-site. The RCRA Facility Investigation (RFI) demonstrated that a Light Non-Aqueous Phase Liquid (LNAPL) free phase layer and dissolved phase ground water contamination still remain in the Area of Concern at the facility, also known as the Charter Oil Facility Release Area (COFRA). Ground water data collected during the RFI and as part of the Permittee's previous semi-annual ground water monitoring events has demonstrated that the ground water contamination plume is stable and not migrating off-site. Therefore, as part of the Corrective Action remedy, the Permittee will monitor the ground water on-site to address any potential migration of contamination to other areas of the property or off-site.

The IGWMP applies to the entire facility, including all regulated units listed in Modules C, D, F, and I and corrective action units listed in Module E. Under an integrated program and in accordance with OAC rule 3745-54-101, the well system, sampling scheme (including parameters monitored, appropriate sampling and analytical methods, and frequency of monitoring), evaluation procedures, record keeping, reporting and any necessary corrective action are coordinated across the site.

The ground water monitoring wells at the facility are screened in two separate zones: the silt, clay, and sand unit and the lower sand and gravel unit. Near the ground surface, the dense silt and sand to clayey-silt unit occurs and ranges in thickness from 1 to 35 feet. The unit thickens towards the Ohio River. Underlying the silt, clay and sand unit is a sand and gravel unit with a thickness ranging from 25 to 80 feet, which overlies the sandstone bedrock.

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The IGWMP will include the list and description of ground water monitoring wells which will be sampled, the frequency at which the wells will be sampled, the constituents which will be analyzed, the test methods to be used, the ground water remediation goals, the sampling and analysis procedures, the recordkeeping and reporting requirements, and the quality assurance/quality control procedures. The Permittee will prepare a new IGWMP to be provided to Ohio EPA for review and approval.

More specifically, the IGWMP will group the ground water monitoring wells into four different categories. Wells located within the ground water contamination area ("in-the-plume wells") will be sampled every two years unless LNAPL exists within the well which is considered to be more than a sheen in the well. These "in-the-plume wells" include PRW-01, PRW-02, PRW-03, PA-07, and WTI-06. The data from these wells indicates ground water contamination and, therefore, the level of constituents of concern in these wells will be monitored for changes in constituent concentration levels over time. While these wells have not been sampled regularly in the past, they have indicated the presence of LNAPL at various times during the monthly monitoring events. However, ground water samples will not be collected if LNAPL exists in the well at the time of sampling because the data will indicate the ground water saturation level since the LNAPL layer is present.

Ground water wells located outside the ground water contamination area will be monitored to ensure that the ground water contamination is not migrating. These wells, which will include PA-03, PA-04, PMW-01, and PA-08, will be called the "point-of-action wells" and they will be sampled once per year.

Wells that are located downgradient from the point-of-action wells will be monitored to ensure ground water contamination is not migrating off-site. These wells, which will include WTI-04, WTI-05, and PA-02, will be called "farther-downgradient wells" and they will be sampled once every two years or more frequently if it is determined that ground water contamination has been detected in the point-of-action wells.

Additionally, Heritage-WTI will also sample wells that are upgradient of the ground water contamination. These wells, which will include WTI-01 and WTI-02, will be sampled every two years. WTI-03, the sidegradient well, will be maintained as part of the IGWMP in order to obtain ground water elevations from the well to be used in developing the shallow contour ground water maps.

Ground water from each well in the four categories will be analyzed for volatile organic compounds, semi-volatile organic compounds, and inorganic compounds. More specifically, these constituents are:

- Volatile organic compounds: benzene, toluene, ethylbenzene, total xylenes, acetone, 2-Butanone (MEK), isopropylbenzene (cumene), methylcyclohexane,

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- methylene chloride, 4-methyl-2-pentanone (MIBK), trans-1,2-dichloroethylene, trichloroethylene (TCE), 1,2,4-trimethylbenzene, 1,3,5-trimethylbenzene
- Semi-volatile organic compounds: m-dichlorobenzene, o-dichlorobenzene, p-dichlorobenzene, 2,4-dimethylphenol, 2-methylnaphthalene, bis(2-ethylhexyl)phthalate, di-n-octylphthalate, naphthalene
- Inorganic compounds: arsenic, barium, chromium, lead, nickel.

The results from each ground water sampling event will be evaluated by the Permittee and then submitted to Ohio EPA. More specifically, the data from the in-the-plume wells will be evaluated for any trends in the data which may demonstrate that the concentrations of constituents of concern in the ground water are increasing or decreasing. The point-of-action wells will be compared to ground water remediation goals defined in Z.2 to ensure that the LNAPL plume is not migrating. The farther-downgradient wells will be evaluated for any detection of constituents of concern above the Practical Quantitation Limit (PQL) in the ground water while the upgradient wells will be used to monitor any possible constituents flowing onto the Permittee's facility. WTI-03, a sidegradient well, will be maintained and included in the list of wells from which to obtain ground water elevations.

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 (WMU)/area at the facility, regardless of the time at which waste was placed in such unit/area for those listed in Module E.

The WMUs are operating units. The units were previously monitored under an approved detection ground water monitoring plan in accordance with the previous Permit Conditions. The AOC is a result of activities conducted under a previous owner, Charter Oil. The AOC, also known as the COFRA area, was investigated as part of RCRA Corrective Action. The IGWMP will create one ground water monitoring program for the entire facility.

- (b) Reserved.
- (c) The owner or operator must implement corrective actions beyond the facility property boundary, where necessary, to protect human health and

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the environment, unless the owner or operator demonstrates to the satisfaction of the director that, despite the owner's or operator's best efforts, the owner or operator was unable to obtain the necessary permission to undertake such actions. The owner/operator 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 corrective action must be provided.

Z.2. Ground Water Remediation Standard (GWRS)

The Permittee must ensure that the hazardous constituents or constituents detected in the ground water from a unit/area listed in Permit Condition E.3 do not exceed the following clean-up standards in the uppermost aquifer underlying the units/areas beyond the point of action during the permit period and to respond with any necessary corrective action to bring the ground water back into compliance with those standards. The GWRS has been established in this Permit due to hazardous constituents being detected in the ground water.

(a) List of Hazardous Constituents and Ground Water Clean-Up Standards

The Permittee must monitor the ground water to determine whether units/areas are in compliance with the GWRS. The hazardous constituents listed in the Appendix to OAC Rule 3745-54-98 detected in the ground water underlying a unit/area and reasonably expected to be contained in or derived from the waste contained in the unit/area to which the GWRS applies and their ground water clean-up standards are listed below:

Hazardous Constituents	Clean-Up Standards
benzene	0.005 mg/L
toluene	1 mg/L
ethylbenzene	0.7 mg/L
total xylenes	10 mg/L
acetone	To Be Determined (TBD)
2-butanone (MEK)	TBD

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isopropylbenzene (cumene)	TBD
methylcyclohexane	TBD
methylene chloride	TBD
4-methyl-2-pentanone (MIBK)	TBD
trans-1,2-dichloroethylene	0.1 mg/L
trichloroethylene (TCE)	0.005 mg/L
1,2,4-trimethylbenzene	TBD
1,3,5-trimethylbenzene	TBD
o-dichlorobenzene	0.6 mg/L
p-dichlorobenzene	0.075 mg/L
m-dichlorobenzene	TBD
2,4-dimethylphenol	TBD
2-methylnaphthalene	TBD
bis(2-ethylhexyl)phthalate	TBD
di-n-octylphthalate	TBD
naphthalene	TBD
arsenic	0.010 mg/L
barium	2 mg/L
chromium	0.1 mg/L
lead	0.015 mg/L
nickel	TBD

Within one year of the permit approval, the Permittee will provide to Ohio EPA for approval, background, maximum contaminant levels (MCLs) and/or risk-based GWRS for all compounds. The risk-based GWRS must

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be for unrestricted potable use and must take the additive effects of the compounds into consideration.

(b) Point of Action

The Permittee has integrated the ground water monitoring programs site-wide. The combined point of action (POA) at which the GWRS applies is indicated on a figure to be submitted by the Permittee as part of the Integrated Ground Water Monitoring Plan to be submitted by the Permittee and approved by Ohio EPA. The Permittee must monitor the wells listed in Permit Condition Z.3(b), with the exception of well WTI-03, for the constituents listed in Permit Condition Z.2(a). The Permittee must monitor the ground water passing the point of action, the ground water between the point of action and the downgradient property boundary to determine if the clean-up standard has been exceeded at any point between the point of action and the downgradient property boundary.

(c) Permit Period

The period, during which the GWRS applies, is the permit period, to be renewed as long as constituents are detected above the GWRS at any well facility wide. 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 from all releases of hazardous constituents above the cleanup standards at the point of action and between the point of action and the downgradient property boundary. The Permittee shall implement corrective action beyond the property boundary, where necessary, to protect human health

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and the environment pursuant to the requirements in Permit Condition Z.1(c).

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 silt, clay and sand zone and the sand and gravel 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 action, between the point of action and the downgradient 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 as effective in determining compliance with the GWRS and in determining the success of the corrective action program.
- (b) The Permittee will maintain the monitoring system, which consists of the ground water wells as specified on a figure to be submitted by the Permittee and approved by Ohio EPA as part of the Integrated Ground Water Monitoring Plan and in conformance with the following list:

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Well Identifier	Upgradient/ Downgradient	Purpose
PA-03	Downgradient	Point of Action
PA-04	Downgradient	Point of Action
PMW-01	Downgradient	Point of Action
PA-08	Downgradient	Point of Action
WTI-04	Downgradient	Farther downgradient from Point of Action
WTI-05	Downgradient	Farther downgradient from Point of Action
PA-02	Downgradient	Farther downgradient from Point of Action
PRW-01	Within the plume	Record levels of contamination within the plume
PRW-02	Within the plume	Record levels of contamination within the plume
PRW-03	Within the plume	Record levels of contamination within the plume
PA-07	Within the plume	Record levels of contamination within the plume
WTI-06	Within the plume	Record levels of contamination within the plume
WTI-01	Upgradient	Record ground water quality entering facility
WTI-02	Upgradient	Record ground water quality entering facility
WTI-03	Sidegradient	Record ground water elevations

- (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 the IGWMP to be submitted by the Permittee and approved by Ohio EPA. 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.

The IGWMP to be submitted by the Permittee and approved by Ohio EPA must contain ground water monitoring well construction diagrams which illustrate compliance with this Permit Condition.

- (d) The Permittee must remove or replace any monitoring well in Permit 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 figure as specified in Permit Condition Z.3(b) and to be included in the Integrated Ground Water Monitoring Plan to be submitted by the Permittee and approved by Ohio EPA.

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- (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 one year from the date of replacement using means appropriate to the reason for replacement.

Z.4. Sampling and Analysis Procedures

- (a) The Permittee must implement the IGWMP to be submitted by the Permittee and approved by Ohio EPA. This program must include consistent sampling and analysis procedures designed to ensure monitoring results that provide a reliable indication of ground water quality below the units/areas and in compliance with this Permit Condition.
- (b) The IGWMP to be submitted by the Permittee and approved by Ohio EPA must include sampling and analytical methods 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 IGWMP to be submitted by the Permittee and approved by Ohio EPA.
- (d) Ground water elevations must be measured using the techniques described in the IGWMP to be submitted by the Permittee and approved by Ohio EPA.
- (e) Each well that is identified in Permit Condition Z.3(b) must be checked for the presence of immiscible layers using an interface probe as described in the IGWMP to be submitted by the Permittee and approved by Ohio EPA.
- (f) Samples must be collected and handled (including well evacuation, sample withdrawal, preservation, containerization, filtration, and shipment using Chain of Custody procedures) to ensure representative samples are obtained using the techniques and equipment described in the IGWMP to be submitted by the Permittee and approved by Ohio EPA.
- (g) The Permittee must collect samples from the wells least likely to exhibit ground water contamination prior to collecting samples from wells with known or suspected ground water contamination.

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- (h) Field analysis must be performed using instruments, procedures, and forms described in the IGWMP to be submitted by the Permittee and approved by Ohio EPA.
- (i) Sampling equipment must be decontaminated using techniques described in the IGWMP to be submitted by the Permittee and approved by Ohio EPA.
- (j) Purge water must be disposed in accordance with the procedures described in the IGWMP to be submitted by the Permittee and approved by Ohio EPA.
- (k) Laboratory analytical methods, detection limits and sample holding time must be in accordance with techniques described in the IGWMP to be submitted by the Permittee and approved by Ohio EPA.
- (l) Quality assurance, including field, laboratory, and equipment blanks, duplicate samples, and identification of potential interferences, must be in accordance with the methods described in the IGWMP to be submitted by the Permittee and approved by Ohio EPA.
- (m) Field and analytical data must be validated in accordance with the procedures specified in the IGWMP to be submitted by the Permittee and approved by Ohio EPA and reported as specified in Permit Condition Z.8.
- (n) Chain of Custody procedures, including standardized field tracking reporting forms, and sample labels, must be in accordance with the IGWMP to be submitted by the Permittee and approved by Ohio EPA.

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 IGWMP to be submitted by the Permittee and approved by Ohio EPA. This information must be submitted in accordance with Permit Condition Z.8.

The Permittee must report, in writing to the Ohio EPA, Northeast District Office, the surveyed elevation of the tops of casings, the ground surface and/or aprons, and protective casing of any new or replacement monitoring wells within 30 days of the date of installation.

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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), with the exception of well WTI-03. The sampling procedure and interval for each constituent must be described in the IGWMP to be submitted by the Permittee and approved by Ohio EPA and in accordance with the below table.

Well Identifier	Sampling Frequency
PA-03	Annual
PA-04	Annual
PMW-01	Annual
PA-08	Annual
WTI-04	Every two years
WTI-05	Every two years
PA-02	Every two years
PRW-01	Every two years, unless LNAPL present in well at time of sampling
PRW-02	Every two years, unless LNAPL present in well at time of sampling
PRW-03	Every two years, unless LNAPL present in well at time of sampling
PA-07	Every two years, unless LNAPL present in well at time of sampling

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WTI-06	Every two years, unless LNAPL present in well at time of sampling
WTI-01	Every two years
WTI-02	Every two years

- (a) The number and kinds of samples collected to establish background must be appropriate for the form of statistical test employed, following generally accepted statistical principles.
- (b) The sample size must be as large as necessary to ensure with reasonable confidence that a contaminant release to ground water from a facility will be detected.
- (c) Background data must be updated as necessary in accordance with the IGWMP to be submitted by the Permittee and approved by Ohio EPA to provide an accurate representation of background ground water quality. New or revised background values must be established in the permit through the permit modification process in OAC Rule 3745-50-51.

Z.7. Statistical Procedures

The Permittee may evaluate the ground water monitoring results for each hazardous constituent in Permit Condition Z.2(a) by directly comparing the ground water monitoring analytical results from each sampling event to the GWRS as identified in Permit Condition Z.2(a) or the Permittee may use the following statistical procedures 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), except WTI-03, to identify statistically significant evidence of contamination, the exceedance of a clean-up standard, and/or the effectiveness of corrective action:

- (a) For those constituents for which background values have not been collected and established at the time of Permit Application, the Permittee must choose and submit to Ohio EPA the appropriate statistical method within 45 days after the receipt of the last background sampling event data through the permit modification process in OAC Rule 3745-50-51.

For those constituents for which background values have been collected, the Permittee must conduct statistical procedures as presented in the IGWMP to be submitted by the Permittee and approved by Ohio EPA.

- (b) The Permittee's statistical procedures must be protective of human health and the environment, provide reasonable confidence that the migration of

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hazardous constituents from a unit/area into and through the aquifer will be indicated, and will determine whether such leakage of hazardous constituents into the ground water exceeds specified clean-up standards in Permit Condition Z.2(a). 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 appropriate for the distribution of the data used to establish background or clean-up standards. If the distribution for the constituents differ, then more than one statistical method may be needed. Methodology of updating background must be included in the IGWMP to be submitted by the Permittee and approved by Ohio EPA.
- (iii) The statistical method must provide a reasonable balance between the probability of falsely identifying a non-contaminating and/or exceeding unit/area and the probability of failing to identify a contaminating and/or exceeding unit/area.
- (iv) If a control chart approach is used, the specific type of control chart and its associated parameter values must be proposed by the Permittee and approved in the permit.
- (v) If a prediction interval procedure is used, the levels of confidence and the percentage of the population that the interval must contain, must be proposed by the Permittee and approved in the permit. These parameters must be determined after considering the number of samples in the background data base, the data distribution, and the range of concentration values for each constituent of concern.
- (vi) The statistical method must account for data below the limit of detection with one or more statistical procedures. Any practical quantitation limit (PQL) approved in the permit that is used in the statistical method must be the lowest concentration level that can be reliably achieved within specified limits of precision and accuracy during routine laboratory operating conditions that are available to the Permittee.

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- (vii) If necessary, the statistical method must include procedures to control or correct for seasonal and spatial variability as well as temporal correlation in the data.

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 and submit a Final Data Report and Evaluation to Ohio EPA, in accordance with Permit Condition Z.8(b):

- (i) Ground water monitoring data collected in accordance with this permit including actual levels of constituents.
- (ii) The laboratory results from each of the well samples and their associated qualifiers including the laboratory sheets for every sampling event (including laboratory method numbers, method detection limits, laboratory practical quantitation limits (PQLs), and units of measurement);
- (iii) The date each well was sampled (tabulated);
- (iv) The date, time, and identification of all blanks and duplicates;
- (v) Any field log or laboratory report documentation of deviation from the procedures in the IGWMP to be submitted by the Permittee and approved by Ohio EPA, including documentation of parameter omissions during the sampling event;
- (vi) The date the Permittee received the results from the laboratory;
- (vii) The date the owner or operator completed their review of the analytical laboratory's verification of the accuracy and precision of the analytical data and determined its quality.

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- (viii) 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 recovery percent, surrogate recovery, and an explanation of any rejected results;
 - (ix) Results of all blanks, duplicates (trip, field, equipment, and method), matrix spike analysis, and laboratory control samples;
 - (x) Results of the field parameters;
 - (xi) The statistical evaluation of the data (must include all computations, results of statistical tests, and date the statistical evaluation was completed);
 - (xii) Ground water surface elevations taken at the time of sampling each well;
 - (xiii) Data and results of the annual determination of the ground water flow rate and direction, including potentiometric surface map;
 - (xiv) 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).
 - (xv) Evaluation of the efficiency of any corrective actions performed to bring the ground water quality into compliance with the GWRS per Permit Condition Z.2.
 - (xvi) A report on the effectiveness of the IGWMP, performed by a qualified hydrogeologist.
- (b) Sampling and Annual Reporting

The Permittee must submit a Final Data Report and Evaluation for each sampling and analysis event, conducted in the spring (April, May, or June) of each year. The Report must contain, at a minimum, the information listed in Permit Condition Z.8(a). The Report must be submitted to Ohio EPA, Northeast District Office and entered into the operating record. The

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Permittee must maintain all documentation from the laboratories regarding analysis of ground water samples. Ohio EPA may require submittal of a copy of the full quality assurance/quality control (QA/QC) report for a particular event if circumstances warrant; but, in general, this will not be required.

The Permittee must submit an annual report to the Director by March 1st or the first business day thereafter if March 1st falls on a weekend or holiday. The annual reports must reference the titles and dates of any sampling reports required by the permit or any updates to those reports, but generally do not need to include duplicates of hard copies previously submitted.

The annual reports 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 Conditions Z.5 and Z.8(a)(xii) and (xiii), and the results of any statistical analyses required by Permit Conditions Z.7 and Z.9. In addition, a copy on disk of all ground water and blank data must be submitted electronically in the format for the Supplementary Annual Ground Water Monitoring Report supplied by the Director, a paper 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 annual report not addressed in this Permit Condition must be submitted as required by OAC Rule 3745-54-75.

These two reports may be combined into one report to be submitted as soon as technically feasible after the sampling event or by March 1st of the following year at the latest. However, it is important to note that Permit Condition Z.9(c) must be followed when determining if the GWRSs have a confirmed exceedance.

(c) Other Periodic Reporting

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).

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Z.9. Integrated Ground Water Monitoring Program (IGWMP)
OAC Rules 3745-54-101

- (a) 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 GWRS 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 point of action as defined in Permit Condition Z.2(b), and, as necessary to protect human health and the environment, between the point of action and the downgradient property boundary and beyond the property boundary. The ground water monitoring system must comply with the requirements in Permit Condition Z.3.
 - (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 sampling program as described in Z.6 for each chemical parameter and hazardous constituent specified in Permit Condition Z.2(a) from each well (background and action) specified in Permit Condition Z.3(b) during the permit period and any extensions due to corrective action implementation.

Any additional sampling shall be taken at an interval (frequency) that assures, to the greatest extent feasible, that an independent sample is obtained, by reference to the uppermost aquifer's effective porosity, hydraulic conductivity, hydraulic gradient, and the fate and transport characteristics of the potential contaminants.

- (iv) The Permittee shall determine the concentrations of the hazardous constituents specified in Permit Condition Z.2(a), throughout the permit period specified in Permit Condition Z.2(c), and report the concentrations, including all estimated values above the method detection limit and PQL, to Ohio EPA, per Permit Condition Z.8.

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The Permittee shall compare the concentration of each hazardous constituent measured at each well specified in Permit Condition Z.3(b), except well WTI-03, with its cleanup standard each time ground water quality is determined in accordance with the procedures specified in Permit Condition Z.7.

Wells beyond the property boundary shall be sampled where necessary 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.

- (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 the IGWMP to be submitted by the Permittee and approved by Ohio EPA.
- (vii) Reserved.
- (b) 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 GWRS as specified in Permit Condition Z.2.
 - (i) The Permittee shall collect, preserve, and analyze samples in accordance with Permit Condition Z.4.
 - (ii) The Permittee shall determine the concentrations of the hazardous constituents specified in Permit Condition Z.2.a, throughout the permit period specified in Permit Condition Z.2.c, and report the concentrations, including all estimated values above the method detection limit and PQL, to Ohio EPA, per Permit Condition Z.8.

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- (iii) The Permittee shall determine the ground water flow rate and direction in the uppermost aquifer at least annually, as outlined in the IGWMP to be submitted by the Permittee and approved by Ohio EPA, and report the ground water flow rate and direction to Ohio EPA per Permit Condition Z.8.

- (c) Following any ground water sampling event, the Permittee must compare the analytical results from the in-the-plume wells, point-of-action wells, wells farther-downgradient from the point-of-action wells, and upgradient wells to the GWRS to determine if a confirmed exceedance occurred. 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 clean-up standards specified in Permit Condition Z.2(a) at the point of action specified in Permit Condition Z.3(b), between the point of action and the downgradient 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.
 - (i) When the GWRS have a confirmed exceedance at the in-the-plume wells listed in Permit Condition Z.3(b), then the Permittee must evaluate the data for any trends in the data which may demonstrate that the constituents listed in Permit Condition Z.2(a) are increasing or decreasing and report that information to Ohio EPA in accordance with Permit Condition Z.8.
 - (ii) When the GWRS have a confirmed exceedance at the point-of-action wells or the farther-downgradient from the point-of-action wells listed in Permit Condition Z.3(b), the Permittee must:
 - (a) Notify the director in writing within seven days of this finding.
 - (b) Sample the farther-downgradient from the point-of-action wells listed in Permit Condition Z.3(b) within 30 days of this finding, if not sampled as part of the current ground water sampling event.
 - (c) Within 90 days of this finding, submit a permit modification to establish and implement a corrective action program that

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prevents constituents in the ground water from exceeding the GWRS at the point-of-action wells or farther-downgradient from the point-of-action wells by removing the hazardous constituents or by treating them in place. If corrective action pursuant to OAC rule 3745-54-101 and Permit Module E is already occurring, then any corrective action necessary in response will be coordinated with Permit Module E to the extent practical. The modification application will, at a minimum, include the following information:

- (i) A detailed description of the remedial actions that will remove or treat in place any hazardous constituents that exceed their respective GWRS, as defined in Permit Condition Z.2.a, between the point-of-action wells and the downgradient facility property boundary. To the extent practicable, this remedial action shall be integrated with corrective action activities under Module E of this permit.
- (ii) A plan for a ground water monitoring program that will demonstrate the effectiveness of the remedial action.
- (iii) When the GWRS have a confirmed exceedance at the upgradient wells listed in Permit Condition Z.3(b), the Permittee must:

 - (a) Notify the director in writing within seven days of this finding.
 - (b) The Permittee may make a demonstration that the ground water upgradient of the facility property may be impacting the monitoring wells located on the facility property.
- (iv) The Permittee may demonstrate that a source other than the facility caused a confirmed exceedance of the GWRS or that the exceedance is an artifact caused by an error in sampling, analysis, or statistical evaluation or natural variation in the ground water. In making such a determination, the Permittee must:

 - (a) Notify the director in writing, within 7 days of determining that the facility has reached or exceeded the GWRS, of the intent to make a demonstration.

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- (b) Include in the Sampling Report in Permit Condition Z.8 a report which successfully demonstrates that a source other than the facility caused the standard to be exceeded or that the apparent noncompliance with the standards resulted from error in sampling, analysis or evaluation.
 - (c) Include in the Sampling Report in Permit Condition Z.8 an application for a permit modification to make any appropriate changes to the IGWMP at the facility.
 - (d) The Permittee may make this demonstration in addition to, or in lieu of, submitting a permit modification application to modify the IGWMP for corrective action. However, the same period of 90 days is required for both a successful "Other Source Demonstration" and the submittal of the permit modification application in accordance with Z.9. The Permittee is not relieved of the 90 day requirement for a permit modification unless the "Other Source Demonstration" is deemed successful by the Agency prior to the 90 day time limit.
 - (e) Continue to monitor in accordance with the IGWMP at the facility.
- (d) Reserved
- (e) Response Action
- (i) If, based on the results of the Permittee's ground water monitoring program, the GWRS detailed in Permit Condition Z.2(a) have not had a confirmed exceedance, with the exception of in-the-plume wells, then the Permittee shall continue under routine IGWMP monitoring.
 - (ii) If the Permittee determines the corrective action program established by this permit no longer satisfies the requirements of OAC Rule 3745-54-101, then 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.

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- (iii) The ground water monitoring requirements may be reduced or eliminated in the event that the Permittee can successfully demonstrate with Ohio EPA approval that the level of contamination has been reduced to below the GWRS and is protective of human health and the environment.

END OF PERMIT CONDITIONS

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- N) WMU 14- Container Receiving Area (unloading docks) - This unit consists of two covered truck unloading docks that abut the northeast side of the Container Processing Building (WMU 10). The unloading docks are paved with reinforced concrete treated to resist chemicals that are managed in this unit. A reinforced concrete containment wall and speed bump border the north and east edges of the unit along the two sides not bordered by the Container Processing Building (WMU 10). A reinforced concrete containment trench is located along the south side of each unloading station. The paved surface of each dock is sloped toward these trenches. This unit manages containerized wastes generated off-site. Tankers may also be staged in this unit in accordance with Section D of the approved Part B permit application and this permit. The wastes are subsequently unloaded to the Container Processing Building (WMU 10). There have been no documented releases from this unit. The potential for release to ground water, surface water, on-site soils, and air is low.
- O) WMU 15- Container Holding Building (Slag Canopy)- This unit is a 50 foot by 50 foot structure used to store containers of a wide range of waste types. Staging and processing activities are also conducted, in accordance with Section D of the approved Part B permit application and this permit. WMU 15 is located just north of the incineration system (WMU 1). The unit is fully enclosed and equipped with adequate health and safety equipment such as automatic fire detection and suppression, safety showers, and vapor recovery. The floor of this unit is constructed of reinforced concrete treated to resist chemicals managed in the unit. A combination of six inch high speed bumps and curbs surround the unit and are integral to the containment system and minimizing the accumulation of storm water. The floor is sloped towards a concrete sump, part of the 10, 520 gallon capacity containment system. There have been no documented releases from this unit. The potential for release to ground water, surface water, on-site soils, and air is low.
- P) WMU 16- Less than 90 Day Accumulation Areas - These units are currently sited at the following locations: (1) North less than 90 day Area - east of the Building B (External Truck Wash, WMU 5), and (2) East less than 90 day Area - along the utility bridge north of the Organic Waste Unloading Area (WMU 3). These areas store wastes generated off-site, that are stored in containers within trailers, and on-site, typically containers holding slag and ash (the treatment residuals from the incineration process), slag quench water, used refractory brick, and spent activated carbon. The Permittee is also permitted to conduct specifically approved hazardous waste activities as described in Section D of the Part B permit application. The two areas are open, uncovered, and located over reinforced concrete in constructed containment areas. Curbing, sumps, and sloped berms control run-on and are part of the containment system. There have been no documented releases from this unit. The potential for release to ground water, surface water, on-site soils, and air is low.

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- Q) WMU 17- Bulk Solid Waste Storage Tanks- This unit consists of two reinforced concrete tanks located inside the Incinerator Feed Building. The units are open topped tanks separated by a center wall to prevent the co-mingling of waste. The total capacity of the two existing tanks is approximately 1,200 cubic yards. Bulk solid waste is unloaded from trucks or roll-offs into the tanks through doors located on the east side of the tanks. The waste is blended and transferred via an overhead crane from the tanks to the incineration system (SWMU 1) for treatment. Vapors released from the waste are collected by vapor recovery vents in the tank area and conveyed to the vapor recovery system. There have been no documented releases from this unit. The potential for release to ground water, surface water, on-site soils, and air is low.
- R) WMU 18 - Building C (Lab Pack Building)- Building C is located east of the Container Processing Building (WMU 10). The building is fully enclosed with exterior containment curbing. The base of the interior of the building is sloped to a sump located in the northwest corner. The containment capacity of this building is 11,200 gallons. Containers of waste stored in this building are placed on pallets (or equivalent) and /or in heavy duty storage racks to prevent contact with the building floor. This area has two-level racks with the ability to store an equivalent of 240 fifty five gallon drums or 13,200 gallons. The primary use for this unit is for auditing lab packs but other processing activities and the storage of lab packs are also permitted. The unit is connected to the vapor recovery system and is used during auditing lab packs or other waste processing activities when there is a potential for the release of vapors or fugitive emissions. There have been no documented releases from this unit. The potential for release to ground water, surface water, on-site soils, and air is low.
- S) WMU 19 - Satellite Accumulation Areas – Satellite Accumulation Areas (SAAs) are areas where hazardous waste is accumulated at or near the point of generation which is under the control of an operator of the process generating the waste. The containers located at the SAAs are typically 55-gallon drums. SAA containers are typically designated by a sign located nearby and a yellow outline painted on the floor to indicate the container location. Wastes managed in the SAAs include, but are not limited to, lab wastes, cleanup debris, personal protection equipment, absorbent pads, and/or waste liquids from compatibility testing, sampling, and flushing lines. SAA containers are kept closed at all times unless waste is being added to or removed from the container.

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SAA's are located in multiple areas throughout the facility. Most SAA's are located within other WMU's as listed and described in Attachment 4. WMU 19 includes those SAA's that are not contained within a specific WMU listed in Attachment 4. These include the SAA within the laboratory and the SAA within the Maintenance Building. There have been no documented releases from this unit and the potential for release to ground water, surface water, on-site soils, and air is low.

- T) WMU 20 and 21 - Incinerator Feed Building - In addition to containing the Bulk Solid Waste Storage Tanks (WMU 17) and the feed mechanisms to the Incinerator System (WMU 1), this unit also includes two direct feed units. These two direct feed units are the Direct Organic Tanker South and the Direct Drum Pump-out.

The Direct Organic Tanker South is located in a bay south of and adjacent to the Bulk Solid Waste Storage Tanks. The unit includes an unloading system to transfer liquid waste from tanker trucks directly to WMU1 by pressurizing the tanker truck with nitrogen thus displacing the contents. The feed rate is determined using the scale located in the Bay. The unit has an automated fire detection and suppression system. The Direct Organic Tanker South is equipped with vapor recovery and all doors are kept closed during off-loading to ensure a negative pressure thus controlling possible fugitive emissions and the release of odors during unloading activities. Direct Organic Tanker South is isolated from the rest of the incinerator feed building by walls to the north, south, and west, with a roll-up door located on the east side for tanker entry. The floor is curbed to contain 10,000 gallons and includes a small sump to contain minor spills or leaks. The bay is paved with reinforced concrete treated to resist chemicals that are managed in the unit. When not feeding waste to WMU 1, bulk waste containers may be staged in this bay in accordance with the approved Part B permit application. There have been no documented releases from this unit. The potential for release to ground water, surface water, on-site soils, and air is low.

The Direct Drum Pump-out unit is located west of and adjacent to the Direct Organic Tanker South and is enclosed and isolated from the rest of the Incineration Feed Building. The unit has two stations for feeding containerized liquids to WMU 1 via lances. Waste feed rates are measured using a scale. The unit has an automated fire detection and suppression system capable of extinguishing Class 1A flammable liquids. The types of waste processed in this

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unit include odorous waste, water-reactive waste, Class 1A flammable liquids, and highly reactive waste streams. Direct Drum Pump-out is isolated from the rest of the Incinerator Feed Building by walls to the north, east, and west, with a roll-up door located on the south side for transfer of containers into the unit. The doors are kept closed during processing to control fugitive emissions and to maximize the efforts of the vapor recovery system in the form of snorkels over each station. The unit has secondary containment with a capacity of 1,125 gallons that includes a sump. The floor is paved with reinforced concrete treated to resist chemicals that are managed in the unit. Hoses and lines used to feed the waste are flushed between transfer of each waste stream using a compatible material. There have been no documented releases from this unit. The potential for release to ground water, surface water, on-site soils, and air is low.

- U) WMU 22 - Decontamination Building - The Decontamination Building is a 14 foot by 12 foot completely enclosed structure attached to the eastern side of the External Truck Wash (WMU 5). A 6 inch deep metal catch basin collects the rinseate generated from decontamination activities and a grating is used to support equipment or containers being cleaned. Rinseate in the catch basin is drained to the sump located in the External Truck Wash after each decontamination activity has been completed. Decontamination activities may be conducted as described in Section D of the approved Part B permit application. Equipment can be cleaned in the Decontamination Building, and it may also be used for cleaning out containers that once held hazardous waste. The Permittee will not decontaminate containers that previously held odorous or low odor threshold waste in the Decontamination Building. To prevent accumulation of vapors, the Decontamination Building is equipped with a roof vent. There have been no documented releases from this unit. The potential for release to ground water, surface water, on-site soils, and air is low.

Area Of Concern (AOC) - Former Charter Oil Facility Release Area

The property where the Permittee is located was formerly occupied by Charter Oil. The Charter Oil facility included approximately 7.2 acres of property which consisted of a building, the barge off-loading pier which extended into the Ohio River and a petrochemical terminal. The petrochemical terminal, approximately two acres, consisted of ten large capacity, above ground, storage tanks surrounded by an earthen

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dike; a metal transfer pipeline ten inches in diameter; and a tanker truck terminal. The transfer pipeline connected the storage tanks to a barge terminal in the Ohio River, and also to a truck load-out area north of the storage tank area. The petrochemical terminal and tanks have since been removed. Additional information regarding Charter Oil can be found in Section E of this permit.

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ATTACHMENT 6 - RESERVED

Refer to most recent version and/or updates to the Integrated Ground Water Monitoring Plan (IGWMP), which is a separate document.

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